

# --- Canyoneers ----

## Zion National Park – Backcountry Plan Scoping

Zion has started the planning process for the Backcountry Management Plan by asking for scoping comments. For CANYONEERS this is an important opportunity to influence how the technical canyons are managed for the next twenty years. The Zion Canyoneering Coalition believes that the current Permit System with tight Quotas and required personal experiences is unnecessary for protecting park resources, and urge all canyoneers to submit scoping comments and become part of the planning process.

More information available at the ZCC website: ZionCanyoneering dot ORG.

### Writing Your Scoping Letter

The Park has asked for your comments as part of the Scoping Process, and you should give it to em.

**First: the mechanics.** Your letter **must** be postmarked by October 7, 2005, and **must** include your name and mailing address (most people put this at the top). Include the statement "Please place me on the mailing list for inclusion in the planning process in the future".

Send your letter to:                    Zion National Park  
    Backcountry Management Plan EA  
    Springdale, UT 84767

Your letter can also be sent via email to: **Zion\_Backcountry\_Plan@nps.gov**. If you send by email, be sure to include your name and mailing address, or your letter will not be considered.

**The Scoping Process** is the official start of the public part of the planning process. This part of the process determines the scope of the project. What needs to be looked at? What are the problems with the current management? What are the goals we are trying to achieve, and how can they best be achieved? What is working, and what is not working? Which parts are baby, and which parts are bath water?

The Scoping Process is virtually unlimited, however... both the park and the ZCC have been studying these issues for three years, and have a pretty good idea of what the key points are. The goals of the park have already been set forth in the **General Management Plan** and are not up for debate. The details of how the goals are defined, measured and the park plans on achieving them are what the Backcountry Plan is all about.

In the scoping process, we want the Park to recognize the following points (please include in your letter):

- The current permit system is a pain, and not appropriate for wide application in wilderness. The permit system itself is a major obstacle to a satisfying wilderness experience.
- The current permit system IS appropriate for the few, most crowded and most sought-after destinations.

- An easier system, such as mandatory trailhead permits, could meet park goals in all but the most crowded places.
- The park should not impose strict wilderness solitude values on places where it does not naturally occur. Having a range of experiences is part of the General Management Plan, and having Pine Creek and Orderville crowded on weekends is not a problem.

The Park will read all the scoping letters, study the issues, and develop a proposed plan with alternatives. Staff will analyze each of the alternatives and write up what they think the effects of each alternative would be. This will be released to the public as a Draft Backcountry Management Plan, and comments sought. Expect this to be released in about a year.

The Draft Plan will have a preferred alternative - what the park thinks it should do. Without a flood of comments (sometimes even WITH a flood of comments), the preferred alternative is selected. In the case of the Backcountry Management Plan, the final decision-maker is the Park Superintendent, who will generally take the recommendation of the staff.

**Some suggestions for an effective Scoping Letter:**

**:: Support the ZCC:**

If true, please state as the **first thing** in your letter that you "support the position of the ZCC".

**:: State Things in your Own Words:**

State what is true for you. If you agree with our specific position, please restate it in your own words.

**:: Be Appropriate to Scoping:**

Scoping is the start of the planning process. At this phase, the question is *What are the Questions?* You need not have solutions - this phase is for identifying the problems.

**:: Say What You Mean:**

While this is the Scoping process, do not refrain from being blunt and direct. Tell the Park what you think.

We suggest a two-part Scoping Letter - the first part directly answering their questions; the second part more personal and wide-ranging.

**:: PART ONE: Answer Their Questions:**

The Park asks Specific Scoping Questions, and that is a good place to start. Here are suggestions for answering their questions:

**ZNP Question 1: Are the current daily backcountry use limits for canyons appropriate (Primitive Zone - 50 people per day, Pristine Zone - 12 people per day)? Why or why not?**

***Suggested Response (A):*** No. The current use limits are much too restrictive for most places. Daily use limits should only be applied to the most-sought-after objectives, to prevent resource damage and limit over-crowding. Use limits should not be applied to canyons where there are no crowding problems, but use should be monitored in case crowding problems show up in the future. While the idea of the "Pristine" and "Primitive" Zones is fine, each

zone has a wide range of canyons that cannot so simply be lumped together. Where daily use limits are appropriate, they should be analyzed and applied to each canyon individually. Use limits should be set in a scientific, rather than arbitrary, manner, and should allow for the maximum usage while maintaining a wilderness flavor to the canyon, appropriate to the taste of the people visiting each canyon.

Canyon Resource	Suggested starting limit people per day
The Narrows	80
The Subway	80
Orderville	no limits
Pine Creek	no limits
Keyhole	no limits
Mystery Canyon	36
Behunin	36
Kolob Canyon	18, no groups larger than 6
All other canyons	no limits

**Suggested Response (B):** No. The current use limits are much too restrictive for most places. I suggest the following Daily Use Limits:

**ZNP Question 2: Are the current backcountry group size limits of 12 people per group appropriate? Why or why not?**

**Suggested Response:** Yes. The size limit of 12 is okay, but the Park should find ways to encourage smaller groups, such as having fewer restrictions or having lower costs for small groups.

**ZNP Question 3: Should commercial guiding be allowed in the Primitive Zone? Why or Why not?**

**Suggested Response:** No. There are plenty of canyons that work well for guiding in the region, but outside the park. Instruction is available locally that can prepare adventurous visitors for basic technical canyons like The Subway in one day. This is enough. I support the continued ban on guiding in the Pristine Zone.

**ZNP Question 4: Does current backcountry management allow for an appropriate level of protection for natural and cultural resources, and wilderness experience and values? Why or why not?**

**Suggested Response:** No. Current backcountry management is too strict, and is the greatest single impediment to a wilderness experience in the Park. The bureaucratic requirements of the permit system are not conducive to a "primitive and unconfined recreation", and should be revised to place less of a burden upon the backcountry visitor. Natural and cultural resources are being well protected.

**ZNP Question 5: What other issues exist concerning backcountry management in Zion National Park?**

**Suggested Response:** I am greatly concerned that erosion problems on canyon approaches are left unattended by the park. The park should go ahead and work on entry trails, especially the Mystery Canyon entry trail, rather than letting them deteriorate and limiting access.

**:: PART TWO: Speak from the Heart:**

After answering the specific questions, I suggest writing a few paragraphs or a few pages about YOUR experience of Zion. What works and what doesn't work. What is great, and what is a pain in the patooty. Remember these points:

**:: The people reading these things are people like us** - outdoorsy, love Zion, want to do what's best. Speak to them, human to human.

**:: Say good things first.** More than polite, you want them to know that you appreciate their efforts to preserve the park, their concerns for public safety, and that people have a high-quality wilderness experience while in the park.

**:: Be blunt, but polite.** No reason to beat around the bush, but avoid using loaded words and questioning people's motives. Assume that we all have the best of intentions.

**:: Be generous.** I believe canyoneers are generous rather than selfish. We're willing to share. Meeting a few other parties in canyons does not destroy our experience of the canyon.

**:: Do NOT use satire or irony.** These are easily misinterpreted. And, the planning process has no sense of humor, so just say things straight.

**:: Speak about what happened.** Tell a specific story about how the permit system is such a pain. We did this. It messed us up. I wanted to show my sister the Subway, but could not get a permit, etc.

**:: Speak for yourself.** Don't speak in generalizations (people think...), communicate your thoughts and feelings and be responsible for them. (ex: "I think it would be much more of a wilderness experience if I didn't have to wait in line for a permit, but could fill one out at the trailhead. My whole trip plan becomes about getting the permit - not very wilderness compatible.")

**:: Be Specific about Canyons.** The main issues are The Subway, Orderville, Pine Creek, Keyhole, Mystery Canyon, and Behunin. Speak specifically to your experiences in these canyons.

**:: Get it done and send it in.** Your letter need not be perfect. Get it done, and be sure to send it in a few days before the deadline.

**:: Get your friends to send in letters, too.** There is power in numbers. Only with an overwhelming response, will change be effected.

This flyer brought to you by:  
Zion Canyoneering Coalition  
341 N Center Street #6  
Salt Lake City, UT 84103

Contact: tom at CanyoneeringUSA dot com.

**Scoping Comment Form  
Zion National Park, Utah  
Backcountry Management Plan & Environmental Assessment**

Please respond to the following questions and return your comments by October 7, 2005. You may attach additional pages if needed or provide comments in another format. Also, please include your name and mailing address. Thank you again for your interest in Zion National Park.

Please be aware that names and addresses of respondents may be released if requested under the Freedom of Information Act. Our practice is to make comments, including names and home addresses of respondents, available for public review during regular business hours. Individual respondents may request that we withhold their home address from the record, which we will honor to the extent allowable by law. There also may be circumstances in which we would withhold from the record a respondent's identity, as allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. We will make all submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public inspection in their entirety.

Are the current daily backcountry use limits for canyons appropriate (primitive Zone - 50 people per day, Pristine Zone - 12 people per day)? Why or why not?

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What other issues exist concerning backcountry management in Zion National Park?

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Please check the box if you would like to remain on the mailing list to receive additional information concerning this planning process.

Name:

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Street/Box #:

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City, State, Zip Code:

Comments may also be sent by e-mail to [Zion\\_Backcountry\\_Plan@nps.gov](mailto:Zion_Backcountry_Plan@nps.gov). Your e-mail must include your name and street mailing address for your comments to be considered.

Mail your comments to: Zion National Park  
Backcountry Management Plan EA  
Springdale, UT 84767