



Finding of No Significant Impact Zion National Park Backcountry Management Plan

In compliance with the National Environmental Policy Act (NEPA) the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine management alternatives for the backcountry in Zion National Park (ZION). The EA analyzed two alternatives and described the impacts associated with implementing the proposed action (Alternative B) or maintaining the current backcountry management practices (Alternative A).

The Backcountry Management Plan (BMP) for ZION was developed to provide guidance for managing the 145,060 acres of backcountry in the park. This includes all recommended wilderness and three General Management Plan (GMP) zones (Primitive, Pristine, and Research Natural Area).

The plan provides opportunities for a variety of backcountry recreational activities and experiences while recognizing and protecting the wilderness resource and values of the backcountry. Backcountry visitor use management decisions are based on standards developed through the NPS Visitor Experience and Recreation Protection (VERP) process.

PURPOSE AND NEED FOR THE ACTION

The purpose of the plan is to describe how the NPS manages for future generations a variety of opportunities to experience the backcountry in ZION while protecting park natural and cultural resources, and wilderness values. The backcountry management plan will:

- Protect and preserve the park's natural and cultural resources and values, and the integrity of the wilderness character for present and future generations.
- Provide for freedom of public use and enjoyment of the park's backcountry in a manner that is consistent with park purposes and the protection of park resources and values.
- Provide for public understanding and support of wilderness values.
- Further refine decisions outlined in the 2001 GMP.
- Serve as guidance for field and management staff in application of backcountry management techniques and integration of wilderness management objectives into other aspects of park management.
- Provide a broad range of opportunities to facilitate backcountry use while protecting the wilderness resource.
- Apply policies consistently, thereby enhancing backcountry user's experiences and ensuring compliance with regulations.
- Base management decisions on sound scientific research and knowledgeable observation. Incorporate new data and information, as necessary, into a dynamic backcountry management program.
- Provide public information to promote Leave No Trace skills and wilderness ethics in order to reduce behaviors that are harmful to natural and cultural resources and backcountry experiences.
- Instill and apply the Minimum Requirement Concept into management actions and practices.

The need for the backcountry plan comes from the following:

- The need was identified in the 2001 GMP. The backcountry plan is a "step-down" implementation plan that provides more detailed information on how the NPS will achieve the desired conditions outlined in the GMP as they relate to backcountry management.

- Visitor use in the backcountry has steadily increased since the mid 1980's. Carrying capacities and appropriate uses and use levels need to be identified.
- The population in Southern Utah continues to grow and visitation to ZION in general continues to increase. As a result, day use and its associated impacts have increased. Appropriate management actions are needed to protect the backcountry resources for present and future generations.
- New technology continues to play a role in how backcountry areas are managed and requires consideration to protect natural resources and visitor experience. Appropriate uses need to be discussed and guidance provided.

PREFERRED ALTERNATIVE

The selected action (preferred alternative) provides visitors traveling through the backcountry of ZION with the opportunity for a variety of personal outdoor experiences, ranging from solitary to social. The visitor experience should relate intimately to the splendor of the wilderness resource of ZION. The preferred alternative formalizes visitor carrying capacities based on VERP studies; identifies strategies to monitor the effects of visitors on park resources and visitor experience; identifies indicators, standards, and management options as part of the monitoring strategy.

The selected action (preferred alternative) provides standards and/or recommended actions for day use and overnight group size limits and encounter rates, private stock use, aircraft use, campsite standards and management, climbing management, trail standards and management, and facilities in the backcountry.

OTHER ALTERNATIVES CONSIDERED

The No Action Alternative describes backcountry management as it exists today. Many of the management actions identified in this alternative were made through the 2001 GMP process and were considered interim until the backcountry plan/EA was completed.

Alternatives Considered and Dismissed

Allowing commercial use (guiding) in the Pristine Zone. The GMP completed in 2001 states: *No commercial recreational activities, motorized/mechanical uses, or saddle stock will be permitted [in the Pristine Zone] in order to minimize impacts to other visitors and resources.* The BMP is a "step-down" implementation plan tiered to the GMP. Therefore, the BMP must be in conformance with the decisions made in the GMP. Also the majority of the public that provided input on the BMP, either during the scoping process or through comment on the draft plan/EA, were opposed to commercial guiding anywhere in the backcountry; therefore this alternative was dismissed from further consideration.

Opening Goose Creek Canyon Research Natural Area (RNA) to canyoneering. During the GMP process several areas in the park were identified and analyzed as potential RNAs. The RNAs were selected to represent and include important physical processes, biological species and communities, and cultural resources within landscapes of applicable size to allow them to be affected by natural forces. Landscape units were selected that contain outstanding examples of several ecological units and multiple resource attributes. Goose Creek Canyon was identified because it encompassed 5 ecological units (slot canyon, riparian fluvial and aquatic, springs and seeps, hanging canyons, relict forests) and contains prime Mexican spotted owl habitat. The park closed all RNAs to public recreational use in order to maintain the integrity of these areas for research and to provide undisturbed habitats that can be used for comparison purposes. There are other canyons in the park that provide the canyoneering public with an experience similar to that of hiking Goose Creek. For these reasons this alternative was dismissed.

Although not an alternative, one comment letter stated that an environmental impact statement should be prepared for this planning effort. The first step the NPS takes in determining the Appropriate NEPA Pathway (as described in Director's Order-12 – Conservation Planning, Environmental Impact Analysis and Decision Making) is to complete an environmental screening form. The form asks resource specialist to document any potential environmental impact of the proposed action on their resource specialty. If there are not significant impacts identified and if no significant impacts are identified through external scoping, then it is appropriate to prepare an environmental assessment. No significant impacts to human environment were identified either through the environmental screening form or through external scoping. ZION determined that at this time an EA is the appropriate NEPA pathway.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in NEPA and further articulated in Council on Environmentally Quality (CEQ) guidance (1981). According to this guidance, "the environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in NEPA Section 101." That policy is to:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative A represents current backcountry management as described in the 2001 GMP, which continues existing management and use levels until a backcountry management plan is completed. The GMP also identified the need to apply the visitor carrying capacity concept before backcountry management decisions were made. Alternative A does not provide for an ongoing monitoring program to assess the affects of visitor use on park resources or to assess the quality of visitor's backcountry experience.

Alternative B, the Proposed Action/Preferred Alternative, guides the NPS in providing opportunities for a variety of backcountry recreational activities and experiences while recognizing and protecting the wilderness resource values of ZION's backcountry. Backcountry visitor use management decisions are based on standards developed through the NPS VERP process. The Preferred Alternative as compared to the No Action Alternative will:

- Improve visitor experience and resource protection through the employment of the VERP process. This includes the identification of indicators and standards for both resource protection and visitor experience, along with a monitoring program and management options designed to mitigate effects if identified thresholds are met or exceeded.
- Provide an array of backcountry opportunities (with different degrees of solitude, challenge and accessibility) while protecting resources for present and future generations.
- Achieve a balance between visitor wants and resource protection through the implementation of VERP monitoring. Carrying capacity adjustments can be made to protect either the visitor experience or to protect resources when monitoring shows a need.

Therefore, Alternative B, the Proposed Action/Preferred Alternative, is the environmentally preferred alternative.

MITIGATION MEASURES

The mitigation measures listed below are considered part of the selected action (preferred alternative) and will be followed during plan implementation. These actions were developed to lessen the potential for adverse impacts from implementing the preferred alternative, and have proven to be effective in reducing environmental impacts.

Wilderness

- Minimize use of motorized equipment or mechanical means of transport through the use of Minimum Requirement Analysis.
- In keeping with wilderness character, natural materials will be preferred to repair or construct wilderness facilities (e.g., water bars, sign posts, tent pads) or restore desired conditions to impacted areas.

Visitor Use and Experience

- Inform visitors of planned and current area closures due to management activities through press releases, notices at trailhead and visitor facility bulletin boards, backcountry permitting, the park website, and other means as necessary.
- To protect visitors, temporarily close trails and/or roads, use cautionary signing on trails and/or roads, and close facilities if warranted.
- Limit the number, area, and duration of trail and areas closed in order to maintain opportunities for solitude and primitive, unconfined recreation.

Threatened, Endangered, and Sensitive Animal Species

- Comply with the Endangered Species Act.
- Consult threatened and endangered species recovery plans and scientific literature when proposing management activities in species habitats.
- Limit disturbances near nest sites/eyries for Mexican spotted owl, peregrine falcon, and goshawks (March-September).

Threatened, Endangered, and Sensitive Plant Species

- Comply with the Endangered Species Act.
- Consult threatened and endangered species recovery plans, specialists, and scientific literature when proposing management activities in species habitats.

Vegetation

- Stock must be fed certified weed-free feed 24 hours prior to spending the night in the backcountry and while in the backcountry.
- All equipment, including hand tools, must be washed before use in the park. This is to ensure that all soil and potential weed seeds are removed.

Soils

- Trails will be closed to stock use during periods of wet weather or due to other resources concerns.

Cultural Resources

When proposing to designate campsites the following approach will be used:

- an archeological survey will be conducted around all proposed campsites;
- if cultural sites are found (1) the campsite will be relocated, (2) if the campsite can not be relocated a detailed site recording will be conducted including on-site artifact identification, analysis, spatial analysis from artifact distributions, systematic artifact collection, and detailed feature documentation;
- document data recovery efforts in a professional report and submit it to the Utah State Historic Preservation Office (SHPO) for review;
- curate all cultural resource materials - artifacts and documentation - in park collections.

WHY THE SELECTED ACTION (PREFERRED ALTERNATIVE) WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR § 1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. The selected action (preferred alternative) will have no or negligible beneficial or adverse impacts on wetlands, prime and unique farmlands, lightscapes, air quality, natural soundscapes, water quality, floodplains, environmental justice, Indian trust resources, archeological resources, historic structures, ethnographic resources, cultural landscapes, museum collections, park operations, energy requirements/depletable resource requirements and conservation potential, economic considerations, some threatened and endangered plants and animals (bald eagle, western yellow-billed cuckoo, southwestern willow flycatcher, desert tortoise, Virgin River chub, woundfin, Holmgren milkvetch, dwarf bear-poppy, Siler pincushion cactus).

The selected action (preferred alternative) will have negligible to minor short-term impacts to some threatened, endangered, or sensitive plant and animal species (Mexican spotted owl, California condor, Shiwits milkvetch). Because of management actions identified in the preferred alternative (limits on group size and numbers of visitors per day, campsite designations, trail and route monitoring), any impacts to sensitive plant or animal species or their habitats are negligible to minor and short-term.

Impacts to vegetation will be direct, minor, and will likely be short-term due to increased monitoring and identified mitigation. Impacts to soils could be adverse, direct, minor to moderate, and long-term due to increase use in some areas. Soil loss and visitor created trails will be monitored. When the standard is

met or exceeded management options such as rerouting or closing the trail, adding erosion control features, or limiting visitor use will be implemented. This will help minimize soil loss due to visitor use.

The selected action (preferred alternative) will have a beneficial minor short- and long-term effect on the wilderness experience of solitude due to the group size limits and encounter rates. Depending on the visitors' point of view, their experience of primitive and unconfined recreation could be beneficial or adverse, minor and short-term. Some view designating campsites and trails, group size limits and daily use limits in areas as a positive effect on their experience, other view this management as negative.

Degree of effect on public health or safety. Travel in the backcountry has inherent risks and visitors assume complete responsibility for their own safety. Although it is the park's responsibility to ensure that visitors have the information available to make their visit to the park's backcountry as safe as practical. Visitor education is the primary means through which the park would continue to encourage safe backcountry travel. The selected action (preferred alternative) does not identify any actions that would pose an adverse effect to public health and safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. As described in the environmental assessment wetlands, prime and unique farmlands, historic sites, archeological sites, ecologically critical areas, wild and scenic rivers and other unique natural areas will not be affected. There are no known ethnographic, cultural landscapes or Indian trust resources identified in the project area that could be affected by the selected action (preferred alternative).

Degree to which effects on the quality of human environment are likely to be highly controversial. There were no highly controversial effects identified during either the preparation of the environmental assessment or the public review period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks. There were no highly uncertain, unique, or unknown risks identified during either preparation of the environmental assessment or the public review period.

Degree to which the action may establish a precedent for further actions with significant effects or represents a decision in principle about future consideration. The selected action (preferred alternative) neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. The cumulative impacts of the selected action combined with all other foreseeable actions were analyzed in the EA and no significant adverse cumulative impacts were identified.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat. As it is anticipated that visitor use will increase in the park, limiting the number of per day visitors in some sections of the park and incorporating VERP standards will decrease impacts to threatened, endangered, and sensitive animal populations or their habitats.

Threatened and endangered animal species will be affected by implementation of the proposed action mainly from noise associated with human activities such as hiking and camping. These impacts are not uniformly distributed across the park, but will affect these animals in areas with higher visitor use. Areas where visitor use is low are anticipated to receive little additional impacts to these animals. Any impacts will be negligible to minor and short-term. This leads to a no effect determination for bald eagle, western yellow-billed cuckoo, southwestern willow flycatcher, desert tortoise, Virgin river chub, and woundfin; a may affect, but is not likely to affect determination for Mexican spotted owl and California condor; and would not result in reduction or adverse modification for Mexican spotted owl critical habitat.

Effects of the proposed action on the Shivwits milkvetch will be negligible and will result in a may affect, but is not likely to adversely affect determination. This is because of protective measures identified in the proposed action which include: rerouting a trail away from milkvetch plants, monitoring the entire trail to ensure that visitor use does not impact any plant populations or critical habitat, and closing the trail to horse use when wet.

The proposed action will not result in reduction or adverse modification for Shivwits milkvetch critical habitat. This is because the proposed action will not alter any of the primary constituent elements and therefore will not diminish the contribution of the constituent elements of critical habitat for the recovery of Shivwits milkvetch.

Holmgren milkvetch, dwarf bear-poppy, and Siler pincushion cactus are not known to grow in ZION and there is no likely habitat for any of these species in the park. Because of this there are no impacts from the implementation of the proposed action on any of these species. The proposed action will result in a no effect determination for these listed species.

Whether the action threatens a violation of Federal, state, or local environmental protection law.

The selected action (preferred alternative) violates no federal, state or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

The implementation of the selected alternative (preferred alternative) will not constitute an impairment of park resources or values. Impacts documented in the environmental assessment and summarized above will not affect resources or values key to the natural and cultural integrity of the park or alter opportunities for the enjoyment of the park. The selected action (preferred alternative) will not impair park resources and will not violate the NPS Organic Act. This conclusion is based on a thorough analysis of the impacts described in the environmental assessment, the public comment received, and the professional judgment of the decision maker, in accordance with NPS Management Policies. As described in the environmental assessment, implementation of the selected action (preferred alternative) will not result in major adverse impacts to resources or values whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Zion National Park, (2) key to the natural or cultural integrity of the park, or (3) identified as a goal in the park's general management plan or other relevant NPS planning documents.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Scoping is an early and open process to determine the extent of environmental issues and alternatives to be addressed in an EA. ZION conducted both internal scoping with NPS staff and external scoping with the public and interested and affected groups, governments, and agencies.

Internal scoping, which included an interdisciplinary team of park staff, identified the purpose and need, identified potential actions to address the need, determined the likely issues and impact topics and identified the relationship of the proposed action to other planning efforts at ZION.

A scoping letter was prepared and over 300 were mailed to the public, federal and state agencies, and interested groups in August 2005. American Indian tribes traditionally associated with lands in ZION were also apprised of the proposed action in August 2005. The scoping letter included a brief description of the proposed action and described opportunities for public participation. A press release was issued by the park and published in local newspapers in August 2005. The park also hosted four public information workshops.

Comments were solicited during the scoping period that ended October 7, 2005. Over 180 comment letters were received. The general concerns identified in the letters included: daily backcountry use limits for slot canyons; backcountry group size limits; commercial guiding in the backcountry; belief by some that a wilderness experience and wilderness values are not a priority when visiting ZION; management in the backcountry is overly restrictive; the permits system is too difficult to use, that permits are too expensive, and there should be self-serve kiosks for obtaining permits. These issues and others were addressed in the EA.

The plan/EA was made available for public review and comment from May 16 through July 30, 2007. Over 400 letters announcing the availability of the EA for public review and comment and 28 copies of the EA were distributed to the public, government agencies, private organizations, and individuals. Copies of the plan/EA were also available for review at local libraries and on the internet (<http://parkplanning.nps.gov> and www.nps.gov/zion). A press release was issued and published in local

papers in May 2007. The park also hosted two public information workshops. During the comment period the park received over 150 comment letters. Some comments resulted in minor changes to the text of the plan. Substantive comments are addressed in the Errata Sheets attached to this FONSI.

Agency and Tribal Review and Comment

In accordance with the National Historic Preservation Act of 1966 (as amended) - Section 106 and 36 CFR 800, consultation was initiated with the Utah SHPO in August 2005. The EA was sent to the SHPO for review and comment in August 2007. The SHPO concurred with our determination of no effect to any cultural resource in a letter dated June 20, 2007.

In accordance with the National Historic Preservation Act, letters for both scoping and plan/EA availability were sent to the following tribes: Hopi Tribe, Kaibab Paiute Tribe, Moapa Band Paiute Tribe, Northern Ute Tribe, Paiute Indian Tribe of Utah, Southern Ute, Ute Mountain Ute, White Mesa Ute, Navajo Tribe, Skull Valley Goshute, Goshute Indian Tribe, Pueblo of Zuni, and San Juan Southern Ute. No comments were received from any of the tribes.

Park staff contacted the United States Fish and Wildlife Service (USFWS) by letter on August 23, 2005. A reply identifying endangered and threatened species in and around the park was received on August 31, 2005. The park sent the USFWS the plan/EA for their review and concurrence with the Endangered Species Act determinations made through the plan/EA analysis. We received their concurrence with our determinations on October 3, 2007.

CONCLUSION

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Adverse environmental impacts that could occur are negligible to moderate in effect. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed or eligible for listing in the National Register of Historic Places, known ethnographic resources, or other unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that the plan does not constitute a major federal action significantly affecting the quality of the human environment and an EIS will not be required for this plan and thus will not be prepared.

Recommended:

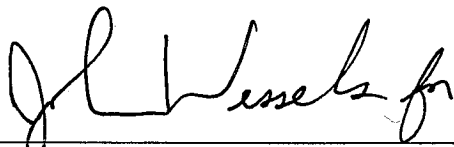


Jock F. Whitworth, Superintendent
Zion National Park

11/26/07

Date

Approved:



Michael D. Snyder, Regional Director
National Park Service, Intermountain Region

11/26/07

Date

Errata Sheet
Backcountry Management Plan
Zion National Park

The majority of the comments received during the comment period were on the following topics: the backcountry permit system, group size limits, day use limits and encounter rates, commercial guiding, natural soundscapes, BASE jumping, and plan alternatives.

Comments needing further clarification are summarized below by topic followed by a response from the National Park Service (NPS). The majority of comments listed below resulted in no text changes to the draft document. Minor comments including typographical and grammatical errors, minor rewording and minor factual corrections are not addressed below, but have been changed in the text of the Backcountry Management Plan (BMP) and Environmental Assessment (EA).

Permit System

Comment: Permit system is too burdensome. The permit system should be removed.

Response: As stated in the BMP/EA: "ZION's backcountry permit system allows the park to maintain levels of backcountry use consistent with a high quality visitor experience, safety, and resource protection by: (1) regulating use through a quota system, (2) providing education concerning resource protection and other Leave No Trace techniques, (3) providing education concerning safety issues, (4) providing a means to track visitor use, and (5) identifying a starting point for search and rescue efforts." Backcountry permits have been required for all overnight trips in ZION's backcountry as well as for day trips through the Narrows and its tributaries for over 26 years (prior to 1980).

The park will continue to work with backcountry users to find ways to improve the permit system and to encourage experienced visitors to obtain permits on-line. Improvements to the system could include: on-line express permit participants may be able to print permits up to three days in advance of their trip and more day-use canyons may be available for on-line reservations and permitting.

Group Size Limits

Comment: The proposed group size limit of 6 for portions of the Pristine Zone is too low.

Response: The group size limit of 6 will be implemented in Pristine Zone slot canyons. The 2001 General Management Plan (GMP), which the BMP is tiered to, states: "The Pristine Zone will offer the feeling of being entirely alone in ZION's remote and isolated wildlands. Use of these areas will be low and group encounters infrequent." The GMP goes on to state: "...providing the type of desired visitor experience will require a high degree of management of visitors outside the zone. For example, visitor levels will need to be highly managed to ensure that visitor encounters are minimized. If impacts occur due to visitor use, there will be increased management of visitors (e.g., required orientations, use restrictions, temporary closures)." Most of the slot canyons in the Pristine Zone require advanced canyoneering skills and take a day or longer to complete. Larger groups are slower, increasing the likelihood of encountering other groups. There are many canyons within and outside the park where larger groups are appropriate and allowed. The group size limit in the Pristine Zone outside slot canyons will remain unchanged at 12.

Natural Soundscapes

Comment: Natural soundscapes should have been an impact topic and analyzed in the EA.

Response: Since there were no actions proposed in the plan that would have an effect on natural soundscapes the topic was dismissed from further analysis. The plan does state: "Any proposal to use motorized tools, equipment or vehicles (aircraft) within the backcountry would be analyzed through the Minimum Requirement Analysis process on a case-by-case basis."

BASE Jumping

Comment: We would like to see BASE jumping allowed in the park.

Response: During the scoping process BASE jumping was not identified as an activity the public would like to see allowed in ZION. Although during the comment period on the draft BMP/EA over 50 comments we received asking the park to allow BASE jumping. The BMP covers areas within the park that are recommended wilderness and are within GMP management zones that are Primitive, Pristine, or Research Natural Areas. All of these areas are managed to preserve natural processes, where natural sights and sounds are all one sees and hears. Mechanized forms of recreation are not appropriate in

these areas. Parachutes are generally considered a form of mechanized transport and therefore are not appropriate in these areas. BASE jumping will continue to be prohibited in ZION and will be subject to the regulations outlined in 36 CFR 2.17.

The following guidance contributed in the above decision:

NPS Management Policies 2006 8.2.2.7 states: *Parachuting (or Base Jumping), whether from an aircraft, structure, or natural feature is generally prohibited by 36 CFR 2.17(a) (3). However, if determined through a park planning process to be **an appropriate activity**, it may be allowed pursuant to the terms and conditions of a permit.*

NPS Management Policies 2006 1.5 states: *An "appropriate use" is a use that is suitable, proper, or fitting for a particular park, or to a particular location within a park. Not all uses are appropriate or allowable in units of the national park system, and what is appropriate may vary from one park to another and from one location to another within a park.*

NPS Management Policies 2006 6.3.1 states: *The NPS **will take no action that would diminish the wilderness eligibility** of an area possessing wilderness characteristics until the legislative process of wilderness designation had been complete. Until that time, management decisions will be made in expectation of eventual wilderness designation.*

The Wilderness Act section 4c states *...there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, **no other form of mechanical transport**, and no structure or installation within any such area.*

Plan Alternatives

Comment: Plan alternatives too restrictive.

Response: The BMP was identified as a "step-down" implementation plan in the 2001 GMP. Implementation plans present how the park will achieve the desired conditions outlined in GMP. This is accomplished by describing specific actions park managers intend to take to ensure that resources are protected and visitors continue to have opportunities for high quality experiences.

The GMP identified and analyzed a wide range of alternatives that included an array of opportunities for visitors to experience the backcountry. The GMP identified desired future conditions (goals) for natural and cultural resource management, visitor use and experience, appropriate park development, wilderness management, and partnerships. The plan also identified strategies in order to achieve the desired conditions (goals). The GMP also divided the park into management zones based on desired resource condition, desired visitor experience, management and scientific uses, and appropriate kinds of activities and development. The two GMP zones that cover the most area in the backcountry are the Primitive and Pristine Zones. The management prescriptions for these zones are as follows:

The primitive zone will provide better opportunities for visitors to experience wildlands and solitude than the frontcountry zones. The landscape will be largely undisturbed, with natural processes predominating. However, compared to the pristine zone, access will be easier into the zone, there will be signs of people, and the area will feel less remote.

The pristine zone will offer the feeling of being entirely alone in Zion's remote and isolated wildlands. This zone will provide visitors a chance to experience a natural landscape. Use of these areas will be low and group encounters infrequent.

As an implementation plan, the BMP incorporates the decisions made in the GMP including desired conditions that protect natural and cultural resources, allow for quality visitor experience, and protect wilderness values. The BMP must adhere all of the GMP plan decisions, including the desired conditions for wilderness and natural and cultural resources and zone management prescriptions. This overarching direction provided by the GMP, the Visitor Experience and Resource Protection study, and NPS policy for managing wilderness help focus alternatives analyzed in the BMP.