



Protect America's Climbing

August 14, 2017

Kezia Nielsen
Zion National Park
Springdale, UT 84767
Submitted via email: zion_visitor_use@nps.gov

RE: Access Fund Comments on the Zion National Park Preliminary Alternative Concepts for the Visitor Use Management

Dear Zion Planning Team,

The Access Fund welcomes the opportunity to submit these comments regarding the National Park Service's (NPS) Visitor Use Management Plan (Plan). We provide these comments to assist Zion National Park (ZNP) planners in developing appropriate and effective alternatives for the Plan. Access Fund appreciates the extensive work that Zion planners put into the Preliminary Alternative Concepts for the Visitor Use Plan. While we recognize the tremendous increase in visitation levels at ZNP, we also recognize that most climbing areas are not experiencing similar increased visitation and we are concerned that certain aspects of the preliminary alternative concepts will inadvertently restrict rock climbing access.

Access Fund

Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund has over 15,000 members and 100 affiliates. We currently hold a memorandum of understanding with the National Park Service¹ to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. The Access Fund has a long history of participation in Zion National Park management initiatives,² and we welcome this additional opportunity to participate in the development of the Visitor Use Plan. Utah is one of our largest member's states and many of our members travel regularly to climb in Zion National Park. To learn more, visit www.accessfund.org.

¹ See: https://www.accessfund.org/uploads/Access-Fund-NPS_MOU_-2014-2019.pdf

² See:

http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

COMMENTS

Access Fund understands that ZNP visitation is rapidly exceeding recent record-setting years.³ The increase has triggered the need to develop strategies to protect both visitor experience and natural and cultural resources. Access Fund supports regulations that protect natural and cultural resources, are equitable to all user groups, and utilize the lightest administrative tools and are based on visitor use data.

We do not support a blanket permit system to enter ZNP as proposed under Alternative B. Alternative B will inadvertently penalize climbers because climbing resource access will be restricted due to the crowding issues elsewhere in the park. Although ZNP is a world renowned destination for rock climbers, overall climber use numbers remain low, primarily due to the committing length and difficulty of the rock walls within ZNP. A blanket restriction would severely restrict rock climber's access to ZNP which is extremely reliant on weather conditions. The probability of climbers permits lining up with the weather being clear and dry (a requirement for climbing on the sandstone walls in ZNP) is low. The inability to be flexible in order to alter climbing plans based on weather and rock conditions will severely restrict access to this world class climbing resource.

We support site specific management prescriptions based on an understanding of visitor use patterns. Therefore, we support aspects of Alternative C because it proposes permits only for certain high-use front and backcountry areas based on visitor use data; an example of this could be requiring permits to hike Angel's Landing or the Narrows. Destination based permits for areas that receive extremely high use may improve the visitor experience and reduce impacts to the resource. This may be an appropriate way to manage visitors at more popular areas without restricting access to zones that are not attracting use levels that exceed carrying capacity, such as most of the climbing areas at ZNP.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system and other management needs the Park may require to provide for the climbing opportunities found in Zion National Park. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program⁴ or assistance from our Conservation Team⁵ which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the Park. Access Fund hopes these comments assist the Zion planners in refining the

³ Zion National Park Visitor Use Management Plan Preliminary Alternative Concepts Newsletter. Summer 2017.

⁴ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm

⁵ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

Preliminary Alternatives for the Visitor Use Plan. The Draft Preliminary Alternatives propose dramatic restrictions which would significantly impact the climbing experience. We support a site specific management approach that balances visitor use and resource protection because these management decisions will affect the future experiences of thousands of climbers who travel to this world-class area every year.

The Access Fund looks forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Thank you for considering the importance of Zion to climbers worldwide and for your hard work on this extensive and important planning process. If you have any questions or comments, please contact me at katie@accessfund.org or 303-552-2843.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Goodwin". The signature is fluid and cursive, with the first name "Katie" being more prominent than the last name "Goodwin".

Katie Goodwin
Public Lands Associate
Access Fund

Cc:

Brady Robinson, Executive Director, Access Fund
Erik Murdock, Policy Director, Access Fund
Jason Keith, Policy Advisor, Access Fund