



Protect America's Climbing

December 14, 2011

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

RE: Access Fund Comments to the Merced Wild and Scenic River Planning Workbook

Dear Yosemite Planning Team:

The Access Fund welcomes the opportunity to submit these comments on the National Park Service's (NPS) Merced Wild and Scenic River Planning Workbook ("MRP Workbook"). We provide these comments to better inform Yosemite National Park (YNP) planners and help focus and refine planning alternatives for the Merced River Plan (MRP). These comments are provided in addition to the scoping comments we submitted in 2010.¹ The Access Fund applauds the work that Yosemite planners put into this excellent and informative workbook, and the extraordinary efforts that the Park has committed to public outreach during the Merced Wild and Scenic River planning process such as webinars and public meetings.

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 2.3 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. California is our largest member state and Access Fund members across the country regularly travel to Yosemite to climb at this world-class destination. The Access Fund has a long history of participation in Yosemite National Park management initiatives,² and we welcome this additional opportunity to participate in the development of the MRP planning alternatives.

COMMENTS

The Access Fund has the following suggestions to improve the alternatives presented in the MRP Planning Workbook. Our comments are numbered to match the numbered issues outlined in the Workbook:

Valley Camping Demand: Issues 9, 12, 14, 19, and 23

Restore an Appropriate Ratio of Camping v. Lodging

The MRP should reverse the lodging/camping ratio in the Valley (currently about 60/40) to provide more camping and phase out developed lodging by moving lodging to the Park's boundaries. Providing more camping in the Park, and limiting lodging in the Park to rustic/primitive accommodations, recognizes that camping is a form of recreation, and that recreation is recognized in the Plan as an ORV. By contrast, lodging is the consumption of commercialized personal services and is a form of leisure which is not recognized as an ORV in the MRP. This change is also consistent with the NPS's own management policies which encourage forms of recreation that promote a direct relationship to Park resources. Changing this ratio would also be more consistent with the character of Yosemite as a national park, as opposed to the luxury resort or amusement park that Yosemite often resembles. The MRP should also focus on improving the quality of the camping experience, which is characterized by crowded sites, antiquated restrooms, mixed RV and tent sites, lack of fencing and vegetation, widespread soil compaction and denuded areas, poorly defined tent sites, and crumbling roadways. For more detail on these proposals, please see the Access Fund's Valley Plan comments.³

Future Camping Locations

The MRP should restore as much camping as possible to sites that have already been disturbed such as the Rivers Campgrounds and the Pine and Oak lodging units that were damaged in the 1997 flood. These areas in particular could be engineered with the recognition that they will again be flooded. Also, to assist MRP planners in assessing sites in the flood plain, maps should indicate flood plain areas where shallow flood depths and low water velocities make the development of campsites feasible. The use of walk-in sites—which allow parking, toilets and other core infrastructure to be concentrated away from dispersed campsites—could assist in minimizing impacts to riparian values. Yosemite planners should recognize that the Park made the decision to locate developed lodgings in prime upland sites, giving priority to lodging rather than camping, and thus relegating camping and rustic lodging to sites with flood plain and riparian issues. The burden of correcting this inappropriate imbalance and restoring the ratio of overnight accommodations in the Valley should fall on lodging, not camping. Thus, if the MRP limits the number of sites in the Rivers Campground in favor of riparian values, for example, planners should seek to locate additional camping in sites now occupied by developed lodging rather than reducing the quantity and quality of camping opportunities.

In addition to the Rivers Area and the Pine and Oak area, other potential locations identified in the Workbook for possible camping, and other areas where we would support the creation of additional campsites, include:

- The Backpackers Expansion area and the area immediately east of the Ahwahnee cabins
- The old group sites east of Backpackers Campground

- The Stables Area
- The Upper Pines Loop Addition and Upper Pines Walk-In area
- The West of Lodge area and East of Camp 4 areas, and
- The Pine and Oak area

Another possibility for additional camping is to close off the road between The Stables and the Mirror Lake Trailhead (which would become a bus turnaround) and turn the area along this road and the lower north slope of the Medial Moraine into a walk-in camping area, with parking at The Stables. The Access Fund opposes new campsites developed in the West Yosemite Valley Area (i.e. Eagle Creek, Taft Toe, and West of El Cap Meadow) to avoid new development, noise, and congestion in this largely undisturbed part of the Valley.

The MRP should also establish a diversity of camping opportunities including: 1) walk-in, 2) walk-to, and 3) options where campers "drop-off" their gear, park, and walk-in to their campsites) and not just limit opportunities to drive-in campgrounds which are space-consumptive, noisy, and inappropriately mix RVs and tent campers. The MRP should bring campsite numbers at least back to pre-flood totals as contemplated in Yosemite's General Management Plan (there's currently a shortfall of 300 campsites). The Access Fund has long advocated for the addition of camping in the Park outside of Yosemite Valley,⁴ particularly at Foresta, and we urge MRP planners to incorporate expanded camping opportunities out of the Valley into the plans for the MRP corridor.

Retain the "Improvements" to Camp 4 from the Lodge Redevelopment Plan

Park planners should also include in the MRP the several "improvements" for Camp 4 that were contemplated in the Lodge Redevelopment Plan⁵ (which was stalled by the MRP litigation). These improvements include showers and updated bathrooms, fencing to encourage revegetation and limit loud bus noise, a foul weather cooking pavilion and communal fireplace, more separation from parking areas to reduce noise especially from buses, and a nearby location for Ken Yager's Yosemite Climbing Museum. Thought should also be given to ways to improve the quality of the camping experience in Camp 4, which is intensely crowded throughout the summer season. In addition to focusing on more camping in the Park, planners should also improve the quality of the camping experience, especially at locations such as Camp 4 where climbers are forced into highly dense and low-quality campsites. Planners should recognize the historic importance of this campground and improve some of the basic amenities such as the bathrooms.

El Cap Meadow and Informal Social Trails: Issue 21

El Cap Meadow is one of the most remarkable locations in Yosemite Valley, especially for climbers. In order to safely and successfully climb El Capitan, it is necessary to undergo extensive preparation. In addition to packing food, water, and gear for an ascent up El Capitan, it is critical that climbers

familiarize themselves with the route they intend to climb, and the features on that route, especially those visible from the ground. This is because climbing a wall of El Cap's magnitude almost always presents significant challenges with route finding. Accordingly, would-be El Cap climbers often spend hours, and in some cases, days, studying the features on El Cap through a telescope or binoculars in order to ensure adequate familiarity with their intended climb to avoid "getting off route" and getting a sense of scale. El Cap Meadow also serves as an important social focus for climbers, who come there to watch friends and other climbers on El Cap, enjoy views of the other formations in the Valley, relax in the sun, swim in the river, and escape the urban atmosphere of the mid-Valley area.

El Cap Meadow, particularly the east end of the meadow, is the ideal location for scouting climbing routes. MRP planners should ensure that measures to restore or harden El Cap Meadow do not unreasonably limit or prohibit climbers' access to this incredible and indispensable resource. Also, because El Cap Meadow lies at the center of the viewshed from virtually every climbing route on El Cap and other features in the west end of the Valley, planners should ensure that restoration or hardening measures are not unsightly from above. The MRP should consider a hybrid approach for a boardwalk further west of typical climber use areas, and use fencing and other ways to focus people onto a few discrete paths into the Meadow. It is critical the MRP allows climbers their traditional, low impact use of the Meadow.

River Access West of Pohono Bridge: Issue 22

The Merced River Gorge segment west of Pohono Bridge has a number of popular climbing areas, including Cookie Cliff, the Rostrum, Reed's Pinnacle, Elephant Rock, and others. Climber parking and approach access to these areas should be retained and improved to reduce impacts.

High Visitor Use/River Banks Impacts at Upper and Lower Pines Campgrounds: Issue 7

The only two options provided in the MRP Workbook to reduce river bank impacts at the Upper and Lower Pines Campgrounds are to eliminate or relocate campsites that are near the river. We believe that before these options are considered, efforts should first be made to fence and sign the areas of the riverbank to be protected, as has been done at Devil's Elbow, and then design river access points in resilient locations and restore riparian areas to natural conditions.

Parking, Transportation, Noise, and Inappropriate "Amusement Park" Attractions

- The Park should ensure climbing needs are addressed in the MRP, particularly parking locations throughout the Valley and the Merced Gorge segments (Cookie Cliff, Arch Rock, etc.). Where appropriate, roadside parking should be paved to reduce impacts and moved off the shoulder to improve safety.
- Park planners should ensure that there is adequate day use parking while pursuing a range of transit strategies to reduce auto use in the Valley. The Access Fund also supports:

- The expansion of transit opportunities to and in the Valley, and better information at and before entrances regarding parking and traffic conditions in the Valley.
- More access options to lesser attractions in the Park and surrounding area rather than regulatory solutions such as day-use reservations, parking permits and closures.
- Park-and-ride facilities outside the park but do not support them at the Taft Toe area because of new impacts caused to this largely undisturbed area.
- All reasonable day-use parking facilities should be developed or improved in the Valley, including Camp 6, Curry Village, and the wilderness parking lot.
- Peak season day use should be managed to reduce the number of autos circulating in search of parking.
- Non-resource based attractions and high-impact commercial amusements such as swimming pools, the skating rink, and horseback rides to Mirror Lake should be phased out.
- The Plan should include a noise control element that addresses noise sources such as idling tour buses, motorcycles, trash collection, RV generators, the Green Dragon touring flatbeds and others.

CONCLUSION

The Access Fund hopes these comments assist Yosemite planners to in identifying planning issues in the MRP that are important to the climbing community. The Merced River Plan 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 Plan 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.

Sincerely,



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¹ See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/Access%20Fund%20Scoping%20Comments%20to%20Merced%20WSR%20Plan.pdf>.

² In the 1990s the Access Fund participated in the development of a draft climbing management plan and 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 big wall climbers who lack food storage while they are on overnight climbs. 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 testified at a 2003 congressional field hearing in Yosemite National Park regarding the Park Wide 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. We also provided scoping comments to the Tuolumne River and Meadows Plan. 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. Finally, the Access Fund is proud to annually support the Yosemite Climbing Association's "Yosemite Facelift" scheduled every year at the end of September. See our extensive library of Yosemite comments at http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5050525/k.11DB/Position_statements.htm.

³ See http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CA--Yosemite%20Valley_4.22.2003.pdf.

⁴ See http://www.accessfund.org/atf/cf/%7B1f5726d5-6646-4050-aa6e-c275df6ca8e3%7D/ca_yosemite%20campgrounds_15_4.16.2003.pdf.

⁵ See Access Fund Comments to the Yosemite Lodge Area Redevelopment Environmental Assessment Concerning Camp 4 at http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CA--Yosemite%20Lodge_10.2.2003.pdf.