



February 3, 2010

Yosemite National Park Superintendent
Attn: Merced River Plan
P.O. Box 577
Yosemite, CA 95389
Email: yose_planning@nps.gov

RE: Access Fund Scoping Comments on the Merced Wild and Scenic River Plan

Dear Yosemite Planning Team:

The Access Fund welcomes the opportunity to submit these scoping comments on the National Park Service's (NPS) Merced Wild and Scenic River Plan ("Merced River Plan" or MRP). We provide these comments to better inform Yosemite National Park (YNP) planners and help identify the appropriate scope for the Merced River Plan. We also wish to help protect the Merced River corridor "for the benefit and enjoyment of present and future generations" as required by the Wild and Scenic River Act.¹ Our comments are focused primarily on the Yosemite Valley and Gorge segments of the river corridor and secondarily on the Wilderness segment.

The Access Fund

The Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 1.6 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization, with over 15,000 members and affiliates. Many of our members climb in Yosemite National Park. The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers.

The Access Fund has a long history of participation in Yosemite National Park management initiatives. For example, the Access Fund submitted extensive comments on the Valley Plan in 2000, the Yosemite Falls Plan in 2001, the Yosemite Lodge Redevelopment Plan and Valley Implementation Plan in 2003, and earlier efforts on a Merced River Plan. The Access Fund also

¹ 6 U.S.C. §§ 1271-1287.



testified at a 2003 congressional field hearing in YNP regarding the Parkwide Out-Of-Valley Campgrounds Study, and provided lengthy informal input regarding a climbing management plan for Yosemite Valley and a redesign project for Camp 4 (which was partially addressed in the Lodge Redevelopment Plan). We also provided scoping comments to the Tuolumne River and Meadows Plan and will contribute comments when YNP publishes draft alternatives. In the 1990s the Access Fund built a climbers' trail to the Sunnyside Bench area in the Valley, and in 2005 we provided grant funding for bear boxes placed at strategic locations in Yosemite Valley to serve the needs of wall climbers who lack food storage while they are on overnight climbs.

In 2009, we awarded a grant to Yosemite National Park for the creation and printing of a brochure for climbers visiting Yosemite. In partnership with the Yosemite Climbing Association, the American Alpine Club, Friends of YOSAR, and the Yosemite Mountaineering School, the Access Fund also helped produce this brochure which includes guidance for low-impact climbing and camping, safety information, maps, and descriptions of various climbing opportunities in the Park. The Access Fund continues to communicate with planners at YNP regarding future planning initiatives and implementation plans, such as those scheduled that will affect El Capitan Meadow, Camp 4 (and camping issues park-wide), climbing management policies, and noise. Finally, the Access Fund is proud to annually support the Yosemite Climbing Association's "Yosemite Facelift" scheduled every year at the end of September.

The Access Fund supports all types of climbing, from urban sport climbing to pristine alpine wilderness mountaineering, including climbing experiences in protected environments such as those mandated by the Wild and Scenic River Act (WSRA) and the Wilderness Act. We also believe that these special environments are entirely appropriate for recreational uses, and that compatible and historic activities such as climbing in Yosemite should be recognized under the WSRA as Outstandingly Remarkable Values (ORVs). Indeed, NPS policies support activities (like climbing and camping) that promote a "direct association with park resources"² and climbing in Yosemite is dependent on the topography and ecology provided by the Merced River. The Access Fund supports the protections required by the WSRA and Wilderness Act, as well as NPS planning and management policies that provide and enhance climbing and camping opportunities.

² NPS Management Policies, 8.2 Visitor Use (2006). "To provide for enjoyment of the parks, the National Park Service will encourage visitor activities that ... will foster an understanding of and appreciation for park resources and values, or will promote enjoyment through a direct association with, interaction with, or relation to park resources." See http://www.nature.nps.gov/naturalsounds/PDF_docs/Visitor_Use_8.2.pdf.



Climbing Should Be Identified as an Outstanding Remarkable Value (“ORV”)

The Wild and Scenic River Act provides for the preservation of “outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values.”³ Climbing in the Merced River planning area fits the “recreational” category for an outstanding remarkable value (ORV) and must be protected and enhanced as such. To be included as an ORV, a value must meet two criteria. It must be 1) river-related, and 2) a unique, rare, or exemplary feature that is significant at a comparative regional or national scale.⁴ Recreational rock climbing in the Merced River planning area meets this test.

To be river-related, a recreational value must 1) be located within a quarter mile of the river and 2) owe its location or existence to the presence of the river.⁵ Much of the climbing in Yosemite Valley and Merced River Gorge segments of the planning area lies within a quarter mile of the river. An enormous amount of climbing also lies immediately outside of this management boundary, including world class climbs such as El Capitan. Yosemite climbing occurs on rock formations carved by the Merced River and its glaciers. While climbing does not take place directly in the Merced River (and for this reason does not pose a threat to its ecosystem), the activity is undeniably linked to the river and its processes.⁶ In fact, climbing could not exist without the contributions of the Merced River to the geological history of Yosemite Valley. The very walls and boulders that climbers enjoy are a product of twenty-five million years of sculpting by the river and multiple glaciers, a process that has created the most spectacular climbing in the world. Climbing in Yosemite is inextricably linked to the river, and consequently is river-related for purposes of the Wild and Scenic Rivers Act.

The second ORV eligibility criterion is that a particular recreational activity “have the potential to be popular enough to attract visitors from throughout or beyond the region of comparison or [be] unique or rare within the region.” Outstandingly remarkable recreational values should attract visitors “willing to travel long distances to use the river resources for recreational

³ 6 U.S.C. § 1271.

⁴ Interagency Wild and Scenic Rivers Coordinating Council, *The Wild & Scenic River Study Process*, 1999. See <http://www.ncrc.nps.gov/rtca/nri/eligb.html>.

⁵ Interagency Wild and Scenic Rivers Coordinating Council, *The Wild & Scenic River Study Process*, 1999 at 12.

⁶ Thousands of climbing routes lie directly within the Merced Wild and Scenic River management corridor, including many world-famous climbs such as Arch Rock, Cookie Cliff, Elephant Rock, The Rostrum, Lower Cathedral Rock, and Liberty Cap.



purposes” and the “river may provide, or have the potential to provide, settings for national or regional usage or competitive events.”⁷

Yosemite Valley is the most challenging, historic, well-known rock climbing area in the world, and known to climbers from Norway to Japan simply as “the Valley.”⁸ Climbing in Yosemite has inspired a score of climbing guidebooks, thousands of unique routes, and countless stories and legends. Moreover, Yosemite has been the site of practically every advancement in climbing technology, technique, and ethical standards for the past sixty years. As noted, climbers travel from all parts of the Earth to experience the unique and rare climbing experiences found only in Yosemite Valley and the Merced River planning area. Climbing in Yosemite Valley’s Merced River planning area is a unique, rare, and exemplary recreational activity that is significant regionally, nationally and internationally. That Yosemite Valley is a rare and unique climbing resource is a vast understatement, akin to claiming Yellowstone National Park has a few unique geothermal features.

Climbing also has characteristics that set it apart from other forms of recreation that together constitute the recreational ORV for Yosemite Valley and the Lower Merced Gorge. The National Park Service notes that recreational ORVs could include, but are not limited to, sightseeing, wildlife and botanical observation, camping, picnicking, photography, hiking, backpacking, swimming, fishing, floating, boating, writing, contemplation, nature study, photography, artistic expression, and participating in Park education and interpretive programs.⁹

The most important characteristic to climbers is that the climbing opportunities in Yosemite Valley are of a quality, length, density, number and accessibility that cannot be found anywhere else in California, the United States, or the world. This goes to the second ORV criterion. We think the most important characteristic to planners should be that unlike many other forms of recreation, for climbing the breathtaking scenery of Yosemite Valley is not simply a stunning

⁷ Interagency Wild and Scenic Rivers Coordinating Council, *The Wild & Scenic River Study Process*, 1999 at 13. <http://www.ncrc.nps.gov/rtca/nri/eligb.html>

⁸ In the past, Yosemite National Park has recognized the unique role that climbing has played in Yosemite Valley. During efforts to determine Camp 4 as eligible for listing on the National Register of Historic Places, Don Klima with the Advisory Council on Historic Preservation said that “During the period 1947 to 1970, the Yosemite Valley region was an exceptionally important center of rock climbing activity. Activities and technological advancements and skills developed here made significant contributions at the regional, national and international level within the sport. World-renowned climbers such as Tom Frost, Royal Robbins, and Yvon Chouinard, were among the pioneers of this sport who developed equipment, techniques, and forged new routes in Yosemite, considered a Mecca for rock climbers. They used Camp 4 as a base camp. Camp 4 is listed on the National Register of Historic Places because of its nationally significant role in the development of rock climbing as a sport. The documentation makes a strong case for the “exceptional significance” of Yosemite National Park within the context of modern mountaineering and rock climbing history.” See <http://www.nps.gov/archive/yose/news/2003/camp0227.htm>.

⁹ NPS, *Yosemite National Park, Merced and South Fork Merced Wild and Scenic Rivers Draft Outstandingly Remarkable Values Report*, February 2008 at 10.



backdrop; it is the fabric on which climbing occurs. Given that the Valley walls are an integral feature of the river, and that viewing them makes some forms of recreation outstandingly remarkable, it follows that climbing is also an outstandingly remarkable recreational value. A third unique aspect of Yosemite climbing is that it is dispersed in the management area both horizontally and vertically, whereas most other potential recreational ORVs experience the river corridor only on the Valley floor. Accordingly, YNP should reference climbing as an outstandingly remarkable (recreation) Value in its ORV report due for publication in the spring of 2011.

Yosemite's User Capacity Framework Should Consider Climbing's Unique Characteristics

The Wild and Scenic Rivers Act requires that wild and scenic rivers “be administered in such manner as to protect and enhance the values which caused it to be” designated.¹⁰ In order to protect and enhance climbing as a recreational ORV,¹¹ Yosemite National Park should consider the unique characteristics of climbing, and develop management policies in the MRP that enhance the climbing experience while protecting current use levels and environmental conditions.¹² To protect and enhance Yosemite climbing, the MRP should address:

- Transportation into the Park. Climbers must have ability to drive vehicles into the Park. Climbing in Yosemite often requires a significant amount of gear. The ability to bring climbing gear, in addition to camping gear, necessitates the use of personal vehicles. Restricting entrance into the Park to public transportation would significantly hinder the climbing experience.

¹⁰ 16 U.S.C. § 1281.

¹¹ Even if climbing is not considered a recreational ORV for the purposes of the Merced River Plan, Yosemite National Park should consider these characteristics while developing the MRP so that climbing as an activity is not negatively and unnecessarily affected by the Park's user capacity program.

¹² The unique characteristics of climbing in Yosemite Valley may also be researched in the following guidebooks:
Wilder, Matt, and Chris McNamara. *Yosemite Valley Bouldering*. Supertopo, 2007.
McNamara, Chris, and Erik Sloan. *Yosemite Big Walls*. Supertopo, 2005.
Barnes, McNamara, Snyder, and Steve Roper. *Yosemite Valley Free Climbs*. Wilderness Press, 2003.
Chris McNamara. *The Road to The Nose*. Supertopo, 2001.
Don Reid. *Yosemite Climbs: Big Walls*. Falcon, 1998.
Don Reid. *Rock Climbing Yosemite's Select*. Falcon, 1998.
Don Reid. *Yosemite Climbs: Free Climbs*. Falcon, 1994.
George Meyers. *Yosemite Climbs*. Chockstone Press, 1987.
Steve Roper. *A Climber's Guide to Yosemite Valley*. Random House, Inc., 1982.

The Access Fund and its partners are currently exploring a much more detailed report of the behavioral trends of climbing in Yosemite Valley that we will submit to the Park Service in coming months.



- Increased camping opportunities, with more primitive sites and a volunteer work program to allow climbers to camp for the longer periods necessary to plan, prepare for and carry out Yosemite Valley's longer climbs. Climbers must have access to affordable overnight camping.
- Parking spaces at traditional climbing access trailhead locations. Climbers must have the ability to Park within a reasonable distance from the many existing climbing access trailhead locations. The sheer height and difficulty of Yosemite's walls often requires climbers to bring overnight climbing equipment and provisions, making it difficult to ride public transportation, and/or transport such gear over long distances without the use of personal vehicles.
- Intra-Park transportation with bus stops placed at major climbing access trailhead locations. To reduce vehicle congestion, the Access Fund supports intra-Park public transportation. We encourage the Park to place bus stops at traditional climbing access trailhead locations to accommodate climbers doing day ascents, or who otherwise will not need to carry bulky overnight climbing equipment. A Valley-wide free bike program should also be considered.
- Maintained climbing access trails with minimal, climbing-specific or no trailhead markers to limit attracting non-climber access (like the posts with carabiners on them that Joshua Tree National Park has on their climber trails).
- Staging areas at the base of climbs, but also traditional locations to network socially and prepare for climbs such as the Camp 4 parking lot and El Capitan Meadows.
- Maintained climbing descent trails. Maintained climbing descent trails are critical for safety reasons and to avoid unnecessary impacts that result from multiple unmaintained descent trails.
- Ability to stay in the Valley for extended periods. The climbing in Yosemite is among the most difficult in the World and takes weeks to master even for expert climbers. It is therefore necessary that climbers, in order to adjust to Yosemite's uniqueness and difficulty and avoid accidents, have the ability to stay in the Park for extended periods of time.
- Amenities such as groceries, showers and a climbing equipment shop. Climbers from all over the world travel to Yosemite and rarely stay for less than a week. Consequently, it is necessary that climbers have access to basic amenities such as groceries and showering facilities.
- Interpretive and educational facilities for and about climbing, including a climbing museum.



- NPS support facilities and services, including Yosemite Search and Rescue and the Climbing Ranger program.
- The climbing school and guide service. The climbing school facilitates people’s entry into the sport of climbing, especially for children and young people who would otherwise not have an opportunity to experience climbing, particularly in an extraordinary environment like Yosemite. The guide service allows climbers at all skill levels to advance their skills and to safely and confidently climb routes they would not otherwise attempt.
- Reduced development in Yosemite Valley.

Critical to maintaining the outstandingly remarkable values of the climbing experience in Yosemite Valley and Merced River Gorge are the following qualities:

- A healthy and protected natural environment.
- Primitive camping opportunities.
- Effective transportation to and from climbing access trails
- A quiet soundscape consistent with the Valley’s wilderness designation, NPS regulations and the California Vehicle Code.
- Reduced development in Yosemite Valley.

Accordingly, the Merced River Plan should use the following tools and methods to implement a carrying capacity program as required by the WSRA and the National Park’s Service’s own management policies which prioritizes those activities with a “direct relation to park resources.”¹³

- Develop a plan for effective transportation into the Park from gateway communities and regional airports and other public transportation facilities in cities such as Fresno and Merced.
- Prioritize primitive walk-in camping over auto-camping; prioritize auto camping over RV-camping; and prioritize RV camping over lodging.

¹³ NPS Management Policies, 8.2 Visitor Use (2006).



- Develop an effective intra-Valley bus system that focuses on high-use trailheads and parking lots.
- Restore and slightly widen the Valley Loop Trail that circles the Valley away from the road and closer to the cliffs (away from the river). Visitors then could safely walk, run, or bike to all parts of the Valley without being forced to either drive their cars or try to share the road (as a hiker or bicyclist) with its dangerous traffic laced with highly distracted drivers. That Loop Trail would also greatly help to disperse visitors more evenly in the Valley, instead of having them compelled to congregate in a few areas.
- Enforce National Park Service regulations and California Vehicle Code restrictions on loud motorcycles and trucks, manage RV generator use to reduce conflicts at campgrounds, ban loud speakers on tour busses, and limit noise from trash pickup operations.
- Develop and implement management policies that reduce user conflicts (i.e., horses and hikers, RVs and primitive campers, loud campers and quiet campers, loud motorcycles and everyone else).
- Phase-out or de-emphasize recreational activities that have little or no “direct relation to park resources” (such as tennis and swimming pools) and which artificially increase the number of recreational users in the Park.
- Provide effective education and information on climbing management polices and environmental conditions to the climbing community through message boards, online websites, and inter-personal ranger-climber relations such as the Camp 4 Coffee and other public meetings.
- Provide minimal services at stores that supply groceries, automobile gas, climbing equipment, and showers.

Yosemite planners should take into account the unique characteristics of climbing when developing a user capacity framework for the Merced River planning area. Unlike other recreational uses such as hiking, picnicking, and boating, climbing is a widely dispersed activity taking place in a vertical landscape where there are thousands of possible routes and destinations. Moreover, most climbing routes are accessed through the Merced River planning area. Other activities, by comparison, are limited to a far fewer number of established trails, picnic sites, and boating locations.

Additionally, unlike other recreational uses, climbing depends on the whims of weather, and climbers’ plans must be flexible enough to accommodate changing conditions. A fast moving storm could be life-threatening for a pair of climbers 800 feet off the ground, and climbers must



be able to change their plans and objectives quickly. Because of the weather-dependent nature of their activity, climbers cannot always plan their specific routes in advance, except in the abstract. Any user capacity framework adopted by NPS must consider these unique aspects of climbing, since user capacity models that are designed for hiking or sightseeing may not take these factors into account.

The Merced River Plan Must Allow For Access to Park Areas Outside of the Planning Area Boundary

The Merced River Plan and any user capacity model adopted by the NPS must allow climbers to access areas outside the Merced River Plan boundary by passing through it. Many approach trails used to access climbing walls pass through the MRP planning area, but climbers' destinations are often outside these proposed boundaries. Even within the WSRA planning areas, Congress declared that selected rivers that

possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations." (emphasis added)¹⁴

Therefore, any user capacity model adopted as part of the Merced River Plan should not unreasonably restrict access to outstandingly remarkable recreational values *within* the planning corridor. Importantly, YNP should also not place unreasonable restrictions on legitimate activities located just *outside* of the Merced River Plan boundaries but which require access through the planning area. No other activity has the same dynamic as climbing whereby passage through the planning area at many dispersed locations is necessary, and it is critically important that YNP recognize this circumstance and manage for reasonable use limits at least consistent with existing climbing use levels.

The Merced River Plan Provides an Opportunity to Reverse the Increasing Urbanization of Yosemite Valley

Increase Camping Opportunities and Reduce Luxury Accommodations

One of the challenges of the MRP will be integrating NPS management policies into a plan where the requirements of the Wild and Scenic Rivers Act direct the planning process. Yosemite planners may effectively address the question of how to prioritize planning decisions by following the simple value system set forth in National Park Service Management Policies Section 8.2, which emphasizes visitor experiences that foster a "direct relation to park

¹⁴ 6 U.S.C. §§ 1271-1287.



resources.”¹⁵ This policy immediately suggests a natural hierarchy of overnight opportunities for Park visitors. Overnight visitor experiences that foster the most direct relationship with Park resources should be accorded the highest priority in Park planning, while those that foster the least direct relationship with Park resources should be accorded the lowest priority. Thus, in considering visitors’ overnight experiences for the Merced River Plan the NPS should prioritize backcountry camping first, followed in order by walk-to and walk-in campsites,¹⁶ drive-in campsites, RV camping, rustic lodging like Curry Village, then the Merced Lodge, followed last by the Ahwahnee Hotel. In the Merced River Plan this hierarchy can be achieved by expanding the number of walk-in campsites in the Valley while reducing the number of developed lodgings and RV sites.¹⁷ Using this prioritization hierarchy could allow YNP to reduce impacts to the river corridor from urban development while expanding the number of campsites in the Merced River planning area and in the process fulfill the purpose of the Park to foster a more direct relationship to park resources for many visitors.

For this reason, we believe the plan should fully consider the possibility of restoring camping in areas of Yosemite Valley where campsites have been removed, including the area east of the Ahwahnee Hotel and the Rivers Campgrounds, as well as in areas where more developed lodgings could be removed. In particular, we think the Ahwahnee cabins, the most expensive and space-consuming lodgings in the Valley and the primary reason this area would not be considered for camping, should be considered for removal. The camping experience in Yosemite has been recognized in earlier plans as a recreational ORV, an irreplaceable means of creating “personal memories, traditions, and multigenerational bonding among families and friends.”¹⁸ More campsites means more outstandingly remarkable experiences and accordingly camping should be encouraged as the primary option for overnight visitors to the Park. Thus, the potential for more camping sites—used by climbers as well as other recreational groups—should be studied in the Merced River Plan, while some existing camping sites could be altered from RV to walk-in to conform to the hierarchy set forth in NPS visitor use policies.

¹⁵ NPS Management Policies, 8.2 Visitor Use (2006).

¹⁶ In YNP’s *Campground Study*, a walk-in campsite is defined as one within 50 feet of parking, while a walk-to site is more than 50 feet from parking. *Campground Study* at B-11.

¹⁷ In previous comments The Access Fund has stated our support for less developed campgrounds that serve climbers and other backcountry visitors to Yosemite. Climbers and backpackers are able to use smaller, less-developed walk-in campgrounds without paved roads and running water. Because of the Yosemite National Park’s campsite shortfall and the demand for camping in Yosemite Valley, the Access Fund supports the continue review of all the potential camping areas studied in the 2002 Campground Study. The NPS should also coordinate campground planning with national forests outside the Park.

¹⁸ NPS, *Yosemite National Park, Merced and South Fork Merced Wild and Scenic Rivers Draft Outstandingly Remarkable Values Report*, February 2008 at 10.



Reduce Motorcycle, RV, Trash Disposal, Campground and Tour Bus Noise

Yosemite wilderness users are required to conform to strict guidelines to protect wilderness resources, and Yosemite National Park invests significant resources in enforcing wilderness regulations. The Park should spend a corresponding amount of effort to ensure that wilderness users receive the benefits of a wilderness experience, one that is not needlessly degraded by noise sources from outside wilderness. Yosemite is one of the nation's flagship parks and one of the world's premier climbing resources. It deserves noise protection that is consistent with its world-class status.

On weekends long lines of motorcycles, sometimes numbering as many as 60 according to entrance station staff, roar through the Valley and the Merced River planning area. Many of these motorcycles have altered mufflers that cause them to emit an ear-splitting roar. When groups of motorcyclists file through the Valley, they emit a tremendous thunder that can be heard for miles into the wilderness. In Yosemite, wilderness begins at 4,000 feet elevation (pretty much as soon as you get above the Valley floor) and motorcycle noise has a direct impact on climbing and many other types of outstandingly remarkable recreational values in the Merced River planning area. Climbers constitute one of the Park's major user groups in the wilderness immediately surrounding the Valley, and this noise has a very negative impact on the climbing experience.

Modified mufflers violate the California Vehicle Code, which YNP enforces.¹⁹ Motorcycle noise also violates NPS management policies that strive to "preserve, to the greatest extent possible, the natural soundscapes of parks . . . [which] exist in the absence of human-caused sound."²⁰ NPS policy also endeavors to "restore degraded soundscapes to the natural condition wherever possible, and will protect natural soundscapes from degradation due to noise."²¹ The already degraded soundscape in Yosemite Valley continues to deteriorate, and motorcycle noise is now a significant disturbance to climbers and others visiting Yosemite. The Merced River Plan should also address other noise sources that negatively impact ORVs in Yosemite Valley. These include

¹⁹ See Cal. Vehicle Code Sections 27150-59 (Exhaust Systems) and Sections 27200-27207 (Noise Limits) at <http://www.leginfo.ca.gov/cgi-bin/calawquery?codesection=veh&codebody=&hits=20>

²⁰ NPS Management Policies, 4.9 Soundscape Management (2001).

²¹ Id. NPS regulations also prohibit operating a motor vehicle that produces noise in excess of 60 decibels at 50 feet or makes noise "which is unreasonable, considering the nature and purpose of the actor's conduct, location, time of day or night, purpose for which the area was established, impact on park users, and other factors that would govern the conduct of a reasonable person under the circumstances." 36 CFR § 2.12.



recreational vehicle generator noise in campgrounds, the crash of dumpsters being emptied, and unreasonably loud campers.²²

It is unnecessary for the trash pickup at the campgrounds to occur early in the morning when campers on vacation are still trying to sleep. The enormous steel dumpsters make a tremendous crash when their lids fly open after being lifted above the trucks, followed by a second crash when the truck starts to lower the dumpster and the lid flops closed, then a third crash when the truck drops the dumpster to the ground. This process is repeated multiple times as each dumpster in a campground is emptied. The Park should reschedule these trash pickup times to preserve the soundscape in the MRP planning area. The Park should also do more to manage loud campers—by way of information and education—to limit, for example, radio noise and barking dogs. Lastly, the open megaphone used by the tour guides on the Green Dragon is a needless source of noise, one much heard by climbers in the Valley’s wilderness areas. This megaphone could easily be replaced by headphones or the hand-held recording wands commonly used in tours of monuments and museums elsewhere.

Conclusion

The Access Fund hopes these scoping comments assist the NPS in identifying the proper planning scope for the Merced River management corridor and produce a better plan. In short, we support recognizing climbing as an outstandingly remarkable value for the Merced River planning area, and we believe that Yosemite’s user capacity framework should consider climbing’s unique characteristics. We provide several suggestions herein for the user capacity plan and will submit more detail in the next few months that will assist YNP to protect and enhance climbing and its unique characteristics in Yosemite Valley and the Lower Merced Gorge. The Merced River Plan also provides an opportunity to manage the increasing urbanization of the Yosemite Valley, including reducing luxury accommodations in favor of campsites and addressing problematic noise pollution, and the MRP must allow for access to Park areas outside of the planning area boundary.

Thank you for considering the importance of Yosemite to climbers worldwide and for your hard work on this extensive planning process. If you have any questions or comments please contact me at 303-325-5936 or Jason@accessfund.org.

²² RVs are currently allowed to start their generators at 7:00 a.m. which is far too early, especially on Sunday mornings when many tired campers look forward to sleeping in following a long work week and a late Friday night arrival in the Valley. Generators are allowed to operate until 7:00 p.m., thereby assuring that they will be thudding while other campers’ are trying to enjoy their dinners. This is inexcusable. There is no legitimate camping function a generator performs that cannot be handled by battery power or propane. RVs in Valley campsites should be required to charge their batteries between 10:00 a.m. and 4:00 p.m. and to use battery power and propane outside those hours.



Sincerely,

A handwritten signature in blue ink, which appears to read 'Jason Keith', is positioned below the 'Sincerely,' text.

Jason Keith
Access Fund Policy Director

Cc: The Honorable US Congressman George Radanovich
Brady Robinson, Access Fund
Armando Menocal, Access Fund
Paul Minault, Access Fund
Paul Minault, Access Fund
Brian Poulsen, Access Fund
Phil Powers, American Alpine Club
Linda McMillan, American Alpine Club
Mark Fincher, Yosemite National Park Climbing Program Manager
Jesse McGahey, Yosemite National Park Climbing Ranger
Ken Yager, Yosemite Climbing Association
Chris McNamara, Supertopo