

September 6, 2006

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Yosemite National Park
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**Re: Access Fund Scoping Comments to Tuolumne Wild and Scenic
River Comprehensive Management Plan/Tuolumne Meadows
Plan and EIS**

Yosemite Planning Team:

The Access Fund welcomes the opportunity to submit these scoping comments to the National Park Service's (NPS) Tuolumne Wild and Scenic River Comprehensive Management Plan/Tuolumne Meadows Plan and EIS ("Tuolumne River and Meadows Plan"). With input from several past and present Tuolumne climbers, we provide these comments to better inform Yosemite National Park (YNP) planners and help identify the appropriate scope for the Tuolumne River and Meadows Plan that will help to both protect this unique environment and provide opportunities for enjoyment.

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.

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 2001 Yosemite Falls

Plan, the Yosemite Lodge Redevelopment Plan and Valley Implementation Plan in 2003, and the 2005 Merced River Plan. The Access Fund also 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). In the 1990s the Access Fund built a climbers' trail to Sunnyside Jamb Crack in the Valley, and last year 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 in the Valley while they are on overnight climbs. The Access Fund continues to communicate with the 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. Finally, the Access Fund is proud to again support the Yosemite Climbing Association's "Yosemite Facelift" scheduled for 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 mandated by the Wild and Scenic River Act (WSRA) and the Wilderness Act. We also believe that these special environments are entirely appropriate for compatible recreational uses. Indeed, NPS policies support activities (like climbing, picnicking and camping) that promote a "direct association with park resources."¹ Accordingly, the Access Fund supports the protections required by the WSRA and Wilderness Act as well as NPS planning and management decisions that provide and enhance climbing and camping opportunities. We also endorse NPS decisions to continue the modest level of services and facilities currently provided at Tuolumne Meadows and environs.

Climbing History at Tuolumne

Tuolumne Meadows offers some of the finest alpine rock climbing and scenery found anywhere in the world. Boasting both short "cragging" routes and multi-pitch alpine summits (both Tuolumne styles of which are considered classics by climbers world-wide) the Tuolumne area has attracted climbers since at least the 1940s when the Mathes Crest and Southeast Buttress of Cathedral Peak were first scaled. New climbing route activity continued through the late 1950 and 1960s when signature Tuolumne climbs such as the Crescent Arch on Daff Dome, the West Ridge of Mount Conness, and the Regular Route

¹ National Park Service Management Policies, 8.2 Visitor Use (2001). Moreover, the YNP General Management Plan (GMP) seeks to "promote visitors' understanding and appreciation" of Tuolumne Meadows, and this may best be accomplished through YNP management policies that support climbing and camping experiences.

on Fairview Dome were first made. Into the 1970s climbing test pieces were established on Medlicott Dome (Bachar-Yerian) as well as modern Tuolumne favorites such as the Third Pillar of Mount Dana.

Climbing guidebook writer Greg Barnes notes that the Meadows provides a very different experience from what climbers find in Yosemite Valley. “Instead of smooth, polished cracks and blank faces, Tuolumne has sharp, angular cracks, endless fields of knobs, and golden glacier polish with incut edges.”² Tuolumne is cool when the summer heat cooks lower elevations, and the Meadows has little traffic compared to the near urban atmosphere of Yosemite Valley. Thus, in addition to the area’s unique geologic attributes that make it ideal for rock climbing and wilderness camping, Tuolumne also fits a seasonal niche: every summer overheated climbers and campers travel to Tuolumne from afar seeking the cool temperatures found in the Tuolumne high country.

Tuolumne Planning

In 1984, Congress designated approximately 83 miles of the Tuolumne River as a Wild and Scenic River, including 54 miles within Yosemite National Park.³ As directed by the Wild and Scenic Rivers Act,⁴ the NPS must prepare a comprehensive management plan for the Tuolumne River within Yosemite National Park to guide future decisions within the river management corridor (approximately ¼ on each side). The Tuolumne River and Meadows Plan “will evaluate a range of alternatives that present management direction for protecting the free-flowing condition and unique values of the Tuolumne River in Yosemite National Park.”⁵

The two management plans that the NPS intends for the Tuolumne area will consolidate a comprehensive management plan for the Tuolumne Wild and Scenic River (“Tuolumne

² Greg Barnes, *Tuolumne Free Climbs* 13 (2003).

³ The same year The California Wilderness Act of 1984 also provided direction parkwide in Yosemite for wilderness protection.

⁴ The Wild and Scenic Rivers Act of 1968 was amended by the California Wilderness Act of 1984 to add the Tuolumne River to the national system of protected rivers.

⁵ 71 Fed. Reg. 38899 (July 110, 2006). In the National Park Service, a river management plan authorized by the 1968 Wild and Scenic Rivers Act is on the same level as a general management plan. Thus, the Tuolumne River Plan will work side-by-side as a companion document to Yosemite National Park’s 1980 General Management Plan (GMP) and amend provisions of that GMP which relate to land use planning and user capacity in the Tuolumne River corridor. Both the GMP and the Tuolumne River Plan will guide future decisions and implementation plans, such as the Tuolumne Meadows Plan.

River Plan”)⁶ with an implementation plan for Tuolumne Meadows (“Tuolumne Meadows Plan”).⁷ Congress directed the NPS to complete the River Plan simultaneous to the development of the Meadows Plan which will implement the action items of the River Plan as well as address additional facilities and infrastructure issues that need immediate attention.

Accordingly, these scoping comments address both how the climbing community might be affected by NPS planning required by the Wild and Scenic Rivers Act as well as specifics related to any changes to facilities and services at Tuolumne Meadows. These comments should help define the NPS’s management direction for both Tuolumne plans. The Access Fund hopes these and other public comments will help identify the appropriate range of issues that should be addressed in this planning effort that will help ensure that future NPS actions are consistent with the National Park Service Organic Act, various Yosemite management plans, and other relevant laws and policies.

Access Fund Scoping Comments

The Access Fund’s primary concerns regarding the scope of planning for the Tuolumne River and Meadows Plans are as follows

- **Retain and increase camping opportunities**, especially walk-in sites, both at the existing Tuolumne Meadows Campground and other campgrounds along Highway 120. At the very least there should be no net loss of campsites in the Tuolumne area.
- **Maintain the level of services and facilities at Tuolumne Meadows**, no more and no less, except for the addition of more campsites.
- **Preserve and enhance appropriate parking areas** in the Tuolumne Meadows area along Highway 120 that provide access to recreational opportunities such as climbing, hiking, and fishing.

⁶ *Id.* The Tuolumne River Plan will provide broad management guidance and establish the overall goals and vision for the river corridor. Its policy directives will guide future management and amend the Yosemite National Park General Management Plan for the Tuolumne River area.

⁷ *Id.* The Tuolumne Meadows Plan is an implementation-level plan that will carry out the goals of the River Plan, focus on the types and levels of visitor services and activities offered in the vicinity of Tuolumne Meadows, and delineate which areas may be targeted for restoration.

- **Ensure that customary and compatible recreational uses** within the Tuolumne Wild and Scenic River management corridor, such as **climbing, picnicking and camping**, are maintained. In particular, the Access Fund is concerned that the NPS will remove “Loop A” from the Tuolumne Meadows Campground and will restrict use of the Lumbert Dome picnicking and parking area.
- **Reduce noise from motorcycles and RV generators.** These noises significantly degrade the experience of other YNP visitors. The Plan presents an excellent opportunity for the NPS to analyze the **soundscape** for both the Tuolumne River management corridor and Highway 120.
- **Recognize climbing and camping as Outstanding Recreational Values (ORVs) of the Tuolumne Wild and Scenic River management corridor.** The unique qualities of the Tuolumne climbing and camping experience are consistent with the NPS’s definition for recreational ORVs and thus should be designated as such.

The NPS Should Retain and Increase Camping Opportunities in and Near Tuolumne Meadows

The Access Fund is concerned that this planning initiative will negatively affect camping opportunities in the Tuolumne area. For example, we understand that there has been some discussion about removing “Loop A” in the Tuolumne Meadows Campground because it is near the Tuolumne River. This camping loss would only add to the existing camping shortage at Tuolumne, and would neglect the specific goals of YNP planners. Indeed, the 1980 Yosemite Park General Management Plan (GMP) calls for *increasing* the number of campsites in the park and for building new walk-in campsites at Tuolumne.⁸ Moreover, 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 over 100 campsites in the Tuolumne area. Currently, the demand for campsites greatly exceeds supply in both Tuolumne and YNP as a whole despite clear NPS planning goals to increase camping in the park. Accordingly, in the Plan, the NPS should implement the findings in the 2002 Campground Study in regard to the Highway 120 corridor, which would at least add another 16 infill campsites in

⁸ Yosemite National Park, General Management Plan, 17 (1980). The GMP calls not just for 50 more walk-in campsites at Tuolumne Meadows, but also for retaining 50 campsites at Tenaya Lake, expanding the Porcupine Flat campground from 50 to 75 sites, the Yosemite Creek campground from 30 to 75 sites, and the White Wolf campground from 86 to 150 sites. The Crane Flat campground also was to be increased from 164 to 200 sites.

existing campgrounds.⁹ We also oppose any reduction in the number of existing campsites. Thus, if Loop A of the Tuolumne Meadows Campground is slated for removal, the NPS must relocate those campsites inland or reconfigure the existing loop for walk-in sites, but in no case should the NPS reduce the number of campsites.

Providing camping opportunities furthers important NPS management policies¹⁰

In our comments to the Valley Plan and the 2002 Campground Study, we pointed out the many ways that camping enhances the visitor experience and promotes the enjoyment of Yosemite National Park:

First, camping is a form of *recreation*, in which the camper has to provide their own shelter, food, warmth and protection from wildlife, insects, and the elements. Staying in developed accommodations, by contrast, where these services are provided to the visitor, is a form of *leisure* 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. Thus, camping brings the visitor closer to the very natural attributes for which national parks are set aside and protected.

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 nation's great parks such as Yosemite present an opportunity to be a force for social equality. Unfortunately, the lodging picture in YNP preserves the social distinctions of the greater society, rather than leveling them. This is true particularly in Yosemite Valley where luxury accommodations abound at the expense of camping opportunities.

Finally, camping is inherently communal. Campers live in the open in close proximity to others and must adapt their behavior to accommodate others' needs. Campers thus have an enhanced opportunity to associate with other people and develop new relationships in the context of a natural park setting. Camping also fosters the development of relationships within existing groups by bringing people together in simple and informal surroundings. This aspect of camping is recognized in the 2002 Campground Study, which calls for more group sites and more closely-related "buddy" campsites.

⁹ *Campground Study* at C-3 - C-4.

¹⁰ 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 (2001).

Hierarchy of overnight opportunities for park visitors

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. Thus, in considering visitors' overnight experiences for the Tuolumne Plan the NPS should prioritize backcountry camping first, followed in order by walk-to and walk-in campsites,¹¹ drive-in campsites, RV camping, and finally rustic lodging like Tuolumne Lodge.¹² In the Tuolumne Plan this can be achieved by expanding the number of walk-in sites at the Tuolumne Campground while reducing the number of RV sites.¹³ Using this prioritization hierarchy could allow YNP to reduce impacts to the river corridor at Loop A while maintaining the same number of campsites in the Tuolumne Meadows Campground.

The Access Fund supports less developed campgrounds that serve climbers and other backcountry visitors to Yosemite's high country. As we have pointed out in the past, climbers and backpackers are able to use smaller, less-developed walk-in campgrounds without paved roads and running water. There exist a number of locations in YNP where such campgrounds could be developed, including along Highway 120 in the Tuolumne Meadows high country and along the old Tioga Road alignment leading to May Lake.

Because of the Tuolumne campsite shortfall and the demand for camping at Tuolumne, the Access Fund supports the implementation of all the areas studied in the 2002 Campground Study. The NPS should also coordinate campground planning with national forests outside the park. In recent years, the Inyo National Forest closed all the informal camping areas along Highway 120 east of the park and along the road to Saddlebag Lake, eliminating about 100 informal overnight parking and camping areas. These actions have increased public demand for camping opportunities inside YNP and this shortage needs

¹¹ 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.

¹² The 2006 *Draft Outstandingly Remarkable Values (ORVs)* for the Tuolumne River Plan embraces the "rustic lodging" experience at Tuolumne Lodge while saying nothing about the importance of camping as an ORV in direct contravention of the Management Policies. *Tuolumne Wild and Scenic River Outstandingly Remarkable Values Draft Report*, 12 (2006).

¹³ At present, the Tuolumne Meadows campground has 332 sites. Campground Study at A-17. Of these, 161 or almost a half are RV sites, while only 25 are walk-ins (for backpackers). Note: this calculation is based on the campground map handout provided by the Tuolumne Meadows campground office.

to be taken into account in the River Plan and any other YNP planning for new campgrounds.

Services and Facilities at Tuolumne Should Be Maintained at Current Levels

The current level of facilities at Tuolumne are modest and consistent with NPS goals of providing experiences that facilitate the use and enjoyment of parks which are “harmonious with park resources, [and] compatible with natural processes.”¹⁴ We believe the existing services are currently at an appropriate level for the rustic back country atmosphere at Tuolumne Meadows and should not be altered in any significant manner. We support maintaining these services just as they are, or with minimal improvements and better maintenance to reduce resource impacts and improve the visitor experience.¹⁵

NPS policies state that overnight facilities and food services will be restricted to the kinds and levels necessary and appropriate to achieve each park’s purposes. Overnight accommodations and food services will be provided “when the private sector or other public agencies cannot adequately provide them in the park vicinity.”¹⁶ In-park facilities or services such as those found at Tuolumne are justified when the “distance and travel time to accommodations and services outside the park are too great to permit reasonable use, or when leaving the park to obtain incidental services would substantially detract from the quality of the visitor experience.”¹⁷ The nearest facilities and services to the Tuolumne area are found at Lee Vining 20 miles and 30 minutes away, however traveling to Lee Vining not only consumes fuel but also pollutes the park environment and adds to the traffic congestion on YNP roads thus distracting from the visitor experience.¹⁸ Many YNP visitors value the opportunity to buy gas and basic groceries at Tuolumne Meadows, and this convenience for incidental services maintains the quality of the visitor experience by preventing the need to drive to Lee Vining or Crane Flat. Accordingly, the

¹⁴ NPS Management Policies, Chapter 9: Park Facilities (2001).

¹⁵ Currently at Tuolumne Meadows visitors find the following services and facilities:

- Tuolumne Meadows Grill
- Tuolumne Meadows Store & Gas Station
- Yosemite Mountaineering School and Outdoor Shop
- Tuolumne Meadows Stable
- Tuolumne Meadows Campground (approx. 332 walk-in, drive-in auto and RV sites)

¹⁶ NPS Management Policies, 9.3.2 Overnight Accommodations and Food Services (2001).

¹⁷ *Id.*

¹⁸ NPS Management Policies, Chapter 9: Park Facilities (2001).

current Tuolumne Meadows facilities are appropriately modest yet serve important visitor needs and should be retained at present levels.

Existing Parking Locations Should be Retained Throughout the Tuolumne Area

The Access Fund is concerned that the NPS may remove parking locations along the Highway 120 corridor as part of the River Plan. We support the retention of existing climber access parking locations at, for example, Fairview and Cottage Domes. NPS policy supports the use of necessary and small parking areas to accommodate park visitors where they don't "unacceptably intrude . . . on park resources or values."¹⁹ When parking areas are deemed necessary, they will be "limited to the smallest size appropriate, and be designed to harmoniously accommodate motor vehicles and other appropriate users."²⁰

The existing pullouts along Highway 120 are necessary because they serve the needs of visitors who access the numerous hiking, climbing, fishing and mountaineering objectives found in the Tuolumne region. Many of these areas are not served by a formal NPS trailhead or parking areas and require various specific parking locations along Highway 120 between Tioga Pass and Crane Flat. This is true particularly in the Tuolumne Meadows region where most of the rock climbing is found. Removing these pullouts would cause access problems for these user groups and potentially cause resource damage from Tuolumne visitors forced to pull on to the shoulder of Highway 120. Instead, the NPS should survey existing parking locations and formally acknowledge key parking sites along Highway 120 to facilitate visitor access and address any maintenance needs. If necessary, the NPS should take measures to mitigate parking impacts while preserving the essential access these parking areas provide.

The NPS Should Maintain Customary and Compatible Recreational Uses of the Tuolumne River Area

The Access Fund is concerned that the Tuolumne River Plan might alter longstanding resource-compatible visitor use patterns at Tuolumne and, for example, remove or reduce in size the Lumbert Dome parking and picnic area. Congress passed the WSRA to protect not only free-flowing rivers but also their immediate environments which "possess outstandingly remarkable scenic, *recreational*, geologic, fish and wildlife, historic, cultural, or other similar values." Congress also acknowledged that these river segments

¹⁹ NPS Management Policies, 9.2.5 Parking Areas (2001).

²⁰ *Id.*

are to be “protected for the benefit and enjoyment of present and future generations.”²¹ Accordingly, under the WSRA all existing uses along the Tuolumne River management corridor including picnicking may continue where they do not conflict with river protection.²² Moreover, the 1980 Yosemite GMP states that a variety of uses must be retained to preserve the vitality of the park, and those activities such as climbing, camping and picnicking “which take advantage of the park’s natural features rather than man-made facilities or mechanized equipment, are the most appropriate uses of the park.”²³ The climbing and picnicking at Lembert Dome is one such place.

The Lembert Dome has been popular with climbers for decades, not only as a morning breakfast location and staging area for climbs on the dome, but as a place to cook dinner outside the confines of the campground. Here, picnickers can walk up the base of the dome and sit while eating their dinner and enjoy the changing colors of the sunset and the spectacular views out over Tuolumne Meadows towards the Cathedral Range. NPS management policies state that “picnic areas and other day use areas to be used for specific purposes may be provided on a limited basis as appropriate to meet existing visitor needs.”²⁴ The Lembert Dome area has been serving the needs of climbers, picnickers and other recreational users for decades and should be preserved and possibly expanded under the Tuolumne Plan.

Besides the Lembert Dome picnic area, other customary and compatible recreational activities at Tuolumne could be affected by the River Plan. The WSRA provides that, unless otherwise designated by the managing agency, the 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.”²⁵ At Tuolumne this management corridor may include:

- Picnicking and parking at the Lembert Dome picnic area
- Climbing on Lembert Dome, with many classic routes at all levels of difficulty

²¹ WSRA, §4(d), 16 USC 1275(d).

²² To achieve a “nondegradation standard” for the Tuolumne River, the NPS must establish a management plan that documents baseline resource conditions, specifies potential adverse impacts, and plans for strategies that will resolve such adverse impacts and “enhance” the Wild and Scenic values (Outstandingly Remarkable Values) as established in the WSRA. Climbing and picnicking along the Tuolumne River, at Lembert Dome for example, should be seen as activities that enhance the management area’s ORVs.

²³ Yosemite National Park, General Management Plan, 15 (1980).

²⁴ NPS Management Policy - 9.3.4.1 Picnic and Other Day Use Areas (2001).

²⁵ WSRA, §4(d), 16 USC 1275(d).

- Climbing on Puppy Dome including several excellent beginner top-roping routes used by the Yosemite Mountaineering School, boy scouts, other groups, and families
- Climbing on Canopy World and other riverside domes which offer a variety of routes within easy reach of the river
- Climbing on the Cottage Domes which host many classic hard Tuolumne face routes
- Wilderness climbing and camping in the Grand Canyon of the Tuolumne around and below Glen Aulin
- Camping in the Tuolumne Meadows Campground
- Use of the services and facilities found at Tuolumne Meadows

Wilderness climbing and camping are recreational values promoted and protected by the Wild and Scenic Rivers Act and the Tuolumne River Plan should take notice. As noted, Congress passed the WSRA to protect “free-flowing” rivers—and their immediate environments—which “possess outstandingly remarkable scenic, *recreational*, geologic, fish and wildlife, historic, cultural, or other similar values.”²⁶ Congress also acknowledged that these river segments are to be “protected for the benefit and enjoyment of present and future generations.”²⁷ Visitors have been using various Tuolumne climbing, picnicking and camping areas for decades, and each of these activities fit the NPS definition for a recreation ORV: “untrammelled character . . . [that] provides outstanding opportunities for a diversity of experiences characterized by primitive, unconfined recreation in a landscape dominated by natural scenery and soundscapes.” The Tuolumne environment is ideal for primitive unconfined climbing and backcountry camping in a matchless natural scene. As such, climbing and camping in the Tuolumne River management corridor is consistent with the WSRA and NPS policies and thus there should be no change to these longstanding recreational uses by the Tuolumne River Plan.

The NPS Should Assess Soundscape Impacts Caused by Motorcycles and RV Generators

Loud noise from motorcycles and electric generators greatly diminishes the ability of climbers, campers and other visitors to enjoy the natural soundscape of YNP, particularly in the Tuolumne Meadows high country where such urban intrusions are especially inappropriate. Motorcycles roar up from Yosemite Valley and over Tioga Pass daily and fill the road corridor with a tremendous ear-shattering thunder that can be heard for miles

²⁶ *Id.*

²⁷ *Id.*

into the wilderness. This noise exceeds not only NPS soundscape management standards but the requirements of the California Vehicle Code,²⁸ the Wilderness Act and the WSRA. To our knowledge, the park has made absolutely no effort to enforce the noise standards of any of these authorities; the Plan, however, may provide such an opportunity.

Likewise, RV generators in the Tuolumne Meadows (and other campgrounds) regularly violate NPS and WSRA soundscape standards. Under YNP's camping regulations, RVs are allowed to run their generators from 7 a.m. to 7 p.m. This overly-generous period makes it impossible for tent campers to sleep late in the mornings or enjoy preparing and eating their dinners without disturbance. The Tuolumne 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.”²⁹ NPS policy also endeavors to “restore degraded soundscapes to the natural condition wherever possible, and will protect natural soundscapes from degradation due to noise (undesirable human-caused sound).”³⁰ Consistent with this direction, the 2006 *Draft ORV Report* seeks to protect the outstandingly remarkable values identified in the Tuolumne River management corridor, most of which is in designated Wilderness, that provides “outstanding opportunities for a diversity of experiences characterized by primitive, unconfined recreation in a landscape dominated by natural scenery and *soundscapes*.”³¹

Accordingly, in the plan the NPS should analyze and propose mitigation measures for loud motorcycle noise along Highway 120, 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 Tuolumne management area and propose specific actions to reduce noise levels.³² At a minimum, soundscape protection measures must

²⁸ California V.C. § 27202. Motorcycle Limits.

²⁹ NPS Management Policies, 4.9 Soundscape Management (2001).

³⁰ *Id.*

³¹ *Draft ORV Report*, 12 (2006).

³² The NPS should restore the natural quiet and natural sounds associated with the physical and biological resources especially along Highway 120 and in the Tuolumne Campground. 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

include reducing motorcycle and RV generator noise to levels acceptable to other park visitors.

Climbing and Camping Should be Explicitly Recognized as Outstandingly Remarkable Values of the Tuolumne River Corridor

The unique qualities of Tuolumne climbing and camping are a recreational values promoted and protected by the Wild and Scenic Rivers Act. Congress passed the WSRA to protect free-flowing rivers and their immediate environments which “possess outstandingly remarkable scenic, *recreational*, geologic, fish and wildlife, historic, cultural, or other similar values.” Outstandingly remarkable values (ORVs) are defined by the WSRA as the unique characteristics that make a river worthy of special protection. The 2006 *Draft ORV Report*³³ for the Tuolumne Wild and Scenic River presents proposed ORVs for the portion of the Tuolumne Wild and Scenic River located within Yosemite National Park, however climbing and camping both failed to make the list.

The 1979 *Wild and Scenic River Tuolumne Final Study and Report* found that each river segment had ORVs in the following categories: scenic, *recreational*, geologic, wildlife, historic/cultural, and scientific/educational. The ORVs articulated in Table 2 of the 2006 *Draft ORV Report* provide broad indicators of acceptable and intended recreational uses occurring within the various segments of the Tuolumne River. The Tuolumne River outstandingly remarkable values acknowledged in the *Draft ORV Report* include its “untrammeled character . . . [that] provides outstanding opportunities for a diversity of experiences characterized by primitive, unconfined recreation in a landscape dominated by natural scenery and soundscapes.”³⁴ The climbing opportunities found at Tuolumne Meadows are rare in quality with regards to high quality alpine granite rock climbing in an untrammeled wilderness setting. Tuolumne’s unique attributes attract visitors from around the world as can be attested to by a brief visit to the Tuolumne Meadows Campground. Similarly, the unique wilderness camping found in the Tuolumne Meadows area is rare and popular to international visitors. As such, recreational climbing and camping at Tuolumne are both activities consistent with the standard set out in the NPS’s 2006 *Draft ORV Report*, and the NPS should elevate its protection of these recreational ORVs when it identifies the proper scope for the Tuolumne River Plan.

which current conditions in a soundscape will be measured and evaluated. NPS Management Policies, 8.2.3 Use of Motorized Equipment (2001).

³³ *Yosemite National Park, Tuolumne Wild and Scenic River Outstandingly Remarkable Values Draft Report* (2006).

³⁴ *Tuolumne Wild and Scenic River Outstandingly Remarkable Values Draft Report*, 12 (2006). “Recreational” ORVs are specifically defined as “opportunities [that] are, or have the potential to be, rare or popular enough to attract visitors from around the world.” *Id.*

Conclusion

The Access Fund welcomes this opportunity to comment on the scoping phase of the Tuolumne River and Meadows Plans. We hope that these scoping comments assist the NPS in identifying the proper planning scope for the Tuolumne River management corridor and produce a better plan. In short, we support increasing the number of campsites in the greater Tuolumne area especially at the Tuolumne Meadows Campground. The NPS should also maintain customary and resource-compatible recreational uses in the area and continue the services and facilities at Tuolumne at existing levels with regards to the stores, gas station and grill. If you have any questions or comment please contact me at 435-21519-0693 or Jason@accessfund.org.

Best Regards,

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The Honorable US Congressman George Radanovich