



Protect America's Climbing

August 31, 2023

Zion National Park VUM Planning Team

[zion\\_visitor\\_use@nps.gov](mailto:zion_visitor_use@nps.gov)

**RE: Proposed changes for frontcountry camping and Wilderness Recreation Permits at Zion National Park**

Submitted via: <https://parkplanning.nps.gov/commentForm.cfm?documentID=130851>

Dear Zion National Park VUM Planning Team,

Access Fund appreciates the opportunity to provide input on the proposed changes for frontcountry camping and wilderness recreation permits at Zion National Park. The proposed changes would increase fees for overnight wilderness users including climbers. We provide these comments to assist Zion National Park Service (Zion) planners in developing appropriate changes specifically to overnight wilderness recreation permits, which climbers regularly purchase to climb big-wall objectives in Zion.

**Access Fund**

Access Fund is a national advocacy organization and accredited land trust that leads and inspires the climbing community toward sustainable access and conservation of the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 130 local affiliates. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

**Comments**

Zion offers world class recreation experiences, including rock climbing. Climbers travel from all over the world to climb Zion's unique sandstone walls. Many climbers need more than one day to complete these long climbing routes, often over 1,000 feet tall and highly technical. For many years climbers have been required to obtain a permit if they plan to spend the night camping on a big wall climb in a wilderness area. Zion is proposing changes to how this permit is administered and the cost of the permit. We provide the following comments to assist park planners in creating

the best user experience for climbers and other recreational users who plan to spend the night in wilderness areas.

### **Reservations and Permits**

The process of acquiring an overnight wilderness permit should be streamlined to reduce administrative burden on the public. The proposed changes include moving all permit administration to Recreation.gov. We believe that Zion should also continue to offer an onsite, in person option to acquire a permit to spend the night in a wilderness area and not wholly rely on an online permit system. This option could be conducted at the visitor center, and would allow last minute permits for recreation users who are already in Zion, as well as a valuable education opportunity to inform visitors of rules and park resources. The mandatory use of Recreation.gov adds additional access barriers to individuals who do not have access to a computer, internet, and a debit or credit card. Additionally, Recreation.gov is only made available to English reading-comprehension individuals and is not available in other languages—whether for residents or non-English speaking visitors, this can create an access hurdle for non-traditional visitors.

### **Fees**

The proposal includes changes in fees associated with the wilderness recreation permits for overnight users. The current system charges a \$5 dollar fee to reserve a permit on the Zion NPS website and an additional \$15 fee for 1-2 people for a total of \$20 dollars. Permits reserved onsite in Zion cost \$15 total for two people with no reservation fee. The proposed change requires users to reserve their overnight permit through Recreation.gov for \$20 dollars with an additional fee of \$7 dollars per person on the reservation. For a climbing party of two people, an overnight permit will cost \$37 dollars under the proposed changes. This additional increase of \$17 dollars for two people is not clearly justified in Zion’s planning documents. We request Zion provide additional information to clarify why there is a significant increase specifically for overnight visitors.

We encourage the planning staff to explore how any additional fees may impact the ability of low-income populations to climb and spend the night in Zion’s wilderness. We believe park managers should conduct a displacement study to better understand the correlation between fees and how this might impact and/or displace low-income and otherwise marginalized populations. We understand that fees can be necessary to protect the lands we all love, and that fees are often necessary for the continued management of specific public lands. However, if Zion intends to be consistent with the Interior Department's Equity Plan<sup>1</sup> and fully consider the justice, equity, diversity, and inclusion ramifications of the fee increases proposed, managers must also plan to deal with the negative impacts of the increase on marginalized communities.

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<sup>1</sup> See “Interior Department Takes Action to Foster Equity and Inclusion Across Its Bureaus.” found at <https://www.doi.gov/pressreleases/interior-department-takes-action-foster-equity-and-inclusion-across-its-bureaus>.

## **Climber Education**

The current overnight wilderness recreation permit program at Zion incorporates opportunities for Zion park staff to connect with and educate climbers and other overnight wilderness visitors prior to them collecting their permit and beginning their climb or overnight trip. It is unclear what educational outreach opportunities will be available to users if they reserve and collect permits only through Recreation.gov. This opportunity for education and outreach is both beneficial for new visitors to the park as well as for the management of resources by educating users prior to their trip. Zion should continue to find ways to provide outreach and education to overnight wilderness users. Access Fund offers to continue to partner with Zion on important climber education initiatives that both inform climbers of rules and regulations as well as protect the resource.

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Thank you again for the opportunity to be involved in planning for the future of Zion National Park. The climbing community has a special love for Zion, as many others do. With foresight and proper planning, we hope Zion continues to be both well-loved and well-stewarded for future generations of visitors. Please do not hesitate to contact me with any questions at [katie@accessfund.org](mailto:katie@accessfund.org).

Sincerely,



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Cc:  
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Access Fund, Interim Executive Director