



November 22, 2016

Thank you for the opportunity to provide scoping comments on the Visitor Use Management (VUM) Plan for Zion National Park. The mission of the National Parks Conservation Association (NPCA) is to “protect and enhance America’s National Park System for present and future generations.” Founded in 1919, NPCA has become the leading citizen voice for the national parks. We are a national non-profit with headquarters in Washington, DC, and 24 regional and field offices across the country, including our Southwest Regional office in Salt Lake City. NPCA represents over one million members and supporters who care deeply about America’s shared natural and cultural heritage preserved by the National Park System.

As an organization that advocates for the parks along with a diverse set of partners, we recognize the very real challenges some of our national parks face, from rapidly increasing visitation coupled with declining funding dollars. As Zion National Park anticipates visitation levels exceeding four million people this year, we are particularly concerned about the concentration of this many people on the park’s natural and cultural resources as well as infrastructure (shuttles, roads, trails, buildings, etc.). The number of park rangers has not substantially increased in the face of growing visitation, leaving park staff scrambling to keep up with increasing search and rescue calls, visitor contact and education, and care and maintenance of the park throughout the year. The essence of the national park experience itself is at risk as the opportunities to experience the grandeur of Zion National Park without a crowd diminish.

The issue here in Utah is particularly acute and not only leads to management challenges inside the parks, but also within the local gateway communities. We commend Superintendent Bradybaugh and his staff for their outreach to local and regional stakeholders in an effort to work together to explore potential solutions to congestion in the park and communities. With so much at stake including world class natural and cultural resources and recreational opportunities inside and surrounding Zion National Park, as well as the economic well-being, quality of life, and tourism experience in the region, it is imperative that all stakeholders engage to identify solutions.

NPCA is committed to working with the National Park Service (NPS), the State of Utah, local gateway community leaders and the broader public to explore, support and implement solutions to protect national park resources and the visitor experience. Our support for various solutions, however, is guided by our mission “to protect and enhance America’s National Park System for present and future generations.” We hold NPS to the standard of the Organic Act of 1916 to manage national park units with the purpose “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations”. In other words, we will support solutions that minimize impacts on park resources and protect the purpose, fundamental resources and values of Zion National Park as identified in the Zion National Park Foundation Document. Ideally these solutions will also enhance and maintain the visitor experience, a robust tourism economy and local quality of life for Southwestern Utah.

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The stated purpose of the Zion National Park VUM Plan is to identify strategies for managing visitor use and access including, but not limited to, the appropriate levels of use in the park's frontcountry areas, consistent with the long-term stewardship of parkwide cultural and natural resources, past planning efforts, and the provision of high-quality visitor experiences. To achieve this purpose, we support the NPS intent to build upon (not replace) previous planning processes, monitoring and studies, and tier this VUM Plan back to desired conditions and visitor management decisions made in the 2001 General Management Plan (GMP), 2007 Backcountry Management Plan (BMP) and the 2013 Virgin River Comprehensive River Management Plan (VRCRMP).

The 2001 GMP established a 5-year timeframe for completing carrying capacity studies for Zion National Park. While carrying capacities and implementation plans have been established for the park's backcountry in the BMP and VRCRMP, it is critical for the park to now focus the VUM on establishing appropriate levels of use in Zion National Park's frontcountry high development, low development and transition zones. As park visitation numbers are predicted to continue to increase, it is critical to understand the type and level of visitor use the park can accommodate in the frontcountry while sustaining resource and social conditions that complement the purposes of the park and its management objectives (2001 GMP, pg 1).

We support the park's proposed action to establish visitor capacities and identify implementation techniques to actively manage visitor access to the park's frontcountry through a timed-entry, reservation and/or destination-specific permit system. We are concerned about potential downstream impacts from proposed implementation techniques, particularly the possible spike in visitor use in other areas of the Park on the east side of the tunnel, Kolob Canyon, Kolob Terrace, and recreation destinations outside park boundaries. There will be pressure to spread visitation across the Zion National Park landscape and allow more use, guiding and trails in the park's backcountry. Therefore, management techniques must be strengthened and visitors actively managed to protect the integrity of the 90% of Zion National Park that is designated or recommended wilderness. Building in an adaptive management component of the plan will help ensure desired conditions are achieved, unacceptable deterioration of park resources and the visitor experience are avoided, and the integrity of park wilderness and backcountry areas are protected.

Question 1: Zion Canyon Reservation and/or Timed-Entry System

We believe creating a canyonwide timed-entry or reservation system is the best solution for managing levels of visitation during peak times to protect the visitor experience along with the health and integrity of park resources. We support exploring the reservation/timed-entry system as a way to give people certainty of entrance during peak times, reduce crowding, and enhance the visitor experience. Examples in other parks and Zion National Park's backcountry management demonstrate that people adapt to these types of reservation and permit systems with careful planning and marketing, especially for foreign and non-local visitors. Actively managing visitor access can also be a real benefit to the local community by helping to spread out visitation throughout the year and reduce congestion in town, particularly in Springdale.

We recognize the complexity of developing an effective reservation/timed-entry system with the sheer number and myriad of visitor uses concentrated in the canyon. We ask that the park consider the following points in developing the VUM plan and build in a robust adaptive management component to the plan so you can learn and improve the system over time to meet desired conditions.

- **Visitor Diversity:** Careful planning and monitoring after implementation is necessary to ensure that the reservation/timed-entry system does not deter particular segments of the visitor

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population over others, especially younger, more diverse visitors that NPS is working to engage in the parks.

- **Lodge:** How will lodge residents and users (restaurant) be incorporated into the system? If they are given an automatic pass up canyon, how do you track this in your capacity numbers and does this give an access advantage to more affluent visitors?
- **Multi-modal Trail:** If a multi-modal trail is established up canyon, will trail users need a reservation to use it? If not, there might be a marked increase in visitors accessing popular destinations by bicycle to get around the reservation system.
- **Tour Buses:** We understand the dramatic increase in tour buses is a growing management challenge and that tour buses are currently allowed to access Zion Canyon up to the lodge and disperse from there. While this approach relieves congestion on the shuttles, it contributes to large pulses of visitors at popular destinations and must be considered in total carrying capacity numbers on the trails, park facilities and resources.
- **Shuttle System:** The Zion Canyon shuttle is a critical and successful tool to connect the park with its gateway communities and relieve parking and traffic congestion up canyon. We understand that substantial investments must be made to maintain and improve the shuttle system and upgrade the road bed, and NPCA is committed to advocating for those resources. We support the park exploring ways the shuttle can be used to actively manage visitor numbers through the reservation/timed-entry system to stay within carrying capacities including enforcing seating capacity, shuttle run reconfiguration and modifying shuttle stops into flag stops.

Question 2: Other Potential Zion Canyon Strategies

- **South Campground:** We support changing the South Campground to reservation-only to give visitors more certainty in their trip planning and eliminate the lines of cars queuing up early in the morning to get campsites. We encourage the park to continue working with the communities, BLM and other land managers in the greater Zion Canyon area to develop a comprehensive solution to the camping issue. Making the change to reservation-only campsites may alleviate camping congestion in Zion Canyon by encouraging visitors to seek alternate campsites further away from the park rather than driving all the way into the park in search of a campsite and backtracking down canyon when the campground is full.
- **Infrastructure/Parking:** The Zion GMP states that any proposed developments will be intended primarily to protect resources and further identifies the need to concentrate any new facilities or development within previously disturbed areas, make the construction footprint as small as possible and work with adjacent landowners to develop outside park boundaries where possible. We do not believe adding significant parking inside the park is a viable solution. We recognize parking in Springdale is also an issue and encourage the park to continue to pursue options for addressing vehicle congestion by working with the county and communities on public transportation and expanding the shuttle stops down canyon.
- **South Entrance Redesign:** We support redesigning the south entrance to improve the flow of traffic and safety for pedestrians and bicyclists, within the GMP guidelines for development outlined above.
- **Multi-Modal Trail and Connectivity:** NPCA supports the development of a multi-modal trail and improved connectivity between modes of transportation as a way to encourage people to get out of their cars, get exercise, and ride bikes or walk into the park rather than drive – if the trail can follow the footprint of existing trails without damaging fragile riparian habitat. There are likely many visitors to the park who would prefer to walk or ride bikes, but do not feel

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safe doing so on the narrow road with shuttle and bus traffic. Visitors accessing the canyon on the trail would need to be incorporated into the overall carrying capacity target (see above).

- **Pre-planning and Real-time Information:** NPCA supports using technology and finding other ways of providing pre-planning and real-time information to park visitors to help in their trip planning and hopefully help provide a seamless, enjoyable national park experience. Working with the local business community, local/state tourism representatives, and the Utah Department of Transportation to help educate visitors and provide information could be a win-win for both the national park and its neighboring communities. A key messaging component should include information about stewardship ethics – how visitors can take care of park resources, facilities and behave toward each other while in the park. Given the high percentage of international visitors to Zion, information should be provided in multiple languages, perhaps in the form of a booklet of common NPS messages (i.e. Do not feed animals).
- **Spreading Out Visitation:** We are committed to advocating for additional funding for the parks that could supplement additional rangers and other resources to accommodate increased visitation in the less busy times of the year. We are concerned about pushing visitation to the shrinking shoulder season if there are not additional resources.
- **Automated Gate Pass System:** This option, especially during peak times of day during the peak season, can be an efficient way of decreasing congestion at the entrance station. We are concerned, however, that this eliminates a key (sometimes only) point of contact with a ranger to distribute information and educate visitors before they enter.
- **Maintenance and Rehabilitation:** As the park prioritizes potential strategies for managing visitor use, sustainability of park resources (natural, cultural, historic structures, facilities) in perpetuity must be at the top of the priority list to leave them unimpaired for future generations.

Question 3: Destination Specific Strategies

- **Angels Landing and the Narrows:** These two destinations have the most acute issues with resource impacts, human safety and waste management, and a deteriorating visitor experience due to crowding. They should be top priorities for actively managing visitor use through a reservation or permit system.
- **East Entrance:** Changes made in Zion Canyon visitor management will make visitor orientation at the east entrance even more important. NPCA encourages the park to work with adjacent land owners and other partners to enhance visitor facilities outside park boundaries, especially since they are actively seeking to be part of the solution.
- **Zion – Mount Carmel Highway Tunnel:** With the increase in tour bus traffic in addition to other oversized vehicles, a system is needed to improve the flow of traffic through the tunnel that minimizes impact to the majority of visitors who have standard vehicles. Establishing specific times for oversized vehicles to pass through the tunnel would help those drivers, as well as other visitors, to adjust their plans and expectations around anticipated tunnel delays.
- **Zion-Mount Carmel Highway – East and West of Tunnel and Kolob Terrace:** Downstream effects from changes in Zion Canyon visitor management on use in the Zion-Mount Carmel Highway and Kolob Terrace areas, added to already elevated use in these sections of the park, should be carefully assessed and benchmarks and indicators established to avoid shifting the congestion problems to new locations in the park. Any changes made to enhance and accommodate increased visitation must not compromise the fragile wilderness adjacent to the road corridors and must follow guidelines for preserving the historical character of the road and tunnel, both of which are included on the National Register of Historic Places.

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- **Kolob Canyons:** We support the strategy of establishing visitor capacities for Kolob Canyons; if visitation is already reaching or exceeding those capacities, the park should implement a reservation, timed-entry or site specific permit system to actively manage visitor access.

We recognize the incredible challenge NPS faces in seeking a balance in visitor use management that ensures its resources are preserved in perpetuity while providing a high quality national park experience for those venturing from around the world to visit Zion National Park. We believe this balance cannot be achieved under current and increasing visitation without actively managing within the carrying capacities of the park's frontcountry and backcountry destinations. We are committed to working with the park, leaders in the gateway communities, county and state, and the public to help identify and support solutions that protect the park and the visitor experience at Zion. We look forward to evaluating the preliminary alternatives and providing additional feedback when they are available for public review.

Sincerely,

A handwritten signature in black ink, appearing to read "Cory MacNulty". The signature is fluid and cursive, with a small yellow square mark at the bottom right of the signature.

Cory MacNulty
Utah Senior Program Manager
National Parks Conservation Association

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