

National Park Service  
U.S. Department of the Interior

Zion National Park  
Utah



## ZION NATIONAL PARK VISITOR USE MANAGEMENT PLAN

PRELIMINARY ALTERNATIVE CONCEPTS PUBLIC COMMENT SUMMARY REPORT  
November 2017





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## SUMMARY

During the summer of 2017, Zion National Park released a newsletter outlining planning objectives, preliminary alternative concepts, and descriptions of actions considered but dismissed as part of the Visitor Use Management Planning process. Many public comments were received on the proposed action in fall 2016. This public scoping feedback was considered as the preliminary alternative concepts were developed by park staff and NPS specialists. The public was asked to share their thoughts on the preliminary alternatives as outlined in the newsletter, between July 17 and August 14, 2017. Due to reports of the online commenting system being down over a weekend, the comment period was extended to August 18th.

During public review of the preliminary alternative concepts, approximately 1,650 correspondences were received through the NPS Planning, Environment, and Public Comment (PEPC) website or by mailing and emailing directly to Zion National Park. Comments were received from 47 states and the District of Columbia. While most comments came from the United States, comments were also received from 11 other countries (see tables below). A small number (approximately 100) form letters were received; however, the majority of comments came from private individuals.

In order to reach a broad audience, the newsletter and information about the preliminary alternative concepts were shared with the public for their comment in a variety of ways. More than 350 hard copy and/or email versions of the newsletter were distributed by mail or email to local, state, and federal governmental officials, tribal representatives, local business leaders, commercial users, and other individuals who had previously expressed interest in the planning process. A press release was also distributed to all major local and regional news outlets. Multiple articles on the planning effort were also circulated on local and national outlets during the comment period. Through direct correspondence from the park superintendent, local and state elected leaders, as well as local, state and federal agency managers, were made aware of the public comment period for the preliminary alternative concepts.

The National Park Service collected public comments during this phase of the planning effort in **order to understand the public's perspectives on preliminary alternative** concepts for the Zion National Park Visitor Use Management Plan. In implementing the NEPA process, thoughts and ideas from individuals, organizations, and agencies are analyzed and considered equally. For this reason, the unique content of comments, rather than the number of times a comment was received, will be used to guide the refinement of preliminary alternative concepts and help inform the development of a preferred alternative as the draft management plan is prepared. This report summarizes public comments received during the public comment period.

The following table provides the distribution by state of public comments that were submitted to the PEPC system, by email, and U.S. mail.

Table 1. Distribution by State of Public Comments Submitted to the PEPC System

State	Percentage	Number of Correspondence
Utah	51.4%	848
California	8.4%	139
Nevada	8.2%	135
Arizona	3.8%	63
Unidentified (No state listed or international)	2.6%	43
Colorado	2.2%	37
Texas	2.1%	35
Florida Pennsylvania Washington Illinois	1-2%	18-29 (per state)
Oregon Indiana North Carolina Georgia Wisconsin Virginia Minnesota New Jersey New York Michigan Ohio Tennessee New Mexico Missouri Massachusetts	0.5-1%	10-14 (per state)
Idaho Connecticut Montana Kentucky Wyoming Maryland Arkansas South Carolina Kansas Maine Oklahoma Louisiana	<0.5%	1-9 (per state)

State	Percentage	Number of Correspondence
District of Columbia (Washington, DC)		
Iowa		
Alaska		
New Hampshire		
Nebraska		
Hawaii		
Rhode Island		
Delaware		
West Virginia		
Alabama		
Mississippi		
		Total 1,649

Table 2. Distribution by Country of Public Comments Submitted to the PEPC System.

State	Percentage	Number of Correspondence
United States of America	98.5%	1,625
Canada	0.5%	5
Australia Great Britain	0.2%	4
Italy Mexico France Denmark Netherlands Germany Belgium Canada Korea	0.1%	1-2 (per country)

## DEFINITION OF TERMS

**Correspondence.** A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, or open house transcript.

**Comment.** A comment is a portion of the text within a correspondence that addresses a single subject or issue. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.

Comment Summary. A grouping that is centered on a common subject. Comment summaries combine similar comments. Example quotes from the comments used to create a comment summary may also be presented to highlight the type of sentiments that went into the comment summary.

## COMMENT ANALYSIS

The public was asked to provide general input on the preliminary alternative concepts and was not asked to respond to specific questions. Comments ranged from simply stating which alternative was supported or opposed, to detailed recommendations for implementation of an alternative concept. Concerning alternative concept A, the no-action, many visitors expressed support for this alternative as they could not support a reservation system, while others expressed opposition to this alternative as they do not believe it solves any of the problems facing the park. Concerning alternative concept B, those who support the alternative generally liked that it addresses crowding while still allowing flexibility to visit destinations within the park, while others expressed opposition generally because of the need to gain a reservation to enter the park year-round. Concerning alternative concept C, those who support the alternative generally liked that it addresses crowding and allows detailed trip planning for specific sites, while others expressed opposition generally because of the need for a reservation, being too restrictive on where a visitor could go, and being complicated and potentially costly to implement.

Specific comments on the alternative concepts and the actions contained within them are summarized below into concern statements. Concern statements have been organized by the following topics:

- Actions Considered but Dismissed
- Commercial Services
- Park Facilities
- Park Entrance Fees
- Information, Interpretation, and Education
- Alternate Management Strategies or Actions
- Impacts to Park Resources
- Reservations and Permits
- Shuttle System
- Visitor Capacity
- Zion-Mount Carmel Highway

### ACTIONS CONSIDERED BUT DISMISSED

The Zion National Park Preliminary Alternative Concepts Newsletter provided descriptions of actions that have been considered but dismissed from further consideration. For some of these actions, commenters expressed support for them to not be dismissed and to be included in an alternative. Below are specific topics that were commented on. Additional comments related to reservations can be found in the reservations and permits section of the document.

#### Time-of-day Congestion Pricing

Commenters both supported and did not support surge, congestion, or demand-based pricing where the price varies depending on demand, time of day, and season. Commenters specifically highlighted tollways, amusement parks, and parking meters that implement congestion pricing. Another commenter said this type of fee structure can displace visitors who cannot afford a higher entrance fee.

## Dispersing Use to Relieve Congestion in Zion Canyon

Comments advocated for advertising different areas of the park and region to disperse visitor use from Zion Canyon. Within the park, commenters specifically mentioned trail development on the east side of the park, wilderness, Kolob Terrace, and Kolob Canyons as a way to bring more visitors to these areas. Some commenters stated that wilderness designation does not limit the park from encouraging greater access of those areas by individuals, groups and/or commercial services. In addition, some commenters recommended increasing limits for permitted wilderness hikes while others would like permits or restrictions such as group size lifted. Other commenters stated that the park should attempt to entice visitors to explore the park during the off-season / less-visited months.

Encouraging visitors to go to other nearby lands was also mentioned. It was suggested that the park should work with surrounding communities, as well as neighboring state and federal lands, to encourage visitors to disperse to other areas to recreate. Some commenters identified specific places displaced visitors might go, including Eagle Crags, Smith Mesa, and Cedar Breaks. Still others suggested working with the local communities to develop recreation opportunities in Springdale such as tubing, a nature museum, an interactive wildlife exhibit, mini golf, or a go-cart track. One commenter recommended privatizing shuttles to the visitor center, expanding paid parking in town, or adding additional services (such as biking through the park, private shuttles through the park, tour groups for specific trails, etc.).

## Closing Zion Canyon to Vehicles and Eliminating Shuttle

Commenters suggested that Zion Canyon be closed to vehicles as a way to address issues such as resource damage and mentioned that visitors who want to visit the canyon could walk or bike to destinations. Others stated that dispersing visitors to less visited areas could cause adverse impacts to those areas. Some commenters suggested the shuttle be discontinued; others suggested exceptions for those with disabilities, while others suggested removing the road within upper Zion Canyon entirely.

## COMMERCIAL SERVICES

Numerous comments referred to the commercial services in the park, and some recommended potential new visitor service opportunities. Comments are categorized as they relate to commercial services, proposed new commercial services, and commercial bus tours.

Some commenters recommended prohibiting all commercial use in the park. Many others identified need to regulate the number and size of commercial groups using the park, stating that commercial services have added to congestion, resource impacts, and degraded visitor experience. Some commenters suggested a need to limit commercial services to specific trails or areas. One commenter noted that the high rates charged by commercial service providers cater to higher income visitors and are a barrier for many visitors. Several commenters suggested that preference for reservations should be given to individuals over commercial service tour groups.

Some commenters stated that the reservation system, camping, and parking should not be managed by a commercial service. Another suggested the role of commercial services in managing these systems and activities should be further evaluated.

Multiple commenters expressed that the park should continue to allow bike/bike tour commercial use authorizations, stating that biking helps minimize congestion and provides an alternate way to experience the park. Several commenters noted that commercial services can help the park in managing and educating visitors. One commenter recommended giving local businesses preference when issuing commercial use authorizations (CUAs).

Under alternatives B and C, one commenter expressed concern that the park would determine which visitor services are appropriate and necessary (without concern for commercial service providers or local businesses) and stated that this was contrary to one of the plan objectives of proactively engaging key partners and stakeholders.

Other commenters believed that if a visitor has a commercial tour or experience reserved (e.g. horseback rides), that a reservation should automatically be provided. Several commenters questioned whether commercial service providers would use the same reservation system as individuals, and emphasized the need to restrict how many reservations could be booked by commercial service providers.

Finally, some commenters wondered how lodging reservations at the Zion Lodge would be dealt with in the reservation system. Some commenters recommended that those with lodging should not be required to obtain an additional reservation. Others believe lodge guests automatically getting a reservation is unfair to other users who cannot afford to stay there. Some commenters were concerned for lodging outside the park and recommended that hotel lodging in Springdale work in conjunction with the park so that hotel guests can be assured of access to the park.

### New Commercial Service Strategies or Actions

Although some commenters suggested there should be no commercial services in the park, a number of commenters provided ideas for new commercial services and activities in the park.

One commenter stated that a shuttle to Kolob Canyon or tours of the canyon should not be allowed, while another supported idea of a shuttle or allowing commercial tours at Kolob Canyon. One commenter suggested additional food services in the park. Several commenters suggested using a commercial service provider to upgrade and operate the shuttle system, including extending the shuttle to the east side of the park, and suggested a shuttle from St. George, Utah, or Las Vegas, Nevada. One commenter suggested expanding the shuttle to the East Entrance through a commercial service provider and/or partnering with Kane County and local businesses on Zion's east side.

Some commenters suggested allowing commercial guiding on select backcountry / wilderness areas such as Observation Point, Deer Trap, and Cable Mountain via East Rim Trail on the east side. Some

commenters noted that commercial services could help educate visitors about wilderness and assist the park in monitoring impacts and issues.

### Commercial Bus Tours

Many commenters stated that commercial tour buses add to crowded conditions by dropping off large numbers of visitors at one time and add to the strain on park facilities such as restrooms. Some recommended complete prohibition of bus tours in the park, but many provided specific suggestions on limitations such as restricting the number of buses per day or season (either through permit system or reservation system), limiting the size or type of buses permitted in park, restricting commercial bus tour routes and stops in the park, limiting group sizes when disembarking, or requiring buses to park at the visitor center and having patrons disembark to ride the park shuttle. Several commenters recommended limiting ability of commercial bus tours to book blocks of entry reservations and/or blocks of rooms at the Zion Park Lodge. Others recommended requiring commercial bus tours to provide educational information and messaging and require commercial bus tours to review park etiquette rules with their clients. Several commenters recommended increased fees for bus tours to offset the impacts of the large groups on park resources and facilities. Some recommended adding specific operating terms and conditions to commercial bus tour permits such as requiring drivers to pick up trash and prohibiting use of in-park restrooms (require buses to have toilets).

A commenter noted that commercial bus tours add to tunnel congestion, and suggested limitations on when commercial buses could use the tunnel. Some commenters expressed concern that restricting or prohibiting commercial bus tour access to the East Entrance could impact tour itineraries and add to South Entrance congestion due to rerouting.

One commenter noted that seniors often rely on bus tours as a way to visit parks and noted that buses help alleviate parking and traffic congestion.

### PARK FACILITIES

Numerous comments referred to the current facilities within the park, and recommended potential new facilities. Comments are categorized as they relate to visitor services, entrance stations, bicycle use, Kolob Canyon, Kolob Terrace, Zion-Mt. Carmel Highway, parking, and trails.

#### Visitor Services

Many people commented on the need for additional visitor service facilities within the park, including the campgrounds, restrooms, and picnic areas. Only some commented that the current number of facilities was adequate or that their visitor experience would be negatively impacted by new infrastructure within the park.

Some commenters mentioned that they would like to see either more sites added to existing campgrounds or the development of another campground on the east side of the park. Several people were concerned with the campground reservation system, and whether it improved or detracted from their experience. For instance, some people were in favor of the reservation system

and suggested making all of South Campground reservation-only (either year-round or during the busy months). Conversely, others felt that the campground reservation system impeded their experience because either they could not plan their trip in advance or they wanted it to be impromptu, or because other people made reservations but did not show up—and those sites were not released to people looking to camp that night / last minute. Other recommendations related to camping and campgrounds included having a **mandatory “lights out” at night or compulsory** quiet hours; limiting camping to two nights maximum per party; and asking the BLM to build a campsite near Springdale to alleviate crowding within the park. Another commenter suggested that the park ban recreational vehicles or RVs and allow only tent camping.

Some commenters suggested installing additional or improved restroom facilities at locations throughout the park, including the East Entrance, above the main tunnel, Scout Lookout, Observation Point, and at the junction between Emerald Pools and the Kayenta trail. Commenters suggested composting toilets or restrooms throughout the park, but more specifically in the Narrows. Other suggestions **regarding improvement of the park’s facilities included adding a picnic** area west of the tunnel, installing an electronic board with lights outside the park that indicated which campgrounds were full and which had availability, and expanding the South Campground.

### Entrance Stations

**Several people commented on how to improve long lines and wait times at the park’s entrances.** Many recommended adding another lane (much like the employee-only entrance lane) for those who already had a pass (i.e., Interagency Annual Pass, Interagency Lifetime Pass, or Zion Annual Pass). Other recommendations included having more staff at the entrance stations, extending the **hours the entrance station is staffed each day, and installing “electronic displays”** before the entrances with relevant information in multiple languages.

### Bicycle Facilities

Many suggested taking advantage of bicycle use as a way to decrease automobile traffic. For instance, some commenters recommended some sort of bicycle rental within the park. Some people suggested designating certain times of the year or certain days, or particular areas of the park as bicycle-use only. Several commenters stated that if the park does implement a day-use reservation/ permit system, those who enter on bicycles or on foot should be exempt. Other general comments regarding bicycle use included having a tent-only campground for cyclists, allowing the use of e-bikes, and building bike paths in Zion Canyon parallel to the main roadway.

### Kolob Canyon

Many commenters supported the addition of new facilities within Kolob Canyon, to disperse people from the overcrowded Zion Canyon. Some recommended new trails, restrooms, picnic sites, ranger talks, or an additional shuttle route to Kolob Canyon. Some commenters wanted Kolob Canyon to **be left “as is” since exploring this quieter area of the park enhances their visitor experience.** Some commenters recommended not allowing commercial services or bus tours in Kolob Canyon and argued against dispersing use to this area of the park. Conversely, some commenters recommended allowing commercial use in Kolob Canyon.

## Kolob Terrace

Comments regarding Kolob Terrace were divided just as they were in reference to Kolob Canyon, with people for and against additional facilities. Those who were opposed to additional facilities in Kolob Terrace voiced concern that doing so would invite detrimental impacts to the natural resources. Conversely, some recommended offering additional services in Kolob Terrace so that more visitors would travel beyond the park's crowded frontcountry in Zion Canyon.

## Zion-Mt. Carmel Highway

Many commenters supported the idea of building new facilities at the East Entrance, or somewhere on the Zion-Mt. Carmel Highway. Many recommended extending the shuttle service from the east side, thereby reducing the traffic through the tunnel. These commenters noted that a parking lot would need to be built at the East Entrance in order to accommodate the shuttle riders. Other commenters suggested that more facilities in general, such as restrooms, trails, and parking pull-outs are needed along the Zion-Mt. Carmel Highway. Some commented that the park should work with neighboring counties and private landowners to discuss the possibility of additional facilities at the East Entrance. Finally, commenters suggested that east side parking be designated for visitors with wilderness permits.

## Parking

Many commenters suggested remedying the parking problems at the park by either building parking garages outside the park, inside the park, or by charging a fee to park within the park. People recommended locating these facilities either in Springdale, outside the East Entrance, or around the Zion Canyon Visitor Center and Human History Museum. Several people wanted to see designated parking for those with wilderness permits. Some commenters stated that adding additional parking locations within the park would detract from its scenic beauty and thus were opposed to any new facilities. Some people stated that road markings and striping, as well as designating angled parking, would provide more parking spaces to the public. Some commenters expressed concerns that parking in unauthorized areas such as roadsides has created a dangerous situation. Some commenters specifically pointed to roadside parking on the east side of the park while others mentioned vehicles parking illegally in Springdale as parking becomes hard to find. Another commenter suggested the park place boulders or other obstacles in places where they do not want visitors to park. A commenter suggested large vehicles, both RVs and vehicles with trailers, be prohibited from parking areas.

## Reservations for Parking

A commenter suggested the park number its parking spots and allow visitors to reserve 50% of them for the day with a \$5.00 reservation fee. If unused after two hours the park could release the open spaces. Commenters suggested the park require reservations for all parking year round.

## Trails

Many commenters believed that the park should add more trails in order to spread out the crowding that occurs on popular trails such as Angels Landing and the Narrows. One commenter suggested building a paved trail that parallels Zion Canyon Scenic Drive for bicyclists and pedestrians, which would then mean fewer people riding the shuttle buses or driving personal vehicles. Some commenters did not want to see any new trails within the park, and some noted that the park did not seem to be able to maintain its existing trails, let alone invest in building new ones. Some commenters suggested limiting group size of commercial tours on trails.

## PARK ENTRANCE FEES

Commenters expressed a variety of perspectives related to park entrance fees, with some supporting increased fees, and others opposing any increased fees. A number of commenters suggested differential pricing based on visitor type, residency, or nationality. Other commenters proposed alternative fee structures to help the park service manage use and recoup management costs. These topics are noted in more detail within the following categories: increasing park fees, no fees or reduced entrance fees for U.S. citizens, and other potential changes to fee structure.

### Increasing Park Fees

Some commenters recommended that the park increase entrance fees. Some commenters believed this could help reduce high visitation while others believed it would help generate revenue for the park to take care of facilities and provide additional opportunities. Commenters stated their willingness to pay additional fees to visit. Other commenters raised concern over fees potentially being increased and recommended that fees not be increased. Some commenters believed increased fees would disproportionately affect working families and lower income individuals and may not allow them to visit the park. Other commenters mentioned that visitation could be reduced by increasing fees in a variety of areas, including not only park entry, but also on camping, park commercial operators, and commercial bus tours. One person supported the no action alternative with increased entrance fee. One commenter suggested an increased fee for walk up reservations and a limited number of free online reservations be available in advance.

### No Fees or Reduced Entrance Fees for U.S. Citizens

A number of commenters expressed support for reduced fees specifically for local residents and/or U.S. citizens. Commenters frequently stated the belief that U.S. taxpayers should not have to pay fees, or additional fees, but believe it would be appropriate for international visitors to pay higher fees.

### Other Potential Changes to Fee Structure

Some commenters suggested charging a per-person entrance fee, not a fee per vehicle. A number of commenters recommended charging a fee for parking within the park, with free parking for registered campers and lodge guests. A commenter suggested offering discounted fees for visitors who travel with big tour companies between the many national parks in Utah, as well as for lower income populations. Conversely, other commenters suggested a higher fee for international visitors,

specifically those traveling on commercial bus tours. One commenter suggested the park work with neighboring towns to shuttle visitors into the park and offer those who use this service a discounted entrance fee.

Another commenter suggested reducing fees during lower use periods and increasing fees during higher use periods. One commenter suggested four separate fees: one for basic entrance, another for visitors wanting to drive between the south and east entrances, another fee for entering the Zion Canyon above Canyon Junction, and another tied to site-specific permits. A commenter also suggested a discount for visitors who carpool or those with electric vehicles. One commenter suggested that a park entrance fee would not be necessary if the park instead charged fees for a tour bus that did not stop, charged another fee for access to popular trails based on maintenance requirements, and charged for parking. One person suggested adjusting the park entrance fee annually commensurate with the Consumer Price Index so that fees that are charged keep pace with inflation.

## INFORMATION, INTERPRETATION, AND EDUCATION

Commenters were divided on whether the park should continue its current strategy for educating visitors about Leave No Trace (LNT) and resource protection, or whether it should expand it. Several visitors suggested expanding educational efforts. For instance, one commenter said that visitor education could be expanded by installing signs on popular trails with LNT and Pack It In, Pack It Out messages. Another suggestion recommended using volunteers to create an LNT video to be played on shuttles or tour buses to educate visitors on LNT practices. Several people expressed interest in a Zion app that would provide real-time information about visitation levels in the park (one commenter suggested expanding cell coverage in the park in order to access the app). **Other people recognized the park's current education efforts but noted that people do not pay attention to signs, read the park newspaper, or heed crowding warnings.** Recommendations for expanding education efforts included having a 1-800 number for people to report inappropriate visitor behavior, handing out plastic trash bags for people to pack out their trash, enforcement of parking by issuing citations every time someone parks illegally, requiring visitors to watch LNT videos when they make a reservation, and requiring commercial services and bus tours to provide more educational messaging.

Another commenter suggested additional enforcement and citations for littering and alcohol consumption. Several commenters recommended that the park create a Virtual Reality (VR) video that would provide visitors with views of the park without having to actually visit those areas. A commenter felt some of the park's negative messaging is dissuading visitors from visiting Zion National Park. Another commenter suggested the park leverage partners, including the Zion National Park Forever Project and commercial service providers, to inform and educate visitors. A commenter suggested the park work with nonprofit partners to fundraise and use new techniques and technologies to support critical park functions.

A commenter suggested the park increase signage along switchbacks to advise drivers to reduce speeds. A commenter suggested the park increase the real-time signage to include messaging for

permits and/or reservations remaining, crowding alerts, and other key messages that could inform visitors of what to expect when visiting the park.

A commenter suggested the park provide a checklist for park visitors so they could “check off” less popular hikes instead of just the bucket list popular hikes like Angels Landing and the Narrows.

Some commenters stated that they would like the park to make every effort to inform the public once an alternative from this plan is selected for implementation. Commenters suggested the park use radio, television, or other ways such as handouts at the park to inform visitors and nearby communities about this plan moving forward.

### Advertising Campaign

Numerous commenters were concerned that advertising was drawing too many people to the park. Many of these commenters asked that the State of Utah stop its “Big 5” (officially the Mighty 5) campaign, citing it as the direct cause for overcrowding in the park. One commenter stated that the NPS Centennial “Find Your Park” campaign was responsible, and another noted that advertising to international crowds was drawing too many people. Another specifically recommended stopping advertising to international visitors. A commenter suggested the park pull back on the private races occurring within the park. A commenter suggested the park use advertising to discourage visitors from coming to the park.

## IMPACTS TO PARK RESOURCES

### Natural Resources

Multiple commenters noted increased refuse and visitor-created trails and suggested these were impacting wildlife and the environment. Other commenters suggested crowding was impacting resources and in turn affecting their experience. Another commenter suggested the integrity of ecosystems is compromised under the current number of visitors. Multiple commenters were concerned about vegetation along trails, one specifically mentioning the Narrows. A commenter expressed concern for the California condors with current visitation levels. A commenter was concerned that if alternative concept C was implemented the impacts from traffic and pollution would be increased and localized to specific areas causing increased damage.

### Cultural Resources

A commenter suggested the park issue more citations for vandalism to cultural resources including graffiti or for visitors traveling off trail. A commenter suggested the park consider the implications of reservation systems on traditional uses of the park. Commenters supported the identification and avoidance of prehistoric archeological sites and traditional cultural properties.

### Visitor Use and Experience

Multiple commenters supported the park taking management action to improve the visitor experience. Many commenters said they no longer visit Zion Canyon because of crowding and are exploring other parts of the park. Some commenters stated they no longer visit the park during the peak season due to diminished visitor experiences. A commenter suggested the serenity and overall

visitor experience of Zion is being severely compromised with current visitation. Some commenters stated that safety concerns for themselves and others are impacting their experience. A commenter suggested that in the future the park should consider the impacts to visitors who are unable to obtain a reservation. A commenter suggested a reservation system would impact the visitor experience by controlling the experience and reducing spontaneity. Multiple commenters suggested the park prohibit smoking because it was impacting their experience. A commenter suggested the park prohibit speakers or backpacks with speakers, suggesting these can impact the visitor experience along trails.

### Socioeconomic Impacts

Many commenters suggested the park consider economic implications of reservation systems and visitor capacity to local businesses and nearby communities. Commenters suggested the park continue to consult with nearby towns and counties as the alternatives develop, and later during implementation. Many commenters suggested that setting a visitor capacity could seriously impact local businesses.

### Safety Concerns

Some commenters expressed safety concerns about unprepared hikers they observed in the park. They noted that these hikers either did not have the necessary equipment and adequate supplies, or that they were unprepared for the difficulty of the hikes they were undertaking. One commenter suggested having a ranger at Angels Landing and the Narrows trailheads to intercept and educate these hikers. Others suggested that the crowds on popular trails (mostly Angels Landing) led to safety issues as people were not waiting to ascend or descend safely, but rather were grabbing hold of anything or anyone they could. These commenters were in favor of a day-use permit system for these trails to help reduce the crowds and safety issues. Multiple commenters suggested an age limit for Angels Landing. Several commenters noted that commercial services could assist the park by providing technical expertise to support visitors, providing more controlled visitor experiences, and communicating key safety messages. One commenter suggested that any parking along the road was a safety hazard. Another commenter suggested the park use only online reservations for non-technical trails. Finally, another commenter stated that people standing on the buses was a safety issue and should be addressed by only loading as many passengers as there are seats.

### NEW ALTERNATIVE OR COMBINATION OF ALTERNATIVE CONCEPTS TO CONSIDER

Commenters suggested a number of hybrid alternatives, including hybrids of alternative concept A: no-action and alternative concept B. Commenters also selected different components of the two-action alternative concepts that together formed their desired alternative.

Some commenters preferred alternative concept B but also suggested the park include prohibiting the use of oversized vehicles in the tunnel, currently proposed in alternative concept C. Some commenters suggested implementing alternative concept B before implementing alternative concept C. Other commenters suggested implementing alternative concept C and then implementing alternative concept B. A commenter suggested either alternative concept B or C be implemented but only for weekends. Other commenters suggested there should be more alternatives that are

somewhere between the no-action alternative and the two action alternative concepts that could reduce visitation. Some commenters supported a hybrid of alternative concepts A and C, which would include specific permits but no additional management actions.

A common suggestion was to implement the reservations proposed in the action alternative concepts only during peak visitation season; some commenters suggested between March or April and through September, October, or November. Many commenters suggested that if alternative concept B was selected, visitors would still frequent the two most popular trails, and perhaps a combination of a parkwide reservation and permit for specific hikes would be the best alternative. Many commenters suggested only permitting specific hikes. Another commenter suggested that the park begin permitting Angels Landing and the Narrows only on holiday weekends.

Many commenters described an alternative that implemented the reservation system to include reservations that could be made in advance and reservations that could be obtained “day of arrival” (more information about this is included in the implementation of reservation systems section).

#### ALTERNATE MANAGEMENT STRATEGIES OR ACTIONS

A commenter suggested the park develop a bypass around the park. Another commenter suggested a point system whereby visitors receive points for visiting during non-crowded times and then apply points to visit one of the congested trails. A commenter suggested the park explore providing access by last names: allowing A-K on even days and L-Z on odd days. A commenter suggested building another road up the other side of the Virgin River.

A visitor suggested the park invest in a ski-style gondola service that would replace the shuttle service. Some commenters suggested a light rail or monorail solution. Commenters stated the light rail and gondola services could move more visitors per hour into Zion Canyon than the current shuttle service. Another commenter suggested an evacuated tube transportation technology or a hyperloop-type system to remove parking and the shuttle from the park. Another commenter suggested a ski lift that would take visitors into the park.

#### Provide New Visitor Center and Supporting Visitor Facilities

Multiple commenters suggested the park provide additional new visitor centers. Specific locations were suggested; these included west of Springdale and at all other park entrances. Some noted these new visitor center sites could provide additional shuttle stops and parking. Commenters also suggested large visitor facilities (i.e., a multi-level parking structure) that could be provided in nearby towns such as Springdale, Virgin, or Rockville, or developed through partnerships or sponsorship. A commenter suggested a visitor center outside of the park could assist with reservations and provide orientation services to visitors before they arrive, ultimately reducing congestion near the current visitor center. Another commenter suggested a visitor center west of Springdale for queuing of tour buses for entry to the park and as an option for hikes and sightseeing for bus groups.

## Lottery System

Some commenters expressed support for a lottery system being implemented at the park. Commenters mentioned specific examples of lottery systems they think work well. Some commenters expressed concern over a lottery system and provided examples of lotteries that they feel are not effective. Commenters often recommended a lottery system as a way to bring fairness to **a reservation system so that one user type wouldn't have an advantage over others.** Some commenters suggested a lottery system be used for a portion of reservations to accommodate last-minute reservations.

## First Come, First Served

Commenters recommended that the visitor capacity be identified and then visitors be let into the park until it “fills” on a first-come, first-served basis. Some commenters believed additional visitors should then be allowed to enter the park as others leave. Others recommended a portion of the total daily visits should be available by reservation and the other by first-come, first-served walk up.

## RESERVATIONS AND PERMITS

The most frequently commented on topic was the proposed reservation systems that are part of the preliminary alternative concepts. Comments ranged from general concern over the reservation system to specific recommendations for how such a system could be implemented.

### General Comments on Reservation System

Commenters expressed both support and opposition to a reservation system being considered as part of the preliminary alternative concepts. Many visitors expressed opposition or apprehension over the idea of a reservation system. Commenters often stated they did not know the answer to issues but did not believe a reservation system is the solution. Some commenters suggested if Zion National Park moves forward with a reservation system that this would set a precedent for other national parks. Other commenters stated that requiring a reservation is fundamentally against the mission and values of the National Park Service. Many commenters expressed support for a reservation system being considered and described negative experiences of crowded conditions. These commenters believe that protecting resources in the park is the mission of the National Park Service and that a reservation system would improve visitor experience, safety, and resource protection. Some commenters liked the assurance of a reservation system knowing what they would have access to once they arrived at the park.

Commenters suggested all park users be subject to a reservation system, including park staff, commercial services, and commercial bus tours. Some commenters questioned whether commercial services should use the same reservation system as individuals or whether the entry reservations should be provided with their permit, and emphasized a need to monitor the marketplace for illegal sales of unused reservations by both commercial service providers and individuals.

Many commenters suggested the park use a phased approach to implementing any reservation system or components of the alternatives (more information in phasing, trial basis, and monitoring

section below). Many commenters suggested a seasonal reservation; that no reservation be needed for the winter months.

Multiple commenters suggested the park provide more information about the reservation systems in future public documents.

## Implementation

Many commenters provided specific suggestions and examples for implementing the reservation system. Some examples are provided below but commenters' specific suggestions will be reviewed during the refinement of alternatives. For example, a commenter suggested a mixed approach of implementation, where some reservations or permits are available online while others are available on a first-come, first-served basis. Another commenter suggested the park implement reservations on an every-other-month basis, so visitors could choose to come during a month with fewer visitors when the reservation was in place or during a month with more visitors when it is not in place. A commenter suggested the park manage visitor use through reservations through the current shuttle service. A commenter was interested in how a reservation system would affect those who arrive on foot or bicycle.

## Specific Suggestions for Advance Reservations

Many commenters gave specific suggestions for advance reservations and allocations. For instance, release 20% of reservations/permits 6 months in advance. Other commenters provided specific examples of reservation systems the park could imitate such as those used at specific museums or an amusement park. Several commenters suggested the need for advance reservations to allow commercial service providers to offer advance bookings and plan itineraries. These specific suggestions and examples are not included in this document but will be reviewed during the refinement of alternatives.

A commenter suggested the park allow online purchasing and at-home printing of any reservations the park implements. Other commenters suggested different methods for presenting reservations including digital or virtual reservations. Some commenters also suggested a fee be associated with specific hikes. A commenter suggested the park allow visitors to enter the park without a reservation after 4 p.m. **One commenter suggested an “access pass” as a higher cost pass that would be available on a daily basis for those who did not or were not able to make a reservation.**

## Angels Landing and the Narrows

Many commenters supported a permit system for Angels Landing and the Narrows. Some commenters suggested the park permit only Angels Landing and the Narrows. Other commenters did not support a permit system for Angels Landing and the Narrows. Others supported a modified permit system, specifically citing access to Angels Landing from the West Rim Trail and permitting only from the bottom up in the Narrows. Other commenters suggested only the last part of Angels Landing be permitted. There was concern that if a lottery system was in place it would be unlikely the commenter would be able to access these two areas again. A commenter suggested a wilderness type permit for Angels Landing and the Narrows to preserve trails and the visitor experience. Some

commenters suggested an age limit and additional NPS presence on these two specific trails. Commenters also gave specific suggestions for how to implement permits such as staggering permits by time for the two destinations, permitting only full day hikes, permitting only between the hours of 9 a.m. and 3 p.m., or adding these two hikes to the canyoneering permit system. Many commenters cited safety concerns for the current number of visitors on Angels Landing. Another commenter suggested only ranger-guided hikes past Scout Lookout.

### Local Economy

Commenters raised general concern for what a reservation system could mean for local businesses. Some commenters recognized that the increase in visitation has created opportunities for local businesses and worry what a reservation system would mean for those businesses. Others believed a reservation system would discourage visitors from coming to the local area beyond any limitations set by the park.

### Park Revenues, Implementation and Costs

Some commenters raised the concern that a reservation system that reduces use levels would in turn reduce revenue for the park. Commenters were concerned that a reservation system would be costly to manage, particularly in a time when the park has significant deferred maintenance needs. Some commenters believed that checking for reservations would ultimately result in the same congestion problems currently happening at the entrance stations. Others believed the system would be confusing to visitors, especially to those who speak different languages. Commenters believed the park will need a robust campaign and education strategy to make sure people are aware of the system. The recommendation was made to allow visitors to make or pick up reservations in Springdale. Another commenter wanted to know what would happen if visitation should drop and wanted to know if the reservation system would then be removed. Commenters were also concerned at how much a reservation itself would cost. A commenter suggested both the cost of the parkwide reservation and the trail-specific reservation be free to visitors. A commenter suggested a refundable fee for permits that is given back to visitors when they pick up their permit. If they do not arrive to collect the permit the fee would not be refunded.

### Coordination with Nearby Parks

Some commenters wanted to know how this reservation system would be coordinated with other nearby parks that may also be considering some type of reservation system. Others worry that reservation systems would become common at national parks rather than looking for other solutions. Some commenters expressed concern at logistical challenges and burden of coordinating commercial services and commercial bus tours across multiple parks considering reservation systems.

### Cost of Reservations

Some commenters noted concern with having the reservation system managed by a commercial service, expressing that a commercial service may be driven solely by profit motive, may unfairly allocate reservations to other commercial service providers, and would create a system that is

burdensome to the public. Others worry that reservation system may eventually lead to a situation where only those willing or able to pay high fees would be able to get into the park. A suggestion was made to charge more for peak season reservations than off-season reservations as a way to encourage visitors to come in other seasons and to ensure that affordable reservations are available. Others were concerned that the reservations on top of the cost of the annual pass would make visiting the park very expensive.

### Trip Planning

Many commenters raised concern over how a reservation system would impact trip planning and the ability to be flexible when coming to Zion. Some commenters recommended considering bundling park entry reservations with existing systems used for camping and park lodging reservations for efficiency and ease of booking. Commenters are concerned that visitors may plan a trip unaware of the reservation system and may not be able to enter the park upon arrival. Others were concerned that visitors who have limited vacation date windows would be unable to get a reservation for those days. Some commenters worry about the challenges and burden on visitors of having to advance plan every visit, and potentially navigating multiple permits or reservation systems if they are visiting multiple parks. In addition, some commenters believe that the local town will have to deal with angry visitors who did not know about the reservation system before arriving. Other commenters expressed support for a reservation system, citing the ability to plan their trips ahead of time with guaranteed access.

### Making a Reservation in Advance

Commenters posed questions of how far in advance reservations would become available. Commenters wanted to know details of whether all reservations would be available a year out, six months out, etc. or if reservations would be released over time. Some commenters recommend reservations be available a year or more out so that visitors, and commercial service providers, can plan their trips while others want more short-term windows for reservations so trips can be made on a shorter time frame. Making portions of the reservations available at different increments was also suggested to allow opportunities for both long-term planners and short-term planners. Some commenters who operate commercial guiding or tour services are concerned that they will not be able to guarantee a reservation for their tours. Multiple commenters were concerned that the permits would become so competitive that eventually people could wait years for an opportunity. A commenter suggested some sort of wait list where a person would know that eventually they would get a permit. Some commercial operators were concerned that they would not be able to advertise trips effectively if they could not make reservations for one to two years in advance.

### Length of Reservation

Commenters wanted to know how long reservations would be for and if reservations would be for different time slots throughout the day. Some wondered what time of day the reservations would start. The recommendation was made that a reservation could be good for a certain number of days. Other recommendations include limiting reservations to either a morning or evening reservation and charging more if someone overstays their reservation time. Some commenters recommended that visitors be limited in the number of reservations they can get in a year. Another suggested that

shorter reservations be available for those scenic driving but not hiking in the park. Several commenters recommended a need to limit the number of reservations that could be booked by commercial service tour operators and/or commercial bus tours, and suggested limiting how many people could be booked under one reservation.

### Unused Reservations

Commenters raised the concern, and expressed frustrations, that visitors would make reservations and then not use them because they were not able to reach the park that day or altered their travel plans. Commenters questioned whether unused reservations will be made available to others, possibly as a walk up reservation. One commenter suggested that a refundable fee be charged when making a reservation and only refunded when a person visits the park, to discourage no shows. Other commenters wanted to know what would happen if a visitor was late for their reservation due to unforeseen circumstances. A commenter suggested a no refund policy and enforcement of restrictions on how many days or visits each visitor could get.

### Day of and Walk Up Reservations

Many commenters recommended that some sort of last-minute reservations be made available. Commenters suggested that a portion of reservations be available for walk up or first come, first served that would allow flexibility for visitors who do not know their schedule ahead of time, visitors making a last minute trip, and for local residents. Some commenters suggested the park only do “day of” or “walk up” admittance instead of reservations. Commenters provided many specific suggestions for the implementation of the reservation system including specific allocations for same-day reservations that should be considered for both alternatives.

### Black Market and Abuse of Reservation System

Commenters raised concern that a reservation system would be subject to abuse. Commenters worried that reservations would be quickly bought by private individuals or tour companies who would then sell them at higher prices to visitors or their patrons. They also noted that commercial service providers may try to sell reservations for trips not booked. Ultimately, commenters worry that the average person would have a difficult time gaining a reservation fairly. Commenters wanted to know how the system would account for such concerns. Commenters provided some suggestions to avoid this type of behavior such as limiting the number of reservations that can be made at one time, establishing rules prohibiting resales, or linking reservations to specific permit approvals for a commercial service.

### Site-Specific Reservations

Commenters raised concerns over how the NPS would implement and enforce a reservation system based on specific sites as outlined in preliminary alternative concept C. Commenters believe enforcement would be difficult but necessary. Some believe effective enforcement would also make the park feel more commercial. Others expressed support for this system as a way to spread visitation and be able to plan one’s trip effectively. One commenter recommended providing suggested itineraries if alternative concept C is chosen, for visitors who may not know the park well enough to

plan their trip in that detail. Another commenter suggested visitors may abuse a site-specific permit system by reserving all sites to keep their options open.

### Ability to Gain a Reservation

Some commenters raised the concern over how difficult obtaining a reservation may be. Commenters noted other reservation systems that sell out immediately and are very difficult to get. Commenters believe this will make visiting Zion very difficult for them and worry that they will not be able to visit in the future. Some commenters specifically mentioned that reservations being made online will be a disadvantage to some and can make it easier for earlier time zones to make reservations first. Other commenters liked the idea of reservations being made online. Some commenters expressed interest in reservations being available online as well as in person.

### Phasing, Trial Basis, and Monitoring

Many commenters suggested the park use a phased approach to implementing any reservation system or components of the alternative concepts. Commenters recommended that reservations be implemented on a trial basis before a parkwide reservation system is required. Many of these commenters recommended that reservations for high use hikes be tried first or for busy holiday weekends. Other commenters suggest that the reservation system be implemented for a short amount of time and then adjusted to make sure it is working well and not excluding specific groups. Many commenters suggested the park first implement a permit system for popular hikes like Angels Landing and the Narrows before implementing a parkwide reservation system.

Multiple commenters suggested the park integrate adaptive management into future planning and implementation. One commenter recommended that the park conduct careful monitoring in order to make adjustments.

### Alternative Solutions

Some commenters recommended specific actions that they believe would reduce crowding but not require a reservation system. Ideas included: a lane dedicated for season passes to reduce traffic congestion; items currently in the considered but dismissed section; a limited number of entries per hour; first-come, first-served system with no reservation; increased fees for hiking off trails. Other commenters often stated that while they did not know the answer they did not believe a reservation system is the solution. Some commenters believed that a reservation system should only be considered after all other options have been tried. One commenter proposed a governmental transportation solutions group that would include nearby counties and government representatives to look for other solutions for Zion and the surrounding areas.

### Timed-entry and Queuing at Park Entrances

Commenters suggested the park consider a timed-entry reservation for both entrances to the park as well as specific trailheads. The timed-entry reservation would have a specific window in which visitors could arrive. Some commenters recommended a system similar to some museums where visits are scheduled on the hour and the park could control how many people are in the canyon at

one time. One person suggested that once a park or trail reaches a visitor capacity, that entrance be denied until a visitor leaves, so as one visitor exits another could enter. Commenters had specific suggestions such as allowing hikers to enter in the morning and commercial tour buses arrive in the afternoon to spread out use. Another commenter suggested visitors reserve and pay for a specific amount of time that they would remain in the park.

### Weather and Visitor Safety

Commenters believed that the lack of flexibility that is created when requiring a reservation may inadvertently encourage visitors to make unsafe decisions. Some believed reservations would make planning around unpredictable elements such as weather difficult and that some visitors may go on **hikes that they shouldn't because it is** the only time they have a reservation. Others wonder if visitors would be allowed to visit on another day if weather conditions do not allow them to do the trip they had planned. Similar concerns were raised for the site-specific reservations in preliminary alternative concept C.

### Annual and Week Passes

Commenters expressed concern and confusion over how annual park pass holders would navigate the reservation system. Some people asked if pass holders would still be required to make a reservation. Some commenters raised concern over visitors spending money on such passes and then having to pay additional fees at the park. Similar concerns were raised about the current seven-day pass, and commenters questioned whether the fee structure for the park would change with a reservation system.

### Climbing and Canyoneering Access

Many commenters raised the concern that a reservation system may make it more difficult for climbers and canyoneers to visit the park. Climbing-related commenters were concerned that they would also need to get a reservation even when the type of use they participate in takes place not in heavily used areas. Some commenters asked that climbers be exempt from the reservation system. Canyoneering-related commenters were concerned that they would be required to obtain both a wilderness permit and a reservation for park entry.

### Camping

Commenters raised concerns similar to lodging about whether a visitor who has a camping or lodge reservation would also need an additional entry reservation for the park. Some commenters expressed support for all campgrounds to become reservable while others want to keep the South Campground as first come, first served. Some commenters suggested specific campsites remain first come, first served but most of the campground be reserved. In addition, commenters expressed support for the campground to be improved. A commenter suggested a campsite must be occupied the first night of the reservation and if it is not, then the reservation is passed to the next visitor.

## Zion-Mt. Carmel Highway

Many commenters expressed concern that a reservation system for entry into the park would hinder their travel on the Zion-Mt. Carmel Highway. They stated that they only use the highway to access property, travel to towns outside of the park, and to get from one point to another outside of the park, and that they do not spend extended periods of time recreating within the park. They were concerned that they would not be allowed to continue to use the highway as a thoroughfare if a reservation system was implemented.

## Preference for Locals within a Reservation System

Many commenters believed any reservation system should not apply to locals. They identified the implementation of a **“local pass”** or **annual “Zion pass”** that would allow access without reservations for those going to areas outside Zion Canyon; would allow access to local residents any time without reservations; or offer a local pass that could be obtained for immediate access. Others believed that if a reservation system is applied to locals that allowances could be made for them such as: certain times reserved for local residents; allowing one day a week where the park allows entry for **Utah residents without reservations**; offer **“locals-only day”** once a year; offer locals a free day once per month; reservations for everyone during busy season; no reservations for locals during non-busy season; punch card for locals, for example up to four times per year without reservation; or exchange time volunteering in park for time to recreate without reservations. Some commenters stated that no priority should be given to Utah residents. One commenter believed that if locals have to use a reservation system then NPS employees should too when on their personal time.

Many commenters expressed concern about how the reservation system would affect visitors from **the local area**. The **“local area”** was identified differently by commenters: **county residents**, residents within a certain number of miles of the park, residents from various ZIP codes, residents of Utah, and residents of Las Vegas, Nevada. Many commenters expressed concern about losing spur-of-the-moment access if a reservation system is implemented. Commenters believe locals are already shouldering the burdens of such increased visitation to Zion and that they should not have to encounter further barriers to enter the park.

Residents come into the park to view waterfalls during rainstorms; photographers come in when they see that the lighting is just right; and others plan last-minute trips when work schedules allow. Non-local residents also raised concern over having to plan a trip to the park many months in advance and not being able to visit on the spur of the moment during a road trip or vacation to the area. Commenters suggested a variety of ways to accommodate local use. For example, a commenter suggested the NPS issue a punch pass for visitors who live nearby so they could visit up to four times a year. In another example, a commenter suggested the NPS provide **four days a year for “locals”** only.

## Concern for Specific User Groups

Some commenters expressed concern for specific user groups. Some commenters stated that those visitors with senior passes should have priority in the reservation system, and that there should be fewer restrictions for handicap and seniors. Others were concerned about how a reservation system

would affect disadvantaged populations (those without access to computers, etc.). Commenters also suggested that nature photographers, climbers, and canyoneers have different allocations within the reservation system, or be allowed in the park outside of the reservation system hours. (More comments on the reservation system can be found later in this report including specific recommendations for implementation.)

#### Preference for Local and U.S. Citizen Users

Some commenters who raised concerns about locals being able to access the park under a reservation system also suggested a tiered approach to the system. Some suggested that reservations be first and most available to local residents, then to Utah residents, then U.S. citizens from other states, and lastly international visitors. Others suggested that preference be given to locals or U.S. citizens by week or time of year. A general sentiment shared by commenters was that it is fair to give U.S. citizens more preference to the park as their taxes support parks. Others believed the mission of the NPS guides open access to U.S. citizens.

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## Technology Disadvantages

Commenters raised the concern that an online reservation would create a disadvantage to users who do not own or regularly use computers. Commenters were also concerned that the need to use smart phones and other technology may make it harder for older and lower income users.

## Reservation Only During Peak Seasons

Comments recommended that a reservation system be implemented only during peak use seasons at the park. Some believed shoulder and winter seasons do not have a problem with crowding and that implementing a reservation system year round would make it harder for locals and others to come to the park who prefer visiting in lower visitation times. Commenters also recommended that reservations be used only for busy holidays and weekends.

## Reservation for Groups

The suggestion was made to require reservations only for large groups rather than individuals.

## Reservation and Wilderness Permits

Some commenters expressed concerns about how the entry reservation and wilderness permit reservations would work, and questioned whether visitors would need multiple reservations. A commenter suggested a parkwide reservation and permits for all wilderness areas to prevent overuse. Alternatively, some commenters supported the day use permits for wilderness. Another commenter suggested wilderness users should be exempt from any reservation system or included in the visitor capacity.

A commenter stated that reservations or permits for wilderness areas was outside the scope of the frontcountry scope of the plan and others do not believe day use permits are needed or should be considered. In addition, many commenters recommend that Zion Wilderness permit holders should not have to drive into the park to get their permit, citing pollution and wasted time. A commenter suggested the park consider reducing the group sizes in wilderness from 12 to 6, and reduce the daily visitation in the Subway and Orderville Canyon.

## Site-Specific Permits

Commenters expressed both support and opposition for permits being required for specific destinations such as Angels Landing and the Narrows. For some commenters, the need to obtain a permit on top of a reservation made alternative concept C undesirable. Some are concerned that a person may not be able to get a reservation for the hike they want or may not be able to adapt depending on weather or other conditions. Other commenters believed part of the visitor experience is discovering the park and that making specific reservations not only infringes on this experience, but it is not realistic, as visitors often do not have a complete understanding of what the park has to offer before arriving. In addition, commenters are concerned that visitors may make reservations for trails they are not prepared for or truly able to hike just because it was the only thing available, thereby putting themselves at risk. Others support this idea as a way to ensure crowding and resource impacts are reduced at certain sites and found it to be a similar idea as the Zion Wilderness

permits and camping reservations. Some believe site-specific reservations should be required for certain popular hikes but not for the entire park. Many commenters expressed support for a site-specific permit or reservation system with the understanding that a general reservation for other areas would not be needed. Another commenter suggested that if the park were to permit Angels Landing and the Narrows that the visitor capacity could be higher because the park would not have to artificially limit general park attendance to prevent overcrowding at these sites. Some commenters suggested sites on the east side of the park should not be included in the site-specific reservation system because of low visitor use. A commenter suggested trailhead parking spots be available to visitors with site-specific permits.

## SHUTTLE SYSTEM

Some commenters recommended retaining the shuttle service, if financially possible, and conveyed how the shuttle has transformed the canyon from loud and polluted to quiet and clean. One commenter questioned statements that increased visitation is causing financial challenges and a strain on operating the shuttle system. They expressed that the costs to run the park are mostly fixed and the attendance is steadily increasing, and suggested that should result in extra funds for park upkeep and service enhancement. A couple of other commenters noted they would be willing to pay a higher entrance fee to support the shuttle system. Many commenters supported the need to evaluate the operation of the shuttle system (e.g., number of shuttles, shuttle operating hours, frequency of routes, route configurations, and shuttle operating season(s) to determine service and efficiency improvements). Some commenters recommended lengthening shuttle start/stop times to allow visitors access outside of typical peak hours. Some commenters suggested that the shuttle should operate year-round, or suggested providing service at least during off-season busy weeks (i.e., Thanksgiving). Conversely, one commenter stated that the shuttle should not operate during the winter, while another suggested shortening the shuttle operating season. Some commenters suggested terminating shuttle routes at the Zion Park Lodge, and requiring visitors to hike or bike from the lodge to other trailheads in the upper canyon, emphasizing this would greatly enhance the experience of visitors in the upper canyon. Another commenter suggested having visitors park at entrances and access the park only via shuttle, suggesting this would allow visitors to walk through the tunnel and gain a new experience. Many commenters supported adding shuttle routes to the east side, noting that this would require adding additional facilities to support in that part of the park. One commenter was against adding shuttle routes to the east side, stating the shuttles would be too slow and costly to operate up switchbacks to tunnel, and emphasizing that this route is frequently used by commuters.

Many commenters recommended considering routes based on user type (e.g., hiker-only shuttles, scenery tour shuttle with no stops, Zion Park Lodge guests, etc.) or shuttles that provide direct routes (express routes) to popular trailheads or destinations in the park (e.g., Temple of Sinawava, Emerald Pools, Grotto, east side, Museum, campgrounds). Others recommending extending shuttle routes to Hurricane and or La Verkin and providing fast-pass shuttles if visitors park and ride from those communities. A commenter suggested the park explore a new type of shuttle that would originate in St. George, Hurricane and/or Las Vegas and allow visitors to prepay so the shuttle could bypass the entrance station. Several commenters suggested expanding the shuttle system to include Kolob routes; some of those suggested the Kolob routes be only scenic with no stops.

Several commenters suggested need for a more holistic network and recommended a regional transportation system that would connect to St. George and Kanab and provide route options through both the South and East Entrances. Additionally, those same commenters suggested working with local partners and stakeholders to develop, fund and/or manage a regional transportation system. One commenter suggested several ideas for locating transit hubs outside the park (e.g., Mt. Carmel Junction, La Verkin Maverick station, Zion Ponderosa and North Fork Roads) where visitors could load onto a transportation system designed to take visitors direct to specific locations or trailheads in the park; there would be no stopping and loading onto different vehicles and visitors could pay entrance fees at these satellite areas. One commenter suggested partnering with local businesses to provide free shuttles into the park.

One commenter suggested need to reconsider decision to dismiss, without analysis, an alternative that would require the park to expand or re-tool the shuttle service in Zion Canyon and emphasized need to coordinate with local counties in the analysis.

A number of other comments identified specific actions to improve the shuttle system, including contracting out operation of the shuttle system. Another commenter suggested visitors receive colored wristbands that correlate with a colored shuttle system that travels different routes. One commenter suggested requiring bus drivers to deliver more educational and safety messages on shuttles.

## VISITOR CAPACITY

Commenters were both in support of and opposed to a visitor capacity. A commenter suggested the park consider how use patterns would shift if reservation systems are implemented. Many commenters suggested the park prioritize different user groups or suggested the park be fair when allocating the visitor capacity and consider commercial use, private use, and educational groups. Some commenters suggested the park consider the different motivations for visitors when determining the capacity, such as those who enjoy the evenings with fewer visitors. Commenters offered a variety of specific suggestions for the visitor capacity.

## ZION-MT. CARMEL HIGHWAY TUNNEL

Many commenters recommended that the park limit oversize vehicle access through the tunnel, primarily by permitting through access at less-busy times in the morning and evening. Some commenters suggested that the park impose a large fee for escorting oversized vehicles through the tunnel. Some suggested banning privately owned RVs and other large vehicles, but continuing to allow school buses and tour operators through.

Many commenters stated that oversized vehicles should not be allowed through the Zion-Mt. Carmel Highway tunnel. Many stated that the tunnel could not accommodate these types of vehicles and that it led to too much congestion and a negative experience for other visitors. Several cited environmental concerns and the pollution that the oversized vehicles produce as reasons for banning them. Many commenters recommended implementing a shuttle from the east side of the park,

adding shuttle parking on the east side and making oversized vehicle owners park there and take the shuttle into the park.

Finally, several people recommended no change in the management of oversized vehicles through the tunnel and that the park should keep the current system of escorting them through. Commenters were concerned about the effects that limiting or prohibiting oversized vehicles would have on the local economy, school groups, commercial service tours and bus tour operators that depend on the business of bringing groups into the park. Some were concerned that prohibiting oversized vehicles would increase pollution levels since the amount of private vehicles entering the park might increase, or because of the additional miles from having to drive around the park.

Some commenters suggested limiting oversized vehicles using the tunnel during peak hours. One commenter suggested the park require reservations for all oversized vehicles to limit peak hour use.

## MISCELLANEOUS

Multiple commenters suggested the NPS increase its presence around the park to assist on trails and roadways in congested areas, or increase the number of seasonal workers or volunteers. Another commenter noted that an increased NPS presence could reduce safety concerns on specific trails such as Angels Landing or at the beginning of the Narrows. For example, a ranger could queue the visitors for Angels Landing chains so as one visitor leaves another can begin. A commenter suggested the park increase NPS staffing. A commenter suggested the park offer guided tours with park rangers and thus reduce the amount of visitor-created trails. A commenter suggested that salaries of staff operating national parks be based on attendance and customer satisfaction. Another commenter suggested visitors who demonstrate Leave No Trace skills, proper human waste disposal, or participate in a service project with the park receive an annual park permit that would allow them access on any day. A commenter volunteered to help update the photography on buses and the interpretive signs throughout the park.