

SUPPLEMENT TO THE  
AMENDED ENVIRONMENTAL ASSESSMENT  
MIDPINES FIRE STATION  
MARIPOSA COUNTY  
*JUNE 2011*



**FEMA**

**U.S. Department of Homeland Security**  
Federal Emergency Management Agency  
Region IX  
1111 Broadway - Suite 1200  
Oakland, CA 94607

**SUPPLEMENT TO THE  
AMENDED ENVIRONMENTAL ASSESSMENT  
MIDPINES FIRE STATION  
MARIPOSA COUNTY**

For submittal to:

U.S. Department of Homeland Security/Federal  
Emergency Management Agency  
Assistance to Firefighters Program Office  
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# **TABLE OF CONTENTS**

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## **MIDPINES FIRE STATION PROJECT**

### **SUPPLEMENT TO FEMA AMENDED ENVIRONMENTAL ASSESSMENT**

<b>1.0 INTRODUCTION .....</b>	<b>1</b>
<b>2.0 RESPONSES TO EA COMMENTS.....</b>	<b>2</b>

### **ATTACHMENTS**

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Attachment A    Comment Letter

## **SECTION 1.0**

### **INTRODUCTION**

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An Environmental Assessment (EA) was prepared for a proposal by Mariposa County (County) to construct a fire station for an existing volunteer engine company in the central region of the County in the unincorporated community of Midpines (Proposed Project). Under the American Recovery and Reinvestment Act of 2009 (ARRA), the Federal Emergency Management Agency (FEMA) may provide grant funding for the Proposed Project through its Fire Station Construction Grant Program (SCG) (Proposed Action). In accordance with the National Environmental Policy Act (NEPA), an environmental review is required to assess the environmental impacts to the quality of the human environment should FEMA provide funding to the County for the new fire station.

The EA was prepared in accordance with NEPA, the President's Council on Environmental Quality regulations to implement NEPA (40 CFR Parts 1500-1508), and FEMA's regulations for the implementation of NEPA (44 CFR Part 10). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. The EA provides a description of the Proposed Action and an analysis of the potential environmental consequences associated with the release of the funds to the County, which would result in the development of the Proposed Project. The EA also includes a discussion of alternatives, impact avoidance, and mitigation measures.

The EA for the proposed FEMA funding of the construction of the Midpines Fire Station was submitted to the State Clearinghouse and released to the public and agencies for a 15-day review period beginning on March 24, 2011 and ending on April 8, 2011. During the review period, FEMA received one comment letter on the EA and Proposed Project. In response to the comments received, an Amended EA was developed and will be recirculated for public review.

This Supplement to the Amended EA presents the comments provided on the EA and subsequent responses to those comments received.

## SECTION 2.0

### RESPONSES TO EA COMMENTS

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One comment letter was received on the EA. The comment letter is provided in its entirety in **Attachment A**. The comments are provided below in bold italics for reference. The responses are provided in normal type face.

***Construction of a new fire station would indeed result in a beneficial effect on the Mariposa County Fire Department Company 21's fire and emergency response services. Following a review of the Environmental Assessment I offer the following comments and concerns about the proposed project, alternatives, and recommendations for impact avoidance, and mitigation measures.***

As was stated in the grant request narrative, the current Midpines Fire Station is unsafe to staff during moderate to strong winter storms and does not contain sufficient space to house minimum required apparatus and equipment to maintain insurance ratings. As envisioned in this EA, the new station would meet the emergency response needs of the Midpines community for many decades into the future.

**Section 1.3; Purpose and need for the Proposed Action:**

***This section fails to completely describe the current existing operations, description of the existing facility, and how it is shared with the US Forest Service. The scope of the proposed project, as described to the community in October 2009, includes demolition of the existing two-bay 2,000 square foot building with a 4,800 square foot facility; with 4 bays to accommodate fire apparatus, living quarters for fire fighters, and a road around three sides of the Community Hall to access the two bays facing south. This is relevant information needed to fully grasp the scope and impacts of the proposed action.***

For the past ten years a single Forest Service engine module was accommodated at the Midpines Fire Station during the summer wildland fire season. The module was staffed six days per week and during daytime hours only. Neither agency has utilized the station for overnight use. While the original community presentation did cite the possibility of a joint MCFD/Sierra National Forest Interagency Fire Station, that proposal was dropped as incompatible with the terms of the grant shortly after the award document arrived. Since one of the primary considerations of the fire station grant program was to meet both current and future needs of the community, inclusion of sleeping accommodations was encouraged by grant guidelines. Consequently, the current design does include space designated as sleeping quarters. MCFD does not currently operate a resident-sleeper program at any of its volunteer-staffed stations and any such system change would have to be first approved by the County's elected body, the Board of Supervisors. By eliminating USFS from the fire station use pattern, the proposed project would only be used by the MCFD volunteer company. As an MCFD-exclusive facility there would be less impact on park facilities than at any other time during the past decade. Volunteer use would result in approximately

100-to-125 emergency responses (approximately every third day) from up to four volunteer members per incident. Additionally, there would be two, three-hour evening training sessions per month. There would be no added parking impacts, no residential use, no equipment or fire apparatus stored outside the building and no hose drying outside. All operational activities would occur indoors. The environmental assessment adequately described the current use of the project site and existing facilities to a level necessary to assess the environmental impacts in relation to NEPA and the proposed project.

***The sentence at the bottom of page 1-5, “The current site is part of the County Park, has adequate room, and would be located on land currently graded for the existing fire station and properly zoned for the land use.”, fails to truthfully describe the fire station setting and how the park and recreation uses of the land compete with fire station needs for space and should be more articulate to assist in fully evaluating impacts and mitigation of the proposed action and alternatives.***

The existing fire station was built in 1985 and does not meet the current or future emergency service needs of the community. While the building footprint of the proposed project would be larger than the current station, the proposed project would not impede any current recreational use of the park. Referencing Figure 4 on Page 2-2 of the draft EA, the proposed new building footprint would include the current fire station building site and expand behind (south) and right (west). This expansion area plays no current role in park usage. The proposed access road paralleling Bear Creek (east side of Community Center) would not be used for emergency response. All response vehicles would leave the fire station from the north facing bay doors. The proposed access road would only be used for the returning apparatus that would park in the rear of the station or for refill apparatus from the water storage tanks that would be located next to the water well on the south property boundary. The north-south portion of the access road already exists and would not be expanded other than some minor grading. The portion that loops around the back (south) would be new but is not part of traditional Community Center use. As mitigation to Community Center public safety concerns, a chain link fence would separate the Community Center from fire station use. The fence would be located in such a manner that it would not restrict current and traditional use of Community Center space. Additional discussions regarding land use were assessed in Section 3.9 of the EA.

***The fire station is in fact one of four functions that compete for space on this 4 acre parcel of land. Park and recreation facilities and services; including 1) a tot lot, 2) picnic area and picnic shelter, 3) public restroom, and 4) space for gold panning. In addition, the Community Hall serves a myriad function including: 1) a meeting facility; 2) election polling place; 3) child care; 4) church services every Sunday; 5) the facility is rented for weddings, birthday parties, memorials, and numerous other social gatherings & events; 6) a bus shelter and the existing paved parking lot accommodate County residence and visitors who travel to Yosemite National Park, and 7) the parking lot serves as Yosemite Area Regional Transportation System (YARTS) transit bus turnaround, and 8) 6-9 Company 21 Fire Station and US Forest Service wildland fire employee vehicles.***

The commenter provides a summary of functions that, from time to time, occur in the park and adjacent to the project site. The current fire station and the expanded proposed new fire station occupy a corner portion of the park but have always co-existed with the listed functions as park use has evolved over the years. Historically, this park was created on donated land by two founding families of the Midpines

community. The land was deeded to Mariposa County by Juanita Moore and family. At the time of donation there were two stated purposes for the land: First and foremost the public land was to house a new volunteer fire station that would meet the emergency service needs of the growing community. Secondly, it was to offer a “wayside rest stop” for visitors enroute to Yosemite National Park. Ernie Correa and family provided the funding, materials and labor to construct the current fire station. As the years passed, use of the park did expand to meet the community’s recreational needs. A Community Center was built and is used for community and family gatherings, on average, less than one time per week. In addition, the Community Center building is serving as a temporary worship site for Mariposa Bible Church until their permanent structure is completed. The northern portion of the park features several picnic tables, a new play area for small children (tot lot), a commuter bus turn-around area and passenger shelter. Located in between the recreation facilities and the proposed fire station is a public restroom facility (see Figure 4, Page 2-2). That restroom is poorly constructed and, due to a lack of electricity or insulation, must be locked during winter months due to freeze potential of the water system. The restroom is slated for demolition and replacement as soon as the new fire station is complete and a funding source can be identified. The new restroom would be more centrally located to better serve the bus passenger shelter and picnic areas of the park. In the past any gold-panning use of the park has been associated with the narrow strip of land parallel and adjacent to Bear Creek (far eastern side). Fire station use has not and would not infringe on this use. Over time and as new uses of the park have evolved, they have done so in harmony with the two “charter” uses—fire station and wayside rest stop. A check of incident reports with the County Sheriff could not identify a single injury or conflict between fire station use and all other evolving community or public uses. Fire department response from and returning to the station would continue exercising due caution for the public. Access and egress speeds for fire department vehicles are limited to 10 MPH until the vehicle clears the park and enters State Route 140, the main roadway.

**Section 2.3; Alternatives Eliminated from further Consideration:**

***Section 1.3, Purpose and Need, does not identify the full spectrum of existing and long-range needs for fire related outdoor equipment storage, parking, hose drying, etc., and outdoor living space for resident fire fighters.***

The commenter states that the Purpose and Need discussion in Section 2.3 of the EA does not adequately describe the full spectrum of existing and long-range needs of the fire station. The proposed fire station has been sized and designed to move all fire equipment storage and hose drying functions indoors. Since the US Forest Service would not be co-locating in the station, there would be no residential use or any impact on the station or park from overnight residential users. As previously stated, only the elected County Board of Supervisors through the public hearing process can authorize residential use of the station by MCFD personnel. Based on fire department projections, service demands that would necessitate a residential function are well into the future. Volunteer firefighter use of the station would offer very little parking impact or conflict with any current park use.

***One important alternative is missing! To fully understand the magnitude of this project, there needs to be an alternative that evaluates only replacing the 2,000 square foot two-bay facility and its office and storage space for the structural fire needs of Mariposa County Fire Department Company 21 and NOT provide space for US Forest Service Wildland Fire fighting operations.***

The commenter states that an alternative of replacing the existing facility with the same size facility should be assessed. The current facility can only accommodate two pieces of fire apparatus. In order to satisfy current Insurance Services Office (ISO) mandates for a Public Protection Class 8 rating, the Midpines and surrounding areas require one structure-type fire engine, one 3,000 gallon water tender, one wildland engine and one reserve engine to backfill a structure engine that may be temporarily out of service or responding to another simultaneous fire. In addition and per ISO and national standards, there must be an adequate training room, clean room for disinfecting contaminated medical equipment, in-station specialized laundry facility for contaminated and soiled personal protection equipment (PPE) and an office area to provide for safe and confidential recordkeeping. To be out of compliance with standards and insurance ratings places the entire community and its homeowners in jeopardy of losing access to affordable fire insurance. A 2,000 square-foot facility cannot meet current and future needs or standards. As stated above, operation of the proposed fire station cannot and would not support the USFS.

### **Section 3.0; Affected Environment, Impacts, and Mitigation for the Alternatives considered.**

#### **3.2 Water Resources:**

*Alternative A fails to provide data and describe impacts and consequences on water resources associated with the employees living in this facility as well as the projected demand to supply fire fighting equipment.*

The commenter states that the analysis of water resources fails to provide data and describe impacts associated with living quarters as well as the demand to supply firefighting equipment. As stated above, no living facilities would be utilized as part of this Proposed Project. Three 10,000 gallon water storage tanks would be located next to the water well and parallel to the south property boundary. Once the 30,000 gallon water storage tanks are full, additional use would be minimal and only to replace suppression water used while training or the occasional fire. Impact on the park's water availability and the local aquifer would be less than currently experienced by the existing fire station.

#### **3.7 Transportation and Circulation:**

*The statement on page 3-30, "The project site includes amenities for pedestrian use (picnic tables and restrooms); however, pedestrian circulation is limited to the park area and the community hall. There are no bicycle circulation facilities on the project site. There are no pedestrian or bicycle facilities along SR-140 adjacent to the project site", is incorrect. Discussions about the need, location, and impacts associated with the construction of a multi-use path along Bear Creek began in the late 1990's with Gwendolyn Foster, Department of Public Works Engineer.*

The commenter states that the description of the pedestrian amenities and circulation is incorrect and the impacts associated with the construction of a multi-use path along Bear Creek should be assessed. The idea of a pedestrian/bicycle pathway along the length of Bear Creek has been discussed in concept since the early-1990s. However, to date the subject remains an idea and has yet to be implemented. The adopted County General Plan makes no mention of this project and the Midpines Park is currently abutted by privately-owned property. In addition, most of the property adjacent to Bear Creek for the length of the "proposed" pathway is currently private property. Since 1990 there has been no funding available to support such a project and, as long as it is not prioritized in the County General Plan, no funding would be available in the future. However, should the pedestrian/bicycle pathway become a priority, Mariposa



County and MCFD would assist in any way possible to blend the project into compatible and harmonious use. As summarized in the EA, the development of an updated fire station in a location where firefighting operations currently occur on the project site would not impact recreation use on the site. FEMA's funding of the Proposed Project would not result in new impacts as the firefighting operations on the project site currently occur concurrently with the other land uses.

***Alternative A as designed with a new access road around the Community Hall would conflict with long-rang plans to construct new recreation amenities.***

The commenter states that the design of the Proposed Project would conflict with long-range planned uses for the project site regarding recreational amenities. The road providing access to the rear of the proposed fire station is not new. It currently exists and serves to provide maintenance and repair access to the back of the current fire station as well as the Community Center. The current road would remain dirt and hard packed rock. It would be graded to remove potholes and furrows that have developed over the years. In addition, in a couple of spots it may be slightly widened to return it to its original access clearance. Once the permanent access to the rear of the new station is complete (west side), the old road would be abandoned. The new access cannot be completed until local funding is appropriated to replace the existing park bathroom facility. As stated above, FEMA's funding of the Proposed Project would not result in new park impacts as the firefighting operations on the project site occur concurrently with the other land uses and the purpose of the Proposed Project is to provide adequate shelter for fire apparatus and equipment.

***With two vehicle bays facing south and the need for a new access road slicing through the south lawn on the back side of the Community Hall, vehicle traffic would: a) impact Community Hall parking, b) conflict with pedestrian circulation, and c) displace land currently used for recreation activities by individuals use who rent the community Hall.***

The commenter states that the need for a new access road would impact Community Hall parking, pedestrian circulation, and displace land currently used for recreation activities. Per the preceding comment, no paved vehicular access is provided to the rear of the community center. It would remain dirt and packed rock. The proposed fire station project does not alter the current parking availability for the Community Center. Pedestrian access was previously addressed and the area where the access road currently exists is not designated for and has not previously been designated as recreational land use. FEMA's funding of the proposed fire station would not impact the land uses as described by the EA.

***The statement at the bottom of page 3-30, "Operation of the proposed fire station would not result in new impacts to the on-site pedestrian facilities. There would be no adverse impact to transportation with the implementation of ALTERNATIVE A." Is simply not substantiated. Events during summer often generate well over 100 individuals that use and enjoy both indoor and outdoor facilities on the south side of the Community Hall. Summer is also when fire fighting operations is busiest and Alternative A, as shown in the 70% construction drawing with a new access road on the south side of the Community Hal, would result in serious conflict and safety risk with pedestrian.***

The commenter states that the analysis within the EA stating that operation of the proposed fire station would not result in new impacts to on-site pedestrian facility is unsubstantiated and states that events on the site generate over 100 individuals and that the access road would result in a serious conflict and safety

risk with pedestrians. The commenter does not substantiate the claims regarding the project site. As stated above, per Department of Public Works statistical analysis, Community Center usage averages less than one use per week throughout the year. During the summer months this may increase from time to time. As mitigation to public safety concerns and possible conflict with moving fire apparatus, a fence would be erected that would separate outdoor public use and fire station operations. Doing so would solve the above concerns.

**Aesthetics:**

***Development of Alternative A failed to comprehensively evaluate the consequences of how this new interagency fire station harmonizes with the aesthetic qualities of this Midpines rustic site. As shown on the construction drawings, the new facility is more than double the square footage and volume of the existing fire station and is situated nearly 10 feet lower in elevation than Highway 140 – a designated scenic overlay, with no existing vegetation on the CalTrans-owned road fill slope to visually mitigate the new structure.***

The commenter states that the EA failed to comprehensively evaluate the consequences of the interagency fire station and the aesthetic quality of the Midpines rustic site. As stated above, the proposed new fire station project would not operate as a multi-jurisdictional fire station. The commenter refers to the current building as “Rustic.” However, the reason this fire station must be demolished and removed is it has been deemed by a structural engineer as unsound and unsafe in moderate to severe wind and weather conditions. It was built by volunteer labor not highly skilled in construction techniques using substandard materials for commercial construction standards. No engineering calculations were completed prior to construction in 1985 and this current station will not comply with required snow loads, wind shear or seismic forces currently required of Essential Public Safety Buildings under California and International Building Codes. While the existing fire station does not currently do so, the proposed new fire station would better blend with the existing next door Community Center. Both would then be contemporarily designed, pre-fabricated buildings.

***Subsequently, visitors and residents would be looking directly down and at the massive highly reflective steel roof surface. Furthermore, design details on the drawings; such as, roof pitch; scale, mass, volume; proportion; lack of architectural detailing; color; texture; etc.; a) effect the quality of the driving experience for visitors and residents as they pass through Midpines en route to/from Yosemite National Park; b) would be a significant change to the Midpines built environment; and c) because of the buildings proximity to CalTrans property line, there is little to no place to plant trees to effectively visually mitigate the structure.***

The commenter states that the metal design features would a) affect the quality of the driving experience as visitors drive to Yosemite, b) would be a significant change to the Midpines-built environment, and c) there is little place to plant trees to effectively visually mitigate the structure. As proposed, the steel roof would be a muted dark color and non-reflective. All trim would be earth tones and non-reflective per mitigations required in the analysis conducted under the California Environmental Quality Act (CEQA). Also, as it currently exists, the Community Center is a 15-year-old metal building that has not aged well. Because it is an Essential Services Building, the proposed new fire station structure would be engineered,

designed and constructed of higher grade materials than the Community Center and would visually shield motorists on Highway 140 from its current state. The Proposed Project would be

- a) Aesthetic and pleasing to visitors and community members,
- b) A vast improvement over the appearance of the current building, and
- c) No trees currently shield the existing building.

***Looking at both Environmental Assessments and architectural plans for the proposed Fish Camp and Midpines fire stations, it is apparent that the goal is to use the same layout and design for both sites. While attempting to apply one design solution to two completely different sites MAY save money, the two sites have little in common. The proposed new Fish Camp fire station would be located a) on a secondary road away from the scenic highway 41 southern approach to Yosemite National Park; b) the proposed site allows for 2 entrance roads; c) the fire station would not share its site with any other community activity or function; and d) it has entirely different structural engineering and mitigations needs (snow loads, soil cuts/fills, visual screening, etc).***

The commenter states that it appears as if the design of the Midpines Fire Station is similar to that of other proposed fire stations in the County. This proposed fire station project appearance, design, and use stands on its own. Any comparison to another station is not necessary or appropriate for this review.

***The new Midpines structure is just too significant addition to the rustic Midpines pine-studded site to not be carefully designed by a qualified architect to insure that it is compatible and respectful of the County Park setting, both natural and human-made.***

The commenter states that the scale of the proposed fire station is too significant for the rustic area to not be carefully designed by a qualified architect. The proposed fire station project is designed by a professional. It would be engineered to the demanding standards required of an essential Services Public Safety building. It would be thoughtfully and carefully designed to the most exacting degree possible considering the budget permitted under the Federal Grant Guidelines. The County does not have sufficient funding to build a facility larger than necessary to meet the MCFD requirements as described above. This proposed fire station project does fit the design and appearance standard of two previously constructed fire stations in Mariposa County.

***The Board of Supervisors-appointed Planning Advisory committee begun the process of defining goals, objectives for future growth and development, and the unique sense of place embodied by this place called Midpines two years ago. Aesthetics and the quality of the built environment are an important long-term goal. The construction of new private and public structures are anticipated, in fact, welcomed elements of the long-range plan and would influence and re-shape the built environment of Midpines and creative contemporary interpretation of rustic design principles which retain validity today should be incorporated into the architectural solution for this new Midpines fire station.***

The commenter states that rustic design principles as defined by the Board of Supervisors Planning Advisory Committee should be incorporated into the architectural design of the Proposed Project. The Board of Supervisors has reviewed and monitored site development plans and the ongoing design process and has not identified conflicts with the values expressed by the majority of the Midpines community.

The aesthetics of design incorporated into this proposed fire station project are in balance with the current and existing Community Center, the current park values and available budget and funding.

***It is imperative that we take time, care, craft, and attention to details appropriate to this new civic project. The Fire Department worked hard to articulate structural and wildland fire station needs and function. There is no evidence that any time has been devoted to aesthetics, visual quality, and architectural details for this importance piece of civic architecture to insure that this new fire station blends into the site as though a part of it.***

The commenter states that time should be taken to design the facilities and that there is no evidence that any time has been devoted to aesthetics of the Proposed Project. Refer to the responses to the four comments cited above regarding aesthetics.

**Cumulative Impacts:**

***“The Proposed Action would not adversely affect a pedestrian or bicycle networks under the Cumulative plus Proposed Action conditions. None of the known cumulative scenario projects are expected to affect these networks. No cumulatively significant Impacts would occur”. This statement is not substantiated.***

***The site plan, with the proposed access road surrounding the Community Hall, as shown in Figure 4 and on the construction drawings, clearly impacts existing pedestrian use in and around the park and Community Center and the proposed access road to the south side of the new fire station clearly inhibits the ability to design safe pedestrian access to the adjacent parcel of land to the south – a proposed acquisition to provide additional park services, activities and facilities. The road also inhibits the ability to design a safe multi-use path along the Bear Creek corridor and the ability to separate emergency vehicle use from pedestrian access.***

The commenter writes that the statement that the Proposed Project would not result in cumulatively considerable impacts to pedestrian and bicyclists has been explained in comments above. Additionally, those concerns are mitigated in previous comments regarding the temporary use of the existing road, erection of a fence to separate public use and fire department operations, and willingness to actively participate in future pathway planning if and/or when funding becomes available. Responses to the direct impacts above indicate that development of the Proposed Project would not result in cumulative considerable impacts to pedestrians and bicyclists, as there are no other planned projects that would result in incremental impacts that, as a whole, could be considered significant.

***Mixing a) large emergency and structural fire fighting apparatus; b) wildland fire fighting material & equipment; c) personal vehicles of both wildland fire fighter’s living in this structure and those that commute to work here; along with d) day-to-day movement of equipment, space needed for outdoor storage, hose drying, etc., with children’s birthday parties, wedding receptions and children using the play park simultaneously are not compatible activities and is asking for an accident to happen.***

The commenter states that firefighting operations and other recreational uses on the project site are not compatible on the project site. As stated above, these uses operate concurrently under existing conditions and FEMA’s funding of the development of the Proposed Project would not result in new impacts.

Additionally, eliminating USFS occupancy reduces station use over average levels of the past decade. Residential use of the fire station would not occur, daily use of the station would cease and parking impact on the park would be substantially reduced. Exclusive use by the Volunteer MCFD Company would be less than two hours per day every third day.

***It is imperative that the site design, as shown on the construction drawings with the access road surrounding the Community Hall constitutes a major conflict and public safety issue.***

The commenter again states that a conflict with the Community Hall and the proposed fire station would be significant. Please refer to the above response regarding compatible uses of the site.

***“Development of the project site would be an improvement over the existing fire station and would be consistent with the existing community hall. Any future development in the vicinity would be subject to County review and approval, and potentially significant impacts to visual resources and would require mitigation such as landscaping shielding and specific design provisions”. This statement at the bottom of page 3-40, is not substantiated.***

The commenter says the statements regarding the development of the Proposed Project would be an improvement and be consistent with the existing uses of the site are unsubstantiated. The existing community hall is a 15-year-old metal building that has not been well cared for and offers little aesthetic value to the park environment. As previously stated, the current fire station is an unsafe structure, does not meet the current emergency service needs of the community and is not at all in concert with the park’s current visual values. The development of the Proposed Project would represent a considerable improvement over existing conditions.

***The increase size, massing, and scale of the new structure, as shown on the construction drawings, is not consistent with the existing Community Hall, and because of the buildings proximity to CalTrans property line, there is little to no possibility to establish an effective “landscape shielding”***

The commenter states that based on the size and location of the project, there is little to no possibility to provide landscape shielding. Comment noted and landscape shielding is not required as the development of the Proposed Project would provide an improvement over existing aesthetics on the project site.

# ***ATTACHMENT A***

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***COMMENT LETTER***

2011 APR 12 PM 12 40

8 April 2011

To: Donna Meyer, Deputy Regional Environmental  
and Historic Preservation Officer  
Environmental and Historic Preservation Office  
FEMA Region IX  
1111 Broadway, Suite 1200,  
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From: Donald Fox  
5511 Pennyroyal Lane  
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209-966-5511

Subject: Midpines Fire Station Environmental Assessment

Construction of a new fire station will indeed result in a beneficial effect on the Mariposa County Fire Department Company 21's fire and emergency response services. Following a review of the Environmental Assessment I offer the following comments and concerns about the proposed project, alternatives, and recommendations for impact avoidance, and mitigation measures.

**Section 1.3; Purpose and Need for the Proposed Action**

- This section fails to completely describe the current existing operations, description of the existing facility, and how it is shared with the US Forest Service. The scope of the proposed project, as described to the community in October 2009, includes demolition of the existing two-bay 2,000 square foot building with a 4,800 square foot facility; with 4 bays to accommodate fire apparatus, living quarters for fire fighters, and a road around three sides of the Community Hall to access the two bays facing south. This is relevant information needed to fully grasp the scope and impacts of the proposed action.
- The sentence at the bottom of page 1-5, "*The current site is part of the County Park, has adequate room, and would be located on land currently graded for the existing fire station and properly zoned for the land use.*", fails to truthfully describe the fire station setting and how the park and recreation uses of the land compete with fire station needs for space and should be more articulate to assist in fully evaluating impacts and mitigation of the proposed action and alternatives.
- The fire station is in fact one of four functions that compete for space on this 4 acre parcel of land. Park and recreation facilities and services; including: 1) a tot lot; 2) picnic area and picnic shelter, 3) public restroom, and 4) space for gold panning. In addition, the Community Hall serves a myriad functions including: 1) a meeting facility; 2) election polling place; 3) child care; 4) church services every Sunday; 5) the facility is rented for weddings, birthday parties, memorials, and numerous other social gatherings & events; 6) a bus shelter and the existing

paved parking lot accommodate County residence and visitors who travel to Yosemite National Park, and 7) the parking lot serves as a Yosemite Area Regional Transportation System (YARTS) transit bus turnaround, and 8) 6-9 Company 21 Fire Station and US Forest Service wildland fire employee vehicles.

### **Section 2.3; Alternatives Eliminated from further Consideration**

- Section 1.3, Purpose and Need, does not identify the full spectrum of existing and long-range needs for fire related outdoor equipment storage, parking, hose drying, etc., and outdoor living space for resident fire fighters.
- One important alternative is missing! To fully understand the magnitude of this project, there needs to be an alternative that evaluates only replacing the 2,000 square foot two-bay facility and its office and storage space for the structural fire needs of Mariposa County Fire Department Company 21 and NOT provide space for US Forest Service Wildland Fire fighting operations.

### **Section 3.0; Affected Environment, Impacts, and Mitigation for the Alternatives considered.**

#### **3.2 Water Resources**

- **Alternative A** fails to provide data and describe impacts and consequences on water resources associated with the employees living in this facility as well as the projected demand to supply fire fighting equipment.

#### **3.7 Transportation and Circulation**

- The statement on page 3-30, "*The project site includes amenities for pedestrian use (picnic tables and restrooms); however, pedestrian circulation is limited to the park area and the community hall. There are no bicycle circulation facilities on the project site. There are no pedestrian or bicycle facilities along SR-140 adjacent to the project site*", is incorrect. Discussions about the need, location, and impacts associated with the construction of a multi-use path along Bear Creek began in the late 1990's with Gwendolyn Foster, Department of Public Works Engineer.
- **Alternative A** as designed with a new access road around the Community Hall will conflict with long-range plans to construct new recreation amenities.
- With two vehicle bays facing south and the need for a new access road slicing through the south lawn on the back side of the Community Hall, vehicle traffic will: a) impact Community Hall parking, b) conflict with pedestrian circulation, and c) displace land currently used for recreation activities by individuals use who rent the community Hall.
- The statement at the bottom of page 3-30, "*Operation of the proposed fire station would not result in new impacts to the on-site pedestrian facilities. There would be no adverse impact to transportation with the implementation of **ALTERNATIVE A.***" is simply not substantiated. Events during summer often generate well over 100 individuals that use and enjoy both indoor and outdoor facilities on the south side of the Community Hall. Summer is also when fire fighting operations is busiest and **Alternative A**, as shown in the 70% construction drawings with a new access road on the south side of the Community Hall, will result in serious conflict and safety risk with pedestrian.



## Aesthetics

- Development of **Alternative A** failed to comprehensively evaluate the consequences of how this new interagency fire station harmonizes with the aesthetic qualities of this Midpines rustic site. As shown on the construction drawings, the new facility is more than double the square footage and volume of the existing fire station and is situated nearly 10 feet lower in elevation than Highway 140 - a designated scenic overlay, with no existing vegetation on the CalTrans-owned road fill slope to visually mitigate the new structure.

Subsequently, visitors and residents will be looking directly down and at the massive highly reflective steel roof surface. Furthermore, design details on the drawings; such as, roof pitch; scale, mass, volume; proportion; lack of architectural detailing; color; texture; etc.; a) effect the quality of the driving experience for visitors and residents as they pass through Midpines en route to/from Yosemite National Park; b) will be a significant change to the Midpines built environment; and c) because of the buildings proximity to CalTrans property line, there is little to no place to plant trees to effectively visually mitigate the structure.

Looking at both Environmental Assessments and architectural plans for the proposed Fish Camp and Midpines fire stations, it is apparent that the goal is to use the same layout and design for both sites. While attempting to apply one design solution to two completely different sites MAY save money, the two sites have little in common. The proposed new Fish Camp fire station will be located a) on a secondary road away from the scenic highway 41 southern approach to Yosemite National Park; b) the proposed site allows for 2 entrance roads; c) the fire station will not share its site with any other community activity or function; and d) it has entirely different structural engineering and mitigation needs (snow loads, soil cuts/fills, visual screening, etc).

The new Midpines structure is just too significant addition to the rustic Midpines pine-studded site to **not** be carefully designed by a **qualified** architect to insure that it is compatible and respectful of the County Park setting, both natural and human-made.

The Board of Supervisors-appointed Planning Advisory Committee begun the process of defining goals, objectives for future growth and development, and the unique sense of place embodied by this place called Midpines two years ago. Aesthetics and the quality of the built environment are an important long-term goal. The construction of new private and public structures are anticipated, in fact, welcomed elements of the long-range plan and will influence and re-shape the built environment of Midpines and creative contemporary interpretation of rustic design principles which retain validity today should be incorporated into the architectural solution for this new Midpines fire station.

It is imperative that we take time, care, craft, and attention to details appropriate to this new civic project. The Fire Department worked hard to articulate structural and wildland fire station needs and function. There is no evidence that any time has been devoted to aesthetics, visual quality, and architectural details for this important piece of civic architecture to insure that this new fire station blends into the site as though a part of it.

### **Cumulative Impacts**

- *"The Proposed Action would not adversely affect a pedestrian or bicycle networks under the Cumulative plus Proposed Action conditions. None of the known cumulative scenario projects are expected to affect these networks. No cumulatively significant impacts would occur".* This statement is not substantiated.

The site plan, with the proposed access road surrounding the Community Hall, as shown on Figure 4 and on the construction drawings, clearly impacts existing pedestrian use in and around the park and Community Center and the proposed access road to the south side of the new fire station clearly inhibits the ability to design safe pedestrian access to the adjacent parcel of land to the south – a proposed acquisition to provide additional park services, activities and facilities. The road also inhibits the ability to design a safe multi-use path along the Bear Creek corridor and the ability to separate emergency vehicle use from pedestrian access.

- Mixing a) large emergency and structural fire fighting apparatus; b) wildland fire fighting material & equipment; c) personal vehicles of both wildland fire fighter's living in this structure and those that commute to work here; along with d) day-to-day movement of equipment, space needed for outdoor storage, hose drying, etc., with children's birthday parties, wedding receptions and children using the play park simultaneously are not compatible activities and is asking for an accident to happen.

It is imperative that the site design, as shown on the construction drawings with the access road surrounding the Community Hall constitutes a major conflict and public safety issue.

- *"Development of the project site would be an improvement over the existing fire station and would be consistent with the existing community hall. Any future development in the vicinity would be subject to County review and approval, and potentially significant impacts to visual resources would require mitigation such as landscaping shielding and specific design provisions".* This statement at the bottom of page 3-40, is not substantiated.

The increased size, massing, and scale of the new structure, as shown on the construction drawings, is not consistent with the existing Community Hall, and, because of the buildings proximity to CalTrans property line, there is little to no possibility to establish an effective "landscape shielding"

