

Dear Zion Canyoneer –

Zion National Park released its draft Backcountry Management Plan on May 27, 2007 for public comment. Comments are being accepted through July 30, 2007 – so NOW would be a good time for you to comment on the plan.

The Zion Canyoneering Coalition (ZCC) finds the draft plan deeply troubling, both from a procedural point of view, from its apparent misuse of the scientific data collected in the VERP study, and the solutions offered to the claimed problems. Below, we list what we feel are the biggest problems with the draft plan. Please read these, study the plan and make your comments by July 30, 2007 to:

**Zion National Park
Attn: Backcountry Management Plan/EA
Springdale, UT 84767**

YOUR COMMENT LETTER

May I suggest your comment letter take the following form:

1. Greeting: “Dear Zion National Park planning team –“
2. “Thank you for allowing me to comment on the May 2007 Backcountry Plan / EA for Zion National Park”.
3. A one-paragraph statement about who you are, what you do and how you use the Park.
4. A clear, one-sentence summary of your position. Such as: “While I support the raising of Daily Use Limits in Alternative B, in general I think the plan has serious flaws that make it unacceptable. The Park has not offered an acceptable alternative.”
5. As many specific points from the plan that you object to, as clearly stated as possible. Please be specific, be polite, be helpful, and be direct.
6. Below are the points that I find most objectionable about the plan. It is probably better to pick out the few key matters that boil your blood, and emphasize those.
7. In the past, I have suggested that telling stories about how the permit system makes your trip to Zion extremely difficult was appropriate. I consider this story-oriented approach a lot less appropriate in this context.

But, the most important point is to DO IT, and get your letter in the mail, with a Monday, July 30th (or earlier Postmark).

Thanks – Tom Jones, Chairman, Zion Canyoneering Coalition

Brief Description of the Backcountry Plan/EA

(the plan can be viewed at the Zion Canyoneering Coalition Website:
<http://www.zioncanyoneering.org>)

The May 2007 plan offers two alternatives:

Alternative A (no action) is the Interim Use Limits as put in place in Spring 2003.

Alternative B (Proposed Action/Preferred Alternative) is much like the Interim Use Limits with some adjustments, and with an ongoing process for adjusting Use Limits using the VERP process. Significant adjustments include:

1. Pristine Zion group size limit would be reduced (6 vs. 12).
2. Use Limits for 2008 would be adjusted in some canyons, including:
 - A. The Subway (80 vs. 50)
 - B. Zion Narrows (2 categories: 40 day users & 12 groups/night replaces 80 total)
 - C. Pine Creek (50 plus possibly greater outside nesting season vs. 50)
 - D. Keyhole (80 vs. 50)
 - E. Orderville Canyon (50 plus possibly greater outside nesting season vs. 50)
 - F. Engelstead Canyon (20 vs. 12).
 - G. In general, Pristine Zone Canyons (20 vs. 12).
 - H. In general, Primitive Zone Canyons (80 vs. 50).

Conditions would be monitored and Use Limits adjusted based on backcountry ranger patrol reports.

Visitor Experience and Resource Protection (VERP) Study

As part of the planning process, a Visitor Experience and Resource Protection (VERP) study was conducted by Robert Manning et al. It looked at various aspects of the Visitor Experience in the backcountry. While the ZCC is highly critical of the conduct of the study, we consider the data produced by the study worthy of consideration.

The study report and the ZCC's criticism of the study is available on the ZCC website.

ZCC Evaluation of the Backcountry Plan and Suggested Talking Points

Before delving into specific issues, we would like to take the opportunity to point out the parts of the Plan that we support. The general relaxation of encounter rate targets, and the raising of daily quotas to 20 (Pristine) and 80 (Primitive) we wholeheartedly applaud. The application of scientific data to the problems at hand, both for planning purposes and as an ongoing effort, is a big step in the right direction.

However, the ZCC believes that the proposed Backcountry Plan has serious problems, and is unacceptable. Our main points of contention are:

Process Issues

A. The draft Plan offers only the No-Action Alternative and Alternative B, the Proposed Alternative, which is largely similar. While we applaud many of the changes in Alternative B, offering a limited range of Alternatives is contrary to the spirit of NEPA and makes a poor starting point for public involvement and effective discussion. A draft plan should offer a range of alternatives – this does not.

Offering but one alternative makes the claim that there is only one legitimate viewpoint. There are contentious issues here – namely the balance between using a complex and cumbersome permit system to ensure one wilderness value (minimizing social encounters) vs. allowing natural social processes to develop and emphasizing other wilderness values (primitive and unconfined recreation). By offering only one solution, park planners close out the possibility of balancing competing interests in a different way; this is poor planning.

B. DRAFT? Or proposed FINAL? The Backcountry Management Plan as released in May 2007 has no indications that it is a draft plan. If not, then this is the public's final chance to comment on these important issues, and the next process step is a final ROD. The Superintendent's letter extending the comment period indicates that this is indeed a draft plan, and thus the next step in the process would be the development of a final Plan utilizing public comments as input. Clarification on this issue should have been part of the draft Plan.

Substantive Issues with Alternative B

A. Non-Use of Inconvenient VERP Study Data

The planning team did not use in the Management Plan VERP Study data that did not support its point of view.

The main point of contention between the ZCC and the NPS planning team has been the extent to which the canyons are crowded. Canyons crowded = comprehensive user restrictions are appropriate. Canyons uncrowded = user restrictions should be applied sparingly. Before the release of the VERP study data, this was a matter of contending opinions. With the release of the VERP study, we have data to look at this specific question, and make an informed decision of where the public stands re: canyon crowding.

Both the 2002 and 2003 studies of Zion Day Use (Permitted) Canyons extensively explored visitor standards of quality for canyon encounters. Consistently and convincingly, the results indicate that visitors are much more tolerant of social encounters than park planners. The lack of distinction between Pristine and Primitive Zone results makes exact interpretation difficult, but, for instance, 90% of park visitors considered it appropriate for the park to manage for an encounter rate of 4 or more groups.

ZION DAY USE (PERMITTED) CANYONS - 2003

Q4D: What is the maximum number of other groups seen/heard that the National Park Service should allow in this canyon? In other words, at what point should visitors be restricted from using this canyon? If the number of groups should not be restricted, you may indicate that.

Number of Groups	Frequency	Percent	Accum Up	Accum Down
1	3	2.1%	2.1%	100.0%

2	4	2.8%	4.9%	97.9%
3	7	4.9%	9.7%	95.1%
4	15	10.4%	20.1%	90.3%
5	7	4.9%	25.0%	79.9%
6	18	12.5%	37.5%	75.0%
7	2	1.4%	38.9%	62.5%
8	11	7.6%	46.5%	61.1%
9	3	2.1%	48.6%	53.5%
10	25	17.4%	66.0%	51.4%
12	15	10.4%	76.4%	34.0%
14	3	2.1%	78.5%	23.6%
15	5	3.5%	81.9%	21.5%
20	6	4.2%	86.1%	18.1%
30	3	2.1%	88.2%	13.9%
50	2	1.4%	89.6%	11.8%

The number of groups
in this canyon should
not be restricted.

15	10.4%	100.0%	10.4%
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In the same study, this question was asked in several different ways, and the data comes out the same - canyoneers are much more tolerant of social encounters, and therefore feel that the canyons are much less crowded, than park planners accounted for. This data reveals that the “problem” is much less severe than park planners presume, and the comprehensive, expensive, difficult and restrictive park-wide quota and permit system is not required to achieve park objectives.

Park planners’ omission of this important data is unconscionable.

B. Selective Quotation from VERP Study Data

On a similar note, park planners did bring in data from the VERP study when it could be interpreted to support Alternative B. On pages 35 and 36, Table 3 (Visitor Acceptance of Management Options for Slot Canyons) shows that backcountry visitors by and large (75.2%) support the management action of “Restrict visitor use through a permit system to ensure opportunities for solitude”. This shows support for quotas and permits, but should not be taken out of context.

A more nuanced study of this kind of question, such as that found in a study of high-use Wilderness Areas by David Cole (*High-Use Destinations in Wilderness: Social and Biophysical Impacts, Visitor Responses and Management Options*. Cole, Watson, Hall and Spildie. US Dept of

Agriculture, Forest Service Intermountain Research Station, Research paper INT-RP-496. October 1997), indicates that visitors support management actions that may restrict access when there is an actual problem that the action would solve. In the current circumstance, the public does not perceive that there is a crowding problem and, in an informed environment, would not support unnecessary restrictions.

C. Decrease in Group Size for Pristine Zone canyons from 12 to 6

Page 29 indicates that the group size limit for Pristine Zone canyons would be reduced to 6, with an explanation on page 39. There are several problems with this proposal:

C1: park planners' interpretation of the VERP study on this issue is not correct. The 2002 Zion Day Use (Permitted) study, Question 10; the question was asked in a decidedly ambiguous manner. 20.6 percent of people found a maximum group size of four to be Very Unacceptable. This indicates that quite a few people were finding the suggested maximum group size TOO LOW, and that these were lumped together with the people who found the suggested maximum group size TOO HIGH.

C2: while taking into account the preferences and prejudices of backcountry visitors is laudable, on issues that involve restricting public access, park planners should look to the park mission and objectives in making decisions, not to the taste of the majority of visitors. The ZCC agrees that groups larger than 12 present serious social and physical impacts on canyons that are not appropriate to wilderness management. Beyond that, the ZCC feels that the park should have a compelling governmental interest, as indicated in the park mission and objectives, in order to further select from classes of visitors to the park. In other words, this issue should not be put to a vote.

C3: if there was a significant problem with excess encounters with large groups, then perhaps management action would be appropriate. By the 2003 survey (Pristine and Primitive zones combined), only 16.2% of groups were 7-12 persons – indicating that there are not a large number of large groups. By the 2002 survey, only 9.3% of visitors rated the performance of avoidance of encountering large groups (question 8/c.) as less than satisfactory. There IS no problem with excessive encounters with large groups – management action is unnecessary and therefore unnecessarily restrictive.

C4: data interpretation – there is a bias in the 2002 and 2003 surveys that can perhaps be corrected by re-tabulating the data. Since surveys were handed randomly to group LEADERS, the data is biased towards small groups in inverse proportion to the group size. In other words, the more desirable group to survey is the backcountry PARTICIPANTS, and the method of selection creates a bias that over-represents the opinions of people in small groups and under-represents the opinions of those in large groups. In other words, if this was a vote of all backcountry participants, then the results of the vote would be quite a bit different than what the park planners reported, especially regarding group size.

C5: a logical conundrum – park planners create a logical conundrum in arguing that a group size of 12 creates social problems, while setting the daily quota for most of the effected canyons at 12. Just who is this large group going to have an undesirable encounter with, themselves? Other combinations of groups (say, 8 and 4, or 9 and 3) are unlikely to encounter each other, and if they do, are likely to have but a brief encounter. It is unclear to me how setting a max group size of 6 in the context of a daily limit of 12 actually decreases undesirable encounters. In a context of a daily limit of 20, the logical conundrum is less acute – but we still believe that encounter studies would indicated that there would not be a significant encounter problem in these canyons.

Philosophically, it is far from clear that it is the park's business to discriminate between legitimate users of the backcountry based on another group's claimed distaste for a certain kind of encounter. It seems kind of petty, and kind of mean; without actually achieving anything.

D. Lack of VERP Data on Key Issues

The Zion backcountry is unique in its usage patterns within the National Park System. Because technical gear is required to access most of the backcountry, because the people visiting these areas are not similar to the on-trail backcountry backpackers; and the Narrows and Subway hikers are not similar to the users of the more technical canyons, there are planning and management issues that a carefully-crafted VERP study could shed considerable light on. None of these Zion-specific issues were addressed in Dr. Manning's study.

Some of the questions we would like to have seen studied:

D1. For each canyon, what percentage of permits actually convert to visitors enjoying the canyon? What is the conversion rate, and what factors effect it?

D2: For each canyon, for a given number of parties in the canyon, what are the actual encounter rates, and what are the perceived encounter rates?

D3: What are the important differences between Pristine and Primitive Zone visitors, their use patterns and desired wilderness qualities?

D4: Quotas impose a different use pattern on canyon use. For short canyons such as Echo, Keyhole and Pine Creek, do quotas actually achieve the desired result? Do quotas effectively manage crowding in these canyons, or do they just prevent public access during un-utilized hours.

E. Proposed Use Limits / Limiting Factors

On page 40, Table 13 lists as limiting factors for Mystery Canyon and Spry Canyon “Eroded access trail”. For each canyon, it is unclear that increased use has any effect on these particular trails. The egress trail problem from Spry Canyon has been solved by communicating to visitors that the watercourse should be descended to Pine Creek, and is now virtually unused as indicated by the lack of trail on the sandslide. The access trail to Mystery Canyon is, for the most part, down a steep Carmel-layer clay debris flow with a hardened surface that shows little change with human passage. In these canyons, these erosion issues are not a legitimate limiting factor.

Also in Table 13, it is indicated that Mexican Spotted Owl nesting sites are the limiting factor for increasing day traffic in Orderville, Pine Creek, Behunin and Echo canyons. Scientific studies and anecdotal evidence tend to indicate that canyon-bottom day-visitors tend to have little or no effect on wall-nesting nocturnal owls. We hope that the park will be able to bring resources to this issue on a timely basis, and ascertain whether visitor quotas can be increased. This is an issue that perhaps could have been resolved in the planning process.

G. Monitoring VERP Standards and Re-Evaluations

In numerous places in Alternative B (page 36, page 41) it is indicated that the primary method of monitoring VERP standards would occur during backcountry patrols, and that re-evaluations would occur every 3 years.

This will be inadequate. The professionally conducted VERP study was inadequate to shed light on the specific issues involved; certainly nothing other than a carefully conducted, issue-focused ongoing study will provide adequate data to monitor VERP standards and make scientific, informed re-evaluations. Assistance with these studies is likely available through Southern Utah University in Cedar City.

There are scientific consequences of using backcountry staff to monitor VERP conditions. Backcountry staff crowding norms are likely quite different than those of the backcountry public, and their reports of conditions are likely to be biased. (This is shown by the 2003 imposition of Use Limits that were considerably lower than the public supported – the Use Limits were based on the idealistic viewpoint of backcountry staff, rather than a scientific evaluation of backcountry crowding). It should also be understood that the VERP baseline data is based on visitor PERCEIVED encounters, rather than visitor ACTUAL encounters – which make rather a large difference. (See *High-Use Destinations in Wilderness: Social and Biophysical Impacts, Visitor Responses and Management Options*. Cole, Watson, Hall and Spildie. US Dept of Agriculture, Forest Service Intermountain Research Station, Research paper INT-RP-496. October 1997). Backcountry staff trained in data acquisition will tend to report much higher encounter rates than backcountry visitors – and the VERP baseline and crowding norm data is based on the PERCEIVED encounter rate, and thus visitor perception is the scientifically correct variable to track.

F. Wilderness Values vs. Restrictions and Quotas

There are important issues not addressed in the Plan, the most important of which is the degree that the permit system, quotas and restrictions impinges on important wilderness values such as the “outstanding opportunities for ... a primitive or unconfined type of recreation”. This particular issue is difficult to address, no doubt, as it is an issue of flavor and style, rather than of specific data – but it is a key issue nonetheless. Park planners endorse an elaborate, expensive, cumbersome and restrictive quota and permit system largely in the interest of protecting a specific, narrow interpretation of one wilderness value, to the exclusion of other wilderness values. This deserves

discussion, a discussion that could be fostered by offering more than one alternative, which was not done in this draft plan.

G. Not Included for Review – Permit System Parameters

Another important issue that is not discussed in the plan are the parameters associated with implementation of the Permit System. While the ZCC appreciates the difficulties of managing a complex system, and wants to avoid micro-managing the system, we feel that SOME discussion of how the permit system is implemented is appropriate. Some of our questions are:

G1: is there a less-burdensome method of achieving park goals, such as self-issued trailhead permits, which would be appropriate for many or most visitors, and many or most canyons?

G2: various aspects of the permit system should be evaluated for effectiveness. Does the not-more-than-24-hours in advance signed-affidavit-of-seeing-a-weather-report system actually contribute to visitor safety, or are visitors able to make good decisions about weather aspects without coercion?

G3. many other National Park units have managed technical backcountry day-use activities with mandatory permits and quotas, but most of them have dropped or carefully focused these systems on specific problems. Why? What were the consequences good and bad of dropping or focusing these systems?

We suggest that bringing all aspects of backcountry management to the Backcountry-Management-Plan-table once every 20 years is desirable, and rather the point of the whole thing.

Overall, while we endorse certain aspects of the plan, we find many aspects of it troubling.