

Item available for public inspection in the Clerk's office during regular business hours (Monday - Friday, 9 AM - 5 PM)

October 1, 2024 Regular Meeting

**Item #7c. -
Updated Staff
Report and
Attachments**

Mono County Community Development Department

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October 1, 2024

To: Honorable Mono County Board of Supervisors

From: Sandra Moberly, County Administrative Officer
Wendy Sugimura, Community Development and Mono County Local Transportation Commission
Erin Bauer, Community Development and Mono County Local Transportation Commission
Liz Grans, Economic Development
Marcella Rose, Sustainable Outdoor Recreation/Public Works
Paul Roten, Public Works

Re: Comment Letter on the Yosemite Visitor Access Management Draft Plan

BACKGROUND

Yosemite National Park (the Park) released the Yosemite Visitor Access Management Draft Plan (the Plan) and Environmental Assessment (EA) in mid-August for public review with a comment deadline of September 30. The document, a summary of key issues, meeting recordings, and other information is available at <https://www.nps.gov/yose/getinvolved/visitoraccessmanagement.htm>.

According to Yosemite's project website, the purpose of the Plan is to reduce overcrowding and traffic congestion, expand tools to better pace vehicle volume into the park, and provide equitable visitor access to inspirational experiences while ensuring operational sustainability and protection of Yosemite National Park's exemplary natural and cultural resources.

This plan is needed to address a wide range of issues associated with persistently high visitation. These issues include but are not limited to:

- Road and parking congestion that delays emergency response and causes unsafe conditions for visitors and staff.
- Long waits at entrances that detract from positive visitor experiences.
- Insufficient numbers of staff responding to intense use and maintenance of facilities.
- Vegetation impacts from non-designated parking.
- Human waste along roads and turnouts and in parking lots.

The park also used lessons learned during the reservation systems from 2020-2022 and 2024 while considering a range of strategies to address crowding and congestion and improve the visitor experience and resource conditions within the park.

DISCUSSION

The Plan identifies four alternatives; the Park prefers Alternative B:

- A. No-Action: Baseline against which other options are compared; no reservation system is implemented.
- B. Parkwide Reservations – Peak Hours, Daily: One parkwide reservation required to enter all areas of Yosemite National Park at any time during peak hours (5:00am to 4:00pm); valid for three days and includes visitors to leave and return the Park.

- C. Parkwide Reservations – Timed Entry: One timed entry reservation for a two-hour window is required and valid for one day.
- D. Yosemite Valley Reservations – Timed Entry: A timed-entry reservation would be required for day users to enter Yosemite Valley in a private vehicle. No reservations would be required to access other areas of the park.

The timing of the release of the Plan did not allow an opportunity to bring a comment letter to the Board for consideration prior to the deadline. Staff communicated this challenge to the Park, and was advised that a letter should be submitted by the September 30 deadline but a Board-approved letter considered on Oct. 1 would also be accepted. Therefore, staff from the Economic Development Department, Public Works Department/Sustainable Outdoor Recreation Division, Community Development Department, and Mono County Local Transportation Commission collaborated on a joint comment letter based on existing adopted policies and the County’s legislative platform, which was submitted on Sept. 30 (see Attachment 1).

For the updated comment letter, the Board of Supervisors may provide direction on 1) any desired modifications to the Sept. 30 letter, 2) inclusion of any positions or issues from the “menu” of topics below, and 3) any additional issues/topics the Board wishes to include. Due to time constraints, the Board could authorize staff to draft a new comment letter based on its direction and authorize the Chair to sign the letter without a final draft returning to the Board.

MENU OF OPTIONS

Support / oppose particular alternatives:

- Supervisor Peters supports reservations for the Valley only (Alternative D) with no restrictions to pass-through traffic.
- Supervisor Gardner supports Alternative B to carefully continue to manage the number of visitors in the Park, ensure a positive experience for as many as practical, and protect the Park's natural resources.
- The Mono County Economic Development Department supports a variation of Alternative D, which is reservations for Yosemite Valley only but not with timed entry, for the following reasons: 1) visitors without a reservation may be more likely to visit Tuolumne and the east side, which would benefit Mono County; 2) congestion at the west side entrances may be alleviated by this option; and 3) Mono County residents will have unrestricted access to the “local” high country.
- The Sustainable Outdoor Recreation division supports Alternative B with amendments including an increased entry window, Bridgeport pass-through privileges, increased communication with gateway communities, and accommodations for backpacker pick up for the following reasons: 1) supports conservation/protection of natural resources better than other alternatives, 2) improves visitor experience due to less congestion, and 3) the other alternatives are less preferable for various reasons. Alternative A does not solve existing problems, Alternative C is more restrictive, and Alternative D potentially deflects current problems to other areas of the Park.
- The Yosemite Mariposa County Tourism Bureau (YMCTB) does not support any of the alternatives and instead advocates for a more thoughtful, delayed, longer-term tested approach (see Attachment 2). The Mono County Economic Development Department also supports this approach to test Alternative D, collect additional data about the least restrictive reservation system, and collect data about the impacts on international visitors in particular. International visitors tend to travel by car on a road trip to several destinations and the lack of connectivity through the Park may prevent them from traveling to the eastside.

Potential issues to include in the letter:

- Points in the Sept. 30 letter typically use suggestive language such as explore, evaluate, consider, etc., which can be modified to more assertive, action-oriented language such as request, implement, require, etc.
- Test Alternative D, Yosemite Valley reservations only, for a year to determine if reservations are necessary for the rest of the Park.

- Advocate for a later start time (e.g., 7:00 am) and an earlier end time (e.g., 3:00 pm) for the reservation system. The timing change would increase access for Mono County residents without reservations, potentially result in more business in gateway communities if visitors are not rushing to the Park in the morning, and may reduce safety hazards as daylight will improve visibility.
- Recommend that number of reservations available be based on the number of available parking spaces.
- Recommend a live-time option be developed to manage all types of reservations in the Park, including vehicle entry, lodging, campgrounds, wilderness permits, etc. to ensure unused permits can be distributed and used.
- Request no reservation system of any kind during slower visitation periods, such as off season and mid week.
- The Park should address camping in the Highway 120 corridor outside the Park which is causing resource damage and potentially driven, to a certain extent, by visitors trying to enter the Park before 5 am.

Special thanks to the multiple staff and departments involved in collaborating on these comments. Please contact Wendy Sugimura at 760-924-1814 or wsugimura@mono.ca.gov with any questions.

ATTACHMENTS

1. September 30 comment letter
2. Yosemite Mariposa County Tourism Bureau position statement and discussion

MONO COUNTY

COMMUNITY DEVELOPMENT DEPARTMENT

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September 30, 2024

Yosemite National Park
Attn: Joe Meyer, Chief of Staff
PO Box 577
Yosemite, CA 95389

Transmitted by postal mail and email to: joe_meyer@nps.gov

Dear Yosemite National Park Visitor Access Planning Team,

Thank you for the opportunity to comment on the Yosemite Visitor Access Management Draft Plan (the Plan) and Environmental Assessment (EA). The timing of the Mono County Board of Supervisors meetings did not provide the opportunity for the Board to approve a letter prior to the deadline date. Therefore, this intermediary letter provides preliminary comments while the Board considers approval of a final letter on October 1, which will then be submitted to the National Park Service as soon as possible.

A summary from individual members of the Board of Supervisors and from individual Mono County Departments are as follows:

Individual Mono County Supervisors

- Yosemite National Park (the Park) should never restrict pass-through traffic, west to east or east to west. Traffic should be allowed to drive freely on Highway 120 at all times. Reservations should pertain to going to the Valley floor.
- I support the proposed Alternative B, which is the one preferred by the Park. I think we need to carefully continue to manage the number of visitors in the Park, to ensure a positive experience for as many as practical, and to protect the Park's natural resources.

Mono County Economic Development

- Keeping Tioga Road open as a travel route would encourage more sightseers to visit Mono County, and potentially alleviate congestion at the western entrances.
- Pass-through visitors support Mono County businesses and economy (lodging, dining, retail, services, etc.).
- The Valley-only option would preserve Mono residents' access to the high country.
- Grant Bridgeport zip code 93517 the Nonrecreational Pass-Through Travel privilege through Tioga Pass.
- The Park's analysis states that "With delays and high demand, visitors and park staff have reported long lines and waits, seeing two to three full shuttles pass before one stops to pick up passengers. Some visitors have reported, and have been observed, walking along the roadways after giving up hope to get on a shuttle. This is a safety concern and is tiring—especially for those with mobility challenges or small children—and adds travel time

between destinations.” Resources should be pooled to better support YARTS and the Park’s public transit to increase use and move people in/out and around the park more efficiently as a solution to congestion, safety problems associated with currently inadequate transit capacity, and provide improved mobility.

- Data is needed determine if the reservation system is suppressing international visitor numbers who typically travel by car on road trips to several destinations. International visitation numbers have not recovered to pre-pandemic levels.
- Solicit supplemental data about early-morning collisions with wildlife before moving ahead with a 5:00 am start for reservations.
- Explore substituting parking reservations for visitor reservations.
- Explore options to capture and distribute reservations booked by no-shows.
- Explain the decision to require reservations mid-week in the off and shoulder seasons.
- Mono County received feedback from local businesses that visitors on the west side who are not visiting Yosemite cancelled reservations on the eastside because they were unaware of the reservation system and could not pass through the Park. The reservation system reduces transient occupancy tax (TOT) and spending in Mono County.

Mono County Outdoor Recreation Division

Recreational tourism dominates Mono County’s economy. Public lands cover 94% of Mono County where the majority of this recreation takes place. This recreational use is measurably increasing and there is a need to balance this increased use with the preservation of public lands. Mono County developed the Sustainable Outdoors and Recreation division to enhance recreational experiences within the county. The division implements sustainable recreation practices to preserve the natural resources within the county for future economic viability and enjoyment.

A key principle in Sustainable Recreation is the conservation and management of recreation in such a way that the beautiful, natural places our visitors and locals come to experience stay that way for future generations. The following comments are offered to better achieve sustainable and responsible recreation management in Yosemite and within Mono County:

Yosemite Park Overuse

- An excess of visitors results in a decreasingly enjoyable recreation experience.
- Parking, trails, and other experiences and services must have sufficient capacity to serve the anticipated number of visitors.
- Overuse of existing infrastructure consumes resources due to avoidable repair, maintenance and restoration projects that could otherwise be used to develop new infrastructure for added capacity.
- The congestion, long wait times at entrances, and destruction of natural resources and landscapes should be addressed by the management plan.

Yosemite Park Recreation

- To facilitate recreational access, the least restrictive system necessary for managing impacts should be adopted.
- The selected management system should not deflect natural resource degradation (e.g., congestion and overuse) to other areas of the Park.
- Evaluate options for increasing recreational access and enhancing visitor and local enjoyment of the Park, such as a longer daily opportunity for entry without a reservation (e.g., entry before 7 am and after 3 pm) and exempting backpacker pick up from trailheads.

Information, Communication and Training

- Increasing communication with partners and gateway communities, specifically by the following methods, would be beneficial for Park management and local communities:

- Seasonal trainings with partners (prior to the reservation period) to review frequently asked questions and how to suggest dispersed camping options that aid those without reservations.
- Allocate Park staff hours to helping with visitor services and information dissemination at the Mono Basin Scenic Area Visitor Center.
- Distribute informational materials to gateway communities regarding reservation system procedure and options for guests without a Park reservation.

Community Development/Local Transportation Commission

The Mono County Community Development Department and Local Transportation Commission (LTC) are submitting the following joint comments based on consistency with the Mono County General Plan and Regional Transportation Plan (RTP) (see Attachment 1, emphasis on highlighted policies):

- Grant Bridgeport zip code 93517 the Nonrecreational Pass-Through Travel privilege through Tioga Pass to reduce vehicle miles travelled, which is consistent with the Mono County Resource Efficiency Plan and General Plan policies, and California state greenhouse gas emission (GHG) reduction policies. Travelling through the Park to destinations south of the Highway 41 Wawona Entrance Station in all cases results in reduced vehicle miles travelled (VMT) and in some cases results in reduced travel time compared to the next fastest or least mileage route¹, which in most cases is via State Route 108. For example, travel via Yosemite to Oakhurst reduces round-trip travel time by 70 minutes and 74 miles, and to Fresno and Bakersfield by 46 miles. Not providing access to Bridgeport residents and the resulting increased VMT should be evaluated in the Environmental Assessment (EA).
- The triggers for all action alternatives are wait times for vehicles at the Yosemite entrance gates. With technologies such as license plate readers and improved reservation scanners to move traffic more quickly at the entrance gates, in theory more vehicles (and people) would be permitted to enter while the number of parking spaces and park services remain the same. Consider the transportation system as a whole and build the trigger around the main carrying capacity factors in the park (e.g. parking or congestion measures in the Valley), and consider how these factors may be affected by different alternatives.
- An efficient entry system that reduces both queues at the entrance gates and greenhouses gases emitted by idling cars would benefit visitors and the environment.
- Although the park indicates an intention to transition, over time, to a fully contactless system of validating reservations, the impact of such a change is addressed only via footnote. According to footnote 20 in section 3-13, implementing a fully contactless system with Alternative B would increase the number of vehicles that could be accommodated by up to 7%. According to footnote 21 in section 3-16, implementing a fully contactless system with Alternative C (where timed entry would space out arrivals) would increase the number of vehicles that could be accommodated by up to 21%. The Plan and EA should better explain how 1) data about traffic impacts were calculated, 2) future technologies might shift those calculations, and 3) increasing the flow of vehicles into the park will affect parking, VMTs, GHGs, and the transportation system as a whole.
- Mono County policies promote the use of transit to reduce GHGs, VMTs, and the need for parking. Transit appears to be a significantly underutilized tool in the Plan to manage the number of vehicles which are the cause of congestion and vegetation impacts from non-designated parking – two key resources issues the Plan is meant to address. Improved public transit coupled with adjustments to reservation system numbers could be an ideal solution to the Park's congestion and parking problems in addition to reducing GHG emissions and VMTs. YARTS is already set up to transport visitors into the park without cars, although additional staging or parking areas outside the Park may be needed, and improved shuttle service in Tuolumne and the Valley could further eliminate the need for private vehicles.

¹ According to routes identified by Google Maps: <https://www.google.com/maps>.

The Park’s analysis determined that “expanding [transit] infrastructure would not adequately manage the number of visitors in specific areas and would cause surges of visitors that would likely not be consistent with the visitor capacities determined to achieve desired conditions for visitor experience and resource protection,” but the number of visitors could and should be managed through the reservation system, and the system should favor a reduction in the number of private vehicles entering the park.

Appendix E of the Plan cites a reduction in the number of private vehicles to the park as a negative because it would limit visitor mobility. An improved public transit system could provide the necessary mobility, alleviate traffic and parking congestion, improve air quality, reduce GHGs and climate change, and enhance the visitor experience. The popularity of public transit where it is available suggests that the benefits already outweigh the costs to many visitors, and improved transit via YARTS could further extend mobility options and range and bolster the visitor experience by allowing people to enjoy the beautiful natural landscape rather than paying attention to the road.

Similarly, local multi-modal options such as increased rental electric bicycles coupled with improved multi-modal pathways in high-use areas, especially Yosemite Valley, could provide mobility options that do not rely on vehicles. The main area of the Valley is only seven miles long, which is not an unreasonable bicycling distance, especially on an electric bicycle and with sightseeing stops.

A reduction in private vehicles, VMTs, and GHGs with increased reliance on a higher capacity transit system and multi-modal travel should be evaluated in the Environmental Assessment.

- Mono County policies promote multi-modal facilities and access, and supports excluding non-motorized access (e.g., bicyclists) from the reservation system. Non-motorized access has no impact on traffic or parking, and would preserve free access to Tioga Road for cyclists.
- Section 3-25 of the Plan discusses the economic impact on Mono County of implementing a reservation system. Although the analysis correctly identifies the importance of tourism to Mono County, it cites short-term rental figures that combine data from unincorporated Mono County and the incorporated Town of Mammoth Lakes without making any distinction between the two jurisdictions which have conflicting sets of regulations.

To clarify, a 2024 study of the unincorporated county identified 106 short-term rentals in 2023. In contrast, a separate study of the town of Mammoth Lakes identified 3,701 short-term rentals in 2023, which indicated an increase in rentals during the County’s moratorium on such rentals.

The Plan’s analysis obscures an important fact: Ninety percent of the unincorporated county’s overnight tourist accommodations are provided by traditional hotels and motels. These businesses would be hurt by a reduction in visitation resulting from the implementation of a long-term reservation system.

- Address equity by making lodging costs inside of YNP higher on weekends and holidays, and lower midweek. This would provide access for those with less economic resources and help drive more balanced visitation patterns that could reduce the need for control via a reservation system.
- Consider new methods to reduce wildlife-vehicle collisions, such as warning systems for when wildlife is present in the roadway. Mono County and the Mono County LTC are partnering with Caltrans District 9 on a project incorporating this technology on State Route 203 which provides access to the town of Mammoth Lakes.

Conclusion

Mono County appreciates the opportunity to comment on the Plan and EA. The County views itself as a collaborative partner to the Park and is open to discussing these and other issues related to visitor management and impacts to gateway communities and neighboring counties. Please contact Wendy Sugimura, the Mono County Community Development Director and LTC Co-Executive Director, at 760-924-1814 or wsugimura@mono.ca.gov, with any questions or for further discussion.

Thank you,

Sandra Moberly
County Administrative Officer

Attachment: Mono County General Plan policies and Mono County Regional Transportation Plan policies

CC: Mono County Board of Supervisors
Mono County Local Transportation Commission
Mono County Tourism Commission

ATTACHMENT

Mono County General Plan Policies

MONO BASIN AREA PLAN

Objective 11.B.

Enhance and support the existing tourism-related economy.

Policy 11.B.1. Cultivate tourism-related programs and attractions that promote longer, multi-day visits.

Policy 11.B.2. Capitalize on local and nearby attractions such as Yosemite National Park, Bodie State Historic Park, Mono Basin Scenic Area, and the Tufa State Reserve by promoting Lee Vining as a centralized recreation hub.

Action 11.B.2.a. Support the Yosemite Policies, and Objective H of the Mono Basin Policies, in the Circulation Element of the General Plan to strengthen the relationship between the Yosemite region and its eastern gateway.

Action 11.B.2.b. Support local recreational uses and visitor accommodations, such as existing campgrounds, hotels/motels, and RV parks.

Action 11.B.2.c. Collaborate with other agencies to provide 24-hour, year-round visitor sanitation facilities; e.g., public restrooms, and sanitation facilities at popular recreation staging areas.

Action 11.B.2.d. Support Lee Vining as a host for YARTS services such as the High Country Hiker Shuttle.

Policy 11.B.3. Support a sufficient bed base and visitor accommodations to support the tourism industry.

Policy 11.B.4. Diversify and promote recreation opportunities during the shoulder seasons and winter.

Action 11.B.4.a. Identify and implement potential shoulder season and winter opportunities, such as ice climbing.

Action 11.B.4.b. Work with applicable entities to increase access and activities.

Policy 11.B.5. Keep public roads open as long as practical during the shoulder season to provide access to recreation activities and other communities.

Policy 11.B.6. Promote collaboration with organizations in the region to enhance tourism.

Action 11.B.6.a. Support the designation of US 395 as a National Scenic Byway.

JUNE LAKE AREA PLAN

Action 20.A.2.b. Encourage and promote backcountry recreation experiences accessible from the June Lake Loop, including fishing, backpacking, horseback riding, and access to Yosemite National Park.

Mono County Regional Transportation Plan (RTP) Policies

YOSEMITE

GOAL 23. Yosemite National Park is a national and worldwide treasure that must be protected and preserved. Bordering the Park's eastern boundary and serving as its only access point from Eastern California, Mono County is an important component of the Yosemite region. Through its transportation planning efforts, the Mono LTC will assist in the preservation and protection of the Park while still providing for visitor enjoyment, by strengthening the relationship between the Yosemite region and its eastern access through communities along the US 395 corridor.

Objective 23.A Support the Park's mission to preserve the resources that contribute to Yosemite's unusual character and attractiveness: its exquisite scenic beauty; outstanding wilderness values; diverse Sierra Nevada ecosystems; historic resources, including its Native American heritage; and its role in a national conservation ethic. These resources are to be made available for enjoyment, education, and recreation while leaving them unimpaired.

Policy 23.A.1. Management of Yosemite's congestion and access should be accomplished in a way that enhances the quality of life and quality of experience in gateway communities.

Policy 23.A.2. Coordinate with local plans when planning potential gateway corridor improvements to assist in dispersing transportation-related impacts from visitors to Yosemite. Develop an access plan with Caltrans, YNP, and the LTC.

Policy 23.A.3. The importance of Yosemite to the regional economy should be a primary factor when considering opening and closing dates for Tioga Pass.

Policy 23.A.4. Continue working with Yosemite National Park on traffic and parking-related issues to provide the best visitor experience while supporting environmental preservation within the Yosemite region.

Policy 23.A.5. Transit-related infrastructure should maximize consideration for the environment; e.g., convenient, well-signed transit stops with appropriate safety and environmental considerations, including pedestrian and bike linkages.

Objective 23.B. Improve opportunities for access by alternative modes (transit, bicycles, pedestrians, air, other non-auto modes).

Policy 23.B.1 In support of YARTS regional transit and other alternative modes for access to Yosemite, encourage multi-modal infrastructure projects that complement the gateway communities, emphasize alternatives to the auto, and integrate joint use of facilities.

Policy 23.B.2. Encourage the use of alternative travel modes for access into Yosemite, including transit and bicycles; e.g., transit riders should have priority access at Park gates and guaranteed access to the Valley.

Policy 23.B.3. Promote the Mono Yosemite Trail as an access route for alternative travel modes.

Policy 23.B.4. Maintenance and improvement projects on SR 120 should focus on accommodating alternative transportation modes, particularly cycling. Provide connections to trails, appropriate signage, and staging areas for cyclists.

Policy 23.B.5. Encourage Yosemite National Park, Caltrans, and Mono County to work cooperatively to develop bicycle facilities on SR/Highway 120 both within and outside the Park.

Policy 23.B.6. YARTS should continue to provide transit service from the Eastern Sierra to Tuolumne Meadows and should seek to formalize national park funding to sustain that service.

Policy 23.B.7. YARTS should accommodate bicyclists and hikers and their gear. YARTS transit facilities should include bike lockers at transit stops and bike racks at key locations. The National Park Service is encouraged to provide bike rentals in Yosemite, and a bike sharing program in key locations, such as Yosemite Valley.

Objective 23.C. Encourage diversity in visitor destinations and experiences.

Policy 23.C.1. The Yosemite Area Regional Transportation System (YARTS) should be developed and implemented in a way that best supports local economies, including:

a. Using YARTS to change visitor behavior to include longer stays in the Eastern Sierra; i.e., staying in the Eastern Sierra and using YARTS for day trips to Yosemite.

b. Encouraging Yosemite National Park to promote a policy of dispersing visitors to other areas in the Park and the gateway communities.

c. Promoting YARTS' marketing efforts to include information about gateway attractions, including activities, attractions, amenities and trip itineraries.

Policy 23.C.2. Plan for and promote the concept that the Yosemite experience begins or ends in Mono County. Marketing the Yosemite experience should be a countywide effort.

Policy 23.C.3. Provide facilities that support a diversity of visitors, including a diversity of lodging types, staging for a variety of activities, and providing information in several languages.

Objective 24.D. Provide for safe and consistent access through Yosemite National Park to its eastern gateway.

Policy 24.D.1. To facilitate visitor travel planning and provide some certainty for local gateway economies, the LTC should work with Yosemite National Park to guarantee opening and closing dates for Tioga Road (SR/Highway 120 West).

Policy 24.D.2. Promote opening the areas along SR 120 to Tioga Pass as soon as conditions are safe.

Policy 24.D.3. Consider using pricing mechanisms as a means to fund Tioga Road opening activities; work with Yosemite National Park to ensure that a portion of entry fees are set aside to fund road opening.

Policy 24.D.4. Accurate and timely information about conditions in the Park should be available in the gateway communities.

Policy 24.D.5. Maintenance and improvement projects on SR/Highway 120 should focus on improving safety, including providing turnouts to allow for safe stops and passing areas, and/or a fast lane/express lane for buses and pass holders (e.g., Wawona Road). Facilities for cyclists and pedestrians should include trailhead parking retention, signage, safe road crossings, etc.

Objective 24.E. Develop transportation infrastructure that supports access to and within communities along the US 395 corridor.

Policy 24.E.1. SR/Highway 120 should remain a trans-Sierra highway open to through traffic for as long as conditions allow. Road-opening policies should promote late closures and early openings based on road conditions.

Policy 24.E.2. Support improvements to key access routes to Mono County and the eastern gateway corridors.

Policy 24.E.3. Resource management decisions in the Park (e.g., changes in allowable land uses, access, and overnight accommodations) should consider associated impacts to gateway communities and access corridors

SUMMARY OF NEEDS AND ISSUES

- Participating in regional transportation planning and projects, such as the Yosemite Area Regional Transportation System (YARTS) and joint planning efforts with Kern, Inyo, and San Bernardino counties, in order to develop an efficient regional system

SUMMARY OF RECOMMENDED ACTIONS

- Recommended actions that focus on interregional connections include continuing participation in the Yosemite Area Regional Transportation System (YARTS), in the intercity transit planning process with Inyo and Kern counties and Caltrans District 9, and in the Eastern California Transportation Planning Partnership, which is a collaborative regional transportation planning process with Kern, Inyo, and San Bernardino counties.

DEMAND MANAGEMENT STRATEGIES

- Transit service to recreational destinations, however, is a viable TDM measure in Mono County. Shuttle service to Devils Postpile National Monument and trolley service to the Lakes Basin has been in place for many years in order to reduce traffic impacts. The Yosemite Area Regional Transportation System (YARTS) provides shuttle service from

Mammoth Lakes, June Lake, and Lee Vining (and other counties surrounding Yosemite National Park) to Yosemite Valley and now specifically to Tuolumne Meadows

CROSS-JURISDICTIONAL COMMUNICATIONS NETWORK NEEDS

- The County continues to participate in YARTS along with Yosemite National Park, Caltrans, and other counties surrounding Yosemite; and

MONO BASIN

- GOAL 22. Provide and maintain a multi-modal circulation system and related facilities that promote the orderly, safe, and efficient movement of visitors, residents, goods and services within the Mono Basin; that invites pedestrian use, provides for pedestrian and cyclist safety and contributes to the vitality and attractiveness of the Lee Vining community; and that facilitates travel to Yosemite and other nearby points of interest.
- Objective 22.H. Provide for the transportation needs of the Yosemite area traveler in a manner consistent with the Yosemite Area Regional Transportation System (YARTS).
 - Policy 22.H.1. Coordinate Lee Vining transportation planning with the YARTS and local transportation providers.
 - Action 22.H.1.a. Request that one or more representatives from the Mono Basin and the County Supervisor representing the Mono Basin be appointed to serve on appropriate YARTS committees.
 - Action 22.H.1.b. Develop Yosemite regional transportation policies for inclusion in the Mono County RTP and the Mono County General Plan Circulation Element as part of the YARTS process.
 - Action 22.H.1.c. Assist YARTS by facilitating a community dialog on Yosemite transportation issues and policies.
 - Action 22.H.1.d. Support Lee Vining as a host for YARTS services such as the High-Country Hiker Shuttle
- SR/Highway 120, both west through Yosemite and east to Benton, is closed in the winter. There is local interest in keeping both sections of the highway open longer and in maintaining SR 120 east to Benton for winter access. There is a need to consider different approaches to increasing funding and responsiveness to maintenance needs on Highway 120 through Yosemite, including:
 - Organizational options, such as Caltrans assuming maintenance responsibility.
 - Establishing a Tioga Pass Authority to maintain the road.
 - Using Park fees for road maintenance
- Low-cost backpacker shuttles should be considered to reduce multi-day parking.

BODIE HILLS

- Objective 21.E. Facilitate travel connections with local and regional recreation nodes and visitor services, such as Mono Lake and Yosemite, and the Bridgeport, June Lake and Mammoth Lakes recreational attractions.

RESOURCE SHARING & PUBLIC/PRIVATE PARTNERSHIPS

- The County continues to participate in YARTS along with Yosemite National Park, Caltrans, and other counties surrounding Yosemite, and YARTS is adding Tuolumne and Fresno counties to its service

WILDLIFE

NEEDS ASSESSMENT

- Mono County LTC supports the efforts and policies in the California State Wildlife Action Plan and will continue to monitor and align transportation as it relates to this plan.

ENVIRONMENTAL ISSUES

- Objective 5.A.2. Implement policies in the County Conservation/Open Space Element pertaining to the development and implementation of programs to minimize deer and wildlife kills on roadways in the county, including clearing brush, improving signage, and enforcing speed limits.
- Objective 5.B.1. Caltrans, the USFS, the BLM, the CDFW, the LTC, the County, the Town of Mammoth Lakes, applicable citizen planning committees and other appropriate agencies should work together to: 1) define environmental objectives; 2) design transportation projects in a manner that improves both the transportation system and the surrounding community and/or natural environment; 3) incorporate environmental mitigation measures and enhancement projects into the planning process for transportation improvements to both state and local circulation systems; and 4) seek funding for implementation of identified mitigation measures and environmental enhancement projects. Potential environmental enhancement projects are identified in Appendix D of this Plan.

REGIONAL POLICY ELEMENT: OPERATIONAL IMPROVEMENT

- Policy 9.B. Reduce the potential for wildlife collisions to improve transportation system safety.
 - Objective 9.B.7. Seek funding for overpasses or undercrossing passageways for mule deer where highways intersect traditional migratory routes to reduce collisions and animal mortality.
 - Objective 9.B.8. Seek funding to increase the effectiveness of existing undercrossing passageways for mule deer and other wildlife to reduce collisions and animal mortality.
 - Objective 9.B.9. Incorporate measures into the design of new roads and road upgrades to reduce collisions between vehicles and deer/wildlife, such as increasing driver line-of-sight and incorporating short sections of exclusion fencing that directs animals to areas of improved visibility.
- Mono County's economy is dependent on natural resource-based recreation and tourism. Projects that detract from or degrade those natural resources are a concern. Environmental resources of special concern in relation to transportation planning and projects include scenic resources, wildlife and wildlife habitat, air quality, and noise. Mono County communities and the LTC have been very proactive in seeking transportation improvements that enrich the livability of local communities. Mono County's tourist-based economy can be enhanced by flexible highway designs, better facilities for pedestrians and cyclists, additional parking facilities, reduced travel speeds, reduction of vehicle trips, and creating an environment that does not favor the automobile over other transportation modes.
- Environmental mitigation to address water pollution due to highway runoff or reduce vehicle-caused wildlife mortality while maintaining habitat connectivity;

MONO BASIN COMMUNITY POLICY

- Action 22.I.1.c. Identify local hazards, such as dangerous wind areas on US 395, defensible space to reduce wildfire risk, wildlife migration corridor road crossings, and road areas lacking cell phone coverage, and work with the appropriate entities to mitigate those hazards.

YMCTB FINAL POSITION on YNP VAMP

8/20/24

Statement:

The Yosemite Mariposa County Tourism Bureau believes in the preservation of Yosemite National Park and a quality and positive visitor experience. YMCTB does not support the VAMP proposals in their current format and recommends a more thoughtful, delayed longer-term tested approach. YMCTB believes more data collection through time and transparency on access is needed before a final plan can be instituted to properly balance protection and visitor access.

Positioning Statement:

The Yosemite Mariposa County Tourism Bureau believes in the preservation of Yosemite National Park and a quality and positive visitor experience. YMCTB does not support the VAMP proposals in their current format and recommends a more thoughtful, delayed longer-term tested approach. YMCTB believes more data collection through time and transparency on access is needed before a final plan can be instituted to properly balance protection and visitor access.

The NPS preferred plan requires full transparency on the exact number of vehicles allowed into the park. A) For all in-park vehicle access daily (i.e, concession vendors, campers, wilderness & Half-Dome permits, property owner: resident and rentals, staff & employees, contractors, and any other measurable allowed access) and B) The exact number of allowed inbound vehicle reservations for visitors coming from outside the park every day, broken down by reservation release date and period (i.e Long term reservations, seven-day reservations, half-day reservations, and allowed same-day access)

YMCTB believes there is an unnecessary rush by Yosemite National Park to move this draft plan to a final Record of Decision (RoD). The current preferred plan has not been fully tested or vetted for a full year, only portions of different variables have been tested. Because there has not been appropriate testing of the complete plan, as is implemented currently, we strongly request a two-year test period be required prior to the permanent RoD. This would include further public input regarding the preferred plan, at different points in time, as the plan is tested.

Additionally, the duration, including exact dates of the preferred plan; including Firefall/Horsetail Fall, must be memorialized in the written plan. (The months impacted, holidays, weekends, and full seven-day-a-week periods)

In summation, YMCTB and a majority of the board of directors stress the need for balance. There needs to be a balance between the protection of Yosemite National Park and the preservation of the visitor experience, not only for those who do visit, but also those who try to gain a reservation but fail, by maximizing accessibility to the park for the general public's enjoyment through a transparent, data-driven solution.

NPS VISITOR ACCESS MANAGEMENT PLAN

KEY ISSUES

1. NPS needs to slow down. They are rushing to put a permanent system in place too quickly with their self-imposed 2025 deadline
 - NPS issued permanent recommendations months before the current pilot test was even finished
 - NPS has only ever tested one type of solution rather than trying to test different options and determine the best one
2. NPS is unduly denying the public access to Yosemite
 - NPS has not prioritized finding the solution that promotes the greatest access for the public while addressing crowding and protecting resources
 - Evaluation criteria does not even include and prioritize negative effects on aspiring visitors
 - NPS is recommending a solution that locks guests out of the entire park when the main problem is crowding in Yosemite Valley
 - NPS's recommendation is even more onerous and restrictive than NPS's current pilot test
3. NPS is designing a system for their convenience, instead of designing the most targeted, minimal system that could address crowding and resource protection. Their approach is unduly and significantly harming visitors and gateway communities
 - 2024 is the first year NPS has its new Yosemite Valley road and parking improvements completed and open, yet NPS did not
 - Test a minimal system this year to see how much the new improvements have helped the situation and where pressure points remain, or
 - Wait to learn the lessons of this season's pilot test and opportunities to reduce the system and its impacts
 - We need NPS leadership to stop, innovate and push for the best solution, not the quickest and easiest for them
4. The NPS's recommended alternative is unduly onerous and punitive
 - Controls visitation at the entry gates, locking people out of the entire park, instead of controlling visitation into just the Valley
 - Requires park entry tickets all of June, July & August (92 consecutive days). Current pilot test is an appropriate July 1st to August 15th, which reflects the true summer peak visitation period
 - Requires entry tickets on all April, May, September & October weekends – this is simply not necessary. Entry controls should target just peak summer & holidays.
 - Allows no entry to the park without a ticket until 4pm, which is unnecessarily late and denies visitors without tickets the opportunity to enjoy the park in the afternoon
 - Valley parking naturally opens up in early afternoon (prior data confirms this, as do the empty parking lots at that time)

NPS VISITOR ACCESS MANAGEMENT PLAN KEY ISSUES

- It takes ½ - 1½ hours to even get to the Valley from most park entrances, so guests arrive to the Valley well after 4pm
 - Open entry should be allowed at 2pm – that time should have been tested in this year’s pilot.
 - Treats Saturday & Sunday visitation the same, despite Sundays being slower with visitation tapering off earlier
 - Requires tickets when not needed, and offers too few tickets on high demand days
 - Many ticketed entry days did not sell out or did not sell out until the final week, suggesting a ticketing requirement is not needed on those days
 - On peak season days when tickets did sell out, too few entry tickets were made available, as evidenced by partially empty parking lots in late morning and early afternoon (as photo evidence confirms)
 - Despite being aware of uncrowded parking lots on entry ticket days, NPS did not changing ticket quantities available (see #5 below) while turning away 700 vehicles per day
5. NPS espouses having dynamic, nimble systems, but time and again NPS does not actually make timely real-time changes to refine systems and promote visitation while protecting resources
- There were no changes at all in allowed visitor counts this year from original ticket allocations, so zero use of real-time data and zero real-time adjustment and refinement to fine tune the system. After repeated requests by visitor’s bureaus, in late summer, after peak season, NPS finally made a modest increase in allotment.
 - NPS’s actions confirm that the public should not trust that NPS is trying to promote visitor access as much as possible while preserving the park experience. In the coming years, NPS needs to walk the walk and further test, be transparent, provide clear reasoning behind their decisions, value and measure the impacts of their decisions on aspiring visitors, and be proactive to truly fine-tune the solution that best serves the public.
6. The impacts of NPS’s recommended approach (Alternative B in the draft plan) are enormous:
- Undue disenfranchisement of the public to its park
 - Frustrated visitors denied entry and turned away at park entrance gates (700 cars per day)
 - Aspiring visitors and travel planners who give up on visiting Yosemite due to uncertainty about park access
 - Undue economic cost
 - Regional economies suffering. Gateway lodging revenue down 15-25%, while labor & other costs rise
 - Worst July occupancy in history this year; lost revenues are in the millions in July alone for each larger hospitality provider, and proportionately significant for others
 - Economies hurt locally and statewide, given Yosemite’s influence on domestic and international travel patterns

NPS VISITOR ACCESS MANAGEMENT PLAN KEY ISSUES

NPS has repeatedly ignored a broad coalition of gateway businesses, tourism bureaus, boards of supervisors, government officials, and community members, who have repeatedly clarified in previous years that NPS's recommended and only approach will have a dramatically negative impacts

Impacts can be mitigated and must be mitigated by the NPS before determining a permanent plan

7. NPS needs to revisit the need and justification for the system given current realities:

July visitation data:

2023 with no system at all = 580,000

2024 with pilot system = 558,000

Implemented entire system, with all of its consequences, to decrease visitation by less than 4% in busiest month of year.

Despite the modest visitor decrease, gateway lodging and tourism businesses had worst July ever, as the system itself has huge consequences and affects who can actually visit and how they visit.

8. NPS needs to take more time to develop, test and refine the most thoughtful, lowest impact solution possible in partnership with key stakeholders, as the public deserves a solution that also best serves their interests, and more time is needed to achieve this goal
9. NPS needs to take the time required to appropriately test a "Valley access" visitation control system (a refinement of Alternative D) that allows the public access to the rest of the park at all times, which can minimize impacts on aspiring visitors and our communities
10. Since a Valley access control system may take time to prepare appropriately and may not be ready for 2025, NPS should test no formal system in 2025 to learn for the first time to what extent the many improvements recently made to Yosemite Valley roads and parking have helped address prior crowding problems. This remains unknown. Such a test will aid in designing the minimum required long-term system to properly balance protection and visitor access; and
11. As part of NPS visitation control efforts and testing, NPS should also prioritize improving operations and immediately implementing strategies that support visitation to enable the most minimal impact long-term solution possible, such as
 - Improved entry gate operations
 - Take the time to align resources to support marginal visitation increases in other high demand areas outside of the Valley:
 - Mariposa Grove: re-implement shuttle from Wawona
 - Glacier Point: re-implement shuttle from Badger Pass
 - Plan to get high country open before Memorial Day, as high country is opening weeks later than in past years with equivalent snowpack

NPS VISITOR ACCESS MANAGEMENT PLAN KEY ISSUES

- Full NPS (& Aramark) staffing
 - Marketing campaigns to educate visitors and change behaviors
 - Encourage Valley visitation in afternoon when crowds are down
 - Introduce a “Yosemite: Outside the Valley” campaign to teach guests about non-Valley options and things to do during busy periods in the Valley
12. Rather than seeking approval now of their recommended proposal, NPS can rebuild the faith and determine the best solution with the fewest negative consequences that best serves all constituents by doing the following:
- Remove their self-imposed deadline
 - Truly prioritize visitor access and community impacts in addition to crowd control and resource protection
 - Work with visitor’s bureaus and visitor serving gateway businesses, who, given their daily interaction with existing and aspiring visitors, have deep knowledge of the impacts of systems on visitors and can best help educating visitors and influencing visitor behavior to support NPS goals
 - Innovate, prepare for, and test a different, more thoughtful approach such as a refinement of Alternative D’s Valley focused system