



November 10, 2022

Yosemite National Park
Attention: Jesse McGahey
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Submitted via email: jesse_mcgahay@nps.gov and the NPS comment portal:
<https://parkplanning.nps.gov/commentForm.cfm?documentID=121898>

RE: Yosemite Overnight Big Wall Climbing Wilderness Stewardship

Yosemite National Park Planning Team:

The Access Fund, American Alpine Club (AAC), and Yosemite Climbing Association (YCA) welcome this opportunity to comment on the Yosemite overnight big wall climbing wilderness stewardship project. We appreciate the effort the Yosemite National Park (YNP) staff have made to include the climbing community throughout the pilot program and planning process. Public input is vital to making future management of wilderness big wall climbing successful. Yosemite is known for its world class granite big wall climbing. All of Yosemite's big walls lie within designated wilderness and require management strategies to preserve wilderness character. We provide the following comments to assist YNP in managing big wall climbing in wilderness.

The Access Fund

The Access Fund is a national advocacy organization and accredited land trust whose mission is to lead and inspire the climbing community toward sustainable access and conservation of the climbing environment. A 501(c)(3) nonprofit 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 a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. California is one of our largest member states. For more information about the Access Fund, visit www.accessfund.org.

The American Alpine Club

The AAC is a 501(c)(3) non-profit organization based in Golden, Colorado with over 25,000 members nationally. Founded in 1902 to support the research and exploration of mountainous regions, the AAC remains committed to supporting the climbing and human-powered outdoor recreation communities over a century later. Grounded in community and place, the AAC's mission is to share and support our passion for climbing and respect for the places we climb.

Through education, community gatherings, stewardship, policy, advocacy, and scientific research, the AAC strives to build a united community of competent climbers and healthy climbing landscapes.

Yosemite Climbing Association

The YCA, creates community stewardship events, through their nationwide Facelift: Act Local campaign. The YCA Facelift was created to inspire clean-up events across the U.S. to galvanize volunteer stewardship in the local parks and open spaces. Facelift expanded in 2022, with 15 new Facelift: Act Local events, coast to coast and the addition of the Mariposa Climbing Museum. The YCA promotes local and visitor stewardship of our precious public lands, creating community through preservation and education.

Comments

Our organizations have spent the past months collecting input from the climbing community regarding the proposed permit system for overnight camping while climbing a Yosemite big wall. YNP cited numerous concerns over impacts from big wall climbers and started a permit pilot program in May 2021 with a plan to enact a permanent program Winter of 2022. The pilot program's goals were to provide an opportunity to educate climbers on Leave No Trace (LNT) climbing ethics and park regulations and help climbing rangers quantify use patterns on big walls. YNP intends to increase compliance with existing regulations and minimize impacts to wilderness character through improved education. In the town hall meetings hosted by YNP, park staff shared concerns specifically over stashed gear and trash being left both on the wall and at the top of El Capitan, along with illegal fire rings and improper disposal of human waste. In July, 2022 Access Fund conducted a nationwide survey with the University of Utah to better understand climbers perspectives on quotas, fees and permits to access climbing areas. Over 1,700 climbers responded from 47 states and 15 countries outside the United States. We will provide survey results throughout our comments. We provide the following suggestions to help YNP craft the best plan to manage wilderness big wall climbing in Yosemite.

Permits

The process of acquiring a permit should be streamlined to reduce administrative burden on the public and YNP. During the pilot program, from April 30th through October 30th, climbers were required to pick up their permit in person from the Valley Visitor Center or Yosemite Museum between the hours of 7:30am and 5pm, requiring climbers to arrive at least one day prior to their climb. The remainder of the year, climbers could self-register to obtain a permit. We understand that in-person, pick-up of a permit affords YNP staff the opportunity to talk directly to climbers and provide education prior to climbers starting their climb. We strongly support any opportunity for additional education of climbers, however this limited time frame makes it difficult for some climbers to obtain a permit and have time to climb their objective. We strongly suggest a

year-round self-registration process for climbers to obtain permits, similar to the process in Black Canyon of the Gunnison National Park. Self-registration would be mandatory and continue to allow YNP to collect user data and monitor climbing activity. Self-registration would also eliminate the need to administer permits through Recreation.gov and charge administrative fees that do not benefit the park (see section below). Both of these are very important factors to the climbing community. We offer the following suggestions to support a successful self registration program:

- A kiosk could be placed near El Cap Meadows that provides condition reports, weather forecasts, important YNP updates, educational and Leave No Trace information in multiple languages and self-registration permits. All overnight big wall climbers would be required to self-register prior to climbing.
- Permits would be free.
- Provide a white board and climbers can write which route they plan to climb and date started. This would be useful information for other climbers when planning their routes.
- Offer both in-person and online education courses climbers can take prior to getting their permit.
- Develop QR codes that link to additional educational information in multiple languages.
- Access Fund, AAC, and YCA will assist in developing educational material and sharing out to the broader climbing community.
- Administer camping a day before and a day after big wall climbs. This could offer additional incentive to self-register.

Fees/Recreation.gov

During the pilot program, permits were provided free of charge. We advocate that permits continue to be free. The Access Fund Climber Survey reported that 45% of climbers would be deterred from climbing at a specific location if a fee was required. Additionally, climbers have voiced strong concerns over permits being administered through Recreation.gov. The Climber Survey reported only 29% of climbers supported fees being used to support a reservation system like Recreation.gov. We understand that YNP and all federal land agencies are required to use Recreation.gov to administer online permits, however a minimum of \$2 of each transaction goes to Recreation.gov and provides no financial benefit to YNP. This is why we are advocating for in-person, self-registration instead of an online permit system.

The Climber Survey reported that 82% of climbers supported some fee if it was going directly towards efforts to support ecological restoration and reduce climbing impacts. YNP stated the purpose behind the permit system is to educate and monitor big wall climbers and no budget or plan was introduced to propose fees. Any future implementation of fees should be open to public comment and YNP should provide a detailed budget to show what the fees would be used for.

Quotas

Overwhelming feedback indicates that climbers are extremely concerned that YNP will at some point implement a quota system for overnight camping while climbing big walls in Yosemite. One of the largest concerns with implementing a permanent permit program is opening the door to future quotas. We acknowledge that YNP stated that there is no intention to apply quotas to big wall permits and that YNP's current use data does not indicate a need for such regulation. The use of quotas would severely restrict climbers ability to climb a chosen route based on their experience level, weather, and other external factors. We strongly encourage YNP to not implement a quota system. The Climber Survey reported that 44% of climbers would be deterred from climbing at a specific location if a quota was implemented. If in the future, YNP deems it may be necessary to implement quotas for big wall climbing or quotas for specific routes, we request an additional public process be held to include the climbing community in the determination.

Combinations of Permit, Fee, and Quota

Overall from our conversations with the climbing community and data from our Climber Survey, the consensus is climbers are deterred from visiting a location if the climbing area requires a fee, permit, quota, or some combination of the three.

- 55% of climbers would be deterred from climbing at a specific location if a fee and a quota was required.
- 45% of climbers would be deterred from climbing at a specific location if a fee was required.
- 32% deterred from climbing at a specific location if a permit was required.

This data supports our recommendation to keep permits free and without a quota to avoid deterring a larger portion of the climbing population from experiencing big wall climbing in Yosemite.

Camping and Infrastructure

The pilot program permit included a night of camping one day before and one day after a climber's big wall climb in the backpacker camping lot. This was a great benefit to many climbers and helped relieve the burden of needing to show up a day in advance to pick up their permit in person. We suggest YNP continue to offer camping a day before and a day after a big wall climb. This could be an incentive for climbers to self-register. We recommend a designated portion of Camp 4 be set aside specifically for this use. Given the historic nature and location of Camp 4, this camp would be an ideal location for big wall climbers to gather as well as a centralized spot for YNP staff to disseminate educational information and updates. Furthermore, additional camping options intended specifically for the climbing community should be explored. A climber's campground, much like the backpacker's campground, could serve as a centralized location for permits, condition reports, and interaction with YNP staff, while

alleviating pressure on the Park's other limited campsites. We encourage YNP to consider a multitude of sustainable camping options and see a mutual benefit between achieving the purpose and need for the big wall permit program and the needs of the climbing community in this regard. Additionally, supporting curated spaces for climbers within YNP will promote community interaction and education, creating a forum for YNP and climbers to address any impact issues caused by climbing in the future.

We recommend adding additional bear boxes near the start of popular big wall climbs to address ongoing issues with food storage. This would facilitate proper food storage for parties that may have to shuttle multiple loads prior to starting a climb and reduce issues with wildlife getting into unattended food.

Education

We strongly support education being the primary goal of administering permits to big wall climbers. We suggest a robust curriculum be developed that is accessible to climbers both in-person and online. We are ready to assist in developing and sharing educational materials that will reduce climber impacts to wilderness character and natural resources. Educational and LNT materials along with rules and regulations could be posted at the self-registration kiosk. In addition, materials could be developed online much like the AAC's "Know the Ropes" video series which teaches skills targeted towards newer outdoor climbers.¹ And the Access Fund's Climber's Pact.² QR codes could be posted at the climber kiosk that provide the materials in multiple languages.

Metrics and Data

One goal of the pilot permit program and proposed permit program is to collect data on climber use and patterns. We encourage YNP to continue to collect this user data and make it regularly available to the public. Any future management decisions regarding the big wall permit program should be based on user data collected. We request YNP develop clear metrics and benchmarks for success to be measured with permit collection and provide ongoing communication to the public about successes as well as what might trigger additional restrictions such as quotas or fees.

Justice, Equity, Diversity, and Inclusion (JEDI)

We urge YNP to work with the broader climbing community to advance inclusive and equitable access to YNP. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. Access Fund has staff dedicated to JEDI issues, and is more than willing to offer

¹ <https://americanalpineclub.org/know-the-ropes>

² <https://www.accessfund.org/learn/the-climbers-pact>

our time and resources to assist the YNP in applying JEDI principles to Yosemite. In addition, the AAC assisted with the first “United in Yosemite” event in 2022 and look forward to hosting this event in future years.

Community Partnership and Support

Access Fund, AAC, and YCA are dedicated to continued partnership with YNP in managing all aspects of climbing in Yosemite. We would like to continue to work with YNP to engage and educate the broader climbing community, foster mentorship within the community and invite industry brands and their professional athletes to join the conversation to assist in minimizing future impacts and avoid the need for additional regulation of climbing in Yosemite. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program³ or assistance from our Conservation Team⁴ which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy. The AAC’s Cornerstone Conservation Grant may also be useful to help subsidize the cost of the Access Fund’s Conservation Team.⁵

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³ <https://www.accessfund.org/take-action/apply-for-funding/climbing-grant-application>

⁴ <https://www.accessfund.org/pages/conservation-team>

⁵ <https://americanalpineclub.org/cornerstone-conservation-grant>

Thank you for your consideration of these comments on Yosemite overnight big wall climbing wilderness stewardship planning process. Our organizations have the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. We look forward to continuing to work with YNP. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone (303) 552-2843 or email (katie@accessfund.org) to discuss this matter further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katie Goodwin".

Katie Goodwin, Access Fund California Regional Director, Policy Analyst

A handwritten signature in cursive script, appearing to read "Taylor Luneau".

Taylor Luneau, American Alpine Club, Policy Director

A handwritten signature in cursive script, appearing to read "Timmy O'Neill".

Timmy O'Neill, Yosemite Climbing Association, Executive Director