

# OUTDOOR ALLIANCE



March 19, 2013

Yosemite National Park  
Superintendent Don Neubacher  
Attn: Merced/Tuolumne River Plans  
P.O. Box 577  
Yosemite, CA 95389

sent via e-mail to: [yose\\_planning@nps.gov](mailto:yose_planning@nps.gov)

Dear Superintendent Neubacher,

Outdoor Alliance appreciates having the opportunity to provide comment on Yosemite National Park's Draft Wild and Scenic Merced and Tuolumne River Management Plans. Outdoor Alliance is a coalition of six national, member-based organizations that includes Access Fund, American Canoe Association, American Hiking Society, American Whitewater, International Mountain Bicycling Association, and Winter Wildlands Alliance. Collectively, we represent the interests of the millions of Americans who hike, paddle, climb, mountain bike, ski, and snowshoe on our nation's public lands, waters, and snowscapes. These lands and waterways include those affected by the Draft Management Plans for the Wild and Scenic Merced and Tuolumne Rivers.

Collectively, Outdoor Alliance has members in all fifty states and a network of almost 1,400 local clubs and advocacy groups across the nation. Our members travel from across the country to experience the spectacular landscapes that characterize Yosemite National Park, particularly those that are valued for human-powered outdoor recreation.

The people we represent have developed a deep personal connection with America's public lands through hiking, paddling, biking, climbing, and backcountry skiing. More than just means of travel, these activities literally and figuratively immerse our members in special places. Their relationship to a place is not static: it is a physical conversation with the landscape. It is this experiential relationship that has inspired all of our nation's great environmental leaders, including many inspired by their connection to Yosemite National Park itself.

A common theme for all of these activities is the element of risk. For many drawn to nature, the risks sharpen focus and skills, and ultimately afford a stronger connection with a wild place. This was as true for John Muir as it is for a present day adventurer. As Wilderness advocate Bob Marshall famously wrote:

Adventure, whether physical or mental, implies breaking into unpenetrated ground, venturing beyond the boundary of normal aptitude, extending oneself to the limit of capacity, courageously facing peril.<sup>1</sup>

Our activities offer the most direct and intimate means of exploring and experiencing Yosemite National Park.<sup>2</sup> They are exactly the kinds of enjoyment the National System was set aside to protect for perpetuity. And yet, Yosemite National Park's proposed Wild and Scenic River Management Plan would ban paddling on several sections of the Merced and Tuolumne rivers because Park officials deem the activity too risky.<sup>3</sup> Rather than manage activities based on a perception of risk, we believe that the Park Service should implement management actions that focus on protecting the valued resources within the Park. The current approach creates a slippery slope that will inevitably lead to a standard that will be viewed as arbitrary.

Paddling, like all our activities, is a well-established form of recreation with a suite of skills and equipment aimed at mitigating and minimizing risks. The activity has developed in a manner that addresses the vast majority of subjective and objective hazards, regardless of the level of challenge. Simply put, very good paddlers with good gear can paddle very difficult rivers with relative ease and safety. These people have earned the keys to unlock some of the most beautiful and remote outdoor experiences on earth by building the requisite skills, knowledge, and friendships—the only true currencies of Wilderness travel. We believe that Yosemite National Park should welcome these experiences rather than turn them away.

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<sup>1</sup> Marshall, Bob. "The Problem of the Wilderness" *Scientific Monthly* 30 (2), February 1930. pp. 141 – 148.

<sup>2</sup> NPS management policies direct that "Appropriate visitor enjoyment is often associated with the inspirational qualities of the parks. As a general matter, preferred forms of enjoyment are those that are uniquely suited to the superlative natural and cultural resources found in the parks and that (1) foster an understanding of and appreciation for park resources and values, or (2) promote enjoyment through a direct association with, interaction with, or relation to park resources." See NPS Management Policies, 1.5, Appropriate Use of the Parks (2006).

<sup>3</sup> See, for example, the Tuolumne River Plan p. 7-118 (prohibiting boating through the Tuolumne Meadows, and p. 8-186 (limit paddling activity because of the risks involved); and the Merced River Plan at pp. 8-37, 8-254, 8-296.

It is axiomatic that the Park Service must educate and actively manage casual visitors that may not be aware of the risks of rapids, cliffs, snow, and other objective hazards. For activity-oriented skilled visitors however, a different approach is warranted. For these visitors, safety can be promoted through requiring proper equipment, and in some cases educational points of contact with Park personnel (often as part of permit issuance). From our perspective, this should be the default management, if there is any active management at all, of our activities across our nation's public lands.

Banning our uses in certain areas to accomplish safety objectives is not the answer. We believe individuals are in the best position to make risk assessments, and we fully support the Park Service in helping to inform those assessments. In other words, through education the Park Service can allow visitors to determine which activities are appropriate for their group and skill level. Banning an activity in an area forecloses opportunities for Americans who have spent years developing the requisite skills from connecting with Yosemite in their own personal way. This impact is felt intensely by those of us who yearn for such a connection with the Park.

We ask that you reconsider using inherent risks in outdoor activities to limit or ban activities in Yosemite National Park. Keeping with a policy of supporting the exploration of National Parks by adventurous paddlers, climbers, skiers, mountain bikers, and hikers, will insure that our members continue to support the National Park Service in its role of protecting our most treasured landscapes.

Thank you for considering this request.

Best regards,

Brady Robinson  
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Access Fund

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Executive Director  
American Whitewater

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