



Protect America's Climbing

September 30, 2016

Superintendent
Yosemite National Park
Attn: Wilderness Stewardship Plan
P.O. Box 577
Yosemite, CA 95389

**RE: Access Fund Comments on Yosemite National Park Wilderness Stewardship Plan,
Preliminary Ideas and Concepts**

Yosemite Planners:

The Access Fund welcomes the opportunity to submit these comments to the National Park Service's (NPS) Wilderness Stewardship Plan (Wilderness Plan) Preliminary Concepts and Ideas. We provide these comments to assist Yosemite National Park (YNP) planners in developing appropriate and effective alternatives for Yosemite's Wilderness Plan.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 13,000 members and 100 local affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. California is our largest member state and Access Fund members across the country regularly travel to Yosemite to climb at this world-class destination. Access Fund holds a memorandum of understanding¹ with the National Park Service to work together regarding how climbing will be managed on federal land. We have a long history working with Yosemite planners on a range of management initiatives including the Merced River Plan and many other management plans and issues affecting climbing and the climbing environment in Yosemite National Park. We welcome this additional opportunity to participate in the development of Yosemite's Wilderness Plan. Please reference our scoping comments to this Wilderness Plan for additional information. To learn more about us, visit accessfund.org.

Yosemite Wilderness Climbing

Yosemite National Park's wilderness contains many of the world's most celebrated and iconic climbing objectives. Managing climbing activity in designated wilderness involves special attention to preserving the wilderness qualities of an area, preserving values on historic routes, and allowing for exploration of

¹ https://www.accessfund.org/uploads/Access-Fund-NPS_MOU_-2014-2019.pdf

adventurous and technical terrain that make the wilderness climbing experience unique. This Wilderness Plan will serve as the basis for the standards and desired conditions that will influence the development and implementation of a climbing management plan for Yosemite despite the fact that the preliminary concepts and ideas developed for this plan do not consider specific climbing management provisions. Accordingly, we provide the following comments how these preliminary concepts and ideas might progress into a draft Wilderness Stewardship plan with consideration towards how the outcomes of this plan might affect a subsequent climbing management plan.

COMMENTS

The Access Fund agrees with YNP scoping documents that planners should address visitor use and capacity, stock use, trail management and commercial services in this Wilderness Plan. However, while planners identify these categories as key issues to be addressed, Yosemite National Park's August 2016 Preliminary Concepts and Ideas document² provides little detailed discussion, except regarding stock use, of these topics. The visitor use and capacity document focuses primarily on the need for a plan but jumps right to an analysis of quota concepts. We believe YNP planners should provide more detailed consideration of visitor use and capacity as well as trail maintenance and commercial services, which are all important components to this Wilderness Plan. It is our understanding that the next publicly available document and comment period will be the Draft Environmental Impact Statement, and we find the lack of discussion regarding the above topics disappointing as park planners thus far have provided the public little new information to provide feedback regarding these important Wilderness management issues.

Visitor Use and Capacity

During the August 2016 public meeting held in Oakhurst, YNP staff discussed the plan's aim to incorporate "adaptive decision making framework" into the overall plan. The preliminary concepts and ideas document includes an analysis of continuing management under a trailhead quota system, or alternatively creating destination based quotas, zone quotas or using a designated campsite function. However, none of the preliminary concepts and ideas discuss specific desired conditions for these areas—that the common management tools would achieve—beyond general mention of protecting visitors Wilderness experience and protection of natural resources.

We believe that planners should base any new management prescriptions first on clearly defined desired conditions, with the means (i.e., quotas) to achieve those conditions backed by scientific data. That is, the visitor use management tools focus primarily on managing visitor use through various quota mechanisms, but the preliminary concepts and ideas do not describe how planners will determine the specific targeted conditions that these quotas are designed to achieve or maintain. We believe Yosemite planners should consider zoning throughout the park, which can effectively identify appropriate desired conditions for each zone in Wilderness and acknowledges existing use patterns and wide-ranging visitor experiences and needs.

*Keeping It Wild*³ promotes the concept that desired wilderness character should be systematically defined first and then periodically monitored through visitor-use assessments and the implementation of indicators and standards methodology. Accordingly, this Wilderness Plan should develop measures "to determine at what level wilderness character is either enhanced or degraded" by visitor use activities and also define when management actions are necessary to maintain acceptable standards. *Keeping It Wild* also recognizes

² https://www.nps.gov/yose/getinvolved/wsp_documents.htm

³ http://www.wilderness.net/toolboxes/documents/WC/NPS_Wilderness%20Character%20Integration%20User%20Guide.pdf

that climbing is a legitimate and appropriate use of wilderness, and that “climbing provides sought-after visitor experiences in wilderness and desired conditions for visitor use should be developed and defined in the context of wilderness character.” Such desired conditions should be developed considering that, among other things, “climbing is a traditional form of primitive recreation that is appropriate in wilderness and solitude and unconfined recreation qualities of wilderness are sought after by climbers.” Climbing also fits NPS’s 2006 Management Policy 6.4.3 regarding Wilderness which requires that “recreational uses of wilderness will be of a type and nature that ensures that its use and enjoyment (1) will leave it unimpaired for future use and enjoyment as wilderness, (2) provides for the protection of the area as wilderness, and (3) provides for the preservation of wilderness character.” Accordingly, a qualitative description in this plan of the integrity and character for Yosemite’s wilderness, including visitor experiences for activities such as climbing, will help clarify appropriate desired conditions for the many and diverse areas within Yosemite Wilderness.

Once a comprehensive set of desired conditions is articulated, then YNP planners should consider which of the proposed “common management tools” (quotas) would be most effective for managing visitor use. Park planners focus these tools primarily on overnight backcountry use which, according to YNP, would address the 65,000 overnight backcountry stays per year in the park (out of 5 million total per year). The preliminary concepts and ideas provide little information on how day use in the backcountry will be managed under the new Wilderness Plan. Given that overnight backcountry users account for 1.3% of visitor use, additional design work and information should be provided on day use management and associated desired conditions should be clearly defined.

We have analyzed these quota concepts for managing visitor use as they relate to climbing use in Yosemite Wilderness, and our overall concern with all the concepts is that the quotas established for non-climbers could unintentionally impact climbing use in YNP. In other words, trail-users create and experience different social conditions than climbers, and rock climbers utilize trail and off-trail approach routes to specific climbing area destinations that are typically not shared with other user groups.

The revised trailhead quota approach does not accurately capture all trail users or manage where groups go once past the trailhead. In many instances this concept would not be applicable to climbers who commonly use non-system trails or go off trail to access climbs. We also question whether under a trailhead quota approach this plan would implement changes to day use or affect climbers engaging in low impact overnight bivouacs at the base of a climb or on a wall. We suggest—even if a trailhead quota system is implemented—that park managers continue to allow bivouacs for climbers where necessary to achieve their climbing objective as long as they observe NPS rules and policies and observe Leave No Trace Principles.

Pass and exit quotas may also have limited applicability to climbers as this approach controls “the total number of hikers entering and exiting the wilderness from outside the Park boundary through a specific corridor or mountain pass.” While examples of the pass and exit quotas may apply in limited and mostly day use circumstances (i.e., Mount Conness), this approach has limited applicability to climbing use patterns in Yosemite Wilderness

Likewise, the designated campsite approach is often not applicable to climbers as they frequently either bivouac near the base of a climb or sleep on the wall itself when targeting longer climbing objectives. While we assume this concept is directed more towards traditional backpackers in YNP backcountry, it is unclear how this might impact climber overnight use in the backcountry and we question whether this potential management tool will apply to climbers who require an overnight bivouac to complete,

approach or return from a climb. As with the trailhead quota, if a designated campsite function is utilized we suggest climbers continue to be allowed to bivouac where necessary to achieve their climbing objective as long as they observe NPS rules and policies and observe Leave No Trace Principles.

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

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

This plan should consider different management alternatives that propose a range of actions, with different zoning combinations over the park’s wilderness landscape with each management zone emphasizing the five qualities of wilderness character. For example, a special recreation zone may be developed to protect and optimize primitive and unconfined recreation, acknowledging that expectations for solitude opportunities may be different as compared to a more primitive backcountry zone—yet both zones carefully maintained for wilderness character. In this way YNP’s Wilderness Plan can develop an appropriate range of planning alternatives that address the realities of visitor use in YNP Wilderness. Through such a zoning process, Yosemite planners can consider and develop planning alternatives for, among other issues, overnight camping/bivouacs, recreation access, stock use, trail management, and commercial services; this kind of zoning process may also create an appropriate framework for an upcoming climbing management plan which will to a large degree involve Yosemite wilderness.

Stock Use

As acknowledged in its public scoping notice, NPS minimally manages the location, timing, and amount of stock use within the YNP’s wilderness areas. We believe that this Wilderness Plan should include guidelines for stock use that will minimize and mitigate impacts to natural resources, and avoid impacts on or conflicts with other wilderness users. Such impacts include but are not limited to excessive dust, trail erosion and fecal matter along multiple-use trails.

Trail Management

Trail management is not discussed in YNP’s preliminary concepts and ideas document. Trail management is a vital component of wilderness management and directly links to visitor use and capacity. We question how trail management will relate to visitor use management as well as what role

informal trails will play in trail management and visitor use management. While we understand that climbing management is not a focus of this plan, we believe that when considering trail management YNP planners should consider maintaining climber access and descent trails (including common bivouac locations), climber access points and parking needs. Because climbing as an activity constitutes a significant percentage of visitor use in Yosemite wilderness, planners should put in place a clear plan to manage informal climbing access trails. This plan should not foreclose the ability of YNP managers to maintain existing climbing access trails.

Moreover, in developing a management framework to address the maintenance of existing trails and when to construct and how to manage new and existing rails, planners should acknowledge the importance of volunteers and encourage their participation to assist NPS in fulfilling its mission. This Wilderness Plan's trail maintenance framework should include a process for ongoing collaboration with volunteers that ensures their ability to meaningfully contribute and effectively leverages their support to appropriately manage visitor experiences in wilderness.

Commercial Services

In YNP's August 2016 preliminary concepts and ideas document, commercial services were not discussed in detail other than to state that the "Wilderness Act requires that the National Park Service evaluate the need for commercial services within wilderness. This plan will determine the appropriate amount of commercial services (such as guided hiking, climbing, and stock pack trips) to be authorized." Further information should be provided regarding how YNP plans to manage commercial services under the new Wilderness Plan. Currently Yosemite provides climbing guide services through a single concessionaire (Yosemite Mountaineering School), thus limiting opportunities for those who wish to visit Yosemite and climb with a guide. The Access Fund believes that Yosemite planners should consider an increase in diverse guiding opportunities (for rock climbing and mountaineering) by permitting new commercial use authorizations that enable independent guides to access the world class climbing in Yosemite Wilderness. Park planners should consider and clearly articulate in detail how various visitor use and capacity management tools might affect commercial services in Yosemite Wilderness.

Soundscapes

Climbers are uniquely impacted by harmful soundscape impacts in Yosemite's wilderness. As noted in our previous comments, this Plan should propose actions to address noise impacts affecting wilderness character, including sources from motorcycles, aircraft, garbage collection, woodcutting, and "The Green Dragon" and other tourist vehicles. The Merced River Plan identified aircraft and vehicle noise as the top two noise sources and the top two priorities for management action, yet soundscape impacts remain unaddressed in Yosemite management plans. This noise not only exceeds NPS soundscape management standards and the requirements of the Wilderness Act and the Wild and Scenic Rivers Act, it also violates NPS regulations and the California Vehicle Code. This plan is the opportunity to address this long-overdue management action that is critical to preserving the park's wilderness character.

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Thank you for considering the Access Fund comments YNP's preliminary concepts and ideas for Yosemite's Wilderness Plan. It is critical that this plan provide an appropriate framework for addressing a subsequent climbing plan, which will mostly involve wilderness management. As noted

we believe that the establishment of a range of management zones that identify diverse desired conditions will protect and maintain wilderness character while designing appropriate management actions related to visitor use at different zones throughout the park's wilderness. Developing multiple zones with identified capacity limits and desired conditions will assist park planners to plan for the appropriate categories of overnight camping/bivouacs, recreational access, trail management, commercial services, soundscapes, and stock use. These zones will also effectively allow NPS planners to subsequently develop an effective and appropriate climbing management plan after this planning process is completed. We also believe that a destination quotas approach may be appropriate for select special destination, high use "hot spots."

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

Regards,

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

Jason Keith
Senior Policy Adviser
The Access Fund

Cc: Yosemite Climbing Association
Bay Area Climbers Coalition
Bishop Area Climbers Coalition
Climbing Resource Advocates for Greater Sacramento
Southern Sierra Climbers Association