



July 30, 2007
Zion National Park
Attn: Backcountry Management Plan/EA
Springdale, UT 84767

Dear Zion National Park planning team –

Thank you for the opportunity to comment on the May 2007 Backcountry Plan / EA for Zion National Park, and thank you especially for extending the comment period.

The Zion Canyoneering Coalition is a group of canyoneers with a high interest in the management of the technical backcountry in Zion National Park. As such, our area of interest encompasses the canyoneering part of the backcountry, including The Narrows, The Subway and Orderville Canyon; and our comments should not be interpreted to include the on-trail, backpacking and climbing sections of the plan, about which we have no significant opinion.

We commend the Park for completing the draft Backcountry Management Plan in extremely difficult conditions. While NPS Regional resources were available for development of the General Management Plan, the planning process for the BC Management Plan fell on the already busy shoulders of Zion's Backcountry staff. In addition, personnel changes and shortages made completion of this plan seemed unlikely in a timely basis.

ZCC Assessment of the Backcountry Plan – The Good Points

Before commenting on other, specific issues, we would like to take the opportunity to point out the part 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 step in the right direction. Recognition that the severely restrictive interim target encounter rates and daily quotas imposed in 2003 were unsupported by the scientific literature and by the VERP studies is laudable.

Overall Assessment

The ZCC believes that the proposed Backcountry Plan is seriously flawed, and is not acceptable.

A Philosophical Divide

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While points of philosophy are not debatable in the Backcountry Plan, we would be remiss if we did not touch on a few philosophical issues where the ZCC and the planning team are in conflict, in order to place our later comments in context.

(1) When is a Wilderness no longer a Wilderness? The Wilderness Act of 1964 defines a Wilderness (among other things) as being a place which “*has outstanding opportunities for solitude or a primitive and unconfined type of recreation;*” The planning team for the Zion Backcountry Plan has chosen to focus monomaniacally on the first clause of this definition – claiming that their duty is to construct a system for minimizing social encounters - while ignoring the equally important second clause. Arguments against this focus include:

A. Lack of social encounters is NOT solitude. Equating the two is fallacious – equating the two only came about because researchers could find no other solid number to measure the wilderness experience with. Numerous studies (including the Zion VERP Study, Zion Day Use (permitted) Backcountry Survey – 2002, Question 8) show that while the two are related, they are not the same.

B. Building an elaborate permit system is contrary to a primitive and unconfined type of recreation. The permit system itself becomes a significant impingement on the wilderness experience of visitors.

C. Building an elaborate permit system is contrary to solitude. Among the attributes of solitude is a freedom from the restrictions of society and government, whereas the proposed permit system provides an ever-present sense of governmental control and structure. See (*Wilderness Solitude: Beyond the Social-Spatial Perspective* by Hollenhorst, Steven J.; Jones, Christopher D. 2001. In: Freimund, Wayne A.; Cole, David N., comps. 2001. Visitor use density and wilderness experience: proceedings; 2000 June 1-3; Missoula, MT. Proc. RMRS-P-20. Ogden, UT: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station: 56-61. Wilderness.Net Research Library Publication Number 2173).

(2) In the planning process, placing restrictions on visitor freedom requires evidence of a problem that requires a solution, and consideration of more than one solution. While in the ordinary process of day-to-day management, we applaud the Park’s timely response to suspected problems, the once-every-20-years planning process is THE place for the park management, with input from the public, to study use of the park and determine whether suspected problems actually exist, at what level, and what the appropriate, least-restrictive response would be. This was not done in this planning process.

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(3) In conjunction with (2), the ZCC contends that a careful and structured VERP study is required to shed light on the specific issues contested in this backcountry plan. The park failed to conduct a careful and structured VERP study. Therefore, the park is in a weak position to continue the current highly-restrictive permit system; and should rescind the day-use permit system for most areas in the park until the park can present evidence that identifies a problem that requires such restrictions.

Specific Comments on the Zion Backcountry Management Plan / EA 2007 (proposed)

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 (solitude, and 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.

Examination of other aspects of this kind of question lead to serious questions about the plan’s interpretation of this result:

From *Visitor Use Density and Wilderness Experiences: A Historical Review of Research* by David N. Cole In: Freimund, Wayne A.; Cole, David N., comps. 2001. Visitor use density and wilderness experience: proceedings; 2000 June 1–3; Missoula, MT. Proc. RMRS-P-20. Ogden, UT: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station., similar aspects were studied in more detail, leading to the following conclusions (excerpts):

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Visitor Opinions About and Responses to Use Limits

Further insight into the effects of use density on experiences can be gleaned from studies that asked visitors about their support for use limits. Typically, visitors support restricting the number of visitors to an area if it is being used beyond its capacity (Lucas 1980). However, visitors are reluctant to ever conclude that an area is being used beyond its capacity. Starting with a study of three eastern wilderness areas (Roggenbuck and others 1982), visitor support for use controls has been assessed by asking them to select one of the following responses: (1) controls are needed to lower use, (2) controls are needed to hold use at current levels, (3) controls not needed now, but should be imposed in the future if overuse occurs, or (4) controls not needed now or in the future. Virtually everywhere this question has been asked, including some of the most densely used destinations in the wilderness system (Cole and others 1997), most people have responded that controls are not needed now but should be imposed in the future if overuse occurs.

The one exception in the literature Linville Gorge Wilderness already has a permit system. Most visitors there also support the status quo, which in this case, means they think use should be held to current levels. Shortly after the implementation of use limits, visitor opinions about limits were assessed at Rocky Mountain National Park (Fazio and Gilbert 1974), Denali National Park (Bultena and others 1981), and San Gorgonio and San Jacinto Wildernesses (Stankey 1979). In each case, most people who visited these places after use limits had been imposed supported that management action. They supported the current management regime.

Hall and Cole (2000) examined visitor response to the imposition of use limits in the Obsidian Falls area of the Three Sisters Wilderness. Prior to the imposition of use limits in 1991, 60 percent of visitors opposed use limits. After implementation of limits in 1997, 60 percent of visitors supported the use limits. One might want to interpret this as evidence that visitors changed their opinion about use limits once they experienced the benefits that accrue from a reduction in use density. This does not appear to be the case, however. Prior to the imposition of use limits, most visitors were repeat visitors. Following the imposition of

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use limits the clientele had changed dramatically. Most visitors were first-timers, more amenable to regulation and, interestingly, no less tolerant of encounters or ecological impacts. One of the effects of use limits was to displace many traditional users who were replaced by people who were less bothered by being regulated. Consequently, the majority of visitors supported the current management regime, regardless of what that regime was. Use limits were not imposed at Green Lakes a nearby wilderness destination that was even more heavily used than the Obsidian Falls area. The portion opposed to use limits there increased from 60 to 70 percent between 1991 and 1997.

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Consequences of Choice

When the consequences of choices are made clear, current onsite visitors tend to support the current management regime and accept existing biophysical and social conditions (unless the costs of a change in management are all borne by some other user group). Since density has little effect on experience quality, few visitors are willing to forego the opportunity for access in order to have fewer encounters when they do visit.

Although visitors tend to support the concept of limiting use to avoid certain problems, they seldom conclude that problems are severe enough to warrant limits at this time perhaps because they recognize that such limits would hinder their own access. Those who do not like the current management program, either the existing regulations or resultant conditions, are likely to have already gone elsewhere. They are not likely to make up a large proportion of any sample of onsite users. Therefore, if use levels are increasing and managers make decisions about tradeoffs the way that empirical studies suggest most visitors would, there will almost always be a constant evolution toward higher density experiences. This suggests that the rationale for use limits is more likely to come from some careful evaluation of legislative and administrative mandates or the unique value and purpose of any given area than from a survey of current visitors.

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

We object to the proposed change in group size 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; and interpreted as all being in the category "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.

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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

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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

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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.

H. The VERP Study was conducted in an invalid manner.

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The NPS VERP Handbook (1997) provides guidance in conducting VERP studies. We contend that the VERP process was compromised at the outset in significant ways, and thus 100% of the VERP data should be viewed with extreme suspicion.

The pertinent part of the VERP Handbook is the section on the VERP Framework:

SUMMARY OF THE (VERP) FRAMEWORK

Nine elements are integral to the VERP framework. The elements are summarized below; each element is discussed in further detail in subsequent chapters. While the scope of the elements, the order in which they are undertaken, and the specific methods used to complete the elements may vary in different situations, all of the elements are necessary to implement a VERP program. Although the elements are numbered and may appear to follow a linear process, it is important to remember that the VERP framework is iterative, with feedback and “feed-forward” occurring throughout the elements.

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Analysis

Element 4: Analyze Park Resources and the Existing Visitor Use. The objective of this element is to understand as fully as possible park resources and existing visitor use and experience. This analysis should be documented, usually through a combination of maps, matrixes, and text.

Prescriptions

Element 5: Describe a Potential Range of Visitor Experiences and Resource Conditions (potential prescriptive zones). Potential zones are described by different desired visitor experience opportunities and resource conditions that could be provided in a given park, consistent with the park purpose and significance. The zone descriptions prescribe the appropriate kinds and levels of activity, development, and management. These potential zones are described in text only; they are applied to specific geographical areas in element 6.

Element 6: Allocate the Potential Zones to Specific Locations in the Park (prescriptive management zoning). In this element the zones described in element 5 are assigned to specific locations in a park. The zoning scheme *prescribes* future conditions; it is not descriptive of existing conditions, although in some cases the continuation of existing conditions could be the desired future. If appropriate, the planning team should develop alternative zoning schemes and assess their beneficial and adverse impacts, consistent with the National Environmental Policy Act (NEPA).

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The VERP study in Zion was done backwards. While the VERP handbook calls for a study of baseline conditions, ie, current conditions of Visitor Use, then the definition of zones and imposition of zone conditions; several of these steps were done in the General Management Plan, severe restrictions imposed (in 2003), and then the bulk of the VERP study conducted. In other words, park planners imposed major restrictions on visitor access and usage patterns, THEN studied the baseline conditions and visitor experience.

We can never again get to the baseline conditions before imposition of severe visitor restrictions in 2003, but from previous studies (including those quoted above), we can see that the interim restrictions substantially changed the visitor base. Previous studies indicate that the result of these changes is a surveyed public that is much more amenable to access restrictions and compliant with park planner's view of the backcountry as crowded and the permit system as being appropriate.

Conclusions

Overall, while we consider the adjustments in quota levels appropriate and long overdue, we consider the proposed Backcountry Management Plan inappropriate at several levels. We reject both Alternatives as being invalid.

The appropriate action for the Park would be to immediately relax the encounter rates and quotas, and remand the plan back to the planning team to deal with the numerous deficiencies outlined above – with the goal of offering a more-inclusive draft backcountry management plan in about 2 years. We would, of course, prefer that in the interim, the Park only apply permit system quotas to the Most Sought After Objectives, as suggested to the Park in the ZCC's November 2006 Citizen's Proposal for the Management of the Zion Backcountry.

Allocation of sufficient resources to study the pertinent questions is a necessary part of the planning process – without it, management of the Park continues to be based on the impressions, opinions and biases of park staff, rather than on rigorous scientific study of the issues at stake.

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Chairman
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Attached: Nov 2006 ZCC Citizen's Proposal

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