



Public Employees for Environmental Responsibility

962 Wayne Avenue, Suite 610 • Silver Spring, MD 20910

Phone: (202) 265-PEER • Fax: (202) 265-4192

Email: info@peer.org • Web: <http://www.peer.org>

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Zion National Park
1 Zion Park Blvd.
State Route 9
Springdale, UT 84767

RE: PEER Comments on Zion Visitor Use Management Plan Preliminary Alternative Concepts

On behalf of Public Employees for Environmental Responsibility (PEER), I am submitting the below scoping comments on Zion Visitor Use Management Plan “Preliminary Alternative Concepts Newsletter.” Unless specified otherwise, all page notations below reference to that document.

Zion National Park should be praised for finally attempting to come to grips with its now crippling visitor overcrowding problem. However, as we point out below, carrying capacities have long been statutorily required of all national park system units.

1. Park Carrying Capacities Are Required by Law – and Are Long Overdue at Zion

The National Park and Recreation Act of 1978 requires “visitor carrying capacities for all areas” of each park unit. (54 U.S.C. § 100502).

In addition, National Park Service (NPS) policy, encourages all parks to adopt formal standards for unacceptable overcrowding, such as caps on waiting times to see a park feature, maximum number of encounters on trails or the ability to camp out-of-sight or sound range of neighbors, and determining indicators for excess usage such as soil compaction, exposed tree roots, or vegetation loss. (See NPS Management Policies on Visitor Use §§ 8.2, *et seq.*).

These requirements have fallen into disuse. However configured, almost no major national parks have carrying capacities based upon a PEER review of 59 National Parks, 19 National Preserves, two National Reserves, 18 National Recreation Areas, and 10 National Seashores in the 411-unit system. Of these 108 major units, only seven have established carrying capacities, and all but one of those cover only certain areas or facilities.

PEER found that of the ten most visited national parks, only Yosemite had carrying capacities for its wilderness zones. In a 1995 plan, Grand Canyon set numeric caps on visitors to specified areas but that plan lapsed and has not been replaced.

By contrast, a few parks have detailed carrying capacities. Everglades has standards for crowding at boat launches, for road traffic, and on trails. In 2014, Golden Gate National Recreation Area, the second most visited place in the park system, promulgated a set of concrete user limits for identified “management zones,” as does the management plan adopted that same year by Gulf Islands National Seashore.

In 2001, Zion adopted “preliminary carrying capacities” which it never finalized. In light of this nearly 40-year old statutory requirement and Zion’s incomplete efforts 17 years ago, Zion’s initiative to begin formulating a plan for carrying capacity in the past year is long overdue.

2. Zion’s Planning Process Is Backward – Start with Desired Conditions

Substantial harmful effects of visitor overcrowding to Zion’s park resources are already occurring. As noted:

“In addition, park managers have observed and recorded increased trampling of vegetation and soil erosion and over 30 miles of visitor-created trails in the Zion Canyon alone.” (p.2).

A full assessment of adverse visitor impacts on Zion’s frontcountry resources should be a top priority for visitor use planning. In addition, the park has yet to finish its “analysis of desired conditions” upon which to base “the establishment of visitor capacities.” (p.4).

Unless Zion knows the desired conditions it seeks to achieve, it cannot properly evaluate the efficacy of proposed alternatives. Nor can it prudently reject alternatives, such as full or partial closures if they are needed to allow recovery for damaged park resources.

In other words, assessing and discarding alternatives before clearly understanding precisely what the park is trying to achieve puts the cart before the horse.

3. Integrate Carrying Capacity into New General Management Plan

The National Parks and Recreation Act of 1978 requires that carrying capacities be a part of the park’s General Management Plan (GMP). Beyond the statutory requirement, incorporating visitor management into overall park management simply makes sense.

Many of the concepts under consideration touch on the park’s transportation system, infrastructure priorities, wildlife management, and other topics. The park references the need for a “holistic, systematic parkwide approach” (p.4) yet proposes only a component-specific plan.

NPS policy requires that the park complete a new GMP at least every 20 years. (See NPS Management Policies § 2.3.1 on General Management Planning). Zion completed its current GMP in 2001. Given that its 20-year window is closing, it should already have begun preparing

a new GMP. To the extent that it does unduly delay immediate steps to protect park resources from damage, Zion should integrate its final Visitor Management Plan into its GMP.

4. Reservation System Should be Park-Run, Not Contracted Out

The park appears to be leaning toward contracting out any reservation system:

“The NPS would study the possibility of managing the reservation system, shuttle, campgrounds, and parking through a concession or service contract for access to the park.” (p.6).

The basis for this statement is not explained. Nor are the criteria for contracting out the management of visitor access to Zion specified.

While the frontcountry “reservation system would be integrated with other park existing or proposed reservation systems” (p.5), it is not stated whether all Zion permits and reservations must be made online and whether a contractor would take over this park-wide system.

Consigning reservations to a remote, low-bid commercial service may make it difficult for Zion managers to directly address any problems, breakdowns, or irregularities that may occur.

5. Potential of Commercial Tour Abuse Should Be Addressed

In Zion’s January 2017 “Public Scoping Comment Summary Report” (hereinafter Comments), people expressed “concern over commercial tour operators potentially taking advantage of a reservation system.” (Comments, p.7). Yet, Zion does not appear to have explored this concern.

Some of the few national park units with reservation systems have seen their first-come reservations monopolized by commercial tour companies. For example, a 2014 NPS review found that most of the free first-come, first-served passes for the USS Arizona Memorial are snapped up by commercial tour operators before visitors can obtain them. The NPS review panel concluded that the total absence of any “written policies, standard operating procedures or operational plans” governing ticket distribution created “ample opportunities for abuse” in which the availability of tickets is “determined primarily by demand from commercial tour operators.” (See “USS Arizona Memorial Ticket Operation Program Review – January 2014”).

Significantly, the suggestion that tour buses be limited (Comments, p.7) was not even among the “Alternatives and Actions Considered But Dismissed” by Zion planners.

If Zion embraces a reservation system, it must recognize and account for the fact that those limited reservations will have commercial value – and may be improperly exploited, especially if it is an online system operated by a commercial interest.

6. Online Only System Should Be Reconsidered

Zion describes its alternatives as “an online year-round reservation system.” (p.4). This pre-decision seems to ignore input it received from interested members of the public:

“Multiple commentators expressed support for managing visitation through reservations, but raised concerns over the thought of such a system being implemented solely online. Commentators suggested that reservations should be available in multiple ways, including over the phone. Other commentators do not support a reservation system of any kind because they believe it would require the use of technology that would lead themselves or others at a disadvantage.” (Comments, p.6)

Zion does not explain why it dismissed these concerns. While the vast majority of people have access to the Internet, many do not. Those people without Internet access may not even learn of the existence of the online system and may find themselves completely debarred from visiting Zion.

7. Some Suggestions Not Considered

In addition to banning commercial tour operators, members of the public suggested banning or limiting tour buses and/or limiting the size of parties making reservations. (Comments, ps.7 and 12). Zion did not include these and other suggestions among the alternatives it considered but discarded.

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