



Protect America's Climbing

February 3, 2023

Superintendent
Yosemite National Park
Attn: Visitor Access Management Plan
P.O. Box 577
Yosemite, CA 95389

RE: Access Fund Comments on Yosemite National Park Visitor Access Management Plan

Yosemite Planners:

The Access Fund welcomes the opportunity to submit these comments to Yosemite National Park's (YNP) Visitor Access Management Plan. We provide these comments to assist YNP planners in developing appropriate and effective alternatives for this plan that will also inform additional future management plans in Yosemite affecting climbing.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 13,000 members and 100 local affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. California is our largest member state and Access Fund members across the country regularly travel to Yosemite to climb at this world-class destination. Access Fund has a long history working with Yosemite planners on a range of management initiatives including the Merced River Plan and many other management plans and issues affecting climbing and the climbing environment in Yosemite National Park. We welcome this additional opportunity to participate in the development of Yosemite's Visitor Access Management Plan. To learn more about us, visit www.accessfund.org.

Yosemite Climbing

Yosemite National Park contains many of the world's most celebrated and iconic climbing objectives and managing climbing activity in Yosemite involves special attention to protect the unique qualities of the area, preserve important values on historic routes, and allow for the exploration of the extensive adventurous and technical terrain that make the Yosemite climbing experience unique, both in and outside of designated wilderness. This Visitor Access Management Plan will serve as the basis for management standards and desired conditions that will influence the development and implementation of climbing management policies for Yosemite, including potentially a future wilderness plan and climbing management plan. Accordingly, we provide the following comments with consideration

towards how the specifics of this plan might affect both the implementation of this Visitor Access Management Plan as well as the development of future plans that address climbing management.

COMMENTS

The Access Fund agrees with NPS planners that Yosemite offers world class experiences, and a welcoming environment for all visitors, and protection of nationally significant resources is of paramount importance. Due to rapid growth in day-use visitation and changing use patterns, NPS planners should consider the best way to manage visitor use to protect park resources and optimize quality visitor experiences. Yosemite planners intend this Visitor Access Management Plan “to evaluate how different management strategies, including reservation systems, could help meet long-term resource and visitor experience goals.” We agree that resource protection and long-term visitor needs are important goals, but that reservation systems are only one strategy planners should consider to accomplish these goals.

The experiences in Yosemite that are most important to the Access Fund and our members focus primarily on the world class climbing opportunities found only in Yosemite National Park. However, we also have a very strong interest in camping, hiking and a range of other issues such as fees, quotas, stay limits, commercial services, noise, permitting, the protection of wilderness character, and the general experience of climbers that visit the park.

For most climbers the best part of their experience in Yosemite is climbing on the incomparable walls of Yosemite Valley and elsewhere throughout the park. Multi-day big wall climbing like that found in Yosemite can be found nowhere else and the Valley has long been a proving ground for many climbers seeking to improve their skills and test their abilities against Yosemite’s high-quality granite. The free climbing in Yosemite—where standards have been set over the course of several decades—is also one of the most unique and high-quality experiences climbers find in Yosemite. Moreover, the big wall, multi-pitch climbing experiences as well as the free climbing opportunities in Yosemite also benefit from the park’s wilderness character, as climbers highly value opportunities to climb in pristine, untrammeled environments.

Some of the worst parts of the climbing experiences in Yosemite include crowding, noise, difficulty finding camping opportunities, and the inability to experience long stays required for training and learning the skills required to scale Yosemite’s big walls. Indeed, a significant barrier that gets in the way of climbers enjoying or visiting Yosemite include difficulty finding camping opportunities, especially given the restrictive stay limits in the park: a 30-night camping limit within Yosemite National Park in a calendar year, and a 14-night camping limit from May 1 to September 15 (including wilderness camping). This is not enough time for climbers to train/prepare for Yosemite’s big walls and complete specific climbing objectives that often require multiple days and repeat attempts. See below some additional recommendations for the Yosemite project team to consider for this Visitor Access Management Plan.

Visitor Use and Capacity

During previous public engagement efforts by Yosemite National Park regarding visitor use and capacity issues, park planners have discussed incorporating “adaptive decision-making framework” into planning, including specific management concepts and ideas related to a trailhead quota system, destination-based quotas, zone quotas, or using a designated campsite function to manage for visitor use limits. Presumably, once quotas or other use limits are set, the park would at some point then implement a reservation system to help manage and keep specific areas, zones or locations within the prescribed

quotas. We believe that planners should base any new management prescriptions first on clearly defined desired conditions, with the means (i.e., quotas) to achieve those conditions backed by scientific data. That is, visitor use management tools focus primarily on managing visitor use through various quota mechanisms, but concepts and ideas should describe how planners will determine the specific targeted conditions that these quotas are designed to achieve or maintain.

Once a comprehensive set of desired conditions is articulated, then YNP planners should consider what common management tools, such as quotas, would be most effective for managing visitor use. We have analyzed quota concepts for managing visitor use as they relate to climbing use in Yosemite, and our overall concern is that the quotas established for non-climbers could unintentionally impact climbing use in YNP. In other words, trail-users create and experience different social conditions than climbers, as rock climbers utilize both trail and off-trail approach routes to specific climbing area destinations that are typically not shared with other user groups.

A trailhead quota approach does not accurately capture all trail users or manage where groups go once past the trailhead. In many instances this concept would not be applicable to climbers who commonly use non-system trails or go off trail to access climbs. We suggest—even if a trailhead quota system is implemented—that park managers continue to allow (permitted) bivouacs for climbers where necessary to achieve their climbing objective as long as they observe NPS rules and policies and observe Leave No Trace Principles. Likewise, a designated campsite approach for managing visitor use is often not applicable to climbers as they frequently bivouac on the wall itself when targeting longer climbing objectives. While we assume this designated campsite management approach would be directed more towards traditional backpackers in YNP backcountry, it is unclear how this might impact climber overnight use in the backcountry and we question whether this potential management tool will apply to climbers who require an overnight bivouac to complete, approach, or return from a climb.

Where appropriate, we support a combination of destination quotas and zone quotas for managing visitor use. The destination quota approach is similar to the current management of the popular Cables Route up Half Dome. This form of management is appropriate for “special destinations” such as Half Dome, which draw large crowds of people to high use “hot spots.” Planners may find that additional locations that attract high use levels in Yosemite warrant “special destination” status and apply a destination quota as an appropriate management tool to for managing visitor use as a means to achieve desired conditions. We expect that prior to the park imposing additional destination quotas, planners will conduct adequate visitor use pattern and carrying capacity studies in order to determine appropriate desired conditions for each “special destination.”

We also support zone quotas and believe that zones can be used to manage social and environmental conditions as well as determine, if necessary, the appropriate time and scope for mitigation. However, given the diversity of visitor use, wilderness character, and management needs at different locations in Yosemite, planners should consider developing multiple zones for this plan with each designed to accommodate the needs and use patterns of appropriate visitor uses. As with all the quota concepts, prior to applying a zone quota park planners should clearly articulate the desired condition for each zone based on well-substantiated social science.

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Thank you for considering the Access Fund comments to the Yosemite National Park Visitor Access Management Plan. As noted, we believe that the establishment of a range of management zones that

identify diverse desired conditions will protect and maintain the park's unique resources while designing appropriate management actions related to visitor use at different zones throughout the park. We also believe that a destination quotas approach may be appropriate for select special destination high use "hot spots" and that developing multiple zones with identified capacity limits and desired conditions will assist park planners to plan for the appropriate categories of overnight camping/bivouacs, recreational access, trail management, commercial services, soundscapes, and stock use. The development of these zones with identified desired conditions, quotas, and management mechanisms will also allow NPS planners to subsequently develop effective and appropriate management plans affecting climbers in Yosemite.

Please let me know if you have any questions or comments related to these comments, and we look forward to working with Yosemite planners throughout all phases of this important planning initiative.

Regards,

A handwritten signature in black ink, appearing to read "Jason Keith". The signature is stylized and cursive.

Jason Keith
Senior Policy Adviser
The Access Fund

Cc: Yosemite Climbing Association