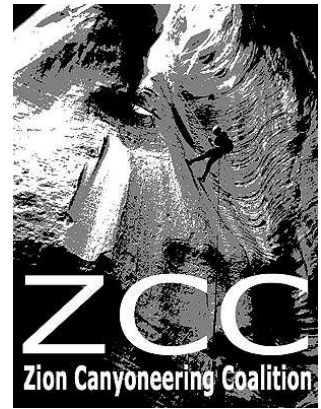


Citizens Proposal for the Management of the Backcountry of Zion National Park

November, 2006 (revised edition)

To: Zion National Park Backcountry Planning Team
From: Zion Canyoneering Coalition

Here are our thoughts on how the backcountry should be managed, with special regard to the technical canyons that are our main point of interest.



I. Purpose and Need for a Plan

In addition to the statutory requirements, we are pleased that a formal NEPA planning process is under way, which allows for:

- A. Public involvement in the management process. The Park is held in trust for the citizens of the United States, and managed by the National Park Service. We, as the public, feel that the voice of the public is rarely heard in a substantive way in management decisions, and we welcome any process that gives the citizenry an opportunity to be heard.
- B. Review of past management decisions. Management plans tend to accumulate actions in reaction to problems and issues. The planning process allows for an objective look at what management actions are effective at forwarding Park goals, and which are not.
- C. Consideration of the Total Cost of management actions. In the day-to-day management of the Park, decision-makers necessarily focus on the costs borne by the National Park Service. In the planning process, planners can also consider the extensive costs borne by the citizenry.

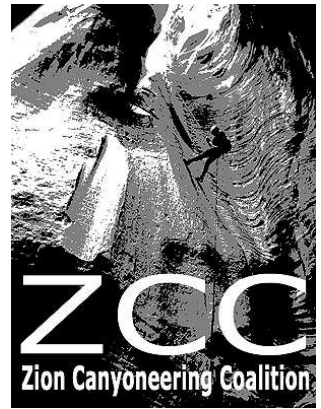
II. Goals and Objectives for Zion National Park

We would like to accentuate a few important Park goals that we feel are neglected in the current interim management plan.

- A. The mission of the National Park Service is to "*preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations*" (NPS national website, mission statement, emphasis added).

ZION CANYONEERING COALITION
PO BOX 5532 - 2625 S STATE STREET - MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

- B. The first mission goal of Zion National Park is: *"provide visitors educational and recreational opportunities that foster an appreciation of Zion and its resources"*. (This and following quotes from the Zion General Management Plan of 2001, page 5).
- C. The purposes of Zion National Park include to *"provide a variety of opportunities and a range of experiences, from solitude to high use, to assist visitors in learning about and enjoying park resources without degrading those resources"*.
- D. One of the strategies outlined on page 7 is to *"institute science-based decision-making, incorporating the results of resource monitoring and research into all aspects of park operations"*.
- E. An important national NPS policy is to manage lands nominated for Wilderness designation to preserve their Wilderness character. Among other things, the Wilderness Act says: *"these (lands) shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness,"* and that *"An area of wilderness is further defined to mean" federal land "which:*
- (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;*
 - (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;..."*



We bring these goals forward because often the goals we are trying to achieve while managing the Park get lost in both day-to-day management decisions, and when utilizing the TOOLS developed to help reach these goals. The tools themselves (such as the Zoning System and the Permit System) can take on a life of their own that gets in the way of achieving the actual goals.

III. Critique of the current Interim Management System

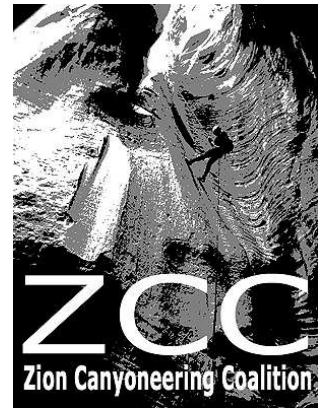
We believe that the current Interim Management System has significant conflicts with Park goals, particularly in the preservation of Wilderness values. In particular, the Interim System:

- A. Establishes an overly restrictive permit system that conflicts with both the "solitude" and "primitive and unconfined type of recreation" components of Wilderness values.
- B. Places an undue burden - temporal, financial and psychological – on the backcountry wilderness visitor.

ZION CANYONEERING COALITION
 PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
 435-648-3089 RATAGONIA AT GMAIL DOT COM

C. Establishes visitor use limits in canyons in an arbitrary and capricious manner, without reference to the numerous studies on crowding available in the scientific literature.

D. Uses too coarse a zoning system that unnecessarily fights against the natural pattern of resource use established by visitors in the several years before implementation of the Interim Use Limits. The two-tier management scheme provides very little in the way of "variety of experiences" and "range of experiences" in the technical Zion backcountry.



E. Strident enforcement of the permit system is antithetical to its goals. The permit system is in place to assure a Wilderness experience; having a permit system requires some degree of enforcement; being required to produce a permit by rangers is not conducive to a Wilderness experience. Enforcement of the permit system should be undertaken with a soft touch, and should be a low priority unless and until significant impact on the Wilderness experience of visitors due to poaching of canyons is suspected.

IV. ZCC Proposed Management Plan

We claim the ZCC Proposal has the possibility of meeting ALL park objectives with:

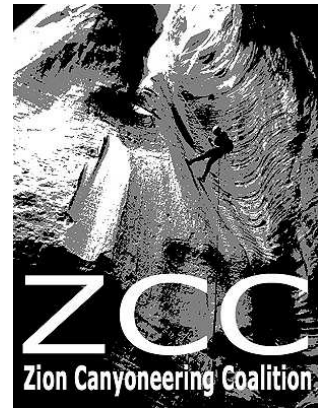
1. the greatest preservation of Wilderness values in the backcountry;
2. the smallest management burden placed on the backcountry staff; and
3. the smallest burden placed on the backcountry visitor.

The ZCC Proposal consists of the following elements:

- A. Quotas, Permits and Backcountry Desk Mandatory Appearance ONLY for the Most Sought After Objectives (MSAOs). We concur that certain key resources in the Park require management intervention in the way of quotas to maintain their Wilderness character, and envision a system much like the current system for a very short list of the most popular canyons. There should also be a method for moving canyons into and out of the MSAO list should their visitation grow or shrink in the future. The ZCC plan applies MSAO status to the following: The Narrows, The Subway, Mystery Canyon and Behunin Canyon.
- B. Continued permits/backcountry desk mandatory appearance required for planned backcountry overnight camping and bivies.
- C. Quotas in MSAOs set using a scientific method; specifically, setting quotas to allow some degree of crowding on maximum use days, as determined by non-biased visitor post-canyon surveys on representative maximum use days. Consideration should also be given

ZION CANYONEERING COALITION
PO BOX 5532 - 2625 S STATE STREET - MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

to "technical crowding" considerations, especially in Mystery Canyon. The ZCC proposes starting quotas as follows: The Narrows – 100; The Subway – 80; Mystery Canyon – 24; Behunin – 36.



D. Permits required for all other technical canyoneering. We recognize that tracking use is important to managing the Park, and, among other duties, determining when management intervention in the form of quotas is required to preserve Wilderness values. Permits would be available through two options:

1. Backcountry Desk Permits (available via current method) and/or;
2. Yearly Pass/Permit plus Trailhead permits.

E. Annual Pass/Permit. Repeat visitors to the technical Zion backcountry would be eligible for an Annual Pass/Permit program that, together with Trailhead permits, would substitute for Backcountry Desk issued permits. To qualify, the applying visitor would have to have completed three technical canyons as trip leader (and, excluding Keyhole, Pine Creek and Echo). As part of the pass program, the visitor agrees (signs a contract) to obtain a trailhead permit whenever visiting the Zion technical backcountry, and to abide by the other conditions currently found on the Zion backcountry use permit. The Annual Pass would have a significant fee (\$50) associated with it. Renewal would hopefully be as easy as signing the contract and paying the fee.

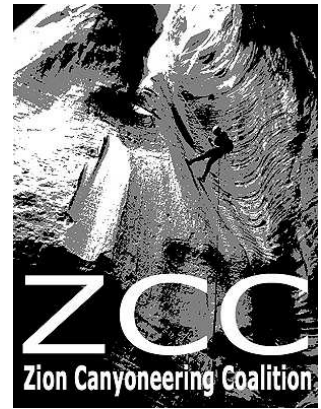
Comment on E: the ZCC recognizes that forced contact with Park staff contributes to the safety of backcountry visitors, especially first-time visitors. However, the mandatory appearance at the backcountry desk contributes little to the safety of frequent, skilled visitors; and imposes a substantial burden on repeat and ambitious visitors. By this method, the Park goals of monitoring canyon use and of making contact with first-time visitors can both be met, with the smallest possible burden on the citizenry and the staff.

F. Trailhead permits would be available at numerous key locations, and would be similar to self-issued permits at other facilities throughout the west. Visitor Center locations would be outside and available 24 hours. Suggested locations are: Main Visitor Center, Kolob Canyons Visitor Center, Museum, The Grotto Trailhead, Lava Point / West Rim Trailhead and at the East Entrance.

G. Canyoneering Advisory Committee – to foster improved relations, the backcountry department should form an Advisory Committee of local, interested members of the canyoneering community. The committee would be used to discuss management problems and issues, suggest solutions, to review crowding survey results, and to review all proposed changes to the management of the backcountry that effect canyoneering.

ZION CANYONEERING COALITION
PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

Having formal input from the community could lead to more and better solutions to problems, fewer unintended consequences, and greater "buy-in" from the citizenry.



- H. Fortresses of Very-Low Social Encounters (aka "Solitude"): we propose that the NPS directly measure the public's desire for zero social encounter areas by setting aside a few, select canyons to be managed (as MSAOs) with strict limits on both group size (maximum of 6?) and parties per day (one?). Party's whose highest priority is very few social encounters could then be directed to these canyons. We suggest that Bulloch Gulch (to Orderville) and Corral Hollow would be a good starting point. If demand for this type of experience exceeds supply, a few other, second-tier canyons could be added to the "Fortress" designation. It might also be a good idea to manage camping at the Grand Alcove in the Right Fork in a similar manner (as a one-party camping location).

V. Claims for the ZCC Proposed Management Plan

We claim the following:

1. The ZCC Plan meets all Park goals with the minimum burden on the visitor. It establishes quotas in canyons that would otherwise be too crowded; it monitors usage in non-quota canyons; it provides a mechanism for moving canyons into and out of the MSAO designation; and it establishes zones of minimum social encounters, so the Park can scientifically assess the demand for the enforced low-social encounter experience.
2. By greatly reducing the mandatory appearance burden on the repeat visitor, it restores much of the Wilderness experience to most of the Zion backcountry, the Wilderness experience that is trammled by an overly restrictive permit system.
3. By removing mandatory visitor contacts that serve no purpose, it will decrease the load on backcountry desk staff, freeing up resources for other backcountry tasks, such as ranging.
4. A careful, scientific look at quotas would most likely raise quota levels in The Subway, making the permit itself easier to get, decreasing the anxiety and disappointment experienced by many visitors, while maintaining a low-degree-of-crowding in the canyon itself.

VI. Critique of the NPS fascination with Very Low Social Encounters

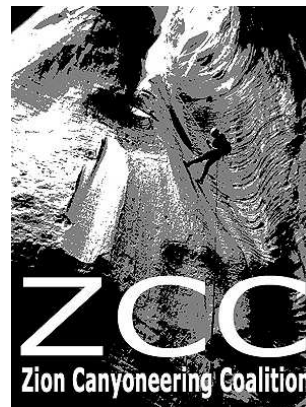
It would be inappropriate to present this plan without addressing the rather large elephant lurking in the corner – the question of what level of management controls are appropriate to

ZION CANYONEERING COALITION
PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

control social crowding, and what is the appropriate degree of crowding to control to, in the interest of maintaining a high quality Wilderness experience for the backcountry visitor.

The National Park Service seems to equate very low rates of social encounters with solitude and with "Wilderness values". This is a view supported by neither the scientific research nor the enabling legislation.

The Wilderness Act of 1964 is noted for its poetic language. The pertinent passage says Wilderness is defined as federal land that:



- (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;*
- (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;..."*

I think we can all agree that Zion qualifies pretty well for clause (1). Check!

It is the ambiguities of clause (2) wherein lurk the possibilities for misadventure. Did Congress really intend that a major National Park with millions of visitors each year would set up an elaborate system of quotas, lotteries, reservations, permits, mandatory appearances and fees (plus checks of permits at trailheads) to place restrictions on the public's foot-powered access to their land, so that visitors to about 50% of the total land area of the park would be assured of not encountering other visitors (or at least, of encountering very few) for the entirety of their visit (in the zone), 24 hours a day, 365.25 days a year? Really?

To believe that, you would have to believe a string of implausible statements:

1. Congress placed a priority on "Solitude" over all other attributes. Not so – according to legal interpretation of "or" clauses in law, both clauses carry equal weight, regardless of their order. Thus "opportunities for a primitive and unconfined type of recreation" holds equal weight with "opportunities for solitude". Clearly, setting up an elaborate quota/permit system civilizes (opposite of primitive) and confines the recreation experience. Without intervention, the Zion backcountry fulfills the second clause in spades! Should the Park really intervene, giving up the second clause, in order to attempt to provide the first clause?
2. "Opportunities for solitude" really means "Solitude". Assuming for a moment that solitude means being away from people, does Zion have outstanding opportunities for solitude without management intervention? Those familiar with the Zion backcountry will know that, of the 64,680 acres of the backcountry labeled as "Relatively Limited Access", about half that acreage has never been visited by humans. Most of the rest is visited by humans

ZION CANYONEERING COALITION
PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

only once or twice a year, or less. Only a few thousand acres of the backcountry are visited by humans on a regular basis, and primarily during daylight hours on weekends in the summer, when the weather is good. Are there plenty of "opportunities for solitude"? Sure, just not at every place in the Pristine Zone, on every day, at every hour.

3. "Solitude" means being away from people. Look it up in the dictionary – it must be true!

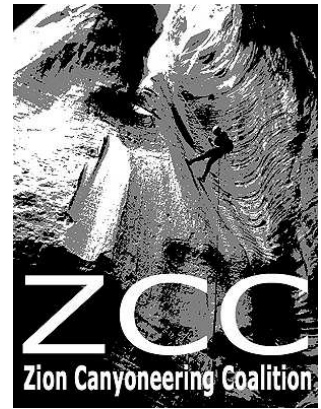
But it's not. Only on a simplistic level does solitude mean being away from other people. If that were true, then the maximum group size should be one! (Not a suggestion). In "Wilderness Solitude: Beyond the Social-Spatial Perspective" (Visitor Use Density and Wilderness Experience: Proceedings, Missoula, Montana, June 1-3, 2000. US Dept of Agriculture, Forest Service, Rocky Mountain Research Station, Proceedings RMRS-P-20, August 2001), researchers Steven J Hollenurst and Christopher D. Jones explored what exactly the meaning of "solitude" is in the context of the Wilderness experience. They suggest a definition that captures the contemporary meaning:

Solitude is psychological detachment from society for the purpose of cultivating the inner world of the self. It is the act of emotionally isolating oneself for self-discovery, self-realization, meaning, wholeness, and heightened awareness of one's deepest feelings, and impulses. It implies a morality that values the self, at least on occasion, as above the common good. (page 56)

After a review of numerous studies on solitude, wilderness, social encounters and crowding, they conclude:

If we are truly interested in providing solitude benefits, we should turn our management and research gaze away from crowding and encounter norms towards our own management tendencies to impose constraints on visitor freedom and independence. Wilderness visitors have always stood apart from the general run of American life. It is critical that we recognize and accommodate their need for independence in their personal and social lives. A management culture that resists all deviations, from its uniformities is antithetical to solitude. (page 60)

4. Very few social encounters is the best thing for the NPS to manage for. Um, not really. The scientific literature shows that people have a perfectly wonderful Wilderness experience at a wide range of social encounter rates. In a study of high-use Wilderness areas (*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), researchers studied hiker responses at several high-use Wilderness area lakes in Washington and Oregon. They found that even with trail encounter rates as high

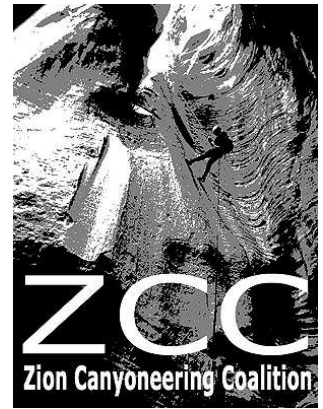


ZION CANYONEERING COALITION
PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

as 67 people per hour, visitors felt only "slightly crowded". While even I would find these levels of encounters unacceptable in the Zion backcountry, it is clear that visitors are much more generous in sharing the Wilderness with others than the Park Service believes them to be.

In general, visitors do NOT support limiting visitation to decrease crowding. In that same study, visitors to high-use areas were asked whether limits should be imposed.

"As has been found almost everywhere this question has been asked, most visitors support the enforcement of use limits at some unspecified time in the future, suggesting that they do not feel these areas are overused currently. This belief is consistent with our finding that numbers of people did not detract from the enjoyment of most trips and the high trip-quality rating". (p 21)



Then again, setting use levels is not done by referendum. Park management does need to make a decision about how crowded a particular place or canyon can get. We argue that the Interim Limits were set capriciously low, based on an aberrant interpretation of the Wilderness Act. Use Limits have their place, carefully applied to the most sought-after destinations, with an appreciation by Park management of the burden borne by park visitors when their visitation is regulated.

VII. Special Considerations for Use Limits in Zion National Park Backcountry

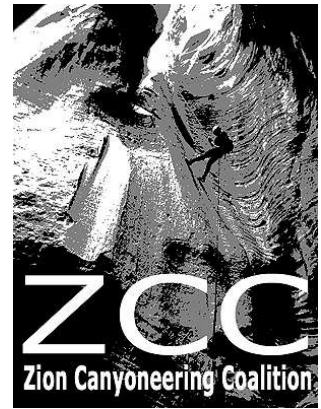
Zion is a very special place, and there are many aspects of backcountry travel in Zion that make it quite different than other Wilderness areas studied. Most of these considerations tend to increase the visitor's privacy, thus allowing quotas to be set somewhat higher. Each canyon presents special considerations in regard to crowding, and there is no objective way to assess crowding other than to directly measure it.

The following characteristics tend to increase privacy in Zion's canyons:

1. **Stunning natural beauty.** While travelling through truly amazing scenery, all but the most stone-hearted will be moved beyond themselves (to experience solitude). Zion's backcountry has much to offer the visitor, other than being away from other people.
2. **Number of permits does not equal number of visitors:** because canyons are technical and the weather is important, many people holding permits do not enter the canyon. On maximum-permit days, how many people actually travel in The Subway? My guess is that on average only 60% of permittees actually enter the canyon (for The Subway). The conversion rate is something that is easy to measure, and the Park should be studying this issue.

ZION CANYONEERING COALITION
PO BOX 5532 - 2625 S STATE STREET - MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

3. One-way travel: for the most part, Zion's technical canyons are traveled in one direction – down. In most Wilderness areas, parties travel both ways on trails and inevitably encounter each other. The one-way nature of Zion's canyons vastly reduces the encounter rate drastically. Even in the few canyons that have two-way travel (The Subway, The Narrows), encounters with upstream visitors occur only after the "best parts" of each, and are therefore less of a disturbance.



4. Similar speed travel: encounters are then controlled by the range of travel speeds and starting times of the various parties. For The Subway and The Narrows, the technical obstacles are few and, other than variations in hiking rate, most parties will descend the canyons at a similar rate, thus maintaining separation.
5. Canyon terrain has extensive opportunities for privacy. Most canyons are highly convoluted and have lush terrain, with limited sight- and hearing lines. A high degree of privacy is built into the canyon experience.
6. Coping behaviors work. Parties wishing to avoid or limit encounters are generally able to do so effectively. Speeding up and passing, or slowing down and allowing another party to get ahead are strategies that work well in the canyon environment.

The following characteristics tend to decrease privacy in Zion's canyons:

7. Technical Crowding: certain canyons have specific technical obstacles that tend to take a long time for some or most parties to complete, such as the last rappel in Pine Creek. Technical crowding takes place when parties stack up, waiting for the team in front.

VIII. Measuring Crowding Directly

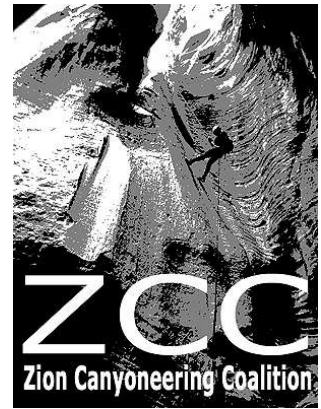
In order to manage crowding in an effective manner, the Park should develop a method for measuring crowding directly in a scientific manner. Review of the research available indicates that every aspect of the research method can be easily manipulated to obtain any result desired, therefore, the research must be undertaken with a careful and studied neutrality.

We suggest that to measure crowding, Park staff:

1. Conduct exit surveys with visitors to MSAO and MSAO-candidate canyons on quota-full (or otherwise heavy-use days). Interviews should be conducted in as friendly and non-confrontational a manner as possible.

ZION CANYONEERING COALITION
PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

2. Staff should survey all members of each party (as much as possible). Trip leaders may have distinctly different experiences and impressions than other members of the party. Surveys should be conducted in a manner that allows each party member to develop their own answers without coaching from the other party members.
3. The survey should consist FIRST of only the two following questions:
 - a. What were the three best things about your hike?
 - b. What were the three worst things about your hike?
4. After these two open-ended questions, other follow-up questions could be asked. We suggest the use of open-ended questions as the only way to not introduce bias into the survey.
5. All other methods of introducing bias should be strictly avoided. For instance, labeling the survey "Subway Crowding Analysis" would tend to suggest to visitors that the 'correct answer' is that the Subway was crowded.
6. Criteria for deciding whether the resource is too crowded should be decided in advance. We suggest that the Subway and the Narrows would be considered crowded when, on 50% or more of the max-quota days, 25% or more of respondents considered crowding to be one of the three worst things. Criteria for other canyons could be set more strictly, such as on 25% or more of the max-quota days, 25% or more of the respondents considered crowding to be one of the three worst things. (It should be noted, in the case of The Narrows, that only crowding in the permit-required area should be measured. For this reason, surveys would need to be conducted at an appropriate physical location, such as at the mouth of Orderville Canyon; and be conducted of permitted through-hikers only).
7. As a control, from time to time, surveys of hikers should be conducted on low-use days.
8. We suggest using the Canyoneering Advisory Board to analyze survey findings and consider changes to canyon quotas and MSAO status. We recognize that using survey results alone without also applying intelligence and judgment is also a bad road to follow.



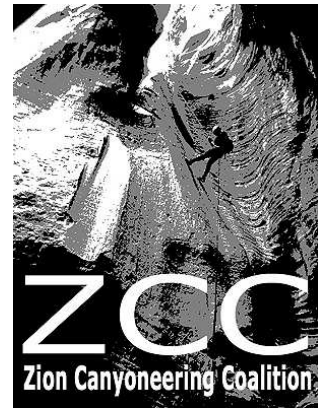
IX. Visitor Safety (and legal aspects).

The National Park Service has had a long and difficult struggle with its role in the area of visitor safety. From the founding of the first National Park (Yellowstone) in 1872, it was only 5 years later that the first two visitors died in the Park, slain by the retreating Nez Perce Indians under Chief Joseph. In Zion, early mountaineers were viewed with great suspicion, and had an

ZION CANYONEERING COALITION
PO BOX 5532 - 2625 S STATE STREET - MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

unusually high death rate. Having ascended The Great White Throne, Robert Orcutt searched for a route up Mount Majestic in 1931, and fell to his death.

Many National Parks have regulated and restricted technical sports in their domains, in the interest of visitor safety. Parks including Yosemite, Rocky Mountain, Devils Tower, Grand Teton and Zion have required, at times, a permit system much like that in place for canyoneering in Zion, for our sister-sport, rock climbing. All have given up such systems as not significantly contributing to visitor safety. Park staff should consult with the technical staff at these parks, and discover how they reached their conclusion to give up a controlling permit system, and whether significant consequences to visitor safety resulted.



The legal climate has changed in the last several years with the clarification of the Federal Tort Claims Act (FTCA), 28 U.S.C __ 1346(b) and 2671-2680 in the 10th Circuit Court's denial of appeal in the case of Nancy Elder and Jeffrey D. Eggertz v. United States of America (2002 01-4120). In this case, the tragedy of the death of a small boy off the Emerald Pools Trail was recognized, but Park liability was denied, as it had evaluated the hazard and taken action appropriate to its natural setting. Among other things, the judge held that:

In the context of the Middle Emerald Pools, one cannot isolate a particular possible warning sign (or other safety measure, for that matter) and say whether its absence constitutes negligence. The adequacy of one safety measure depends on what other safety measures have been taken. If there is negligence, it is negligence in the design of the entire safety package. Yet park management must judge the totality of the safety package in terms of its impact on other public policies besides safety. Thus, it would be impossible to resolve Plaintiffs' negligence claims without evaluating decisions protected by the discretionary function exception.

The National Park Service's Loss Control Management Guidelines manual states:

Paradoxically, many of the natural features found in parks pose significant safety risks to the uninformed visiting public, yet those same features cannot be eliminated nor guarded against in the same manner that a prudent person would expect to find in an industrial or home setting. Therefore, NPS public safety efforts are focused on interpreting the values of the park's natural features and educating the visitor concerning the proper precautions one must take to have a safe and healthful journey at that specific park unit.

The planning process provides an opportunity for careful analysis of legal decisions made by the Park's solicitor in the past and their impact on visitor safety. Specifically, the appearance requirement for obtaining canyon permits, the affidavit of having looked at the weather report

ZION CANYONEERING COALITION
PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

requirement, and the no more than 24 hours in advance requirement. Which of these requirements significantly contribute to visitor safety, and which only place an undue burden upon aspiring recreationists?

Unfortunately, these questions are difficult to answer. The number of flash flood deaths in Zion in recent years has been very small, with none related to permitted canyon activity. Therefore, in one sense at least, it must be working! A causal relationship is much more difficult to establish.

Our gut feeling is that the weather-report / etc. requirements have been very effective at essentially eliminating flash flood deaths in The Narrows. Drownings in the Narrows used to be fairly common. A required visit to the backcountry desk, look at the forecast and discussion about what to do in the event of a flash flood are particularly helpful to the many first-time visitors to Zion that undertake a hike of The Narrows. These steps plus a much more cautious population have practically eliminated flood deaths in the Narrows.

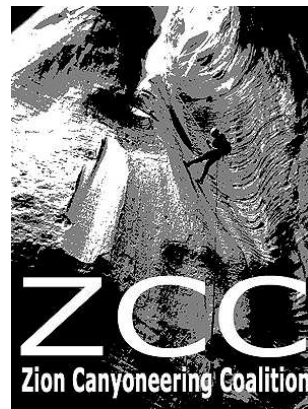
In other Zion canyons, the situation is considerably more turbid. The correlation between the weather report and flash floods in specific places is weak. With exceptions, Zion's canyons do not have prolonged sections where escape to high ground is not available in short order. People do get flashed in technical canyons on a regular basis, but they do the right thing and wait it out in a safe place. People want to live, and are savvy enough to find a way to do so, even when their canyon floods.

Ultimately, just like it says on the permit, backcountry visitors ARE responsible for their own safety. The ZCC plan provides the necessary contact with first-time and infrequent backcountry visitors, while releasing repeat users from the undue burden imposed in the interest of safety, with requirements that do not actually add to their safety.

X. Physical Impacts and Direct Management

Finally, we should talk about physical impacts caused by increased use in the backcountry, and how these should be managed. Thankfully, canyoneering largely takes place on hardened and renewable surfaces that show little to no impact from canyoneer activity. Where erosion impacts do occur, we believe the park should manage these impacts through direct means (hardening and clarifying trails, signage, and closure of alternate routes) rather than through indirect means (limiting usage). We applaud recent actions in Spry Canyon, Keyhole Canyon and Pine Creek as examples of how the canyoneering community and the Park can work together.

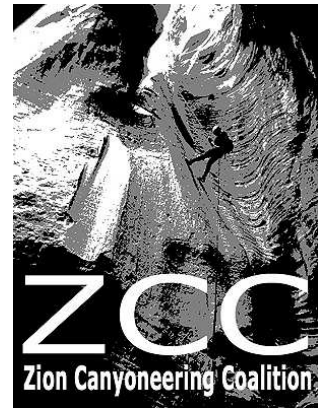
We support an active approach to canyon impacts management, especially those of an informative, as opposed to prohibitive, style. We feel that, for instance, a sign at the top of Mystery Canyon that says "Mystery Canyon, permit required" would be appropriate, and might



ZION CANYONEERING COALITION
PO BOX 5532 - 2625 S STATE STREET - MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

help prevent the one or two parties a year that fail to find the top; while, for instance, a sign in Orderville Canyon indicating "Upstream Travel Prohibited", as an action to discourage upstream travel in order to meet the artificial constructs of the Zone map, are not.

Outside of these areas, there seem to be few significant impacts. Most canyon approaches take place in areas that are far from the eye of the general public, and impacts are not viewed as significant by Park staff. The exception to this is the approach trail to Mystery Canyon, which deserves comment:



1. Mystery is one of the most sought-after objectives in the Zion backcountry. It is a classic canyon popular with beginning canyoneers and family groups. It is an important recreational resource.
2. The approach route is steep and unpleasant, descending an erosion gully on loose dirt and rocks.
3. The first third of the social trail is cut down 6-12" to the subsoil, in an area of wooded steep terrain. The bottom two-thirds follows a debris-flow from the winter 2004-2005 that refreshed the gully surface. Older crown-heads indicate that the slope has slid in similar fashion in the recent past.
4. Despite its being known as "The Death Gully", and despite being descended by a large number and variety of visitors including reckless teenagers, children and beginning canyoneers, no death or significant injury (to our knowledge) has occurred on this approach.
5. Analysis of the trail building potential of the site yielded this comment: *"this one's easy – no way"*. Stabilizing a trail on an active debris-flow area would be impossible. Alternative approaches to the canyon are likely to prove impractical.
6. That said, the route is down clay-heavy soils of the Carmel Formation, which harden and resist further erosion. Even the massive debris flow from the winter of 2004-2005, while ripping out a 10-foot crown and moving several-ton rocks in places, for the most part changed the surface of the gully only a few inches.
7. Traffic on the route does not seem to change it very much. Increased traffic on the route is unlikely to lead to significant changes.
8. While the trail is perhaps unpleasant, its nature is similar to backcountry approach routes elsewhere in the greater Zion area (in particular, the MIA trail), and to backcountry cross-country routes in other Park units like Grand Teton, Rocky Mountain and Grand Canyon.

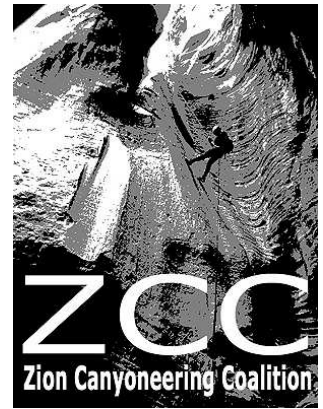
ZION CANYONEERING COALITION
PO BOX 5532 – 2625 S STATE STREET – MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM

9. The route is out of view and reach of the general public.
10. We don't consider the Mystery Canyon approach a "problem" that requires "management action". We consider it acceptable as an off-trail approach to a technical canyon.

XI. Conclusion

Please consider these proposals and especially the impact they would have on the overall feel of the backcountry in Zion, from the visitor's point of view. We seek to restore the sense of *a primitive and unconfined type of recreation* to the backcountry, one that can foster feelings of solitude, where citizens can recreate without an undue burden imposed upon them for little reason. We liken the current permit system in relation to its goal of preserving Wilderness values as throwing out the baby, while keeping the bathwater. We believe that by working together and with careful thought, we can keep the baby, while throwing out the bathwater.

Tom Jones
Chairman
Zion Canyoneering Coalition



ZION CANYONEERING COALITION
PO BOX 5532 - 2625 S STATE STREET - MOUNT CARMEL, UT 84755
435-648-3089 RATAGONIA AT GMAIL DOT COM