

June 22, 2007

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

Re: Access Fund Comments to Zion National Park Backcountry Management Plan/Environmental Assessment

Zion Planning Team:

The Access Fund welcomes the opportunity to submit these comments to the National Park Service's (NPS) Zion National Park Backcountry Management Plan/Environmental Assessment ("Zion BMP"). With input from several past and present Zion climbers, we provide these comments to better inform Zion National Park planners and help identify relevant issues and an appropriate planning alternative for the Zion BMP that will help to protect this unique environment and provide climbing opportunities.

The Access Fund

The Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 1.6 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 15,000 members and affiliates. The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers.

The Access Fund has a history of participation in Zion National Park management initiatives. For example, the Access Fund submitted extensive scoping comments to the Zion BMP in 2005.¹ We also continue to communicate with the NPS staff at Zion regarding ongoing climbing management initiatives such as climbing closures to protect cliff-nesting peregrine falcons.²

The Access Fund supports Zion National Park's Preferred Alternative B as a reasonable and effective climbing management regime that protects the unique backcountry resources at Zion while also providing and encouraging the world-class climbing opportunities found only at Zion. NPS policies support activities like climbing that promote a "direct association with park resources," and climbing closely fits this

management goal as well as any activity in the park.³ Alternative B appears to adequately reflect this crucial recreation management policy with regard to climbing management provisions, and the Access Fund endorses this alternative.

The Zion National Park Draft Backcountry Management Plan

The Zion BMP⁴ seeks to identify “opportunities for a variety of backcountry recreational activities and experiences while recognizing and protecting the wilderness resource values of Zion National Park.” This proposed plan analyzes two alternatives. Alternative A is the “No Action” alternative and describes backcountry/recommended wilderness management as it exists today. Alternative B, which is the NPS’s Preferred Alternative, proposing to “formalize carrying capacities based on visitor experience and resource protection (VERP) studies; identifies strategies to monitor the effects of visitor use on park resources and visitor experience; identifies indicators, standards, and management options as part of the monitoring strategy; and addresses commercial use in the backcountry.” In the Zion BMP, the NPS also claims to develop management policy for “any technical rock climbing areas regardless of where they occur in the park.”

Zion National Park’s preferred Alternative B proposes, and the Access Fund supports, the following continued management outline for climbing activities within Zion’s backcountry:

- Alteration of the rock prohibited; including scarring, chiseling holds, gluing handholds or footholds onto existing rock & otherwise defacing natural rock
- “Clean-climbing” or minimum impact ethic encouraged; use of pitons discouraged
- Climbs temporarily or permanently closed for threatened & endangered wildlife species protection or other resource issues – closures kept to the minimum to protect the identified resource
- New climbs not monitored or limited
- Access to climbs on established & marked routes encouraged
- Power drills prohibited & excess bolting discouraged
- Subdued colors for slings, bolts, webbing, chalk, & other paraphernalia encouraged
- Overnight bivouacs on climbing routes managed by backcountry permit
- Overnight climbers must tube waste & carry it out

Preferred Alternative B gives particular focus on the following topics:

1. Access Trails

Excessive and redundant climbing access trails, or compacted and denuded staging areas, would require management action. Zion National Park’s VERP⁵ analysis for this topic

outlines a response that potentially closes “routes” to climbing areas.⁶ Presumably this extraordinary measure would include alternate climbing access possibilities. The Access Fund supports the NPS proposal to identify and delineate problem access trails to the base of well-known and heavily used climbing routes to prevent further erosion and loss of vegetation, and the use of signs placed to direct climbers away from problem or sensitive areas. We agree that one access route up/down a slope to the base of a climbing area is generally sufficient.

2. Resource Impacts

In the past Zion National Park has been exemplary with regard to progressive management of climbing in raptor habitat. Alternative B proposes the possibility of closing (seasonal or permanent) specific climbing routes to address “specific resource concerns related to nesting species, hanging gardens, or archeological sites.” The Access Fund supports measures to conserve important park resources so long as the agencies provide resource-based justification that the restrictions are necessary. We support the proposal that all “closures [be] kept to the minimum to protect the identified resource.” The Access Fund also supports the proposed prohibition on altering “routes by gluing an artificial hold” or chipping or prying “the rock to create improved holds.” However, we encourage a reasonable interpretation of the proposal that “aggressive, intentional cleaning the rock or soil and vegetation would be prohibited.”

3. Social Impacts

The Access Fund agrees with the NPS that visual impacts are often subjective and thus difficult to manage. We endorse the proposal in Alternative B to eliminate potentially intrusive “bright colored slings, shiny metal bolts, white chalk and the sight of climbers and ropes on an otherwise undisturbed formation” by encouraging climbers to use “climbing protection, slings, and other equipment that blend with the natural surroundings.” However, just because the general public can view climbers does not mean that this activity causes unacceptable visual impacts. Indeed, the NPS in Yosemite National Park rightly recognize climbers as a historic use of that park—even promote the activity—and Zion should similarly embrace its climbing tradition.

4. Fixed Anchors

According to the proposed Alternative B, “bolts should be considered the tool of last resort by visitors who are creating anchors” and that climbers should “use of natural colored anchor material.” If it is determined that some climbing anchors “detract from the aesthetics of the cliff faces” (a difficult and subjective standard) then Zion National Park should consider an anchor replacement and sling clean-up program with climbing locals

who may assist in replacing unnecessary and redundant anchors. For an example of this type of cooperative effort between Arches National Park and the local climbing community, see http://mountainproject.com/v/utah/moab_area/arches/105913581.

5. Human Waste

The Access Fund supports the proposal that climbers be required to “tube or bag human waste and toilet paper and carry it out.” However, it seems unlikely and unnecessary to close climbing areas if “found to be out of standard” which equates to “90 percent of climbs would have no more than two visible piles of human waste near the base of a climb.” Education and outreach should adequately address any persistent human waste issues.

6. VERP

To enforce the current and proposed climbing policies (among other things), Zion NP will conduct “monitoring as described in Table 14.” This table is basically a VERP spreadsheet that specifies items by zone (Pristine, Primitive, Transition, and RNA) and identifies “resource protection indicators, standards, monitoring methods and schedules, and management options.” In general, the VERP standards appear appropriate and the management responses and monitoring for the various indicators seem likely to be effective. However, how will the VERP monitoring be conducted? Does the NPS have the staff, time and money to accomplish these many tasks? Will non-NPS public interest groups be recruited for these jobs?

7. Miscellaneous

- Management zone boundaries in the BMP remain unclear. For example it is difficult to identify the line between the Transition Zone (where most Zion climbing is located) and the Primitive Zone. The final EA should clearly reflect this delineation.
- Will any climbing access trails or parking locations be affected by this plan? During the bus-only months in Zion Canyon, will the NPS continue to issue climbers parking permits for routes that require early starts.
- What, if any, new climbing area restrictions will be implemented as a product of this BMP?

*

*

*

The Access Fund welcomes this opportunity to comment on the Zion Backcountry Management Plan/EA. We hope that these comments assist the NPS in identifying the proper planning alternative for the Zion backcountry. If you have any questions or comments please contact me at 303-545-6772 x102 or Jason@accessfund.org.

Best Regards,

Jason Keith
Access Fund Policy Director

Cc: Steve Matous, Access Fund Executive Director
Deanne Buck, Access Fund Programs Director
Steve Downes, Salt Lake Climbers Alliance
Brian Cabe, American Alpine Club

¹ See <http://accessfund.org/pdf/AFscopZion.pdf>.

² See <http://accessfund.org/access/index.php#Utah>.

³ National Park Service Management Policies, 8.2 Visitor Use (2001).

⁴ The scope of the BMP, as it pertains to climbing, is broad. The BMP/EA states that

This plan/EA provides guidance for the management of 145,060 acres within ZION which include: recommended and potential wilderness; General Management Plan (GMP) Pristine, Primitive, Research Natural Area Zones and portions of the Transition Zone that overlay recommended wilderness; and any technical rock climbing areas regardless of where they occur in the park.

Zion Backcountry Management Plan/EA, iii. Reading this statement literally, all of the restrictions and management guidelines in the BMP govern all rock climbing activities “regardless of where they occur in the park.” including those in the Transition Zone in Zion Canyon. In short, this BMP controls all climbing in Zion National Park whether in the backcountry or not.

⁵ <http://planning.nps.gov/document/verphandbook.pdf>.

⁶ See Zion Backcountry Management Plan/EA, Table 14. 53.