

October 4, 2005

Ray O'Neil
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Springdale, UT 84767
Email: Zion_Backcountry_Plan@nps.gov

**Re: Access Fund Scoping Comments to the Zion National Park
Backcountry Management Plan and Environmental
Assessment**

Dear Ranger O'Neil:

The Access Fund welcomes this opportunity to provide scoping comments to the Backcountry Management Plan Environmental Assessment for Zion National Park (Zion BMP), and applauds this effort to provide reasonable and effective management direction for Zion National Park's backcountry.

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rock climbers and mountaineers nation-wide. Utah is one of our largest member states.

The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission. The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment.

I. INTRODUCTION

Zion National Park has long been one of the most outstanding rock climbing areas in the United States. Climbers are drawn to the area's unique combination of scenic beauty, remarkable landscape, unique climbing challenges, and convenient access. In particular, Zion National Park is known to climbers as perhaps the country's foremost "big wall" climbing area after Yosemite National Park, and climbers from around the nation and internationally travel to Zion for its unique big wall climbing challenges.

The Access Fund has a proud record of conservation work and climber activism in Utah,¹ and a significant number of our members climb and/or live in Utah and Zion National Park in particular. Given the significance of Zion National Park to the climbing community, the Access Fund supports reasonable and effective climbing management policies for this area and we would like to offer assistance towards any future management planning initiatives that involve climbing. The Access Fund has assisted land management agencies in climbing management and general planning initiatives in the following ways:

- Advice on visitation, use patterns, and climbing techniques and tools.
- Assistance with consultation and outreach at a local and national level through making available Access Fund membership mailing lists, website and newsletter.
- Helping conduct and/or undertake surveys of climbing activity to determine management preferences.
- The Access Fund Climbing Preservation Grant program provides funds for research, monitoring, educational outreach and stewardship projects at climbing areas on an annual basis. Specific components of this BMP may be appropriate for Access Fund grant support.

The Access Fund recognizes that recreational access must be balanced with proper management, which may include restrictions to protect the natural and cultural resource values and the integrity of the landscape. However, it is important to note that Zion National Park contains some of the most unique, popular, and challenging technical climbing opportunities in the country and providing for recreational opportunities should

¹ For example, the Access Fund has funded several conservation grants for public land areas in southern Utah including Indian Creek and Zion NP, assisted with the founding of the Salt Lake Climbers Alliance who work with land managers on climbing issues in the Salt Lake City area, and provided financial support for the purchase of important and threatened climbing areas such as the Dugout Ranch at Indian Creek and a campground near Castleton Tower in Castle Valley.

be emphasized in the Zion BMP. The Access Fund is concerned with the preservation of these opportunities, and we provide scoping comments herewith to assess the probable effect of this proposed management initiative.² In addition, please also find enclosed a copy of the Access Fund publication *Climbing Management: A Guide to Climbing Issues and the Production of a Climbing Management Plan*. This publication has proven helpful to dozens of land managers across the country who work on climbing related issues.

II. GENERAL COMMENTS

The NPS “Notice of Scoping” for the Zion National Park BMP notes that the backcountry plan will include areas within the Primitive Zone, Pristine Zone and Research Natural Area Zone, as well as a small portion of the Transition Zone. However, the Notice of Scoping provides no maps indicating the extent of these specific zones and I was unable to find any meaningful boundaries for these areas on the Zion National Park website (the General Management Plan found on the website has no maps). Although I assume that the some of the climbing within Zion Canyon proper is not covered by the BMP management area, much of Zion Canyon climbing will be covered by the BMP as well as the majority of the climbing throughout the rest of the park.

The Access Fund applauds the goals and objectives, as indicated by the NPS, for the Zion BMP, especially (1) the goal of providing “for the maximum freedom of public use and enjoyment of the park’s backcountry in a manner that is consistent with park purposes, wilderness management and the protection of park resources and values” and (2) the objective of providing “a broad range of opportunities to facilitate backcountry use while protecting the park’s natural, cultural, and wilderness resources.”

As you know, National Park Service (NPS) policy recognizes that providing for visitor recreational use has been a fundamental purpose of NPS areas since the establishment of Yellowstone National Park in 1872. NPS Management Policies state that “the National Park Service will encourage recreational activities that are consistent with applicable legislation [and] that promote visitor enjoyment of park resources through a direct association or relation to those resources.” Accordingly, the Zion BMP should encourage

² These Access Fund scoping comments are purposefully more in-depth than may be typical for the NEPA scoping process. In our experience, some of the most important planning decisions are made following the scoping period when agency planners are formulating specific alternatives based on scoping feedback. Thus, my comments are more comprehensive than simply stating what I believe should be the scope of the Zion National Park BMP.

and support recreation such as climbing in the Zion backcountry because climbing provides a direct association and relation to the natural resources of the park.

III. ISSUES TO BE IDENTIFIED BY THE NATIONAL PARK SERVICE

The following Access Fund comments address issues that we feel the NPS should consider as issues to be covered in the Zion National Park BMP.

A. Informal Paths to Climbing Areas

At present there exists a fairly minimal network of user-built trails established by the climbing community to access the various climbing cliffs within Zion National Park. The Zion National Park BMP should consider whether these trails should be formally acknowledged and incorporated into Zion's General Management Plan, and if so determine what level of trail development is appropriate/required, what materials should be used, and what level of maintenance will be regularly needed, if any.

The Access Fund encourages the NPS to inventory this network, establish baseline data, and analyze where trails need maintenance, upgrading, relocation or closure. Following such an analysis, these climber access trails may be formally incorporated into the Zion National Park's trail plan so that maintenance work can be facilitated commensurate with the NPS's NEPA obligations, and in so doing streamline any necessary environmental compliance reviews. Once these trails are incorporated into the formal Zion National Park trail plan, time consuming and expensive environmental reviews will not prevent even the most basic maintenance on existing trails that may prevent erosion.

In maintaining these trails, the NPS should consider working with the Access Fund and the local climbing community, as it has in the past, to help build effective trails using volunteers for high use climbing and bouldering areas. Climber assistance for constructing access trails has proven successful in Zion and elsewhere throughout Utah where volunteers have worked with agency officials to build trails and address erosion concerns.

B. Human Waste

Human waste can be a significant issue at areas that are popular climbing locations. The Zion National Park BMP should consider signage educating climbers regarding Leave No Trace principles posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices.

The Access Fund has found that the best way to address human waste issues in climbing areas is to inform climbers of their proven, documented impacts, and suggest alternative conduct that can ameliorate the problem. The NPS should document the extent of this impact prior to or during the implementation of the BMP so that any proposed management solutions will be based on objective information rather than assumption that human waste has become a “problem.”

C. Natural and Cultural Resources

The Access Fund supports natural and cultural resource management decisions based on thorough information about the condition of field resources and visitor use. The use of baseline data is critical to making informed decisions when imposing management prescriptions to protect these resources. The Zion National Park BMP should clarify how such information will be gathered and a timeline developed for an inventory of natural and cultural resources and associated recreation impacts or potential impacts. Any analysis of the effects of recreational use on natural and cultural resource values begins by looking at patterns and levels of use, as well as the location and sensitivity of these resource values. Once this information has been obtained a determination may be made as to whether any management intervention is necessary for protection of that resource value.³

³ Just as with the issues related to protecting flora and fauna, there exist laws and regulations that protect recognized historical and cultural resources. This management authority already provides the NPS with the legal means to implement protective measures that may affect recreational use patterns at Zion NP which may or have already adversely affected such natural and/or cultural resources. As such, it may be unnecessary to specifically address such issues in the Zion National Park BMP other than to implement some pro-active mitigation measures to, for example, preserve rock art adjacent to popular climbing routes or bouldering areas. However, unless there are specific resource conflicts with recreation that are currently identifiable, the Access Fund suggests that the NPS use existing federal and state laws—instead of this BMP—to manage for the protection of natural and cultural resources. Presumably, the NPS currently has data identifying the locations of sensitive resources throughout Zion National Park, and no doubt much of this information is confidential. Nevertheless, the interface between the location of such special status resources and recreational activity should be appropriately analyzed in detail before any management prescriptions are identified and imposed under this BMP. Please consult the enclosed Access Fund’s document *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* for examples where land managers have provided resource protection while also providing continued climbing opportunities.

D. Fixed Anchors

The Access Fund has a long history of working on fixed anchor policies with land management agencies. Indeed, we are currently assisting all the major federal land agencies to develop nationwide management guidelines for the use and placement of climbing fixed anchors in federally designated wilderness areas.

Fixed anchors, especially bolts, are sometimes controversial. In our experience concerns about bolting are almost never related to the resource impacts that may be associated with the placement and use of these traditional climbing tools, but rather to philosophical convictions. The NPS must protect the resource, but is required only to consider (not necessarily satisfy) the philosophical priorities of specific climbers, climbers generally, or any other interest group. We maintain that any decisions regarding fixed anchors should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural and social environment (see “Planning Methodology” below).

Climbing anchors are necessary for climbers to experience the unique challenges found in Zion NP, however it is the Access Fund’s position that fixed anchors are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for fixed anchors to provide the desired climbing experience should be evaluated before any decisions are made to restrict the use of these tools. This is especially pertinent to Zion given that 95% of the park is managed as wilderness and the NPS will likely recommend the majority of the park for wilderness designation. Furthermore, the specific character of the rock at the Zion NP requires that some level of fixed anchor use be authorized if climbing is to take place there at all. All of Zion’s popular technical routes have some fixed anchors. Accordingly, the Access Fund believes that some level of fixed anchor use must be allowed in Zion wherever climbing is allowed, and that the appropriate level of use should be established on an area-by-area basis depending on specific resource considerations.

Outreach and education for the climbing community will likely mitigate any impact concerns the NPS may have regarding fixed anchors. For example, the relatively small number of “first ascentionists” could be encouraged to use naturally colored or painted fixed anchor materials and related hardware to limit issues concerning visual aesthetics. Please see the “Development of New Climbing Routes” section below for more comments on fixed anchor issues, ways to manage potential resource impacts, and model fixed anchor authorization processes.

E. Development of New Climbing Routes

It is important that the NPS institute a presumption that new climbs and bouldering areas within Zion National Park be considered an appropriate use of the park rather than the converse where the onus is on new-route ascensionists to establish or argue for permission in those areas where there is no finding of adverse impact on special status resources within the climbing zone. Unless there is a clear, imminent need to prohibit new routes based on objective environmental or social data, the presumption should remain that new climbing/bouldering routes are authorized.

The NPS at Zion National Park may want to review established climbing management plans implemented by other NPS units. Two exemplary CMPs that address many of the same issues that concern the NPS at Zion National Park are:

- The New River Gorge National River
<http://www.nps.gov/neri/cmp/>
- The Obed Wild and Scenic River
<http://www.nps.gov/obed/final-CMP.pdf>

As in the above noted NPS CMPs, the NPS at Zion National Park should develop criteria that would guide and direct decisions on managing new climbing and bouldering routes.⁴ A first consideration for management action by the NPS should determine whether potential impacts to resources can be mitigated through climber education. In cases where documented sensitive resources are present, new routes could be allowed by permit. The Access Fund believes the NPS should focus on responding with a reasonable lesser restrictive alternative to address resource impacts rather than the all-too-often approach of simply closing areas down. The NPS should also consider effective means by which it can notify the climbing public of any interim or permanent closures such as signage or media outlets.

If any restrictions are considered, the NPS should develop a criterion/question that asks: “are climbing activities likely to have an adverse impact on cultural resources or special status plant or animal communities present within the management area?” In developing

⁴ In addition, draft BMP at Rocky Mountain National Park and Denali National Park and Preserve have effectively and reasonably addressed fixed anchor issues.

this kind of analysis, the NPS should define precisely what “adverse impact” means within this context. Without such a clear definition, arbitrary determinations will necessarily guide management actions. Only by clearly setting such impairment standards that equate to an “adverse impact” will the NPS be able to make rational evaluations of which climbing impacts constitute “adverse impacts.”

F. Planning Methodology

The Notice of Scoping states that Zion National Park will use Visitor Experience and Resource Protection (VERP) “to determine the amount of visitation that can be allowed in a particular area of the park without detrimentally affecting cultural and natural resources of backcountry visitor experiences.” The Access Fund endorses this process. Another method of preventing unwanted impacts to public land resources is to determine how much change to the environment is acceptable. The Access Fund suggests that the NPS use the Limits of Acceptable Change (LAC) methodology to determine whether any activity within Zion National Park warrants management intervention.

As NPS recreation planners at Zion National Park are aware, the LAC process is used by land managers across the country (primarily by the US Forest Service) as a means of coping with increasing demands on public land recreational areas, such as Zion National Park, in a visible and logical fashion. The challenge is not one of how to prevent any human-induced change to Zion NP, but rather one of deciding how much change will be allowed to occur in a given opportunity zone, and the actions needed to control and guide such change, if any. The process requires deciding what kinds of conditions are acceptable, then prescribing actions to protect or achieve those conditions. If an area does not meet those acceptable conditions, then management actions must be taken to correct the situation. For example, if an area receives very heavy route cleaning or trail impacts that cause unacceptable damage to the resource, then management actions may be implemented to mitigate further impacts or rehabilitate the area. As you know, the general LAC process consists of nine steps that can be broken down into four major components⁵ and has been incorporated into the NPS’s VERP handbook.⁶ The Access

⁵ LAC Component I - Identify Issues, Concerns And Opportunities

- Step 1 - Identify area issues and concerns.
- Step 2 - Define and describe opportunity classes.

LAC Component II - Determine Present Condition of Zion NP

Fund endorses LAC because we find its focus on opportunities to be particularly appropriate, especially in public land areas where recreation is specifically mandated such as in NPS units.

G. Education/Community Outreach

A climber education program is a critical component to any effective climbing management initiative. Nearly all climbers will choose to “do the right thing” if they know the appropriate behavior. For example, signage educating climbers regarding Leave No Trace principles should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund applauds the proactive management approach taken by the NPS at the Zion National Park, but for this BMP to be successful the NPS should work with the climbing community directly to foster understanding, appreciation, respect, and a sense of ownership for the natural and cultural resources of Zion National Park.

In addition to promoting a Leave No Trace ethic at Zion, the NPS should continue to do all it can to incorporate the climbing community into any management initiatives—such

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- Step 3 - Select indicators of resource and social conditions.
 - Step 4 - Inventory existing resource and social conditions.
 - Step 5 - Specify measurable standards for the resource and social indicators selected for each opportunity class.

LAC Component III - Determine Action Plan

- Step 6 - Compile information from Components I & II and identify alternative Opportunity class allocations.
- Step 7 - Identify what management actions would be needed for each alternative from Step 6.
- Step 8 - Evaluate and select a preferred alternative. This determines an action plan.

LAC Component IV - Implement And Monitor Action Plan

- Step 9 - Implement actions for preferred alternative and monitor conditions.

⁶ <http://planning.nps.gov/document/verphandbook.pdf>.

as raptor closures—that may affect public use of the area.⁷ By soliciting input from the climbing community directly on any proposed management initiative, the NPS will secure a key partner that can provide insight into specific resource issues and conditions, labor for building trails or other infrastructure, support for regulation compliance, and a good relationship with one of its largest user groups. Climbers have a long tradition of resource stewardship and support for natural and cultural resource protection. This tradition can be harnessed to support NPS planning, through consistent outreach, and an emphasis on education rather than law enforcement.

We recommend that all issues pertaining to climbing at Zion NP, including climbing use patterns, climber traditions and history, or information about technical climbing tools and ethics, be dealt with through a climbing advisory/working group. Such a group will facilitate gathering, sharing and processing information on specific issues. This approach may also be desirable for the consideration of educational outreach and human waste issues. The following interested parties may be helpful regarding any climbing management planning for the Zion National Park:

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⁷ The NPS at Zion has been exemplary in providing public information, using sound science and minimizing restrictions as much as possible while still complying with its mandate with regards to protecting special status nesting raptors in Zion NP.

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H. Sunset Date

The Zion National Park BMP should indicate the duration of the proposed management initiative. Typically such plans have reauthorization dates of five years following plan approval to allow for any necessary revisions. Accordingly, the NPS should provide a time-period specifying the effective duration for this proposed Zion National Park BMP.

I. Additional Comments

The NPS at Zion should also consider the following issues and concerns for analysis in the BMP process:

1. Clearly identify on publicly available maps the extent of the management area for the Zion BMP and its particular management zones;
2. Clearly identify on publicly available maps Research Natural Area zones in the park that “are closed to recreational use” and the reasons and specific authority for such closures;
3. Review of the transportation system in Zion Canyon that may affect access to backcountry portions of the park;
4. Bivouac regulations, if any, in the backcountry;
5. 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?
6. Should commercial guiding be allowed in the Primitive Zone? Why or why not?

7. 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?

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I hope the above information helps the NPS identify the appropriate scope for the Zion National Park BMP, and clarifies ways in which the Access Fund can be of assistance. Please do not hesitate to contact me if you require more information, or would like to discuss any of the points covered in this comment letter.

The Access Fund looks forward to working with the NPS and any interested parties throughout the planning process for the Zion National Park BMP. Zion National Park is truly a national treasure, both as a climbing resource and as a unique natural area. On behalf of the American climbing community, the Access Fund thanks the National Park Service for soliciting public input, and for its commitment to preserving the exceptional climbing opportunities found at Zion. We hope our comments will provide a meaningful contribution to both the substance and clarity of the Zion BMP regarding planning goals, objectives, strategies, and the preservation of recreational opportunities.

Best Regards,

Jason Keith
Policy Director
The Access Fund

Encl.

Cc: Steve Matous - Executive Director, The Access Fund
Brian Cabe, American Alpine Club
Dean Woods, Zion Rock Guides