



...preserving America's diverse climbing resources.

June 7, 2007

Superintendent Michael Tollefson
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

Re: Scoping Comments on the Merced River Plan

Dear Superintendent Tollefson:

The Access Fund is pleased to submit these scoping comments on the Merced Wild and Scenic River Comprehensive Management Plan ("MRP" or "Plan").

The Access Fund

The Access Fund is the only national advocacy organization with the mission to keep climbing areas open and conserve 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. 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 ("YNP") management initiatives. For example the Access Fund submitted extensive comments on the 2000 Valley Plan, the 2001 Yosemite Falls Plan, the 2003 Yosemite Lodge Redevelopment Plan and Valley Implementation Plan, the 2005 Merced River Plan and scoping comments for the Tuolumne River Plan in 2006. The Access Fund also testified at a 2003 congressional field hearing in YNP regarding the Yosemite National Park 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). The Access Fund also provided grant funding for bear boxes placed at strategic locations in Yosemite Valley to serve the needs of wall climbers who lack food storage in the Valley while they



are on overnight climbs. The Access Fund continues to work with NPS planners at YNP regarding future planning initiatives and implementation plans, such as those scheduled that will affect El Capitan Meadow, Camp 4, general climbing policies and camping issues parkwide.

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). NPS policies support activities (like climbing, backpacking and camping) that promote a "direct association with park resources." Accordingly, the Access Fund supports the protection required by the WSRA while also supporting NPS planning and management decisions that maintain the current level of climbing activity and facilities used by climbers in Yosemite Valley and the Merced River corridor.

Access Fund Scoping Comments

The Access Fund's primary comments regarding the scope of planning for the MRP are as follows

- **Increase camping opportunities**, especially the more primitive, walk-in and group sites that best serve climbers and other low-impact recreational users.
- **Preserve and enhance roadside parking** in the Valley that provides access to climbing and other recreational opportunities.
- **Preserve and increase picnic facilities.** Picnic facilities in Yosemite Valley and along the river are valued by climbers and other day users who are camping outside the Valley or the park.
- **Reduce noise from motorcycles and RV generators.** These noises significantly degrade the experience of climbers and other park visitors. The plan presents an excellent opportunity to bring them under control.
- **Recognize climbing as one of the outstanding recreational values of the river Corridor.** The Valley's granite walls are recognized by the U.S. and international climbing communities for the seminal role they played in the development of climbing and for the challenge they continue to present to climbers today. If there is one place in the U.S. where the climbing opportunities present a remarkably outstanding value to the world community, Yosemite Valley is the place.

¹ National Park Service Management Policies, 8.2 Visitor Use (2006). Moreover, the YNP General Management Plan (GMP) seeks to "promote visitors' understanding and appreciation" of the Merced River corridor.

The NPS Should Retain and Increase Camping Opportunities in and Near Yosemite Valley

As the Access Fund testified at the congressional field hearing on the 2002 Yosemite Parkwide Campground Planning Study (the Campground Study), Yosemite has a parkwide shortfall of 1,000 campsites from the number projected for the park in the 1980 Yosemite GMP, with a shortfall of nearly 300 campsites in Yosemite Valley. Currently, the demand for camp sites greatly exceeds supply in both Yosemite Valley and YNP as a whole. Accordingly, in the Plan, the NPS should make every effort possible to increase the number of campsites in the Valley.

Providing camping opportunities furthers important park management policies.² In our comments to the Valley Plan and the Campground Study, we pointed out the many ways that camping promotes the enjoyment of Yosemite National Park through the direct association with park resources called for in NPS Management Policies, enhances the visitor experience, and furthers park values.

For purposes of the MRP, camping is an important recreational activity. The MRP should explicitly recognize camping as consistent with the recreation ORV. The MRP should also explicitly distinguish camping, which a recreational activity appropriate to a park, from staying in developed lodgings, which is a form of leisure more appropriate to a resort. The camper is exposed to the park environment and has to carry, prepare and manage his own food, shelter, light, heat and protection from wildlife, insects, and the elements. Staying in developed lodgings is not a recreational activity but a form of leisure emphasizing the consumption of personal services in a highly developed physical plant that separates the visitor from park resources. Camping brings the visitor into a direct relationship with park resources and distances the visitor from the commercial values of comfort and convenience and the expression of social status through consumption that pervade American society. Camping brings the visitor closer to nature, the simple necessities of daily life, and the way people lived in the past.

Also, camping is democratic. In campgrounds, social distinctions account for little, and camping has the potential to bring people together in shared appreciation of their natural surroundings in a manner that reduces social barriers. The nations' great parks present an opportunity to be a force for social equality. Unfortunately, the lodging picture in Yosemite, particularly the Valley, preserves the social distinctions of the greater society, rather than leveling them, which we believe should be a goal of the parks.

Further, camping is inherently communal. Campers live in the open in close proximity to others and have to adapt their behavior to accommodate others' needs. Campers thus have an enhanced opportunity to associate with other people, develop new relationships, and broaden their social horizons through the camping experience. Camping also fosters

NPS management policy is to "encourage visitor activities that . . . 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." NPS Management Policies, 8.2 Visitor Use (2006).

the development of relationships within existing groups by bringing people together in simple and informal surroundings free of the consumer competition and hierarchical relationships of the greater society. This aspect of camping is recognized in the Campground Study, which calls for more group sites and more closely-related "buddy" campsites.

The NPS Management Policies' emphasis on visitor experiences that foster a "direct relation" to park resources immediately suggests a natural hierarchy of overnight opportunities for park visitors. Visitors' overnight 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. Accordingly, the most primitive experiences that rely on the least man-made infrastructure should be the overnight experience that is most preferred by the NPS, as reflected in planning documents. Thus, for the MRP, in considering visitors' overnight experiences, the NPS should prioritize backcountry camping first, followed in order by walk-to and walk-in campsites,³ drive-in campsites, RV camping, and finally developed lodgings.

The NPS Should Preserve and Enhance Roadside Parking that Serves Recreational Uses including Climbing.

Many small and informal parking areas, particularly in the West Valley, serve to provide access to climbing routes. Until a transportation system is developed that serves the West Valley with a frequency and duration that effectively serves climbers' needs (including off-hour and off-season), these informal roadside parking areas should be preserved for use by climbers and other recreational users.

We also think that overnight parking for big wall climbers should continue to be available at trailheads, including trailheads for the West Valley walls at Leaning Tower and El Capitan. And providing this parking should not be considered as giving climbers special treatment, it is simply affording climbers the same level of convenience for overnight parking that lodgers, campers, and wilderness users have.

The NPS should Preserve and increase Picnic Facilities

Picnic facilities serve the day visitor in much the same way that campgrounds serve the overnight visitor. They offer a place to escape the developed facilities of the Valley and enjoy the park in a more natural, less commercial setting. Current picnic areas are often crowded, however. The west-Valley and mid-Valley areas offer opportunities for additional picnic areas that should be considered in the Plan.

The NPS Should Reduce Noise from Motorcycles and RV Generators

Loud noise from motorcycles and electric generators has greatly diminished the ability of climbers, campers and other visitors to enjoy the natural soundscape of YNP, particularly

³ In the 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.

in Yosemite Valley, where motorcycle noise reverberates in the confines of the valley and strongly impacts other park visitors.

Such urban intrusions are especially inappropriate in a park setting, particularly one where wilderness overlooks all park roads. Motorcycles roar into Yosemite Valley daily, with large groups on holiday weekends that fill the road corridor with a tremendous ear-shattering thunder that can be heard for miles into the wilderness. This noise exceeds not only NPS regulations and soundscape management standards but the standards of the California Vehicle Code, and the mandates of the Wilderness Act and the WSRA. Inexplicably, the Park Service has made absolutely no effort to enforce the noise standards of any of these authorities. The MRP is an opportunity to correct that deficiency.

Likewise, RV generators in the Valley campgrounds regularly violate NPS soundscape standards, as well as the soundscape standards outlined in the WSRA. Under the park's camping regulations, RVs are allowed to run their generators from 7 a.m. to 7 p.m. This generous period makes it impossible for tent campers enjoy preparing and eating their dinners without disturbance or sleep late in the mornings. Our members have had frequent conflicts with inconsiderate RV users in the campgrounds. The Plan presents an excellent opportunity for the NPS to correct this long-standing deficiency in its campground management.

NPS policy strives to "preserve, to the greatest extent possible, the natural soundscapes of parks . . . [which] exist in the absence of human-caused sound."⁴ NPS policy also endeavors to "restore to the natural condition wherever possible those soundscapes that have become degraded by unnatural sounds (noise), and will protect natural soundscapes from unacceptable impacts."

Accordingly, in the plan the NPS should analyze and propose mitigation measures for loud motorcycle noise along the river corridor, RV generator noise in campgrounds and other noise sources that violate California law, NPS policies, and the mandates of the WSRA and the Wilderness Act. NPS planners should identify what levels of human-caused sound can be accepted within the river corridor and propose specific actions to reduce noise above those levels.⁶ At a minimum, this must include reducing motorcycle and RV generator noise to levels acceptable to other park visitors.

⁴ NPS Management Policies, 4.9-Soundscape Management (2006).

⁵ *Id.*

⁶ To do this, park planners should carefully evaluate and manage how, when, and where motorized equipment is used by all those who operate equipment in the parks. The natural ambient sound level—that is, the environment of sound that exists in the absence of human-caused noise—should be the baseline condition, and the standard against which current conditions in a soundscape will be measured and evaluated. NPS Management Policies, 8.2.3 Use of Motorized Equipment (2006).

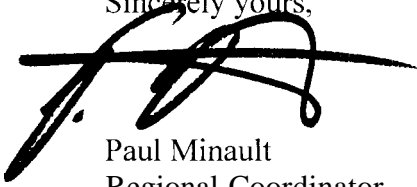
Climbing Should be Explicitly Recognized as One of the Outstanding Recreational Values of the Merced River Corridor

The Wild and Scenic Rivers Act provides that, unless otherwise designated by the managing agency, the planning boundaries of a river "shall generally comprise that area measured within one-quarter mile from the ordinary high water mark on each side of the river." For the Merced River, this area includes most if not all the major climbing areas in the Valley, including its big walls. The Valley's climbing resources are recognized as having worldwide significance. Consequently, climbing should be recognized in the Plan as one of the outstanding recreational values of the river corridor.

The Access Fund welcomes this opportunity to comment on the Merced River Plan. We hope that these scoping comments assist the NPS in identifying the proper planning scope for the river management corridor and produce a better plan.

In short, we support increasing the number of campsites in Yosemite Valley, preserving existing parking areas along the river corridor that serve climbing and other recreational uses, retaining and increasing picnicking areas, reducing motorcycle and RV generator noise, and recognizing climbing as an outstanding recreational use in the river corridor.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Paul Minault', with a long horizontal stroke extending to the right.

Paul Minault
Regional Coordinator
For Northern California

Cc: Steve Matous, Access Fund Executive Director
Jason Keith, Access Fund Policy Director
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⁷ WSRA, §4(d), 16 USC 1275(d).