

environmental statement  
wilderness recommendation  
(FES 74-34)

D-793

ZION



NATIONAL PARK / UTAH

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Final environmental statement  
: proposed Zion wilderness,  
Zion National Park, Uta

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DEPARTMENT OF THE INTERIOR

FINAL  
ENVIRONMENTAL STATEMENT

FES 74 - 34

PROPOSED

ZION WILDERNESS  
ZION NATIONAL PARK

UTAH

Prepared by

NATIONAL PARK SERVICE  
MIDWEST REGION  
ZION NATIONAL PARK

AC 29044  


Acting Director, National Park Service

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Final environmental state-  
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UNITED STATES  
DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE  
FDS 74 - 34

Notice of Availability of Final Environmental Statement

Proposed Wilderness  
Zion National Park, Utah

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Department of the Interior has prepared a final environmental statement for proposed wilderness designation of a portion of Zion National Park.

The environmental statement considers the social, economic, and ecological effects of the proposal to designate 81 percent of park as wilderness and nine percent as potential wilderness addition to be added to the Wilderness Preservation System when the lands qualify.

Copies of the final environmental statement are available from or for inspection at the following locations:

Rocky Mountain Regional Office  
National Park Service  
655 Parfet Street  
Lakewood, Colorado 80215

Superintendent  
Zion National Park  
Springdale, Utah 84767

Utah State Office  
National Park Service  
125 South State Street  
Salt Lake City, Utah 84111

Dated: JUN 13 1974

(sg) Robert C. Hughes

Assistant Secretary of the Interior

FINAL ENVIRONMENTAL STATEMENT

PROPOSED  
ZION WILDERNESS  
ZION NATIONAL PARK

UTAH

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## Summary

( ) Draft                      (X) Final                      Environmental Statement

United States Department of the Interior, National Park Service, Midwest Region, Zion National Park, Utah.

1. Type of action: ( ) Administrative (X) Legislative
2. Brief description of action: The National Park Service proposes that 120,620 acres of Zion National Park be designated as wilderness. The proposal also recommends 12,120 acres as potential wilderness addition to be designated as wilderness by the Secretary of the Interior when he determines that the lands are qualified.
3. Environmental impact and adverse environmental effects: Environmental impacts discussed include ecological, social, and economic considerations. Some of the adverse effects are: possible rationed use, restrictions on backcountry facility development, shifting mass recreational needs to other areas, increased cost of trail maintenance, prohibition of certain research projects, and restricted resource management practices.
4. Alternatives considered:
  - a. No wilderness classification.
  - b. Less wilderness - exclude potential wilderness additions.
  - c. A greater amount as wilderness.
  - d. Combine National Park Service and Bureau of Land Management wilderness.
5. Comments were requested from agencies listed on the following page, and comments were received from those marked with an asterisk.
6. Date draft statement made available to CEQ and the public.

Draft Statement: October 1, 1973

Final Statement:

JUN 13 1974

Comments were requested from the following and were received from those indicated with an asterisk (\*):

\*Advisory Council on Historic Preservation

Department of Agriculture

\* Forest Service

\* Soil Conservation Service

Department of Army

\* Corps of Engineers

\*Department of Commerce

Department of the Interior

\* Bureau of Indian Affairs

\* Bureau of Land Management

\* Bureau of Mines

\* Bureau of Outdoor Recreation

\* Bureau of Reclamation

Bureau of Sport Fisheries and Wildlife

\* Geological Survey

\* Office of the Secretary

Department of Transportation

\* Federal Highway Administration

\*Environmental Protection Agency

\*Federal Power Commission

\*Governor, State of Utah

\*Department of Highways, Utah

\*State Clearinghouse, Utah by State Planning Coordinator

State Historic Preservation Officer, Utah

Division of History, Department of Development Services

\*Preservation Historian

\*State Archeologist

## I. DESCRIPTION OF THE PROPOSAL

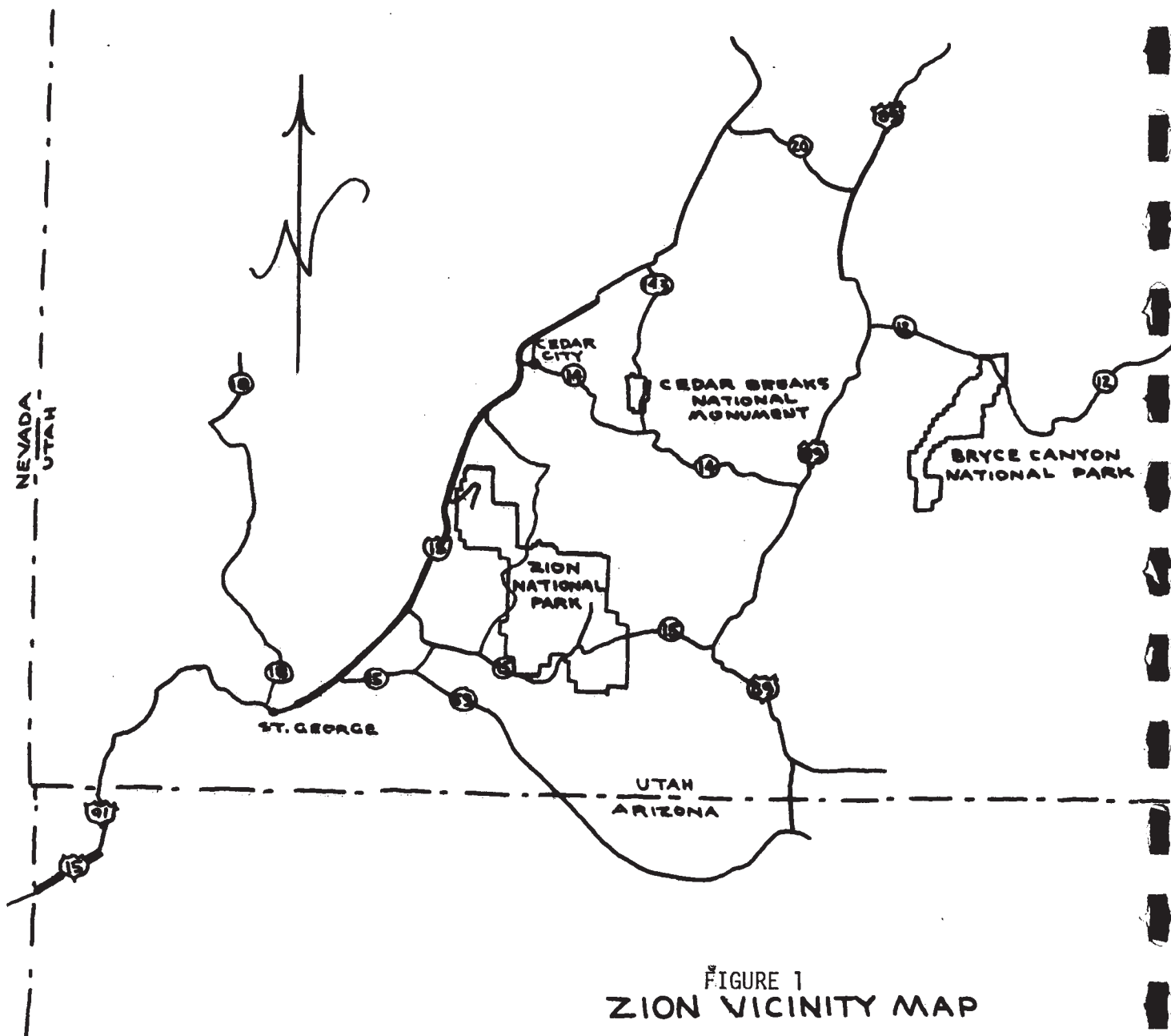
### Proposed action

The Department of the Interior proposes to establish a 120,620 acre wilderness area (81 percent of the Park) composed of three separate units in Zion National Park, Utah. It also proposes 12,120 acres of potential wilderness additions (about nine percent of the Park) for inclusion as wilderness when these lands qualify.

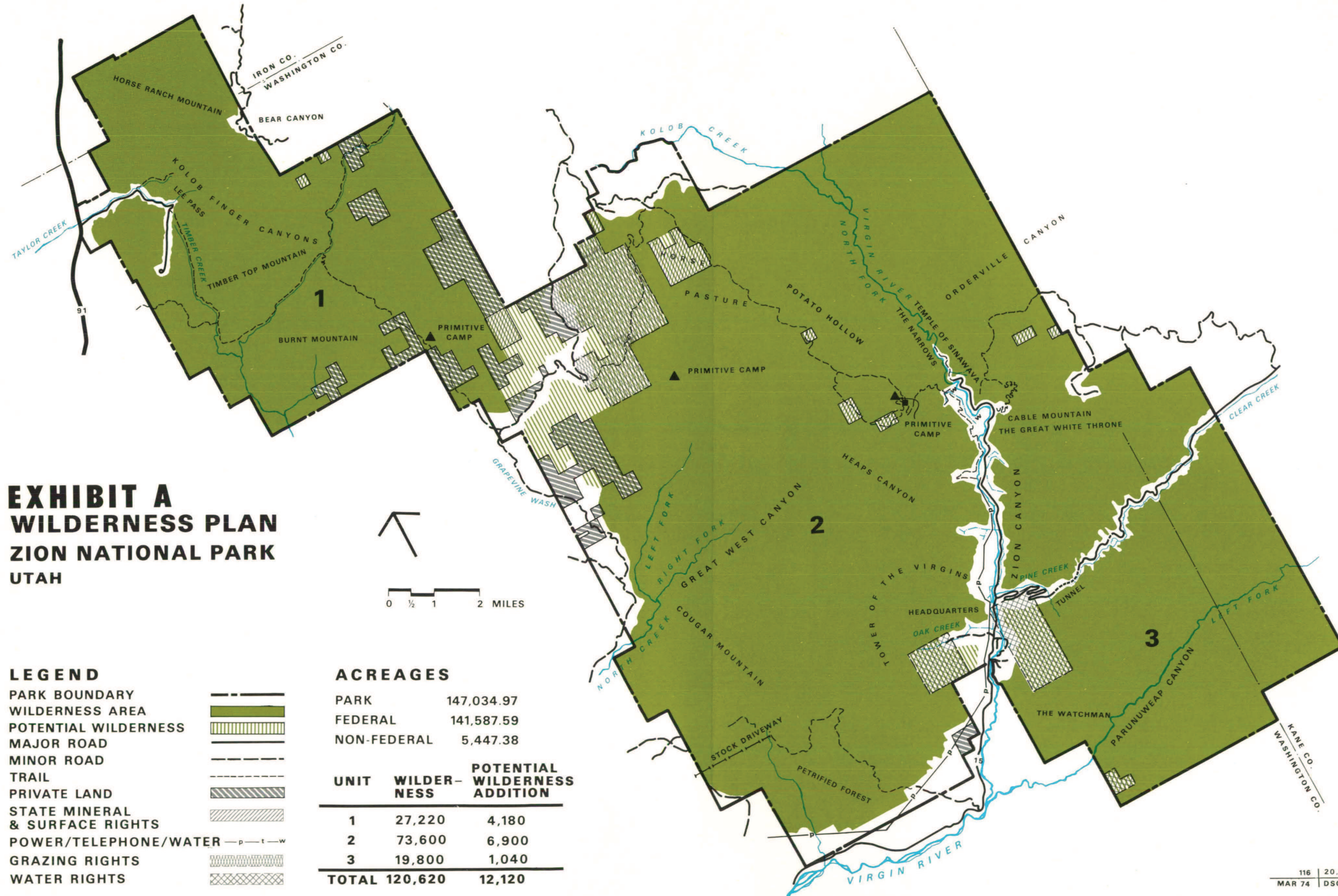
The Department of Interior's proposal for designation of certain lands within Zion National Park is contained in a document entitled Wilderness Recommendation, Zion National Park, Utah. This study is in response to Public Law 88-577 of September 3, 1964, establishing a National Preservation System. In accordance with "...this Act the Secretary of the Interior shall review every roadless area of five thousand contiguous acres or more in the national parks, monuments and other units of the National Park System..., under his jurisdiction on the effective date of this Act and shall report to the President his recommendation as to the suitability or unsuitability of each such area...for preservation as wilderness."

The total of 119,200 acres in three units, recommended for consideration as wilderness, is shown on the accompanying map (Exhibit A). Wilderness boundary lines are drawn on topographic features and section lines.

There are 1,123.99 acres of state-reserved mineral rights; 200 acres of state-reserved surface and mineral rights; 5,447.38 acres of privately-owned land; 2,080 acres of reserved water rights and 4,113 acres on which grazing is permitted for the life of the current permittee. At the present time, none of these lands are proposed for wilderness designation. However, a total of 12,120 acres of lands in this category are proposed as potential wilderness additions to be added to the wilderness when private rights have been acquired. The wilderness study does not bring about the policy of acquiring lands or interests in lands within a unit of the National Park System, this policy was previously established by the Congress when Zion National Park was created. The wilderness study simply recognizes that these lands may in the future be suitable for addition to wilderness after private rights have been acquired. A special provision is recommended in the legislation establishing wilderness at Zion National Park giving the Secretary of the Interior the authority to designate these lands as wilderness at such time as he determines they qualify. A total of 10,660 acres of the roadless area are not recommended for wilderness status.











## SUMMARY

<u>Unit</u>	<u>Roadless Area</u>	<u>Wilderness</u>	<u>Potential Wilderness Addition</u>
1	33,000	27,220	4,180
2	88,300	73,600	6,900
3	<u>22,100</u>	<u>19,800</u>	<u>1,040</u>
Totals	143,400	120,620	12,120

Three primitive camps, located within the proposed wilderness areas, are identified on the wilderness plan. An example of a wilderness campsite is one having a pit toilet and tent sites. This kind of campsite is not considered a permanent installation and could be removed or relocated as management needs dictate.

### Unit 1

An area of 27,220 acres is proposed as wilderness in the Kolob section of the park. Beginning at the northwest corner of the park, the wilderness line proceeds generally south and west on the park boundary to Taylor Creek. At Taylor Creek the wilderness line forms a corridor generally following the south fork to Lee Pass and then 3/4 mile south along the west side of Timber Creek. This corridor contains a road which provides public access to the Kolob section of the park. The wilderness line then returns generally along the south side of Taylor Creek to the park boundary and continues south and east along the park boundary, around private land. The wilderness line then proceeds north and west on the park boundary around private inholdings and returns to the point of beginning. On the east boundary, the wilderness line runs around Bear Canyon, excluding this access road.

A short segment of road, less than 1/2 mile in length on the east boundary is to be closed and included in the proposed wilderness; natural vegetative succession will be permitted on the abandoned roadway.

A total of 4,180 acres of potential wilderness additions is proposed for addition to Unit 1 when private lands and state mineral rights have been acquired.

A primitive camp is located in Hop Valley.

## Unit 2

A total of 73,600 acres of wilderness is proposed for the Great West Canyon area. Beginning at the north-east corner of the park, the wilderness line runs west on the park boundary for about six miles. The wilderness line then turns south and west around mineral, water and grazing rights, and private lands to Grapevine Wash where it follows the wash south to the west rim of the Left Fork of North Creek Canyon, excluding the north-south access road. It then follows the rim south back to the park boundary. The line then continues south and then east on the park boundary to a point approximately one mile north of the southwest corner of the park. The wilderness line then runs in an easterly direction excluding the powerline within the southwest portion of Section 34, T41S, R11W and the southwest portion of Section 31, T41S, R10W.

The wilderness boundary then continues north around a parcel of land with reserved water rights. The line then runs northeast along the western edge of Zion Canyon to a point approximately one mile north of the Temple of Sinawava and then south along the eastern edge of Zion Canyon to Pine Creek excluding all of the heavy public use areas. It then proceeds east along Clear Creek to the park boundary. The wilderness line then continues north on the park boundary, excluding an area on the east boundary for a short public use road and excluding two small sections of land where the state holds mineral rights, before returning to the point of beginning.

Three miles of management road are to be closed to vehicular traffic in Horse Pasture, and will become part of the park trail system. A 3/4 mile section of management road in the Petrified Forest area is being closed to vehicular traffic and will continue as a unmaintained trail. The lands involved are to be included within this proposed wilderness unit. There is one pit toilet within this unit approximately one mile west of Temple of Sinawava at the site of a primitive camp. Another primitive camp is located about five miles west of this pit toilet site. Additional pit toilets are located at Observation Point.

A total of 6,900 acres of potential wilderness additions is proposed for addition to Unit 2 when private lands and nonfederal mineral rights are acquired, and grazing leases expire.

### Unit 3

An area of 19,800 acres in the Parunuweap Canyon area comprises proposed wilderness Unit 3. Beginning at the southeast corner of the park, the wilderness line runs west and north on the park boundary to the vicinity of the Watchman. The line continues east and north to a point approximately 1/2 mile south of Pine Creek, excluding lands with reserved water rights. The wilderness line then continues east along Clear Creek to the park boundary. It then proceeds south on the park boundary for about 5 1/2 miles to the point of beginning excluding lands with reserved water rights.

A total of 1,040 acres of potential wilderness additions is proposed for addition to Unit 3 when nonfederal water rights have been acquired.

### Location

The proposed action is entirely within the boundaries of Zion National Park in southwestern Utah, one mile from Springdale, about 30 miles east of St. George, and about 15 miles south of Cedar City.

### Timing

The President may make a recommendation to the Congress in 1974. If so, the Congress will determine the time of legislative action. Once designated as wilderness, land will be administered in accordance with the Wilderness Act of 1964. The State and privately owned lands, or lands having privately owned interests therein would not be designated as wilderness until such time as the existing rights expire or are acquired. The proposed wilderness designation within Zion National Park would not change or take away any existing private rights.

### Purpose

The purpose of this action is to recommend to the Congress lands in Zion National Park that qualify for designation and administration as wilderness under the Wilderness Act of 1964.

### Interrelated Projects and Wilderness Proposals

There are a number of National Park System areas within a radius of 125 miles of Zion National Park (Figure 2). They are: Grand Canyon National Park (North Rim), Grand Canyon National Monument, Rainbow Bridge National Monument, Bryce Canyon National Park, Cedar Breaks National Monument, Marble Canyon National Monument, Pipe Spring National Monument, Lake Mead National Recreation Area, Glen Canyon National Recreation Area, Capitol Reef National Park, and Canyonlands National Park.

Bureau of Land Management and private lands surround the park. The Bureau of Land Management is currently evaluating their contiguous Canaan Mountain acreage for possible designation as a Primitive area. This acreage adjoins on the south line of Zion's proposed Wilderness Unit 3. They are also studying the Deep Creek area on the northeast corner of the park and the La Verkin Creek area on the west side of the park for possible designation as primitive areas. (Figure 3.)

A recommendation was sent to Congress April 28, 1971, recommending 4,370 acres of wilderness in Cedar Breaks National Monument. On February 8, 1972, a recommendation was forwarded to Congress for 16,304 acres of wilderness in Bryce Canyon National Park but final action has not been taken on this recommendation to date.

The U. S. Forest Service has completed a final environmental statement and land use plan for Aquarius Plateau in the Dixie National Forest. Included in the plan is an area deemed suitable for inclusion in the Wilderness Preservation System which is under consideration by the Forest Service, but which has not been approved. Two areas are involved, a seven mile long canyon and an eight mile long canyon, which are in the Box-Death Hollow Management Area.

In the Pine Valley Mountain area of Dixie National Forest areas for consideration under the new wilderness areas studies program have been approved for study by the Chief of the Forest Service for 41,134 acres. No decision for wilderness recommendation has been made at this time.

In addition, the U. S. Forest Service has the High Uintas Wilderness in the Ashley and Wasatch National Forests which has been sent to Congress by the President. Though not in the immediate area of Zion National Park, this wilderness is located in the northern part of the state of Utah.

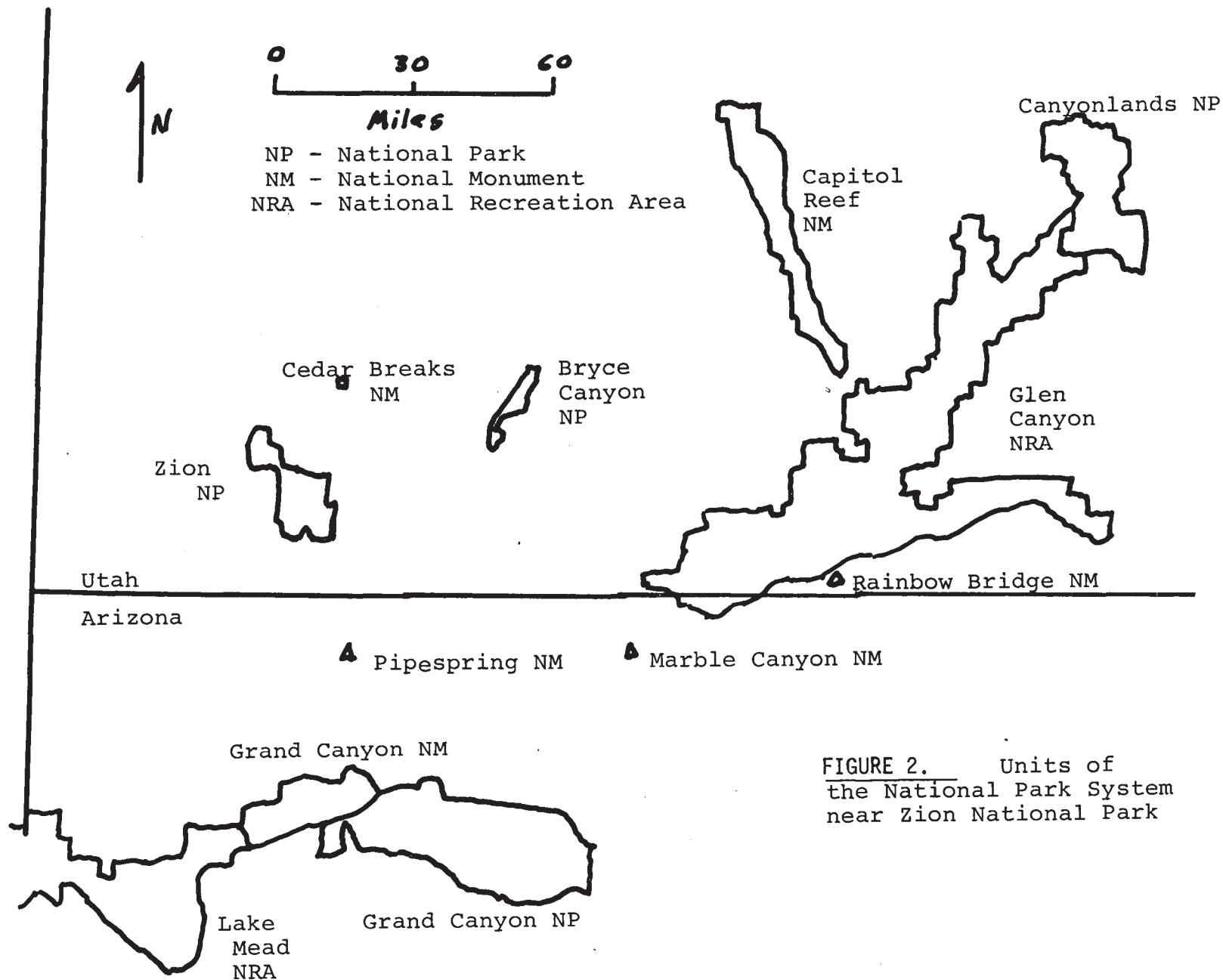


FIGURE 2. Units of the National Park System near Zion National Park

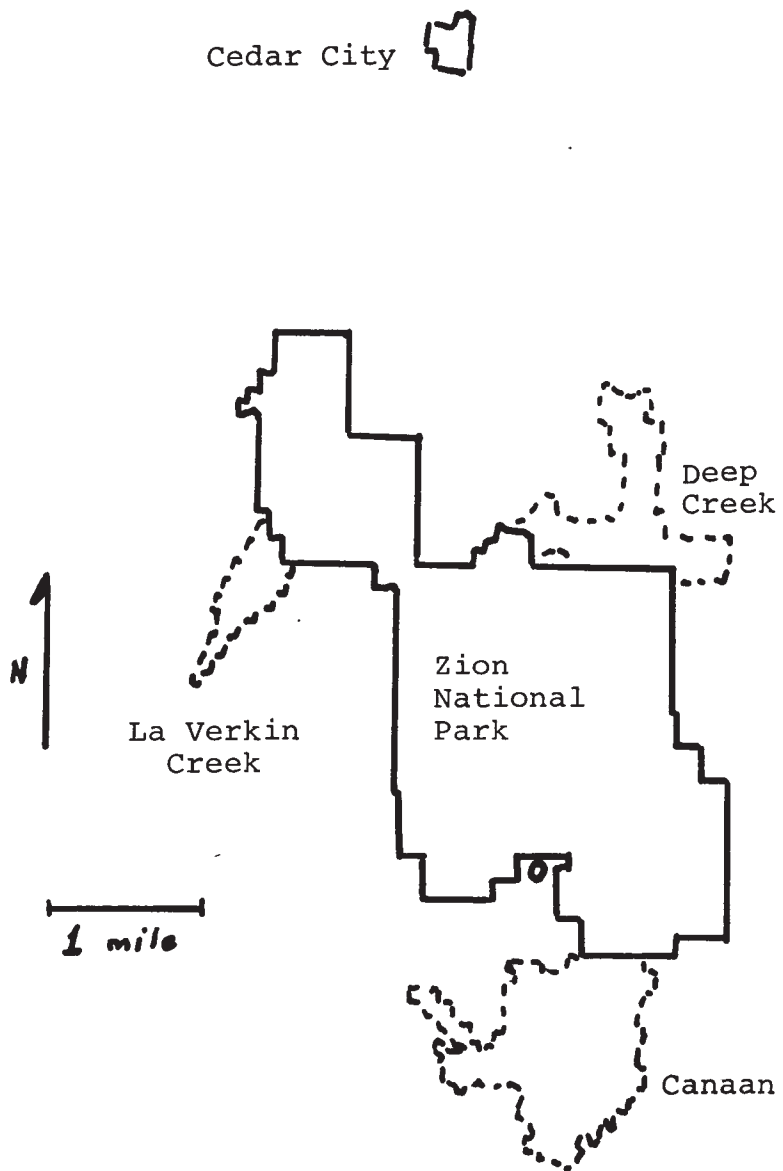


Figure 3. Potential primitive areas on Bureau of Land Management land adjacent to Zion National Park.



## II. DESCRIPTION OF THE ENVIRONMENT

### Legislative History

Zion National Park was established as Mukuntuweap National Monument (15,200 acres) by Presidential Proclamation (36 Stat. 2498) on July 31, 1909. On March 18, 1918, another Presidential Proclamation (40 Stat. 1760) added 61,600 acres and changed the name to Zion National Monument. By an act of Congress (41 Stat. 356) on November 19, 1919, the area name was changed to Zion National Park. Boundary changes in 1930 and 1960 added additional lands to the park. In 1937, Presidential Proclamation (50 Stat. 1809) on January 22, 1937, established a 48,413 acre Zion National Monument west and north of Zion National Park. This section was then added to Zion National Park by Act of Congress (70 Stat. 527) on July 11, 1956.

The organic act of 1909 and subsequent legislation dedicated and set apart as a public park for the benefit and enjoyment of the people of the nation, and with the expressed purpose of preserving in their natural state the outstanding scenic features held therein. This park, one of the world's outstanding examples of erosion, is a continuing example of the natural heritage of this nation for future generations. The geologic formations of Zion National Park are directly related to those of Bryce Canyon and Grand Canyon National Parks in providing the complete story of the geology of this region.

### The Setting

The park is located in Southwestern Utah, on the western border of a massive regional uplift, the Colorado Plateau. Erosion has carved the rocks of this region into a series of deep, sheer-walled narrow canyons. High timber-covered plateaus and isolated mesas and buttes surround the deep canyons. Erosion has exposed highly colored massive walls and domes of crossbedded sandstone. The outstanding feature of this National Park is the spectacular Zion Canyon, carved by the waters of the Virgin River. This canyon is one of the world's outstanding examples of the erosive power of running water. In places the multicolored Zion Canyon walls, 2,000 feet high, are separated by a narrow defile, twenty feet wide.

Tributary canyons of both the Virgin River and other drainage systems have further dissected the rock layers of the Plateau into a labyrinth of additional canyons rivaling the Zion Canyon in ruggedness and beauty. The view from the high, timbered plateau country rimming these canyons affords a glimpse of the dynamic process of canyon carving, an active process continuing today.

Elevations of 6,000 to 7,000 feet are common along the canyon rims. However, elevations drop abruptly to 4,000 feet at the canyon floors below. The highest elevation in the park is 8,740 feet in the northwest corner. The lowest elevation is 3,960 feet at the south entrance.

### Flora and Fauna

The park's ecosystems consist of a wide distribution and variety of plant and animal life. Plants of the Lower Sonoran, Upper Sonoran, Transition and Hudsonian life zones are present. Their distribution is by no means exclusively based on either latitude or corresponding elevations. The desert environment may be only yards away from a cool niche of Douglas fir and White fir. Approximately 6,000 acres of the park is grassland - most of this is in the northwestern Kolob section. 25,000 acres is brushland ranging from the lowest to the highest elevations. Forest land covers about 88,000 acres of the park. This forest land is characterized by either the mixed broad-leaf trees along the stream bottoms, the "pigmy forest" of pinyon and juniper at middle elevations or the open ponderosa pine - Douglas Fir forests on the high plateaus.

The variety and distribution of all forms of wildlife are influenced greatly by the wide elevational range in which they occur. Many varieties exist within the park. Principal species include mule deer, fox, bobcat, beaver, several squirrels, and many other small rodents as well as several species of reptiles, amphibians, fishes and birds. Cougars are occasionally seen in the area. Animals which are known to occur in the proposed wilderness and which are listed in Threatened Wildlife of the United States, 1973 Edition, are the threatened Spotted bat and Prairie falcon, and the endangered American peregrine falcon. The North Black Hawk is listed under Peripheral Birds (threatened with extinction within the United States although not in its entire range). The Ferruginous Hawk has been suggested as possibly threatened, but available information is insufficient to

determine its status. Studies are underway in the park to ascertain the presence of the threatened Little Colorado spinedace and the endangered Woundfin.

At the present time, a small herd of Desert Bighorn Sheep is being raised in a paddock within Zion Canyon near the Visitor Center. When the population has increased sufficiently, part of the herd will be transplanted into the Parunuweap Canyon in the southeast portion of the park, within Unit 3 of the proposed wilderness. From here it is hoped that they will re-populate their past territory. This includes the Proposed Canaan Mountain Primitive Area of the Bureau of Land Management to the south and adjoining Unit 3.

### Archeology and History

There are 85 known archeological sites which have been identified in the park and the immediately surrounding area. In 1933 and 1934 field investigation evaluated 33 sites in the Parunuweap Canyon drainage of proposed wilderness unit #3. Excavations revealed evidence of Basket Maker, Modified Basket Maker and Developmental Pueblo occupation in this region. All excavations were restricted to the Parunuweap area. At the conclusion of the field work, excavated and partially excavated sites were restored to their pre-dig condition. The pre-historic culture uncovered in this area appears to be associated with cultures studied in southern Nevada and the Arizona strip north of the Colorado River. There appears to be less influence on the Zion area by the Four Corners cultural types. The apparent significance of this area is its position as one of the western-most expanses of the Pueblo culture.

The park has a relatively recent history of human occupation and settlement. Indian tribes, Navajos and Paiutes, were living here when the first Mormon settlers entered Zion Canyon in 1863. Remains of the Mormon struggle to settle in the Zion Canyon are sparse. None of the original cabins and farm buildings exist today. Sections of the initial irrigation canal system used for farming are still evident. The Cable Mountain Draw Works (circa 1904) was a structure designed to lower lumber, cut on the plateau above the canyon, 2,000 feet down a sheer cliff to the valley floor. Remains of this structure exist today and reflect the inventiveness and perseverance of the early Zion settlers. A tract of 60 acres including the site has been nominated to the National Register of Historic Places.

The portion of this tract located at the higher elevations to the southeast and including the structure is situated in the proposed wilderness, while the portion below the escarpment is not.

#### Roadless Areas Description

There are three large roadless areas of 5,000 acres or more within Zion National Park subject to study under provision of the Wilderness Act.

Roadless Area 1 of some 33,000 acres in the Kolob section of the park displays deep cut gorges and canyons of spectacular coloration. Forests of the rich green mesa tops break abruptly at salmon-pink precipices. Extinct volcanic cones and lava outcrops remain as evidence of the tremendous volcanic forces which once were active in southern Utah. There are also ancient sand dunes and in the Finger Canyons of the Kolob, lateral erosion has created hanging gardens of mature trees, brush and flowers.

Within this roadless area are several large parcels of private land and lands with reserved mineral rights.

Roadless Area 2 of about 88,300 acres, contains outstanding examples of tectonic activities, cross-bedding, fold, sheer walls and block faulting-exposed water, wind and weather erosion. The Kayenta formation, created by ancient swamps, preserved tracks of ancient animal life which roamed here and long since have been covered by blowing sand of the "Navajo" period and in turn, sealed by a lid of sea-laid Carmel limestone.

Within this roadless area are plant and animal communities associated with the Sonoran desert zone, the juniper-pinyon zone, and the ponderosa pine-covered mesas and highlands.

Several parcels of private land, lands with reserved mineral rights and lands with grazing rights are within this roadless area. There is one tract subject to a water right in the southeast corner of the roadless area.

Roadless Area 3, about 22,100 acres in the Parunuweap Canyon area, also contains highly scenic lands of a rugged nature. Relatively few species of plants are adapted to this arid and harsh landscape. There is one large tract and one small tract of land subject to a water right within this roadless area.

### Climate

The temperature varies between a record high of 115 degrees F. and a low of -15 degrees F. Frequent thunderstorms occur during the later summer months; snow depth may reach three feet in the high plateau country. Annual precipitation is about 14 1/2 inches.

### Visitor Use

Visitation to the park was 1,087,000 in 1973. The average length of stay, except for overnight visitors in campgrounds and concessions, is four hours. It is estimated that approximately 15% of the visitors remain overnight in the park. Access to the park features is provided by three road systems: a 5.2 mile primary road into the Kolob section of the park, a system of primary roads entering Zion Canyon and traversing the southern portion of the park, and a secondary road that bisects the narrow portion of park land connecting the Kolob and Zion Canyon sections. Sixty-five miles of trails give access to the backcountry of the park. Developed campground capacity is 430 units.

### Noncompatible Use

On lands that have been acquired by the United States within the authorized boundaries of Zion National Park, consumptive uses like grazing, logging, mining, hunting and power development are prohibited, except where expressly provided for in the establishment act or other applicable legislation. There are 1,123.99 acres of state reserved mineral rights; 200 acres of state reserved surface and mineral rights; 5,447.38 acres of privately owned land; 2,080 acres of reserved water rights and 4,117 acres on which grazing is permitted. None of these lands are included within the three proposed wilderness units; however, a total of 12,120 acres of these lands are proposed as potential wilderness additions to be added to the wilderness when non-Federal rights have been acquired pursuant to the establishing legislation. The wilderness proposal does not require that any land be acquired; it simply recognizes that when certain lands or interests in land are acquired that these areas would be suitable additions to the Federal lands which are recommended for wilderness designation.



### State-retained Mineral Rights

The State of Utah has retained mineral rights on 1,123.99 acres of land that have been acquired by the National Park Service over the years. In addition, the state has retained surface and mineral rights on 200 acres.

### Private Lands

There are approximately 5,447 acres of private land within the authorized boundary of the park; acquisition will involve seventy individuals and 50 tracts. Hunting and grazing occur on these private tracts within the park boundary. The most important inholding tracts are:

a.	Langston Mountain	320 acres
b.	Hop Valley (2 tracts)	640 acres
c.	Firepit Knoll (2 tracts)	468 acres
d.	Lee Valley-Cave Valley (2 tracts)	1,164 acres
e.	Tabernacle Dome	40 acres
f.	Bauer Tract	1,440 acres
g.	Lamoleaux Tract	<u>398 acres</u>

Total      4,470 acres

### Grazing

Grazing has been reduced over the years to the three individuals listed below; the permits cease at the death of two permittees and is a term permit with the remaining one. This latter is renewable annually until January 1, 1980, with no extension clause at that time.

a. Ward H. and Violet C. (deceased) Esplin:  
This permit covers land purchased by the United States from Esplin in 1967 and 1968; it involves 3,207 acres and grazing not to exceed 1,025 AUM.

b. LeRoy Larson: This permit is a continuation of a permit Larson held on state land prior to transfer of the land to the United States. It covers 390 acres and is not to exceed 39 AUM.

c. Evan S. Lee: This permit is also a continuation of a permit Lee had on state land prior to transfer of the land to the United States. It covers 440 acres and is not to exceed 44 AUM.

#### Water Resources

Water used by the National Park Service for all developments in Zion Canyon comes from springs located in Oak Creek Canyon, Birch Creek Canyon, Wylie Retreat, Upper and Lower Grotto, Scout Lookout Area and the Temple of Sinawava. This water is distributed by a number of separate systems. Through a contract with the Town of Springdale, the National Park Service supplies Springdale with a portion of its culinary water, pursuant to a provision in legislation concerning the park. A well supplies water used by the park for its East Entrance development and operation, and there is an unused, capped well at Taylor Creek, near the entrance to the Kolob Canyon section, which will possibly be used in further development.

#### Alien Water Rights

Six approved applications for water rights exist within Zion National Park; three have an effect on the wilderness proposal by being located within potential wilderness areas.

<u>Application Number</u>	<u>Area Concerned</u>	<u>Permittee</u>	<u>Date</u>	<u>Effect on Wilderness Proposal</u>
12122	Navajo Lake	Utah Fish & Game	4/1/36	No
12562	Navajo Lake	Geo. H. Schmutz	3/7/40	No
9393	S22 & 27, T41S R10W, SLB&M	Town of Springdale	3/6/25	Yes
23283	S17, T41S, R10W, SLB&M	Town of Springdale	3/6/25	Yes
19185	North Creek	Hurricane Canal Co.	Priority	No
30934	Hop Valley Creek	E. S. Lee	4/29/59	Yes



## Economy

On a regional basis, the general economy of one of the three counties in which the park is located is considered economically depressed. On January 1, 1972, Kane County had 15% of its employable individuals on unemployment. The other two counties, Iron and Washington, had unemployment rates of 5.3% and 6.8% respectively. Should approval be forthcoming for the proposed \$600 million Kaiparowits coal fired power plant located near Lake Powell (75 air miles distant), the regional economy will undoubtedly be affected. For example, with the project the population of Kane County is expected to escalate from its present 2,500 level to 13,000 persons ten years after construction begins on the proposed plant. Springdale, Utah, population 172, is adjacent to the south entrance of the park. This community derives income from tourism and some small family farming and ranching operations. Hurricane, Utah, population 1408, is 22 miles southwest of the park. St. George, Utah, population 7097, 42 miles southwest of the park is a growing tourist center, especially for mild winter activities. Cedar City, population 8,946, 62 miles northwest of the park headquarters, is a railroad branch-line terminus currently used for freight. There is a possibility of resumption of some railroad passenger service in the future. The town is also a winter sports center, commercial airport site, and the major supply and distribution focus for southwestern Utah.

Lands adjacent to the park boundary are predominantly private, although large sections of Bureau of Land Management land are contiguous, such as the proposed Canaan Mountain, La Verkin Creek, and Deep Creek Primitive areas. The use of these lands, both private and public, is almost exclusively for livestock grazing. Recreational use of the lands adjacent to the park is gaining. Hunting, fishing, camping, and hiking are activities most popular. Summer home site subdivisions are being developed particularly at higher elevations north and east of the park.

### Regional Outstanding Natural Resources

There is a broad range of natural resource values in southern Utah in the areas surrounding Zion National Park. About 18 miles north of the monument, Cedar Breaks National Monument contains a huge natural amphitheater eroded into the variegated Pink Cliffs (Wasatch Formation), which are 2,000 feet thick at this point. About 35 miles northeast of the park is Bryce Canyon National Park which contains perhaps the most colorful and unusual erosional forms in the world. In horseshoe-shaped amphiteaters along the edge of the Paunsaugunt Plateau of southern Utah stand innumerable highly colored and grotesque pinnacles, walls, and spires. Also near the park important features include cliff dwellings, caves, Coral Pink Sand Dunes State Reserve, Snow Canyon State Park, Joshua Tree Forest, and an iron mine. This region of southwestern Utah contains bristlecone pines which are 4,000 years old and still growing, eroded multi-colored basins that are used as range land, timber land, and prospective mining areas. The corrugated terrain of this region has a variety of geological forms.

The Paunsaugunt Plateau is a 7,000 to 9,000-foot terrace, off of which slide Bryce Canyon National Park to the east, and the Pink Cliff escarpment to the south. The origin of this name is Indian, meaning "home of the beaver." It is also the home of a portion of the two-million-acre Dixie National Forest.

East of Cedar Breaks National Monument is the Markagunt Plateau. Markagunt, which is also an Indian name, means "high land of trees." An outstanding landmark of the plateau is Brian Head Peak, the 11,315 foot apex of southern Utah.

### III.- ENVIRONMENTAL IMPACTS

1. Classification of wilderness, under the provisions of Public Law 88-577 would give further legal protection to the area under consideration by requiring Congressional approval for certain development. As part of the National Park System, the park is dedicated to the preservation of scenic beauty, wilderness, native wildlife, indigenous plant life, geologic features, and areas of scientific significance. Areas in the park where consumptive uses such as grazing, mining and water developments are allowed are identified on the map and are excluded from the proposed wilderness. Wilderness designation would prevent the intrusion of roads, structures or consumptive uses on Federal lands designated as wilderness. Wilderness designation of Federal lands would not affect the private lands or any privately owned property rights. The wilderness proposal does not require that any privately owned lands be acquired or that any privately owned interests in lands be acquired. The proposal simply recognizes that when certain private lands or interests are acquired, in the normal course of events, these lands may be suitable for future addition to the Federally owned area now recommended as wilderness. There would be no changes from the present economic status of the area under consideration.
2. The National Register of Historic Places was consulted and no listed properties will be affected by the proposed wilderness. It is not known at this time whether the 33 archeological sites located in Parunuweap Canyon, Wilderness Unit 3, will meet National Register criteria, but they have been submitted for consideration. They are on Class VI lands within the proposed wilderness.
3. Wilderness designation will preclude the routine use of motorized equipment. Motorized equipment may be used in emergencies or to meet the minimum requirements for administration of the area. Cost factors involved in maintaining trails (65 miles) within the wilderness proposal will increase with such designation. Present trail maintenance costs within the affected area average \$300 per mile. It is estimated that maintenance costs will increase 40% to \$420 per mile should the wilderness be so designated, resulting in a total increase in maintenance costs of about \$10,000 per year.
4. Wilderness designation will preclude certain research techniques due to restrictions on the use of motorized equipment and the prohibition of structures and installations. Archeological research, salvage and stabilization projects have been facilitated by the use of motor vehicles to transport personnel and equipment to the site. Light and medium equipment, such as front end loaders and blades are

employed to remove overburden, thereby reducing labor and labor costs. Wilderness designation will thus retard archeological research and escalate costs. Wilderness designation does not preclude archeological research, however, and is, of itself, a form of protection of cultural resources. At Zion National Park, many of the known sites are in direct association with streams and it would appear probable that undiscovered resources which may come to light as a result of future archeological surveys.

Since bottomlands of the North Fork of the Virgin River, and Clear and Pine Creeks are excluded from the proposed wilderness, wilderness designation would have no effect upon the employment of modern techniques in actual excavation in such areas. Such designation would complicate exploration in the higher elevations as it would limit the use of equipment described above in the study and stabilization of any findings.

5. Wilderness designation will preclude development of facilities for visitor comfort and convenience such as hostels and chalets. Impact here is minimal since current backcountry use does not require them. Potential for significantly increased levels of backcountry use is a factor because of increased interest nationwide and an increase of about 10% per year in Zion's visitation is expected.

A wilderness campsite can include a pit toilet and tent sites. Such installations are not considered permanent and will be removed or relocated if required by management needs, or the dictates of sanitation.

The absence of developed facilities will mean continued protection and perpetuation of natural features and processes.

6. Wilderness designation will preclude development of roads since designation limits access to foot and stock only. The impact here is to deny access to some outstanding scenic and geological features to those persons who are unable to walk or ride a horse or who do not choose to do so. It will diminish the acreage of lands which could otherwise be made available for recreational developments.

Resulting from a master plan decision, a short segment of road in Unit 1, less than 1/2 mile in length on the east boundary is to be closed and included in wilderness. In Unit 2, three miles of management road are to be closed in Horse Pasture and a 3/4 mile section of management road in the Petrified Forest area is being closed. Closing of these roads is a master planning decision and will not result in any impact to the management of the park since they are no longer needed for management purposes. The roadway, however, will be converted to a narrow trail and maintained in accordance with trail standards.

7. Backcountry use is increasing at an estimated 5-7% per year in the proposed wilderness area. The impacts of increased use may cause some deterioration of the ecosystem by trampling, littering, vandalism, firewood gathering, and pollution.
8. Activities and events occurring outside the park can have an effect on the proposed wilderness. The impact of fire entering from private and public lands adjacent to the park is considered minimal because of the terrain configuration and small amount of forest cover. Fires originating within the park will be carefully watched and controlled if they present a hazard to land or property outside the park boundary.
9. Audio and visual impact from multiple-use activities on the adjacent lands may have an effect on the outer fringes of the proposed wilderness. Audio impacts include the effects of all terrain types of recreation vehicles used on private and public lands bordering the park; the intrusion of noise associated with hunting and logging activities and to a degree, the impact created by commercial aircraft flying designated airways over the park. Visual impacts are of two types: (1) summer cabins, hunting camps and access roads are visible from various parts of the wilderness periphery and (2) commercial aircraft contrails frequently lace the skies over the proposed wilderness area.
10. The proposed \$600 million Kaiparowits coal fired power plant which may be located 75 air miles from Lake Powell will undoubtedly effect the proposed wilderness.

The degree of effect is conjectural at this time particularly in relationship to possible air/water pollution directly attributed to the plant operation. One factor is quantifiable, the projected increase in population of Kane County. On April 1, 1970, Kane County census figures indicated a population of 2,421 people. Based on a study by the Center for Business and Economic Research of Brigham Young University of socio-economic effects of the Kaiparowits project, peak employment for the plant and supporting mine construction will reach a total of 1,970 employees within five years of the start of the project. After completion of construction, operating personnel for the mine and steamplant will be approximately 2,090 with a total peak population based on construction employment of 5,500 persons and a total population, based upon direct and operational employment of the plant, reaching some 13,000 persons ten years after construction is begun. Undoubtedly, this increase in local population is going to be followed by an increase in recreational activity, both in the proposed wilderness area, and on lands adjacent to the park and the wilderness area. Satellite industries and service businesses will change the rural economic base of Kane County, resulting in higher incomes and increased leisure time for recreational pursuits.

The Warner Valley Power Project, located within 25 air miles to the west, will have a visual impact from the higher elevation within the proposed wilderness. Any stack plumes will be easily seen when looking to the west of the park.

11. Additional impacts upon the proposed wilderness will result from the various inholdings involving private lands, mineral rights, water rights and grazing.

The State of Utah retained mineral rights on 1,123.99 acres of land that has been acquired by the National Park Service over the years. The State has surface and mineral rights on an additional 200 acres. Although there are no known minerals on any of these lands, the potential for mineral removal activity exists after exploratory drillings or surface excavations. The esthetic intrusion of equipment and structures, and the ecosystem destruction which could result



from such activities would adversely affect the surrounding wilderness values. It may also be possible that those lands proposed for potential wilderness additions would not qualify for wilderness designation unless the evidence of mining could be obliterated.

Approximately 5,447 acres of private lands exist within the authorized boundary of the park. Three thousand, one hundred acres of private lands presently have wilderness character and could in the future be added to the wilderness when these lands are acquired. The statutory action that created the national park provides for the eventual acquisition of all lands within Zion National Park. Developments such as dwellings, ranch structures, fences, and roads detract from the natural setting. Hunting and grazing which are permitted on these private tracts within the park boundary sometimes result in cattle trespass (approximately 200 head in 1973) and wandering hunters (two cases in 1973). These activities result in visual and audio intrusions upon wilderness values in a national park.

Three individuals hold grazing permits on 4,117 acres with a combined allowance of 1,108 animal unit months. Two of these permits are life tenure and the other one is term (1/1/80). Due to the practices employed and the motorization involved with modern livestock operations, these lands are not considered suitable for wilderness designation at this time because the presence of man and his works is clearly discernible. The wilderness proposal does not affect any of these grazing rights or change them in any way. There is included within wilderness a stock driveway which will remain open to this use. When the original park boundary was fenced in the 1930's along the west section line of sections 15 and 22, T41S, R11W, SLB & M, a lane was left open to water in Coalpits Wash so as not to deprive the stockmen of water for their livestock. When Zion National Monument was established in 1937, it extended the park boundary one mile west, and it now runs along the west section line of sections 21, 16 and the SW 1/4 of section 9. Since this stockdrive is included in the wilderness proposal, it will allow the passage of cattle to the watering area thus intruding upon the wilderness values of that area.

Six approved applications for water rights exist within Zion National Park. The wilderness proposal does not affect or take away any existing private rights. The proposal simply recommends that when these rights are acquired, in accordance with the act of Congress which created Zion National Park, the lands should then be included as a part of the wilderness.



These lands are proposed as potential wilderness additions. Water developments include collection boxes at the springs, collection pipeline, and small irrigation ditches which result in intrusions upon the natural conditions. They have minimal effect, however, upon the adjacent lands which are proposed for immediate wilderness designation.

Roads impose another impact upon the proposed wilderness by providing access adjacent to wilderness areas and introducing the sights and sounds of civilization upon wilderness values. In Unit 1, the Kolob Canyon Road into Kolob Finger Canyons area and the private access road in Bear Canyon are excluded from wilderness. Units 1 and 2 are divided by the north-south access road. In Unit 2, a public-use road on the east boundary is excluded; the scenic Zion Canyon Corridor with its heavy public-use areas probes a finger of development deep into the heart of the park. Thus, the roads are an intrusion and result in dividing the wilderness into three segments. The integrity of the wilderness is reduced as a result of this segmentation.

One potential beneficial effect upon the wilderness is the possibility of the Bureau of Land Management establishing primitive areas in their contiguous Canaan Mountain acreage, along La Verkin Creek and Deep Creek. Such designation would preclude the possibility of intrusive developments adjacent to the park's wilderness boundary.

12. Designation of wilderness would give added assurances of the retention of the area's character as developed by the dynamic forces of erosion. These are expressed in the geologic processes interwoven with the ecological interaction found within the park. Wilderness designation would provide an enduring resource, protected from the possibility of other administrative decisions. The intrusion of roads, buildings, power and telephone lines and the sounds of motorized equipment would forever be excluded, unless the Act were rescinded by Congress.

13. Threatened species such as the spotted bat, American peregrine falcon, and prairie falcon living within the proposed wilderness area will be given an increased opportunity to propagate their species and dwell undisturbed through the added protection offered by wilderness from man-made intrusions.
14. The proposal will provide greater assurance for perpetuation of 1) a living outdoor laboratory for the study of natural forces, uninfluenced by man; 2) ecological benchmarks or reserves of plant life, animal life, geologic landforms; and 3) invaluable scientific and educational benefits as man continually relates himself to his natural environment. This greater security will result from legislative prohibition of developments as contrasted to the present administrative policy which also precludes development of these areas, but could be changed by future administrators.
15. The wilderness visitor will be able to enjoy an unspoiled primeval area in which to escape from stress inducing urban conditions. The mental and physical challenges which the wilderness offers its visitors expands their self-esteem and is an extension of personal experience.
16. Wilderness use requires controls over the kinds and intensity of human use allowed, thus assuring a high quality individual experience to those who use the area. This will require a program of monitoring use to determine any adjustment in policy that may be required to preserve the integrity of the area.
17. State and private land within areas proposed as Possible Wilderness Addition are in the process of being acquired under present National Park Service policy. These lands would be in Federal ownership before a final decision would be made as to designation as wilderness. There would be no effect upon the present owners of these lands due to wilderness designation.

Designation of lands adjacent to the State and private lands could occur prior to Federal acquisition of the alien lands. Such wilderness designation would not sever any rights held by private and State landowners. Other than the effects that generally are discussed above no additional effects will occur on the alien ownerships. The overall impact on these lands is concluded to be insignificant.

#### IV. MITIGATING MEASURES

The adverse impacts resulting from the wilderness proposal are minimal as described under the impact section. Measures that will alleviate even those minor influences are as follows:

- A. Backcountry regulations will be enforced by Ranger patrol to assure compliance and thus minimize the impact on the environment. Wilderness designation normally results in increased use.

Proper backcountry sanitation measures will be stressed to the wilderness user to avoid possible air, water and visual pollution resulting from his camping or hiking activities.

A backcountry use management study will be programmed to determine the resource carrying capacity of the wilderness area to prevent ecosystem deterioration through visitor use. A program of monitoring backcountry uses will be used to determine any adjustments that may be required to preserve the integrity of the area.

- B. Research activities, requiring permanent facilities, could possibly be allowed in the areas not designated as wilderness. Research that does not require permanent structures or facilities in addition to those needed for management purposes can be conducted in wilderness areas.
- C. Park visitors who are unable to visit the wilderness by foot or on stock, will be accommodated in parts of the park classified for general recreation or other outdoor recreation units in the region. Information will be disseminated by exhibits, written materials, and personal contacts. To the extent feasible, resource in nonwilderness portions of the park will be managed to perpetuate natural conditions and environments. In this way, visitors who are unable to penetrate wilderness, may be able to gain an appreciation and understanding of natural systems in nonwilderness portions of the park.
- D. As indicated in Section II, limited archeological research has been carried out in Zion National Park,

beginning in 1933. The park remains incompletely surveyed, however, and the extent and significance of its cultural resources are unknown. By Executive Order 11593, May 13, 1971, the President directed that action be taken by federal agencies to locate and inventory all cultural resources under their control and to nominate those which appear to qualify for listing on the National Register of Historic Places. In compliance with this directive, Zion National Park is in the process of nominating the 33 known archeological sites situated on proposed Class VI lands in Parunuweap Canyon to the National Register.

In further compliance, funds are being requested to conduct an archeological survey of the park to professionally determine the extent and significance of its cultural resources. In the interim, known sites will be protected under the provisions of the Federal Antiquities Act of 1906; unpermitted exploration and excavation will be prohibited and visitor use and contact will be limited, or prohibited, as the situation warrants, in accordance with the "Wilderness Use and Management Policy" of the administrative policies for natural areas of the National Park System.

## V. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS

Wilderness designation possibly will result in some unavoidable adverse environmental impact, which, once designation is made, could not be changed without legislative action.

- A. Exclusion of future development of additional visitor convenience facilities, such as roads, shelters, hostels or others, may cause an inconvenience to certain members of the public. However, no such developments are planned for the lands proposed as wilderness. These lands have been and are planned for retention in their natural state whether or not wilderness is designated. Since recreational outlets are otherwise available in this region, this impact is minimal.
- B. Some archeological research, salvage and stabilization projects will be retarded and costs will be escalated since certain techniques require the use of motorized equipment. Wilderness designation, however, does not preclude the carrying on of this work and is, in itself, a form of protection of cultural resources.
- C. The barring of motorized equipment will increase the cost factors of trail maintenance and rehabilitation per unit of work accomplished. Increased costs will be approximately \$10,000 annually.
- D. Certain types of recreational activities such as those involving all terrain or other motorized vehicles are prohibited in wilderness. Such use is not permitted now and there are no plans to permit it at any time in the future. This adds pressure on other areas within the region.
- E. Some littering, pollution of water, sound, air, and visual intrusion or degradation is inevitable through the probability of increased visitation.

## VI. SHORT-TERM VERSUS LONG-TERM PRODUCTIVITY

This wilderness proposal is primarily designed to enhance the long-term productivity of the park area. Wilderness would provide the maximum degree of protection for these natural resources. Except where authorized by law or when carried on pursuant to valid existing rights, natural area policy precludes economic or consumptive uses of resources but does provide for appropriate development and options for management which may result in some disturbance of the natural environment. Wilderness designation precludes such development and provides protection with legislative support. The value of the natural ecosystems functioning without the intrusion of man will increase steadily as they become more scarce in the modern world.

Regulation of use provides for the long-term benefits of maintaining a quality environment for both indigenous species and man. Unlimited and unregulated use might satisfy current demands, but would ultimately result in such a deterioration or alteration of resources that there would be little of the original value to protect and enjoy.



## VII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

With the exception of foregone opportunities, no irreversible or irretrievable commitment of resources will result from the proposal.

National park status, in itself, normally precludes degradation by grazing, logging, mining, or other consumptive uses unless expressly authorized by statute. Under the wilderness designation, the resources would be perpetuated and committed for preservation.

Some erosion may occur on the backcountry trail system, but this would be minor. There would be no destruction of habitat involved, nor would endangered species be threatened. Land use would continue as before. Thus, in these regards, wilderness in Zion National Park would not cause an irreversible or irretrievable commitment of resources.

### VIII. ALTERNATIVES TO PROPOSED ACTION

The National Park Service has considered several alternatives for wilderness designation:

- A. No wilderness designation.
- B. Less wilderness - exclude potential wilderness additions.
- C. Include a greater amount of wilderness.
- D. Combine the National Park Service proposal with that of the Bureau of Land Management.

#### A. No wilderness designation

Present management policies and practices are directed toward maintaining the proposed wilderness areas in a natural state, free of man-made influences. While this effort might continue whether or not these areas are included in the National Wilderness Preservation System, the possibility would always exist that some development or vehicular access might be emplaced by administrative decision. Pressures for additional roads and developments are always present. Those lands not included in the proposal are vital to visitor use, administration and interpretation of the park, and as corridors of transportation. These have been kept to a minimum commensurate with foreseeable needs.

Preclusion of wilderness designation would allow the optional use of motorized equipment and vehicular access. Trail maintenance costs, as a result, would not increase 40 percent to \$420 per mile, thus saving \$10,000 annually in maintenance funds. The archeological study of Parunuweap Canyon proposed by the master plan would not be curtailed due to restrictions on front-end loaders, winches for drag line power, chain saws, permanent research facilities, and motorized access. Excavation time and costs would be reduced significantly.

If future management should so decide, construction of a road system and development of visitor use facilities would be allowable. The current master plan, however, does not identify any proposals or needs for such facilities.

Additional development would result in an altered visitor use pattern, thus providing an opportunity for more visitors to enjoy the resources of Zion National Park. Such development, however, may also increase resource deterioration.

B. Less wilderness - exclude potential wilderness additions.

Discussions on wilderness and alternative proposals began several years ago and administrative classification of primitive lands in the park began before this. The current proposal is the end result of these efforts. All the land now proposed as wilderness is currently being managed as such. A lesser amount would in no way affect the management principles now applied, but the added legal protection that would be achieved by wilderness classification would be lost to that land area not so designated.

Among the possibilities for a lesser wilderness acreage would be deletion from proposed legislation of the potential wilderness additions proposed for ultimate inclusion once they qualify for consideration. The 12,120 acres proposed for eventual inclusion involve state reserved mineral rights, privately owned land, reserved water rights, and lifetime and term grazing rights. Regardless of wilderness designation, these nonconforming uses will eventually be terminated and the lands returned as nearly as possible to their natural condition.

The primary effect of a smaller wilderness proposal is that less of the ecosystem would receive direct protection from the encroachment of artificial influences. Development of nearby facilities could visually intrude upon a greater percentage of a reduced wilderness. The majority of park visitation is highly transient, and most visitors normally experience only the threshold to the back-

country. Greater development may result in a greater economic benefit, but it may also result in resource deterioration through increased visitor use.

C. Include a greater amount of wilderness

Additional land was considered for inclusion in the wilderness proposal. However, each area was intruded upon by one or more of the following: grazing allotments, water rights, private holdings or mineral rights. They were not considered for wilderness inclusion at this time. The grazing allotments have either "death" or calendar year termination dates. The private inholdings are subject to acquisition by purchase or condemnation. As private inholdings are acquired and grazing allotments terminate, there will be a continuing review of the wilderness potential of the affected acreage.

The following table summarizes the existing proposal:

<u>Unit</u>	<u>Roadless Acreage</u>	<u>Proposed Wilderness Acreage</u>	<u>Potential Wilderness Addition</u>	<u>Remainder</u>
1	33,000	27,220	4,180	1,600
2	88,300	73,600	6,900	7,800
3	<u>22,100</u>	<u>19,800</u>	<u>1,040</u>	<u>1,260</u>
Totals	143,400	120,620	12,120	10,660

An estimated additional 2,500 acres are proposed as potential wilderness additions rather than for immediate designation. These are small areas interspersed with alien lands and alien rights which make it doubtful that the federal lands could be managed to provide the attributes of wilderness as defined in the Wilderness Act. However, these lands could be included in the present proposal (Exhibit A - Alternatives for More Wilderness). Another estimated 1,000 - 1,200 acres could be included as wilderness if the powerline into Zion Canyon could be located underground adjacent to the existing roadway or eliminated when the overnight facilities are removed from Zion Canyon as proposed in the master plan. Undergrounding



# **ALTERNATIVES FOR MORE WILDERNESS EXHIBIT A WILDERNESS PLAN ZION NATIONAL PARK UTAH**

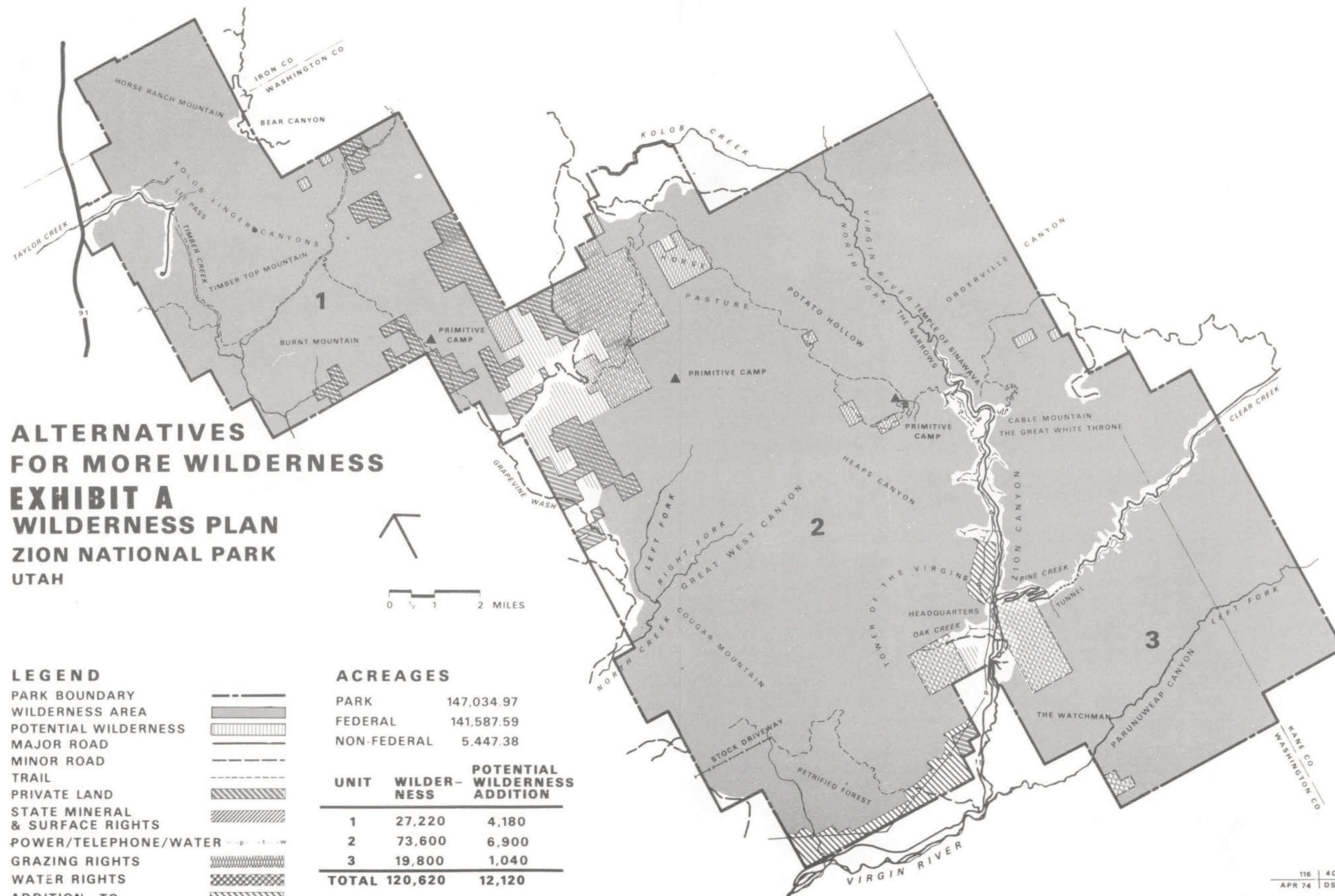
## **LEGEND**

PARK BOUNDARY	---
WILDERNESS AREA	■
POTENTIAL WILDERNESS	▨
MAJOR ROAD	==
MINOR ROAD	- - -
TRAIL	---
PRIVATE LAND	▩
STATE MINERAL & SURFACE RIGHTS	▨
POWER/TELEPHONE/WATER	- - p - - t - - w
GRAZING RIGHTS	▩
WATER RIGHTS	▩
ADDITION TO WILDERNESS	▩

## **ACREAGES**

PARK	147,034.97
FEDERAL	141,587.59
NON-FEDERAL	5,447.38

UNIT	WILDER- NESS	POTENTIAL WILDERNESS ADDITION
1	27,220	4,180
2	73,600	6,900
3	19,800	1,040
<b>TOTAL</b>	<b>120,620</b>	<b>12,120</b>







the line would incur significant construction costs; the present length of the powerline is about 10 miles. If placed adjacent to the roadway, the estimated length would be about 12 miles. Elimination of the line into the canyon would remove the availability of electricity and its convenience from the Zion Canyon Corridor, the focal scenic attraction for visitors to the area. However, with the proposed removal of overnight facilities this would not be a significant impact. Moreover, a visual intrusion would be removed from this significant feature.

Inclusion of additional acreage into wilderness would preclude visitor use developments in the park, thus restricting a segment of the American public from enjoyment of certain features of the park. It would result in an economic benefit to the local communities outside the park through development of these shunted visitor services. Unless these developments are planned, however, they could have an adverse environmental effect upon the ecosystems outside the park.

D. Combination of National Park Service and Bureau of Land Management contiguous wilderness areas.

The Bureau of Land Management is currently evaluating their contiguous Canaan Mountain acreage and the lands along Deep Creek and La Verkin Creek for possible designation as primitive areas (Figure 3).

A larger wilderness area results in greater assurance of preserving wilderness values from intrusive developments. Smaller wilderness units are more susceptible to outside influences of visual and audio impacts. Distance is an important factor in maintaining the solitude and quiet of the natural scene, unmarred by the evidence of man.

A larger wilderness area would allow a greater acreage of the ecosystems to be preserved. It would also, however, result in a greater acreage of land removed from optional land uses such as consumptive resource utilization and visitor facilities developments.

## CONSULTATION AND COORDINATION WITH OTHERS

### A. Consultation and coordination in the development of the proposal and in the preparation of the environmental statement.

#### State-reserved mineral rights.

In 1969 the National Park Service tried to obtain a stipulation from the State which would in effect not permit the State to exercise its right unless agreeable to the Service. The State refused to sign such a stipulation, but indicated they would trade these interests to the NPS. Negotiations were conducted toward such an exchange, but no land was ever made available for exchange purposes by the Bureau of Land Management.

#### Interagency consultation.

Prior to the preparation of the draft environmental statement, inquiries were made to the Bureau of Land Management concerning their management plans for contiguous acreage.

The town of Springdale has water rights within Zion National Park and has an agreement with the National Park Service concerning delivery of water from the park. Talks have taken place with the town of Virgin concerning their request to develop water resources within Zion National Park.

#### Analysis of public response.

Determining the suitability or non-suitability of portions of Zion National Park as wilderness was pursuant to the Wilderness Act of 1964. The proposal brochure and draft environmental statement were prepared for public information and were given wide distribution.

A public hearing on the proposal to establish wilderness within Zion National Park was held in the Zion Visitor Center, Zion National Park, Springdale, Utah, on December 12, 1972.

The hearing was opened at 10:00 a.m. by the Hearing Officer, Mr. John M. Davis, 7272 East Camino Valle Verde, Tucson, Arizona. Approximately 150 people

were present at the hearing and 37 oral statements were made. The proceedings of the hearing were reported by Clair Johnson, Salt Lake City, Utah. The hearing was closed at 3:15 p.m. of the same day after everyone wishing to make a statement was heard.

#### Conservation Group Proposal

The conservation organizations testifying at the hearing and submitting written statements recommended that approximately 12,000 additional acres be added to the preliminary wilderness proposal. These additions would be made by narrowing non-wilderness road-corridors and by designating them as wilderness areas proposed in the preliminary report as potential wilderness additions.

#### Those Opposed to Wilderness

A large number of individuals expressed the view that no wilderness should be designated within Zion National Park, because they felt that the natural resources in the park - such as the grasslands, minerals, timber, and water - should be developed. They expressed a desire for multiple-use management. They also wanted more roads and more developments for public use.

The act establishing Zion National Park provides for the preservation of the natural resources of the park; therefore, with or without wilderness designation, the desire by this group of people for development of the natural resources is prohibited by law.

#### Conclusions

Oral statements and letters provided a total of 1,962 responses to the wilderness proposal.

Of the agencies, private organizations, and individuals testifying or submitting written views, 5 out of 24 agencies, 2 of the 65 organizations, and 131 of the 1,873 individuals supported the preliminary wilderness proposal. Fifty-three organizations and 535 of the individuals commenting favored a larger wilderness;

one individual favored wilderness with no specific recommendations. Twelve agencies, 11 organizations, and 1,206 individuals opposed the establishment of wilderness. Eight agencies acknowledged receipt of copies of the wilderness proposal.

Careful study of the statements presented at the hearing, the letters received, and management consideration have resulted in the following changes:

Four tracts of land shown on the preliminary wilderness plan as containing state surface and mineral rights are entirely in Federal ownership. All or a portion of these tracts, as well as some Federal land immediately adjacent to these tracts, were shown on the preliminary plan as potential wilderness additions. Since these lands are Federal, they are now recommended as wilderness. This will add 420 acres of wilderness to Unit 1 and 1,000 acres to Unit 2, increasing the total recommended wilderness for Zion National Park to 120,620 acres and reducing the recommended potential wilderness by the same amount.

#### Areas Reconsidered

Most of the private organizations and some of the individuals recommended that non-wilderness road-corridors be narrowed by moving the wilderness line closer to the roads. The wilderness lines shown along roadways in the preliminary proposal were drawn along topographic features. These lines were drawn to exclude not only the roads, but adjacent parking areas, pull-offs, utility lines, public-use structures, management structures, and areas of high visitor concentrations. These corridors are considered the minimum necessary for non-wilderness facilities and non-wilderness uses.

The same organizations and individuals also recommended that lands proposed as potential wilderness additions be designated as wilderness. The Wilderness Act specifically states that only undeveloped Federal land may be designated as wilderness. The lands proposed as potential wilderness additions contain non-Federal rights.

These rights and conflicting uses will, within a short period of time, be eliminated. A provision is recommended in the legislation designating wilderness in Zion National Park which would provide the authority to the Secretary of the Interior to designate these lands as wilderness at such time as he determines they qualify.

Many individuals recommended no wilderness. They stated that wilderness would prohibit the development of the natural resources in the park such as grasslands, minerals, timber harvesting, and water. They felt the park should be managed under a multiple-use concept. More developments for public-use and more roads were desired by this same group of people.

The act establishing Zion National Park provides for the preservation of the natural resources; therefore, with or without the establishment of wilderness the resources within the park cannot be used in the way suggested by those who opposed wilderness within Zion National Park.

#### Summation

A total of 1,420 acres are recommended for addition to the preliminary proposal. The total recommended wilderness is therefore 120,620 acres; 12,120 acres are recommended as potential wilderness additions.

B. Coordination in the review of the draft environmental statement

This statement will be distributed to various organizations, agencies and interested individuals with the expertise, jurisdiction or interest required to evaluate the proposal once it has been filed through the Council on Environmental Quality. Comments were received from agencies indicated with an asterisk:

- \*Advisory Council on Historic Preservation
  - Department of Agriculture
    - \* Forest Service
    - \* Soil Conservation Service
  - Department of Army
    - \* Corps of Engineers
- \*Department of Commerce
  - Department of the Interior
    - \* Bureau of Indian Affairs
    - \* Bureau of Land Management
    - \* Bureau of Mines
    - \* Bureau of Outdoor Recreation
    - \* Bureau of Reclamation
    - Bureau of Sport Fisheries and Wildlife
    - \* Geological Survey
    - \* Office of the Secretary
  - Department of Transportation
    - \* Federal Highway Administration
- \*Environmental Protection Agency
- \*Federal Power Commission
- \*Governor, State of Utah
- \*Department of Highways, Utah
- \*Department of Parks and Recreation, Utah
- \*State Clearinghouse, Utah by State Planning Coordinator
- State Historic Preservation Officer, Utah
  - Division of History, Department of Development Services
    - \*Preservation Historian
    - \*State Archeologist

Comments of other agencies, and responses of the National Park Service

Advisory Council on Historic Preservation

Comment: Your statement should explain that the historic and archeological resources within the areas proposed for wilderness designation will continue to be managed



in accordance with the "Wilderness Use and Management Policy" of the administrative policies for historical areas of the National Park System. These policies permit management practices and uses necessary for the protection and preservation of such resources.

Response: Statement modified to include this remark, but referenced to natural areas rather than historical areas administrative policies. Both read essentially the same and provide the necessary protection. (See p. 30, para. 2.)

#### Forest Service

Comment: We agree with the general conclusions of your wilderness study. The following questions were raised by your study report and perhaps could be clarified. On page 3, the last paragraph treats wilderness in Utah but fails to mention proposed units of the National Wilderness Preservation System which are not within National Parks. The High Uintas Wilderness in the Ashley and Wasatch National Forests was recommended by the President to the Congress in 1969, but has not been enacted. This comment is also applicable to page 8 of the Draft Environmental Statement.

Response: Statement has been changed to include this wilderness area. (See page 10, para. 6.)

Comment: Another question pertains to the lands which are proposed for Wilderness status after acquisition of outstanding rights. Neither the study nor the draft Statement reflect what kind of structures or improvements which do not conform to Wilderness standards may be present. Such information would be useful in evaluating whether these lands could become Wilderness.

Response: Wilderness designation will not be affected by structures or improvements since any structures will have been removed, but on reserved mineral rights, ownership of land, reserved water rights and grazing permits as indicated in Section I.

Comment: In the Draft Environmental Statement, item C (1) on page 19 indicates that the sounds of motorized equipment would be excluded by a Wilderness Act for the area. Elsewhere, the study notes that aircraft noise will not be eliminated. These statements conflict.

Response: This is, of course, an unfortunate fact, but until airlines are routed around wilderness areas, it is something we will have to live with.

Comment: On page 20, the Draft Environmental Statement states that, "Wilderness use requires stringent controls over kinds and amount of human use allowed, thus assuring a high quality of individual experience to those who will use the area." This statement seems misplaced under "Favorable Environmental Effects." In addition, the statement would seem more understandable if reworded to reflect that high quality of Wilderness experience may require controls on the kinds and intensity of human use.

Response: Statement modified to reflect above views. No judgment is any longer offered concerning adverse and favorable impacts as often an impact that is considered adverse to one element of the human environment may be considered favorable to another. (Also see p. 28, item 16.)

#### Soil Conservation Service

Comment: There is one correction, on page 14. Cedar City is identified as a railroad center. It is, in fact, at the end of a branch line that is no longer used. I believe that that item should be deleted.

Response: Item retained, but modified.

Comment: The discussion of roads on page 19 could be amplified to indicate what is to be done with the roads in question. Will they be used as trails or obliterated?

Response: No change here. The roads in question are not within the wilderness, but are excluded. Their disposition is discussed in the paragraph.

### Corps of Engineers

Comment: No existing or contemplated Corps project would have any effect on the area covered by the proposed action. The Corps will not be represented at the December 12, 1973, public hearing.

Response: None

### Department of Commerce

Comment: This proposed wilderness area is an excellent suggestion. There would remain, for those who are unable to enter the wilderness area, free access to a large and interesting part of the park. Those who are physically able to enter the wilderness area on foot or by horse are assured of an area free of the evidences of civilization (mining, grazing, motor vehicles, roads). The negative aspects cited (difficulty in archeological research, restrictions of resource management practice, rationed use, restrictions on backcountry facility development and increased costs of trail maintenance), are relatively minor and in some cases are actually positive reasons for creating the wilderness area.

Response: Your comments are noted.

Comment: Possible increased park visitation, as indicated on page 22, may result in an increase of economic, social, and environmental demands on the Park Service as well as the surrounding area. This seems likely, as the proposed wilderness area will reduce the available facilities now existing in and around the park (such as lodging, access roads, etc.), as well as preclude development of future facilities.

The Park Service's and the adjacent area's ability to meet future demands for lodging, dining, parking, as well as needs for water, sewage, etc., would appear to warrant further consideration.

For example, what measures will be taken to mitigate the adverse effects of increased water and sewage treatment demands and solid waste disposal? Do adequate facilities already exist? What zoning regulations govern land adjacent to the park entrances, the local town and the surrounding areas?

Response: There is no development proposed for the areas recommended for wilderness designation. It is true that future development possibilities within these areas would be foreclosed and this is recognized in the statement. About ten percent of the park is not recommended for designation as wilderness. Present and future visitor service and management facilities within the park would occur on this undesignated land. The adverse environmental impacts associated with increased development to accommodate increased visitor use will occur as a result of increased use and not as a result of designation as wilderness. The fact that these impacts would occur on non-designated land within and outside the park is acknowledged.

The town of Springdale, the gateway town most likely to absorb any increase in development that occurs outside the park, due to increased visitation, has a masterplan which considers provisions of increased water supply and sewage disposal facilities with increased use and development.

Comment: It would appear that the Park Service is limiting the uses of the lands but expect to have greater visitations. Thus, the reactions of the local citizens are important. Are they in favor of the proposal, or do they view it as a catalyst for unwarranted growth?

Response: Most are not in favor of the proposal, and one main reason is they are afraid the wilderness will decrease travel so as to "destroy tourism in southern Utah." "Unwarranted growth" would be welcomed by some businessmen.

#### Bureau of Indian Affairs

Comments: The above identified draft environmental statement has been reviewed within our particular jurisdiction or special expertise and no significant conflicts were identified.

Response: None

#### Bureau of Land Management

Comment: We also recommend discussion of how the proposed wilderness may conform or conflict with the objectives and specific terms of approved or proposed Federal, State and local land use plans, policies, and controls for the area affected, as required by the revised CEQ Guidelines of August 1, 1973.

Response: Section I has been expanded to consider other interrelated proposals and studies.

Comment: We suggest that the reason for the proposed action be clarified and discussed in detail. It is difficult for the reader to understand fully why the action is being proposed. It appears that the area may possess the necessary attributes to qualify for wilderness designation; however, does this in itself place it automatically in

nomination, or is the area unique, containing excellent examples of wilderness components?

Response: The text now provides a discussion on the purpose of this proposal (see p. 9, last para).

Comment: The discussion on interrelated wilderness proposals, page 7, and impacts upon the wilderness proposal, B.4. page 19, should be corrected to reflect the fact that BLM is currently evaluating the Canaan Mountain area (see attached map) for designation as a primitive area--not as a wilderness area. This discussion should also be expanded to reflect the specifics of the Canaan Mountain area and how the proposed wilderness relates to them. In addition, discussion of the specifics and relationship of BLM's proposed Deep Creek Primitive Area and the potential La Verkin Creek Primitive Area (see attached map) to the proposed wilderness area should also be included.

Response: References to the proposed La Verkin Creek and Deep Creek Primitive Areas were added to the statement in the noted sections.

Comment: We suggest that the broad range of southern Utah natural resource values involved be first identified. This might include, for example, significant geology, relic or pristine ecosystems, life zones and scenic open space. This would provide a basis for understanding the real significance of the area.

Response: The text has been expanded to include a description of the regional environment near Zion National Park.

Comment: We also suggest that the section on flora and fauna be strengthened by specifically identifying what is found in the proposed wilderness area and where. The draft statement indicates that several species of reptiles, amphibians, birds, and fishes exist within the park. Without specific identification and location, it is extremely difficult to understand what the wildlife resource values are, how they relate to each other, and what impacts may be expected as a result of wilderness designation. There is no mention of any threatened fish species within the proposed wilderness area. Perhaps a statement could be included as to whether or not any exist, and if so, what their status is.

Response: All of the park's ecosystems would be represented in wilderness. Designation as wilderness would be directly compatible with the purpose for which the park was established. Basic resource management practices would not change due to such designation. What impacts would occur to resource values due to designation and use are discussed in Section III.

Threatened species within the park are discussed on pages 14 and 15.

Comment: The discussion should include recognition of the proposed introduction of Desert Bighorn Sheep into Parunuweap Canyon in the southeastern portion of the Park. Sheep are presently being raised in a paddock within Zion National Park for the introduction which may take place within the next five years.

Response: A paragraph was inserted under the Flora and Fauna discussion on the Desert Bighorn Sheep project.

Comment: Indication of water quantity, quality, and location would also strengthen the document considerably. Likewise, it would be of considerable value to include a discussion on minerals, their location and significance.

Response: Water resources in the park are now discussed in Section III. There are no known minerals within the park. Since park lands are not available for mineral development at present, wilderness designation would have no impact in the event minerals were to be found in developable quantities.

Water resources in the park are now discussed in Section II.

Comment: Maps reflecting the location of the resources would be of considerable help in visualizing resource interrelationships, both inside the proposed wilderness area and adjacent areas.

Response: Two maps have been added showing the relationship of the park with units of the National Park System in the vicinity and with the potential primitive areas on Bureau of Land Management lands adjacent to the park (see pp. 11 and 12).

Comment: The statement "some scattered Bureau of Land Management parcels are contiguous" on page 14, gives the impression that little BLM administered land is contiguous, when in reality, large blocks of national resource land (formerly public domain) lie adjacent to roadless areas 1, 2, and 3.

Response: Statement modified to include additional BLM lands, particularly the proposed primitive areas.



Comment: The "segment of the public" which will be denied access to outstanding scenic and geological features, discussed in item 4, page 16, should be quantified. What percent, or number, of total visitors would normally utilize the access roads and what are the impacts of closing roads in Units 1 and 2?

Response: The closing of the access roads in Units 1 and 2 will deny less than 1/2 of 1% of the people use of the area.

Comment: Quantification of the increase in back-country use discussed in item 5, page 17, is important to understand the impacts of the proposed action.

Response: Figures supplied.

Comment: Both items 5, page 17, and E. on page 22, indicate the probability of increased visitation (use), while item 3, page 16, infers that potential for increased use is marginal. Clarification of this situation would be helpful.

Response: Items correlated. (See pp. 24(7), 31(E), and 25(3).)

Comment: Deer funnel into the east-central area of the proposed wilderness (see crosshatched area on the attached map) as they are confined by the North Fork Canyon on the north and Orderville Gulch on the south; here they concentrate and spend the winter. The interrelationships of this area with adjacent lands should be discussed and impacts identified. In addition, critical deer winter range presently exists on Hurricane Mesa and Black Ridge to the west of the proposed wilderness, (see attached map). This range also has a definite interrelationship with the proposed wilderness and the impacts should be identified. Will the proposal intensify the complex deer management problem mentioned on page 10?

Response: The deer management problem in relation to cougars was dropped, as there is no proof one way or the other for this area. Interrelationships of deer browse areas outside and within the proposed wilderness will not change with wilderness designation. The proposal will not intensify the deer management problem.

Comment: Timber has been and may be harvested in the future on national resource lands to the east of this area (see attached map). The impacts of the wilderness proposal should be identified in relation to this resource. Of significance would be the roads within the timber area.

Response: National Park operation already precludes timber harvesting so wilderness designation would not change this status within the boundaries of the eastern portion of Zion National Park. If harvesting occurs on other public lands outside the wilderness, it would be hoped the possibility of a buffer zone along the boundary would be considered, to lessen the visual impact on wilderness users.

Comment: Wildfire originating on lands adjacent to the proposed wilderness is discussed, but should be expanded to consider the threat to adjacent lands when wildfire originates on the proposed wilderness area.

Response: Fires originating within the proposed wilderness will be carefully watched and will be controlled if they present a hazard to land or buildings outside the boundary.

Comment: Uranium deposits are located near the east central portion of the proposed wilderness (see attached map) and active mining claims exist. Some assessment work has been completed recently and the possibility of new road development exists. The statement would be improved with consideration of this resource and potential development impacts.

Response: There will be no impact upon the development of uranium deposits outside the park due to wilderness designation. There will be no direct impact upon areas so designated as wilderness due to development of the deposits. Roads to facilitate operation of the mines are not now, nor will they be permitted on park land. It is recognized that some of the various means possible for development of uranium mines may have an effect upon park lands whether or not they are designated as wilderness. They may include such affects as visual intrusion, runoff interception or alteration and disruption of animal habitat. Due to the speculative nature of the implementation of possible development techniques and the uncertainty of incorporated mitigating measures no attempt is made in this statement to assess these unknown impacts.

Comment: No mention was made of the effect of wilderness designation on the East Fork and North Fork of the Virgin River. Both of these forks have considerable use by hikers and are accessible over national resource lands. In addition, the East Fork has been identified by BLM for study to determine wild and scenic river and/or primitive values.

Response: Putting the East and North Forks of the Virgin River in wilderness will have no effect on the hikers using these avenues. Wild and Scenic River designation would further enhance the approach to the wilderness.

Comment: The discussion on page 17 of the draft statement indicates that the Kaiparowits project has been approved. This error should be corrected. Considerable space is given to impacts of this project (75 air miles distance) while no mention is made of the possible impacts of the proposed Warner Valley Power Project (25 air miles distance) and related Alton Coal Field (20 air miles distance).

Response: Statement modified as suggested, and Warner Valley Power Project added.

Comment: The impacts of eliminating the water rights were not fully assessed. In addition, the allowance of the town of Springdale water right should be clarified. Are these rights for culinary or irrigational purposes?

Response: The impact on water rights is negligible--Congressional approval would be needed for granting additional water rights with or without the proposed action. Springdale water rights were granted by the Congress in the enabling act that initially established the Park. These water rights allow 56 gallon per minute for culinary purposes and 3.97 cubic feet per second for irrigation.

Comment: Discussion should be included on the surface transportation network in the general area and potential impacts.

Response: The public highway system is illustrated in Exhibit A and mention is also made in the text of the possibility of resumption of passenger train service to Cedar City in the future. Section III includes a discussion of the preclusion of further road developments in the proposed wilderness area.

Comment: The impact of increased pressure on areas adjacent to the proposed wilderness is not fully assessed. It is quite important to quantify the

number of visitors that will be channeled onto adjacent lands as a result of wilderness designation to identify impacts. We question that "recreational outlets are otherwise available" as indicated in part 5, page 22. Present facilities on national resource lands are currently being used near their maximum, and additional people pressure would create a serious situation.

Response: Designated wilderness areas would attract, not channel users to adjacent lands. With or without wilderness, human use of backcountry natural areas may need to be rationed.

Comment: We suggest that the measures, listed on page 21, be expanded in detail. For example, A. indicates that "Backcountry regulations will be enforced." What are the specific backcountry regulations? Likewise, "Proper backcountry sanitation measures will be stressed." What are the specific "measures"?

Response: The statement on mitigation has been expanded to provide for studies to monitor use and provide needed information for administrative regulation of use to avoid damaging the natural environment. These studies have been planned and will be completed as soon as possible depending upon the availability of funds.

Backcountry regulation for Zion and other units of the National Park System are contained in the Code of Federal Regulations, Title 36, Parks, Forests, and Memorials, revised July 1, 1973, Part 2.

Comment: We would suggest that the possibility of land exchange involving private, national resource lands, and National Park lands, be addressed in the document. A review of land status in the area reflects many possibilities for compaction in all three ownerships that would probably result in a much improved management situation for all involved.

Response: Consideration of land exchanges is an ongoing activity with the Park Service. Land exchange will not be accelerated or slowed by wilderness designation.

# LEGEND



Potential Primitive Areas -

1. Deep Creek
2. Laverkin Creek
3. Canaan



Locatable Minerals - Uranium



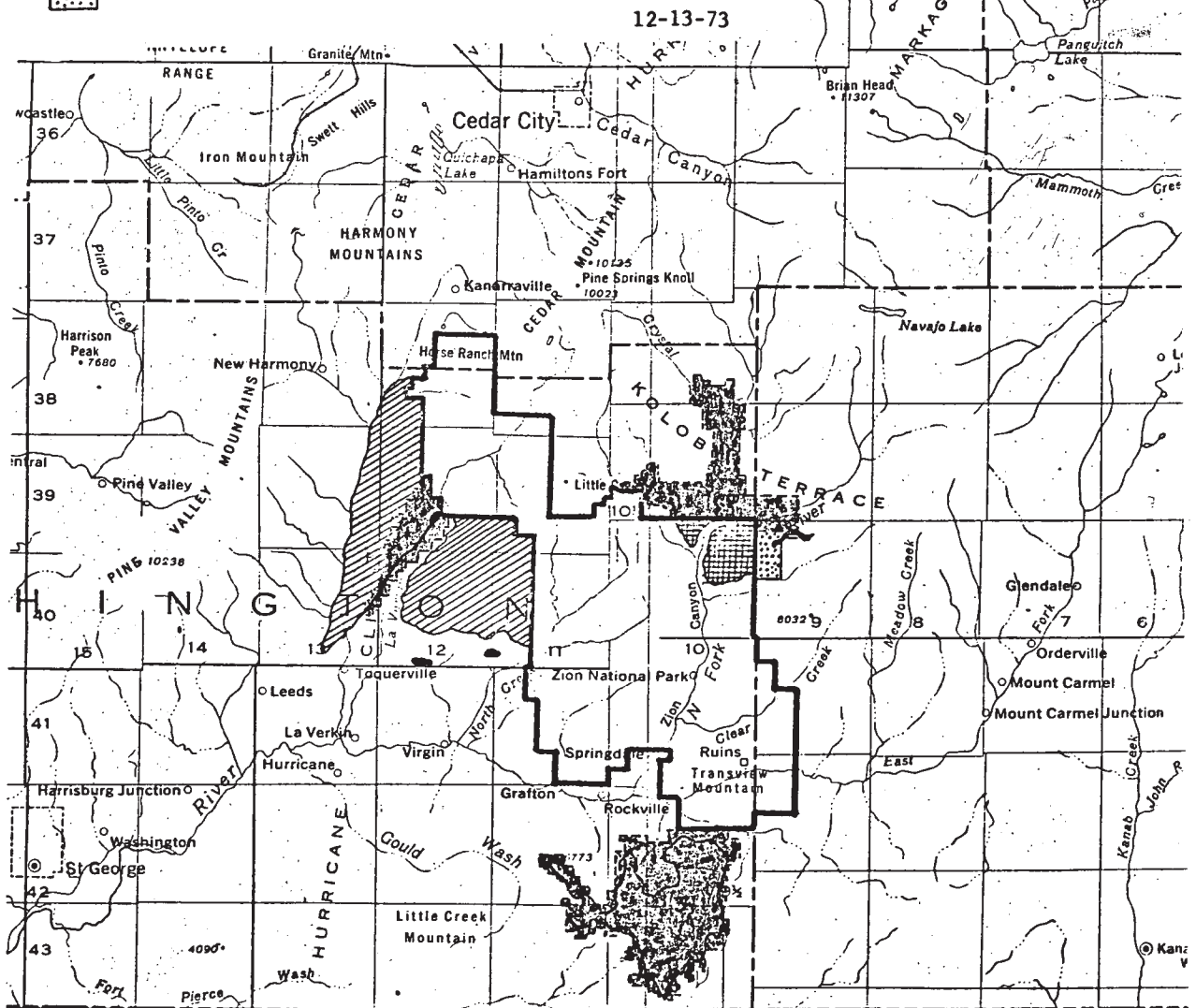
Critical Deer Winter Range



NPS lands in proposed wilderness with unique relations to adjoining lands.



Forest (Ponderosa Pine)



## Bureau of Mines

Comments: In our review of the wilderness study brochure and draft environmental statement, we find we have no major comments. Although much has been written on the geology of the park, there has not been an indepth study of its mineral potential. Questions of mineral potential might arise relative to the enclaves of 3,963 acres of State-owned mineral rights excluded from the proposal.

Response: Park Service and the State are working informally, at this time, on land exchanges to remove these rights from the wilderness. A recent survey has indicated there are 1123.99 acres of state-reserved mineral rights and 200 acres of state-reserved surface and mineral rights, rather than 3963 acres as indicated in the draft environmental statement.

## Bureau of Outdoor Recreation

Comment: The subject draft adequately covers the environmental concerns of this Bureau. We have no comments.

Response: None

## Bureau of Reclamation

Comment: The Bureau of Reclamation has no presently proposed water resource development plans for the area involved.

Page 5, paragraph 3, last sentence: change to read "Wilderness boundary lines follow topographic features and section lines."

Response: Change made.

Comment: Page 5, paragraph 4, second sentence: Begin "At the present time, none ..."

Response: Change made.



Comment: Page 5, paragraph 4: Add a last sentence: An additional 8,593 acres of the roadless area do not qualify for wilderness status."

Response: Modified to read "A total of 10,600" and added as suggested.

Comment: Page 14, first paragraph under Economy: Population figures quoted (except Springdale) are from the 1960 census. We suggest updating to the 1970 census. The 299 population for Springdale should be explained, since it does not match either the 1960 or 1970 census figures which are as follows:

	<u>1960</u>	<u>1970</u>
Springdale	248	172
Hurricane	1,251	1,408
St. George	5,130	7,097
Cedar City	7,543	8,946

Response: Source of the figure 299 is unknown at this time, though it was probably from the Springdale City Office. The corrected population figures have been put in the statement.

Comment: Page 21, item C, second sentence: Use of word "monument" in lieu of "park" is inconsistent.

Response: Changed to "park".

Comment: Page 24, first paragraph, first sentence: Begin "With the exception of foregone opportunities, no irreversible . . ."

Response: Statement modified to read as suggested.

Comment: Page 28, first paragraph following table: First sentence should be clarified. Are the 2,500 acres in addition to the 13,540 listed in the table? If so, this should be so stated.

Response:

The text has been changed to indicate that the 2,500 acres are additional.

## Geological Survey

Comment: Although there are numerous publications covering the geology of the park, very little information is available on the mineral resource potential, if any, of the area. Oil and gas have been produced near the southwest corner of the park, and deposits of gypsum and manganese are present in or near the park.

On page 18, we note that the State of Utah retained mineral rights on about 3,963 acres of land in the park. On the map, some of these lands are enclaves within the proposed wilderness areas. We suggest a statement regarding access to these enclaves be included. The Wilderness Act of 1964 is specific on mineral rights and access only as they pertain to lands administered by the Forest Service.

Response: Access to enclaves with retained mineral rights by the State of Utah was not discussed, because access would not be provided. Five areas have not had vehicular road access in the past, and it would be inconsistent with objectives and restraints on the natural area, with or without this proposal, to provide access. Areas with prior road access will not be provided access under wilderness designation.

The text has been corrected to indicate there are 1123.99 acres of state-reserved mineral rights and 200 acres of state-reserved surface and mineral rights, rather than 3,963 acres as indicated in the draft environmental statement.

Comment: We have several suggestions concerning the map on page 4. Broken blue lines, possibly water pipelines or irrigation ditches in Zion Canyon, are not identified in the legend. Registry of the blue water plate appears to be displaced by as much as 0.1 inch (1/4 mile) in places. Telephone lines appear to have been omitted from the map. Some difficulty is created by the fact that gray and green zip patterns are oriented differently in different parts of the map and also are rotated with respect to the legend. A special symbol to designate the three roads that are proposed for closing might be considered. Since the map depicts a proposed plan, it would be advisable to delete the three deep re-entrants in the Roadless Area boundaries; the proposed closing of the three roads would have the effect of eliminating the re-entrants. The Roadless Area boundaries as now shown seem to be artificial and are confusing.

Response: Modifications of the map will be made when the final wilderness recommendation is made. Registry of blue lines apparently is correct in the present map. There is one telephone line from Springdale to park headquarters. Zip patterns will be corrected in future versions of the map. Roadless area boundaries were established in relation to topographic features or legal subdivisions. The map with the final wilderness recommendation to Congress will not show roads that have been closed as the road closing is not a result of wilderness designation.

Office of the Secretary

Comment: Our Geological Survey and Bureau of Mines report that although much has been written of the geology of the park, they know little of its potential mineral resources. Although the chances seem remote, it may be well for you to include in your study some alternative actions that would be needed if the State sought to exercise its mineral rights in the 3,963 acres excluded from the wilderness proposal.

Response: With or without this proposal, the following Park Service policy would apply:

"If existing incompatible uses persist or if present compatible uses of properties are to be changed and the properties are to be devoted to new and different uses not compatible with the primary purpose for which the area was established, the Service will attempt to negotiate with the owner for the acquisition of the property in order to eliminate a use or avoid development of a use adverse to the management of the area. In the event all reasonable efforts at negotiation fail and the owner persists in his efforts to devote the property to a use deemed by the Service to be adverse to the primary purpose for which the area was established, the United States will institute eminent domain proceedings to acquire the property and eliminate such use or prevent such development."

The text has been corrected to indicate there are 1123.99 acres of state-reserved mineral rights and 200 acres of state-reserved surface and mineral rights, rather than 3,963 acres as indicated in the draft environmental statement.

## Federal Highway Administration

Comment: Our main area of concern would be in maintaining continuity of State Route 15 and possibility of conflict with proposed corridors through Zion National Park and the closure of any other Federally funded roads.

State Route 15 has indicated it would remain open. This route appears to be the boundary between Wilderness Units 2 and 3.

To our knowledge there are no planned corridors proposed to the wilderness areas. The proposed road closures are not anticipated to have any serious impact on other highways in the area.

The statement adequately covers the proposed wilderness areas, and we concur with the findings of the statement.

Response: Your comments are acknowledged.

## Environmental Protection Agency

Comment: Our agency would be concerned about the possible impacts wilderness use may have on water quality. These impacts, although perhaps minor, could be mitigated through proper trail design and specifications, and probably just as important, the location and dispersement of trails and campsites. Caution should be exercised in the location of these "facilities" away from water sources to minimize water quality impacts. The location of campsites is particularly critical due to the concentration of use.

Response: Campsite location is considered in Section III. Further study will be made to determine where additional primitive campsites will be required, and ways to add essential sites without polluting water resources.

Comment: Solid waste problems are common to all back-country areas. Strict enforcement of this problem will be necessary to protect the integrity of the wilderness resource.

Response: Covered in Section III.

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objections to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Comment: An important key in the establishment of wilderness areas is the adequacy, design and locations of staging areas. Considerable impact can be imposed if sufficient consideration is not given to this problem in the planning process. These impacts can occur in the wilderness area as well as at designated access points.

Response: Staging areas, which in this case would fall outside the proposed wilderness, will be covered by the Park's Master Plan now under consideration.

Comment: In accordance with EPA evaluation procedures for impact statements, we have classified the statement as LO-1. A copy of the rating system is enclosed for your information.

Response: None

#### Federal Power Commission

Comment: The staff review shows that the proposed wilderness would not affect existing electric and natural gas facilities under the jurisdiction of the Federal Power Commission and would not appear to have a significant effect on the development of future supplies and transmission of electric power and natural gas.

Response: None

Comment: Based on its consideration of your Department's wilderness proposal, the associated draft environmental impact statement, and the review by its own staff, the Commission concludes that the proposed wilderness would not affect existing and the future development of electric power and natural gas facilities. The Commission notes, however, that the alternative proposal to enlarge the wilderness could affect an existing power transmission line currently operating under an FPC license.

Response: The power line referred to is in the extreme southern portion of the park boundary north of the Virgin River. No response is required.



Governor, State of Utah

Comment: I would like to state my present opposition to the formal establishment of a 119,200 acre proposed wilderness area in Zion National Park, Utah. As I pointed out in our meeting on January 11, 1973, I would prefer to have a moratorium on such major classifications until after enactment of a National, and State of Utah land-use policy, expected within the next few months.

A land use planning and policy act should enable state and local interests to play a more active role in the decision-making regarding land use classification in areas within the State of Utah that are administered by Federal agencies.

Response: Your views are acknowledged, and will be forwarded with any recommendations to the Congress for consideration. The Park Service must respond to the directive in the Wilderness Act of 1964 to report to the President (and he to the Congress) not later than September 3, 1974, as to the suitability or unsuitability of every roadless area of five thousand contiguous acres or more in the national parks, monuments, and other units of the National Park System.

Comment: The Utah Environmental Coordinating Committee concludes that the secondary (external) effects of wilderness designation in relation to the small communities near Zion National Park are not fully known, nor adequately discussed in the draft environmental statement.

Response: The section on environmental impacts has been modified to include information on secondary effects on small communities near Zion National Park.

Comment: Wilderness designation, as proposed, could preclude the plans and proposals for needed development and use of some water resources originating within park boundaries. Considering the aridity of southern Utah in general and the scarcity of suitable water supplies it is imperative that no water supplies be tied up in a wilderness.

I am aware that the wilderness proposal is in response to Public Law 88-577 (The Wilderness Act of 1964). However, it is inappropriate that the area within Zion National Park needs to be formally placed under the National Wilderness Preservation System when it, for all intents and purposes, is presently being managed as de facto wilderness.

Perhaps adverse uses are impairing wilderness values in Zion National Park. If this is the case, there is no specific documentation regarding such in the draft environmental impact statement or the wilderness designation and ask postponement until after we have a National and State land use planning and policy act.

Response: As you have recognized, this natural area has been managed under past policies of the Park Service so that wilderness character and qualities have been preserved for more than 64 years under Park Service administration. Consideration of applications for developing water supplies inside the Park, however, will not be significantly different after wilderness designation under provisions of the Wilderness Act of 1964. Congressional approval will be required with or without wilderness designation.

#### Department of Highways, Utah

Comment: We have reviewed the Wilderness Area Study for Zion National Park and concur in general with the proposed Wilderness Area designations. However, there are two points we believe should be considered further.

Reference the Potential Wilderness Area between units 1 and 2. We believe the text should state the intent to retain the minor road traversing this area. This section of National Park Road is a segment of a loop road between I-15 just south of Hamilton Fort and I-15 at Harrisburg Junction. Because of the terrain through which this road passes, it is a possible candidate for Utah's Scenic and Recreational Highway System - currently in the study stage. Even if the loop is not included in this system, it can provide the average motorist with a magnificent view of this rugged countryside in and around Zion Park.

Response: The portion of the route between Units #1 and #2 is being considered for facility development in the Park's Master Plan, which is now being finalized.

Comment: Also, we note that all of the nearby (125 mile radius) recreation areas in southern Utah are the subject of Wilderness Area proposals or studies, as are areas within Arches, Capitol Reef and Canyonlands National Parks and the Glen Canyon National Recreation Area. We believe that these proposals should be studied as a "package" rather than individually and coordinated with other Federal and State land management agencies to determine the area effect that the combined designations would produce. From this type of study, an area master plan could be developed to provide for foreseeable recreation needs.

Response: The Park Service has an overall plan to study areas throughout the nation to identify lands that qualify for inclusion in the National Wilderness Preservation System.

There is not adequate time to make formal "package" studies of a group of parks and recreation areas and coordinate these studies with Federal and State land management agencies prior to the deadline established by the Congress - September 3, 1974.

The Park Service has discussed the interrelationship of each proposed wilderness area to similar recommendations in nearby areas.

Comment: While the Wilderness Area concept is essential to ensure retention of such areas for our future generations, it would be possible to inadvertently limit access to the average vacationer in an excessive degree. This could run the risk of denying a rugged area recreational experience to those who were not backpackers or could not afford the expense of licensed guided pack trips run by concessionaires within the various national parks and recreation areas. Therefore, a balance is essential to ensure that both the family vacationer and the rugged outdoorsman seeking challenge can be accommodated within the available public lands in Utah.

Response: 10% or more of the park can be and is used by the "family vacationer" in the form of roads, viewpoints, campgrounds and picnic areas. The "rugged outdoorsman" has several trails to follow, the longest being only 18 miles - not very far for a hiker. It appears that both are being served.

#### Division of Parks and Recreation, Utah

Comment: The Division of Parks and Recreation would like to compliment the National Park Service for adequately describing most impacts related to the Zion Wilderness. We are concerned, however, about two impacts which were not adequately covered.

Although the fact is mentioned that BLM is considering the Canaan Mountain area south of the park for primitive area management, the Park Service did not adequately describe the wilderness area considerations at Cedar Breaks National Monument or Bryce Canyon National Park. The roadless area studies of the Forest Service and their potential wilderness designations on the Pine Valley Mountain, on Forest Service lands near Cedar Breaks and on the Aquarius Plateau, all within the Dixie National Forest, were not mentioned. It is the cumulative effect of these management designations that is beginning to concern this agency.

From a recreation standpoint, these designations could result in all of the high quality recreation resources available only to the backpacker or at a distance to the sightseer. The concept of offering a variety of recreation opportunities through a balanced recreation system with adequate management should be encouraged.

Response: The text has been expanded to provide the information requested. (See p. 10.)

Comment: In order to offer a wider variety of recreation experiences in Zion National Park, without hampering the valuable wilderness experiences available in most of the rest of the park, we recommend allowing mechanized access into the Potato Hollow-Horse Pasture area. The roads and trails in that area should be made available for such uses as trailbike riding and snowmobiling. The environmental statement does not adequately describe the loss of these choice recreation experiences under the proposed plan.

Response: Since the road is not being used at this time by recreation vehicles, there will be no loss of these choice recreation experiences under the proposed plan.

Comment: We appreciate the opportunity to comment on this statement. We wish to add that some of the Park Service comments for considering alternatives A or B sound much better than the proposal. These alternatives could more adequately meet the dual responsibility which we understand the National Park Service has:

- (1) Provide for recreation needs of the public and
- (2) protect the beautiful resources under their jurisdiction. It seems the Park Service is placing much more emphasis on the latter rather than intensifying management in selected areas and helping to meet the former.

Response: The views and alternatives A and B are noted.

State Clearinghouse, Utah by State Planning Coordinator

Comment: We think the draft EIS is generally a well prepared document. It rather clearly indicates the Park Services' Plans for Zion National Park.

There are some concerns voiced by members of the ECC that perhaps could be addressed in the final EIS, these include: the advisability of granting the Secretary of the Interior the authority to designate 13,540 acres as wilderness when he determines that the lands quality is questionable. We hope that before such a designation is made, appropriate private persons, state and local officials will be a part of this decision-making process. Since much of the area in question is privately owned or involves private rights, an order by the Secretary to clarify those areas as wilderness might be done without proper hearing. While the Wilderness Area concept is essential to ensure retention of such areas for future generations, it would be possible to inadvertently limit access to some users, especially the handicapped, in an excessive degree. This could run the risk of denying a rugged area recreational experience to those who were not backpackers or could not afford the expense of licensed, guided pack trips run by concessionaires within the various national parks and recreation areas. A balance is essential to ensure that both the family vacationer and the rugged outdoorsman seeking challenge can be accommodated within the available public lands in Utah. For example, we should like to see some facilities and opportunities for recreation provided for non-backpackers near or along the minor road bisecting the park at the narrowest area between units 1 and 2.



Response: The public has been given an opportunity to express views on the proposal to designate 13,540 acres as potential wilderness addition in the current proposal. This is a legislative proposal. If the President recommends wilderness designations and potential wilderness additions to the Congress, there will be an opportunity for further public input during Congressional consideration. However, after Congress has asked, it is expected that lands classified as potential wilderness additions will be converted to wilderness by the Secretary of the Interior as soon as the lands qualify, and further public hearings will not be held.

Facilities for non-backpackers will be considered in the master plan for the Park, which is now under consideration.

Comment: Also, we note that all of the nearby (125 mile radius) recreational areas in southern Utah are the subject of Wilderness Area proposals or studies, as are areas within Arches, Capitol Reef and Canyonlands National Parks and the Glen Canyon National Recreation Area. We believe that these proposals should be studied as a "package" rather than individually and coordinated with other Federal and State land management agencies to determine the area effect that the combined designations would produce.

Response: The Park Service has an overall plan to study areas throughout the nation to identify lands that qualify for inclusion in the National Wilderness Preservation System.

There is not adequate time to make formal "package" studies of a group of parks and recreation areas and coordinate these studies with Federal and State land management agencies prior to the deadline established by the Congress - September 3, 1974.

The Park Service has discussed the interrelationship of each proposed wilderness area to similar recommendations in nearby areas.

Comment: Another unclear point in the draft EIS is whether the wilderness designation will preclude the future operation of the cabins and other visitor facilities within the park. For many park visitors



the opportunity to stay within the park and take advantage of the cabins, restaurants and other facilities is an important part of the total park experience. We urge that the Park Service maintain its present facilities within the park and support private enterprise opportunities necessary to park visitors in towns and other areas on the perimeter of the park.

Response: There will be no conflict between proposed wilderness areas and on-going operation of cabins and other visitor facilities in the Park.

Comment: The State Comprehensive Outdoor Recreation Plan (SCORP) delineates the following high priority activity needs within the Southwest Planning District of which Zion Park is a part. Bike trails, general winter activity areas, wildland hiking trails, bicycle paths, camping sites, and picnicking sites. According to the SCORP, the primary responsibility for meeting these activity and facility needs lies with federal, private and state interests. This fits in with the general objective of Park Management which we hope will provide a multi-recreational park experience.

Response: Multi-recreational park experiences will continue to be provided in the Park on about 10% of the land not proposed for wilderness designation.

Comment: We are cognizant of the National Park Services' position concerning the Town of Grafton; we wish to voice disagreement with the Park Service justification for excluding the historic Town of Grafton from within the Zion boundaries. It seems there should be further investigation to determine the advisability of such action.

Response: This issue is not related to proposed wilderness, but is noted by the Park Service.

Comment: A major concern of the Division of State lands relayed through ECC relates to the reserved mineral acreage within the proposed wilderness area. The state has 3,963 acres of reserved mineral interest. In addition to this, and not included in the report, the state has 200.00 acres where they own both surface and mineral interest; described as follows:

Southeast Quarter of the Northwest Quarter, Northeast Quarter of the Southwest Quarter of Section Twenty-seven; North Half of the Southwest Quarter of Section Twenty-eight, Township Thirty-nine South, Range Eleven West, and the Northeast Quarter of the Northeast Quarter of Section Thirty-one, Township Thirty-eight South, Range Eleven West.

The State would be interested in exchanging their interest out of the Park. Under present management, and more so under the wilderness concept, effective use of the State's reserved mineral and surface interests are impossible. However, we might add that in other cases where the Federal Government has locked up State land through similar actions, the State has had a difficult time getting land values in return.

Response: Consideration is being given to possible exchange of mineral rights with the State. Recent examination of the records shows that the State has mineral rights on 1,123.99 acres and mineral and surface rights on 200.00 acres rather than 3,963 acres as shown in the Draft Environmental Statement.

Comment: On page 12, grazing, logging, mining, hunting, and power development are all called consumptive uses. Maybe in strict sense that the Park Service views these uses, they might be classified as consumptive; in general we think that term consumptive can be misleading. Consumptive use implies destructive or wasteful use, and the use of a nonrenewable resource. Grazing and logging, for example, involve the use of renewable resources, and the harvesting of that resource does not destroy it if the base is maintained and use does not exceed a critical zone.

Response: The reference to consumptive use refers to seasonal harvesting of renewable natural resources and extraction of nonrenewable resources. Park Service policy states "...it is clear that park forests, waters, wildlife, and minerals are not available for consumptive, exploitative use as a material resource."

Comment: Under Part V, Unavoidable Adverse Environmental Effects, no mention is made of the impact that the proposal might have on state and private holdings within the proposed wilderness areas. We would suggest that there will be some impact on alien rights, particularly when private and state land is considered as potential wilderness.

Response: The impacts upon private and state lands is now discussed in this statement (see p. 28, item 17).

Comment: In Part VI, it is stated that wilderness designation will not adversely affect the long-term productivity of the area as a natural ecosystem. In some cases, wilderness designation may introduce unnatural conditions that may change the natural ecosystem.

Response: Wilderness areas will provide for continued functioning of natural ecosystems. In the absence of identification of specific examples that will "introduce unnatural conditions", it is not possible to comment further here. It would appear that wilderness designations reduce rather than increase or introduce unnatural conditions.

Comment: We recognize that fire is an integral portion of many of the unique ecosystems within the proposed Zion Wilderness. However, if the maintenance of fire as a primitive value becomes a threat to adjoining ownerships, additional steps should be taken.

In the "Draft Environmental Impact Statement for Zion Wilderness", Section III - Environmental Impacts, Subsection B - Impacts Upon the Wilderness Proposal, fire entering the wilderness is mentioned in Paragraph 1 as a minimal impact, "because of the terrain configuration and small amount of forest cover." The possibility of fire leaving the wilderness is not considered. Fire originating within the park and spreading to adjacent private and public lands is a distinct possibility especially during adverse weather conditions. Fire is of particular consequence since wildfire presumably cannot be fought using mechanical equipment within the concept of wilderness.

Land use records in the State Forester's Office indicate that use patterns are changing on private ownerships along the north and east park boundaries. The use of these private wildlands is becoming more and more that of recreational subdivisions. Should the present trend continue, increased values will be at risk to wildlife and more humans will be present in the area. Those private wildlands of concern to State Forestry from a fire danger standpoint are portions of Sections 3, 10, 14, 15, 22, and 23 of Township 29 South, Range 11 West and Sections 28, 29, 30 of Township 38 South, Range 11 West, both S.L.B.M.

Since the statutory responsibilities of the Section of Forestry and Fire Control include preventing the origin and spread of fire on non-federal forest, range, and watershed areas, the following suggestions are submitted to the National Park Service for its considerations.

Suggestions to Reduce Fire Hazard to Lands  
Surrounding the Proposed Zion Wilderness

- A. Designate and train the Ranger Patrol to act as fire control officer in his area of jurisdiction.
- B. Provide the Ranger Patrol with several fire tool caches along the north and east park boundaries and provide him (them) with radio communications for suppression assistance if necessary.
- C. Allow the use of mechanized equipment and aircraft for fire emergency use within certain corridors along park boundaries.
- D. Fly fire detection flights on the north and east park boundaries within 12-14 hours after local lighting storms during the fire season.

Response: Proper regulation of fire to prevent spreading to non-Park lands is important to the Park Service. Existing policy for wilderness areas provides: "Wild-fire will be controlled as necessary to prevent unacceptable loss of wilderness values, loss of life,

damage to property, and the spread of wildfire to lands outside the wilderness. Use of fire lookout towers, fire roads, tool caches, aircraft, motor-boats, and motorized fire-fighting equipment would be permitted for such control."

The text has been modified to indicate that efforts will be made to prevent fires from spreading from the park to outside areas.

Comment: We forward the following comments regarding statements concerning wildlife:

Page Ten - Third Paragraph - The statement regarding deer populations - "One of their natural checks, the cougar, occurs in sub-normal numbers, attributed to heavy killing outside the park. This factor contributes to a complex deer management problem." How was this conclusion derived? It is not uncommon for the National Park System to have problems associated with over-populations of ungulates.

Division of Wildlife Resources records indicate the cougar populations are stable. The harvest is not "heavy." Wildlife has a turnover whether hunted or not. Our information indicates that, at the present, transient animals make up the major portion of animals being harvested and that the population is stable. If there is a lack of predators, particularly the cougar, it is probably due to the 975,976 visitors to the park. The cougar, like some other predatory species is truly a sedentary species, thus avoiding people. We feel that this whole conclusion is open to question.

Response: The statement that the sub-normal number of cougar within the park is a result of hunting outside the park has been eliminated.

Comment: Page 18 - Third paragraph - As we understand the Wilderness Act concept, the activities of wandering hunters does not necessarily intrude on wilderness values. It would as far as Park Service objectives are concerned, but not wilderness. We know of other proposed wilderness areas in Utah by the United States Department of the Interior, and hunting or grazing have not been mentioned as "intrusions upon wilderness values."

Response: The text has been modified to quantify the statement to refer to wilderness values in a National Park. (See p. 26, para 2.)

Comment: Page 19 - Third paragraph - If the National Park Service is expecting the same nonintrusive activities such as hunting on Canaan Mountain this would not be true as we understand the Wilderness Act. We would naturally oppose non-hunting moves towards Canaan Mountain.

Response: The wilderness proposal would not oppose or preclude hunting outside the park, and does not change policy or regulations on hunting inside the Park. Statement modified to exclude activities other than development.

Comment: Some representatives to the Environmental Coordinating Committee registered their agencies' opposition to the proposed wilderness designation in Zion Park. For example, the Division of Water Resources regards the proposal for the most part as undesirable for the following reasons:

The restrictions imposed by a wilderness designation could be very detrimental to the people in the drainage area of streams originating within Zion National Park.

The Division of Water Resources suggests that the natural beauty of the park area should be protected. It should be remembered though, in any land classification discussions, that the region around Zion National Park, Southern Utah in general, is very arid and water supplies are scarce. It is, therefore, imperative that no water supply be tied up in a wilderness area. The State of Utah, the towns in Washington County, and Cedar City, have definite plans and proposals for developing waters of the Virgin River and its tributaries for municipal and agricultural supplies. Some of these developments will be rendered impossible by the wilderness proposal. A particular case in point is Grapevine Springs on the Left Fork of North Creek which is the only good source of untreated culinary water for the Town of Virgin, Utah. This, of course, would call for the construction of a diversion structure and a pipeline,



but with proper planning the impacts can be minimal. As the wilderness area is proposed, Grapevine Springs is within the wilderness boundary and the possibility of tapping the source would become very remote. Whereas if the Park remains under National Park Service jurisdiction, the possibility of using Grapevine Springs as a water source is feasible. We would be interested in seeing the wilderness boundary moved to the east, such that Grapevine Springs is not included in the wilderness proposal.

Response: The proposal of Virgin, Utah, to construct a diversion structure and a pipeline and allocate water to the town would not be permitted with or without wilderness unless it is authorized by the Congress. It is not possible under current laws to authorize a diversion structure and pipeline, as proposed by Virgin. Several alternate sources of water have been examined. The most practical seems to be full treatment of either irrigation ditch or river water. This would be the quickest way of getting a dependable water supply.

Comment: The Division points out that water originating from within the Park is capable of carrying heavy loads of silt and sediment and has been known to damage land and property below. This may call for proper control measures such as catchment basins to be constructed within the Park at strategic locations. It may also be necessary to repair some man-made facilities already in the Park. It may be necessary to reseed an area that experiences serious erosion and is not an original trait of the area but was caused by man and should be corrected by man now, or in the near future. All of these controls and corrections would be impossible if land were reclassified as a wilderness area, but they would be possible if the land remained under National Park jurisdiction.

Response: No existing catchment structures would be included in designated wilderness areas.

With or without designated wilderness areas, natural areas of the national park system, such as Zion, are established and managed to preserve for all time scenic beauty, wilderness, native wildlife, indigenous plant life, and areas of scientific significance or antiquities in their natural condition. This permits natural geologic erosion even where man has not disturbed the earth or vegetation. Structures, such as catchment basins, would not be permitted in the Park

except in developed areas. However, it is true, there would be Congressional prohibition of structures in wilderness areas established under the Wilderness Act of 1964 whereas the present prohibition is subject to administrative decisions after appropriate environmental assessment.

Comment: The secondary effects (spillover effects) of wilderness designation in relation to the small communities near Zion Park are not fully dealt with in the draft statement. For example, the discussion of alien water rights, and the importance of these rights to the local people, and economy is not adequate.

Response: The impact of the proposal on alien water rights would be negligible. Congressional approval would be needed for granting alien water rights with or without this proposal.

Comment: The provision of culinary water supply to communities surrounding Zion National Park is not a requirement to the National Park Service. However, we suggest that the National Park Service cooperate in all possible respects in assuring that local water needs are met.

We would also suggest that there be greater cooperation in planning efforts among Washington County communities in this area for possible better solutions to their common problems, especially the provision of water.

Response: The Park Service has conferred with Virgin, and feels a reasonable alternative water supply is available outside the park. The Park Service will continue to consult with local community on this and other matters of mutual interest.

State Historic Preservation Officer, Utah  
Division of History, Department of Development Services  
Preservation Historian

Comment: The Cable Mountain Draw Works which has been nominated to the National Register of Historic Places does have historical significance and we feel the statement adequately insures its protection.

Response: None

Comment: We would like to inquire if any attempt has been made to acquire the old Mormon townsite of Grafton as part of Zion's National Park. The Governor's Historic and Cultural Sites Review Committee has listed the Grafton church on the State Register of Historic Sites and has requested that a survey be made of the entire town for possible nomination to the National Register of Historic Places. It would seem to us that if this could become part of Zion's National Park, the town could be better protected and enjoyed by many more people than at present.

Response: Consideration of boundary changes are not included in this proposal. This should be considered during master plan studies.

#### State Archaeologist

Comment: I read the statement with interest since the area is one of the more archeologically unique regions in the state. My initial concern was that designation as a wilderness area would preclude any archeological research. However, the subject was addressed in the statement and appears to have been adequately resolved.

The archeology of the proposed wilderness area appears to have been given considerable attention in the draft statement. The coverage and plans appear to be more than adequate. In view of some of the environmental impact statements I have seen, I would like to compliment your efforts in this area.

I have only one question. Are all 33 of the known archeological sites in Parunuweap Canyon significant enough to be placed on the National Register of Historic Places?

Response: Taken individually, some of the sites in Parunuweap Canyon would not be significant enough to place on the Register, but as a group, it is felt that they meet the criteria.

**ADVISORY COUNCIL  
ON  
HISTORIC PRESERVATION**

WASHINGTON, D.C. 20240

DEC 7 1973

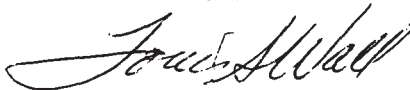
Mr. J. Leonard Volz  
Regional Director  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. Volz:

This is in response to your request of October 15, 1973, for comments on the environmental statement for the Wilderness Proposal, Zion National Park. Pursuant to its responsibilities under Section 102(2)(C) of the National Environmental Policy Act of 1969, the Advisory Council on Historic Preservation has determined that your draft environmental statement appears procedurally adequate. However, we have the following substantive comment to make with regard to mitigating the effect on historic and archeological resources in the Park. Your statement should explain that the historic and archeological resources within the areas proposed for wilderness designation will continue to be managed in accordance with the "Wilderness Use and Management Policy" of the administrative policies for historical areas of the National Park System. These policies permit management practices and uses necessary for the protection and preservation of such resources.

Should you have any questions or require any additional assistance, please contact me.

Sincerely yours,



Louis S. Wall  
Assistant Director  
Office of Compliance, Denver

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOREST SERVICE

Washington, D.C. 20250

2320

NOV 2 1973



Mr. J. Leonard Volz  
Regional Director, Midwest Region  
National Park Service  
U.S. Department of the Interior  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. Volz:

Secretary Butz has asked that we review and comment upon your Wilderness Study for Zion National Park and Draft Environmental Statement DES 73-60. We appreciate the opportunity presented by your letters of October 15.

We agree with the general conclusions of your Wilderness study. The following questions were raised by your study report and perhaps could be clarified. On page 3, the last paragraph treats Wilderness in Utah but fails to mention proposed units of the National Wilderness Preservation System which are not within National Parks. The High Uintas Wilderness in the Ashley and Wasatch National Forests was recommended by the President to the Congress in 1969, but has not been enacted. This comment is also applicable to page 8 of the Draft Environmental Statement.

Another question pertains to the lands which are proposed for Wilderness status after acquisition of outstanding rights. Neither the study nor the draft Statement reflect what kind of structures or improvements which do not conform to Wilderness standards may be present. Such information would be useful in evaluating whether these lands could become Wilderness.

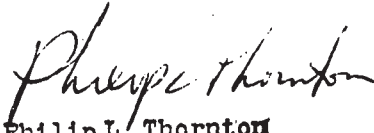
In the Draft Environmental Statement, item C (1) on page 19 indicates that the sounds of motorized equipment would be excluded by a Wilderness Act for the area. Elsewhere, the study notes that aircraft noise will not be eliminated. These statements conflict.

On page 20, the Draft Environmental Statement states that, "Wilderness use requires stringent controls over kinds and amount of human use allowed, thus assuring a high quality of individual

experience to those who will use the area." This statement seems misplaced under "Favorable Environmental Effects." In addition, the statement would seem more understandable if reworded to reflect that high quality of Wilderness experience may require controls on the kinds and intensity of human use.

We appreciate this opportunity to comment upon your proposal.

Sincerely,

A handwritten signature in cursive script, reading "Philip L. Thornton".

Philip L. Thornton  
Acting Chief



UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

4012 Federal Building, Salt Lake City, Utah 84138

December 18, 1973

Mr. J. Leonard Volz  
Regional Director  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

Re: Draft Environmental Statement  
Wilderness Proposal, Zion National  
Park

Dear Mr. Volz:

A copy of this environmental statement was sent to us for review.

There is one correction, on page 14. Cedar City is identified as a railroad center. It is, in fact, at the end of a branch line that is no longer used. I believe that that item should be deleted.

The discussion of roads on page 19 could be amplified to indicate what is to be done with the roads in question. Will they be used as trails or obliterated?

I hope these suggestions are helpful.

Sincerely,



A.W. Hamelstrom  
State Conservationist





DEPARTMENT OF THE ARMY  
LOS ANGELES DISTRICT, CORPS OF ENGINEERS  
P. O. BOX 2711  
LOS ANGELES, CALIFORNIA 90053

SPLED-WB

16 November 1973

Hearings Officer  
c/o The Superintendent  
Zion National Park  
Springdale, Utah 84767

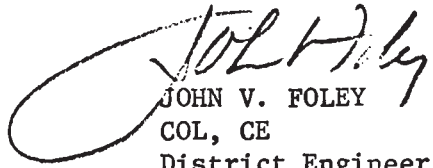
Dear Sir:

This is in answer to a letter of 15 October 1973 from the Regional Director of your Midwest region regarding the wilderness proposal for Zion National Park.

No existing or contemplated Corps project would have any effect on the area covered by the proposed action. The Corps will not be represented at the 12 December 1973 public hearing.

We appreciate the opportunity to review the proposal.

Sincerely yours,

  
JOHN V. FOLEY  
COL, CE  
District Engineer



**OFFICE OF THE ASSISTANT SECRETARY OF COMMERCE**  
Washington, D.C. 20230

November 30, 1973

Mr. J. Leonard Volz  
Regional Director, Midwest Region  
National Park Service  
U.S. Department of the Interior  
Omaha, Nebraska 68102

Dear Mr. Volz:

The draft environmental impact statement "Wilderness Proposal for Zion National Park, Utah," which accompanied your letter of October 15, 1973, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

This proposed wilderness area is an excellent suggestion. There would remain, for those who are unable to enter the wilderness area, free access to a large and interesting part of the park. Those who are physically able to enter the wilderness area on foot or by horse are assured of an area free of the evidences of civilization (mining, grazing, motor vehicles, roads). The negative aspects cited (difficulty in archeological research, restrictions of resource management practice, rationed use, restrictions on back country facility development and increased costs of trail maintenance), are relatively minor and in some cases are actually positive reasons for creating the wilderness area.

We suggest, however, that consideration be given to the following:

Possible increased park visitation, as indicated on page 22, may result in an increase of economic, social, and environmental demands on the Park Service as well as the surrounding area. This seems likely, as the proposed wilderness area will reduce the available facilities now existing in and around the park (such as lodging, access roads, etc.), as well as preclude development of future facilities.


The Park Service's and the adjacent area's ability to meet future demands for lodging, dining, parking, as well as needs for water, sewage, etc., would appear to warrant further consideration.

For example, what measures will be taken to mitigate the adverse effects of increased water and sewage treatment demands and solid waste disposal? Do adequate facilities already exist? What zoning regulations govern land adjacent to the park entrances, the local town and the surrounding areas?

It would appear that the Park Service is limiting the uses of the lands but expect to have greater visitations. Thus, the reactions of the local citizens are important. Are they in favor of the proposal, or do they view it as a catalyst for unwarranted growth?

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving a copy of the final statement.

Sincerely,

  
Sidney R. Galler  
Deputy Assistant Secretary  
for Environmental Affairs



# United States Department of the Interior

BUREAU OF INDIAN AFFAIRS  
WASHINGTON, D.C. 20242

IN REPLY REFER TO:

Trust Facilitation

DEC 12 1973

## Memorandum

To: National Park Service  
Regional Director, Midwest Region

From: Acting Director, Office of Trust Responsibilities

Subject: Review of Draft Environmental Statement - Wilderness  
Proposal, Zion National Park, Utah (DES 73/60)

The above identified draft environmental statement has been reviewed within our particular jurisdiction or special expertise and no significant conflicts were identified.

*Kenneth L. Payton*



# United States Department of the Interior

IN REPLY REFER

BUREAU OF LAND MANAGEMENT  
Utah State Office  
Post Office Box No. 11505  
Salt Lake City, Utah 84111

1792  
(U-911)

December 14, 1973

## Memorandum

To: Regional Director, National Park Service, Midwest Region,  
1709 Jackson St., Omaha, Nebraska 68102

From: Associate State Director, Utah

Subject: Draft Environmental Impact Statement - Wilderness Proposal,  
Zion National Park (DES 73-60)

We have reviewed the draft statement and appreciate the opportunity to comment on it for the Bureau. The proposed wilderness is quite interesting and certainly possesses considerable potential environmental impacts, particularly with regard to the adjacent lands.

Considering the draft statement as a whole, we believe the document can be strengthened with additional specific information in the description of the proposal, description of the environment, values, and impacts. This would provide a much clearer picture of the proposal and its potential effect on the environment.

We recommend that the Master Plan for Zion National Park, that we understand is now being finalized by the National Park Service, be recognized and the proposed wilderness be related to it. This would help identify the proposal's role in overall planning in the area.

We also recommend discussion of how the proposed wilderness may conform or conflict with the objectives and specific terms of approved or proposed Federal, State and local land use plans, policies, and controls for the area affected, as required by the revised CEQ Guidelines of August 1, 1973.

With regard to the specific sections of the draft statement, our comments are as follows:

### Description of the Proposal

We suggest that the reason for the proposed action be clarified and discussed in detail. It is difficult for the reader to understand fully why the action is being proposed. It appears that the area may possess the necessary attributes to qualify for wilderness designation; however, does this in itself place it automatically in nomination, or is the area unique, containing excellent examples of wilderness components?



The discussion on interrelated wilderness proposals, page 7, and impacts upon the wilderness proposal, B.4. page 19, should be corrected to reflect the fact that BLM is currently evaluating the Canaan Mountain area (see attached map) for designation as a primitive area--not as a wilderness area. This discussion should also be expanded to reflect the specifics of the Canaan Mountain area and how the proposed wilderness relates to them. In addition, discussion of the specifics and relationship of BLM's proposed Deep Creek Primitive Area and the potential LaVerkin Creek Primitive Area (see attached map) to the proposed wilderness area should also be included.

#### Description of the Environment

We suggest that the broad range of Southern Utah natural resource values involved be first identified. This might include, for example, significant geology, relic or pristine ecosystems, life zones and scenic open space. This would provide a basis for understanding the real significance of the area.

We also suggest that the section on flora and fauna be strengthened by specifically identifying what is found in the proposed wilderness area and where. The draft statement indicates that several species of reptiles, amphibians, birds, and fishes exist within the park. Without specific identification and location, it is extremely difficult to understand what the wildlife resource values are, how they relate to each other, and what impacts may be expected as a result of wilderness designation. There is no mention of any threatened fish species within the proposed wilderness area. Perhaps a statement could be included as to whether or not any exist, and if so, what their status is.

The discussion should include recognition of the proposed introduction of Desert Bighorn Sheep into Parunuweap Canyon in the southeastern portion of the Park. Sheep are presently being raised in a paddock within Zion National Park for the introduction which may take place within the next five years.

Indication of water quantity, quality, and location would also strengthen the document considerably. Likewise, it would be of considerable value to include a discussion on minerals, their location and significance:

Maps reflecting the locations of the resources would be of considerable help in visualizing resource interrelationships, both inside the proposed wilderness area and adjacent areas.

The statement "some scattered Bureau of Land Management parcels are contiguous" on page 14, gives the impression that little BLM administered land is contiguous, when in reality, large blocks of national resource land (formerly public domain) lie adjacent to roadless areas 1, 2 and 3.

### Environmental Impacts

The "segment of the public" which will be denied access to outstanding scenic and geological features, discussed in item 4, page 16, should be quantified. What percent, or number, of total visitors would normally utilize the access roads and what are the impacts of closing roads in Units 1 and 2?

Quantification of the increase in backcountry use discussed in item 5, page 17, is important to understand the impacts of the proposed action.

Both items 5, page 17, and E. on page 22, indicate the probability of increased visitation (use), while item 3, page 16, infers that potential for increased use is marginal. Clarification of this situation would be helpful.

Deer funnel into the east-central area of the proposed wilderness (see crosshatched area on the attached map) as they are confined by the North Fork Canyon on the north and Orderville Gulch on the south; here they concentrate and spend the winter. The interrelationships of this area with adjacent lands should be discussed and impacts identified. In addition, critical deer winter range presently exists on Hurricane Mesa and Black Ridge to the west of the proposed wilderness, (see attached map). This range also has a definite interrelationship with the proposed wilderness and the impacts should be identified. Will the proposal intensify the complex deer management problem mentioned on page 10?

Timber has been and may be harvested in the future on national resource lands to the east of this area (see attached map). The impacts of the wilderness proposal should be identified in relation to this resource. Of significance would be the roads within the timber area.

Wildfire originating on lands adjacent to the proposed wilderness is discussed, but should be expanded to consider the threat to adjacent lands when wildfire originates on the proposed wilderness area.

Uranium deposits are located near the east central portion of the proposed wilderness (see attached map) and active mining claims exist. Some assessment work has been completed recently and the possibility of new road development exists. The statement would be improved with consideration of this resource and potential development impacts.

No mention was made of the effect of wilderness designation on the East Fork and North Fork of the Virgin River. Both of these forks have considerable use by hikers and are accessible over national resource lands. In addition, the East Fork has been identified by BLM for study to determine wild and scenic river and/or primitive values.

Regional Director, NPS

Page 4

The discussion on page 17 of the draft statement indicates that the Kaiparowits project has been approved, when in fact the project has not been approved. This error should be corrected. Considerable space is given to impacts of this project (75 air miles distance) while no mention is made of the possible impacts of the proposed Warner Valley Power Project (25 air miles distance) and related Alton Coal Field (20 air miles distance).

The impacts of eliminating the water rights were not fully assessed. In addition, the allowance of the town of Springdale water right should be clarified. Are these rights for culinary or irrigational purposes?

Discussion should be included on the surface transportation network in the general area and potential impacts.

The impact of increased pressure on areas adjacent to the proposed wilderness is not fully assessed. It is quite important to quantify the number of visitors that will be channeled onto adjacent lands as a result of wilderness designation to identify impacts. We question that "recreational outlets are otherwise available" as indicated in part 5, page 22. Present facilities on national resource lands are currently being used near their maximum, and additional people pressure would create a serious situation.

#### Mitigating Measures

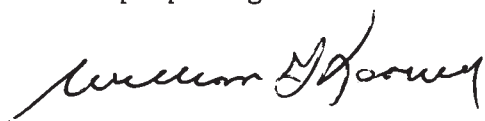
We suggest that the measures, listed on page 21, be expanded in detail. For example, A. indicates that "Backcountry regulations will be enforced." What are the specific Backcountry regulations? Likewise, "Proper back-country sanitation measures will be stressed." What are the specific "measures?"

#### General

We would suggest that the possibility of land exchange involving private, national resource lands, and National Park lands, be addressed in the document. A review of land status in the area reflects many possibilities for compaction in all three ownerships that would probably result in a much improved management situation for all involved.

Had the BLM been afforded the opportunity to provide input into the draft, I am sure that many of the preceding comments would have been unnecessary.

Again, we appreciate the opportunity to review the draft statement, and hope that our comments will be of value in preparing the final statement.



cc: W.O. (220)

D.M. - Kanab, Cedar City

### LEGEND

1. Deep Creek
2. Laverkin Creek
3. Canaan



## Locatable Minerals - Uranium



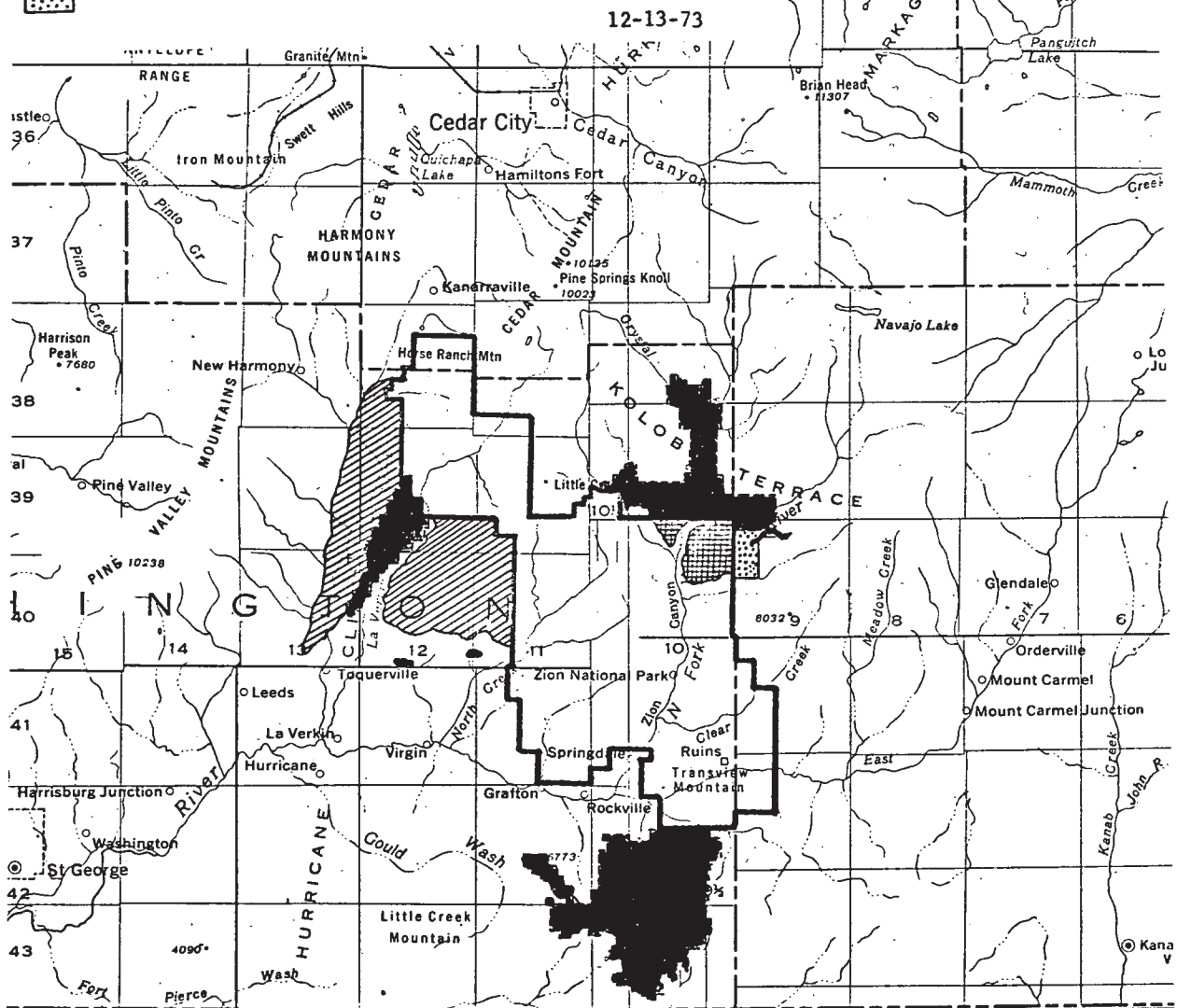
### Critical Deer Winter Range



NPS lands in proposed wilderness  
with unique relations to adjoining lands.



Forest (Ponderosa Pine)





# United States Department of the Interior

BUREAU OF MINES  
WASHINGTON, D.C. 20240

November 14, 1973

DI8 MWR CW

## Memorandum

To: Regional Director, Midwest Region, National Park Service,  
Omaha, Nebraska

Through: <sup>Deputy</sup> Assistant Secretary--Energy and Minerals *Quin*

From: Director, Bureau of Mines

Subject: Wilderness study proposal and draft environmental statement,  
Zion National Park, Utah

Thank you for the invitation to present our views on your wilderness proposal at the December 12 public hearing to be held at park headquarters. We will be unable to attend the hearing.

In our review of the wilderness study brochure and draft environmental statement we find we have no major comments. Although much has been written on the geology of the park, there has not been an indepth study of its mineral potential. Questions of mineral potential might arise relative to the enclaves of 3,963 acres of State-owned mineral rights excluded from the proposal.

Thank you for the opportunity to review your brochure and draft environmental statement.

*Sam Ragan*  
Assistant Director



# United States Department of the Interior

BUREAU OF OUTDOOR RECREATION  
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

A98 MWR CE  
DES-73/60

NOV 26 1970

## MEMORANDUM

To: Regional Director, National Park Service  
Omaha, Nebraska

From: Director, Bureau of Outdoor Recreation

Subject: Draft Environmental Statement--Wilderness  
Proposal, Zion National Park

The subject draft adequately covers the environmental concerns  
of this Bureau. We have no comments.

*Russell A. Soule*

for James G. Watt  
Director





# United States Department of the Interior

BUREAU OF RECLAMATION  
WASHINGTON, D.C. 20240

IN REPLY  
REFER TO: 739

NOV 20 1973

125.

## Memorandum

To: Regional Director, Midwest Region,  
National Park Service, Omaha, Nebraska

From: Commissioner of Reclamation

Subject: Draft Environmental Statement - Wilderness Proposal,  
Zion National Park

As requested by your October 15 memorandum, we have reviewed the subject draft environmental statement. The Bureau of Reclamation has no presently proposed water resource development plans for the area involved.

The following comments are offered for your consideration.

Page 5, paragraph 3, last sentence: change to read "Wilderness boundary lines follow topographic features and section lines."

Page 5, paragraph 4, second sentence: Begin "At the present time, none . . . ."

Page 5, paragraph 4: Add a last sentence: An additional 8,593 acres of the roadless area do not qualify for wilderness status."

Page 14, first paragraph under Economy: Population figures quoted (except Springdale) are from the 1960 census. We suggest updating to the 1970 census. The 299 population for Springdale should be explained, since it does not match either the 1960 or 1970 census figures which are as follows:

	<u>1960</u>	<u>1970</u>
Springdale	248	172
Hurricane	1,251	1,408
St. George	5,130	7,097
Cedar City	7,543	8,946



Let's Clean Up America For Our 200th Birthday

Page 21, item C, second sentence: Use of word "monument" in lieu of "park" is inconsistent.

Page 24, first paragraph, first sentence: Begin "With the exception of foregone opportunities, no irreversible . . . ."

Page 28, first paragraph following table: First sentence should be clarified. Are the 2,500 acres in addition to the 13,540 listed in the table? If so, this should be so stated.

A handwritten signature in cursive script, appearing to read "G. G. Stamm". The signature is written in dark ink and is positioned to the right of the main text block.

cc: Director, National Park Service



# United States Department of the Interior

GEOLOGICAL SURVEY  
WASHINGTON, D.C. 20244

OFFICE OF THE DIRECTOR

November 27, 1973

DES 73-60

## Memorandum

To: Regional Director, Midwest Region, National Park  
Service, Omaha, Nebraska

Through: <sup>Deputy</sup> Assistant Secretary--Energy and Minerals *Quigley*

From: Director, Geological Survey DEC 3 1973

Subject: Review of draft environmental statement--Wilderness  
Proposal, Zion National Park, Utah

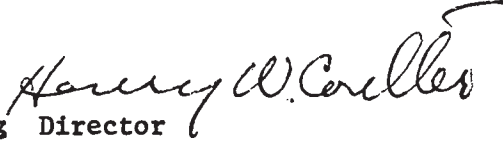
We have reviewed the subject draft environmental statement as you requested in a memorandum of October 15.

Although there are numerous publications covering the geology of the Park, very little information is available on the mineral resource potential, if any, of the area. Oil and gas have been produced near the southwest corner of the Park, and deposits of gypsum and manganese are present in or near the Park.

On page 18, we note that the State of Utah retained mineral rights on about 3,963 acres of land in the Park. On the map, some of these lands are enclaves within the proposed Wilderness areas. We suggest a statement regarding access to these enclaves be included. The Wilderness Act of 1964 is specific on mineral rights and access only as they pertain to lands administered by the Forest Service.

We have several suggestions concerning the map on page 4. Broken blue lines, possibly water pipelines or irrigation ditches in Zion Canyon, are not identified in the legend. Registry of the blue water plate appears to be displaced by as much as 0.1 inch (1/4 mile) in places. Telephone lines appear to have been omitted from the map. Some difficulty is created by the fact that gray and green zip patterns are oriented differently in different parts of the map and

also are rotated with respect to the legend. A special symbol to designate the three roads that are proposed for closing might be considered. Since the map depicts a proposed plan, it would be advisable to delete the three deep re-entrants in the Roadless Area boundaries; the proposed closing of the three roads would have the effect of eliminating the re-entrants. The Roadless Area boundaries as now shown seem to be artificial and are confusing.

  
Acting Director



# United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

In Reply Refer To:  
EBM-MRED-MS

Reference: D18 MWR CW

NOV 20 1973

Dear Mr. Volz:

Thank you for the wilderness study brochure for Zion National Park and the invitation to present our views at the December 12 wilderness hearing to be held at park headquarters.

Our Geological Survey and Bureau of Mines report that although much has been written of the geology of the park, they know little of its potential mineral resources. Although the chances seem remote, it may be well for you to include in your study some alternative actions that would be needed if the State sought to exercise its mineral rights in the 3,963 acres excluded from the wilderness proposal.

Sincerely yours,

(Sgd) John B. Rigg

Deputy Assistant  
Secretary of the Interior

Mr. J. Leonard Volz  
Regional Director, Midwest Region  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102



U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION

REGION EIGHT  
BUILDING 40, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

December 6, 1973

IN REPLY REFER TO:

08-00.21

Mr. J. Leonard Volz  
Regional Director, Midwest Region  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska, 68102

Dear Mr. Volz:

We appreciate the opportunity to review the Draft Environmental Impact Statement on proposed Zion Wilderness, Zion National Park, Utah and offer the following comments.

Our main area of concern would be in maintaining continuity of State Route 15 and possibility of conflict with proposed corridors through Zion National Park and the closure of any other Federally funded roads.

State Route 15 has indicated it would remain open. This route appears to be the boundary between Wilderness Units 2 and 3.

To our knowledge there are no planned corridors proposed to the wilderness areas. The proposed road closures are not anticipated to have any serious impact on other highways in the area.

The statement adequately covers the proposed wilderness areas, and we concur with the findings of the statement.

Sincerely,

W. H. Baugh  
Regional Federal Highway Administrator

*F. S. Allison*  
By: Frank S. Allison, Director  
Office of Environment & Design





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII  
1860 LINCOLN STREET  
DENVER, COLORADO 80203

December 6, 1973

Mr. J. Leonard Volz  
Regional Director, Midwest Region  
National Park Service  
Midwest Region  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. Volz:

Thank you for the opportunity to provide comment on the draft environmental impact statement for the wilderness proposal for portions of Zion National Park. We are offering some minor comments which your agency may want to consider in preparing the final statement.

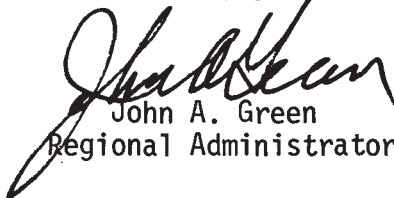
Our agency would be concerned about the possible impacts wilderness use may have on water quality. These impacts, although perhaps minor could be mitigated through proper trail design and specifications, and probably just as important, the location and dispersement of trails and campsites. Caution should be exercised in the location of these "facilities" away from water sources to minimize water quality impacts. The location of campsites is particularly critical due to the concentration of use.

Solid waste problems are common to all backcountry areas. Strict enforcement of this problem will be necessary to protect the integrity of the wilderness resource.

An important key in the establishment of wilderness areas is the adequacy, design and locations of staging areas. Considerable impact can be imposed if sufficient consideration is not given to this problem in the planning process. These impacts can occur in the wilderness area as well as at designated access points.

In accordance with EPA evaluation procedures for impact statements, we have classified the statement as LO-1. A copy of the rating system is enclosed for your information.

Sincerely yours,

  
John A. Green  
Regional Administrator

Enclosure

### Environmental Impact of the Action

#### LO--Lack of Objections

EPA has no objections to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

#### ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

#### EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

### Adequacy of the Impact Statement

#### Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

#### Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

#### Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

FEDERAL POWER COMMISSION  
WASHINGTON, D.C. 20426

IN REPLY REFER TO:

DEC 18 1973

Honorable Rogers C. B. Morton  
Secretary of the Interior  
Washington, D.C. 20240

Dear Mr. Secretary:

This is in response to two letters, each dated October 15, 1973, from the Regional Director, National Park Service, Omaha, Nebraska, requesting comments of the Federal Power Commission on the wilderness proposal and the associated draft environmental impact statement for Zion National Park, Utah.

As described in the reports of your Department, the areas proposed for wilderness designation consist of three units totaling 119,200 acres within the 147,035-acre Zion National Park. The proposal also recommends that 13,540 acres within the park be set aside as potential wilderness addition for possible future wilderness designation.

The Commission staff has reviewed the wilderness proposal to determine its effects on matters affecting the Commission's responsibilities. Such responsibilities relate to the development of hydroelectric power and assurance of the reliability and adequacy of electric service under the Federal Power Act, and the construction and operation of natural gas pipelines under the Natural Gas Act.

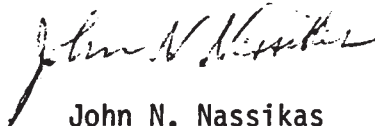
The staff review shows that the proposed wilderness would not affect existing electric and natural gas facilities under the jurisdiction of the Federal Power Commission and would not appear to have a significant effect on the development of future supplies and transmission of electric power and natural gas.

The draft environmental impact statement discusses several alternatives to the wilderness proposal. One alternative would include a larger area of wilderness. As discussed in the draft statement, an additional 1,000 to 1,200 acres of land could be included in the wilderness if the power transmission line into Zion Canyon could be eliminated or located underground adjacent to the existing roadway. The Commission staff notes that the

34.5-kilovolt power transmission line serves national park facilities and communities near the park entrance. It is licensed by the Federal Power Commission to the California-Pacific Utilities Company as Project No. 914. The license was issued in 1929 when the right-of-way of the transmission line was outside the park boundary. Subsequent enlargement of the park placed the power lines within the park boundaries.

Based on its consideration of your Department's wilderness proposal, the associated draft environmental impact statement, and the review by its own staff, the Commission concludes that the proposed wilderness would not affect existing and the future development of electric power and natural gas facilities. The Commission notes, however, that the alternative proposal to enlarge the wilderness could affect an existing power transmission line currently operating under an FPC license.

Sincerely,

A handwritten signature in dark ink, appearing to read "John N. Nassikas", is written over a horizontal line.

John N. Nassikas  
Chairman



STATE OF UTAH  
OFFICE OF THE GOVERNOR  
SALT LAKE CITY

CALVIN L. RAMPTON  
GOVERNOR

January 15, 1974

Mr. Phillip R. Iversen  
Utah State Director  
National Park Service, USDI  
125 South State Street  
Salt Lake City, Utah 84111

Dear Mr. Iversen:

I would like to state my present opposition to the formal establishment of a 119,200 acre proposed wilderness area in Zion National Park, Utah. As I pointed out in our meeting on January 11, 1973, I would prefer to have a moratorium on such major classifications until after enactment of a National, and State of Utah land-use policy, expected within the next few months.

A land use planning and policy act should enable state and local interests to play a more active role in the decision-making regarding land use classification in areas within the State of Utah that are administered by Federal agencies.

The Utah Environmental Coordinating Committee concludes that the secondary (external) effects of wilderness designation in relation to the small communities near Zion National Park are not fully known, nor adequately discussed in the draft environmental statement.

Wilderness designation as proposed could preclude the plans and proposals for needed development and use of some water resources originating within park boundaries. Considering the aridity of Southern Utah in general and the scarcity of suitable water supplies it is imperative that no water supplies be tied up in a wilderness.

I am aware that the wilderness proposal is in response to Public Law 88-577 (The Wilderness Act of 1964). However, it is inappropriate that the area within Zion National Park needs to be formally placed under the National Wilderness Preservation System when it, for all intents and purposes, is presently being managed as de facto wilderness.

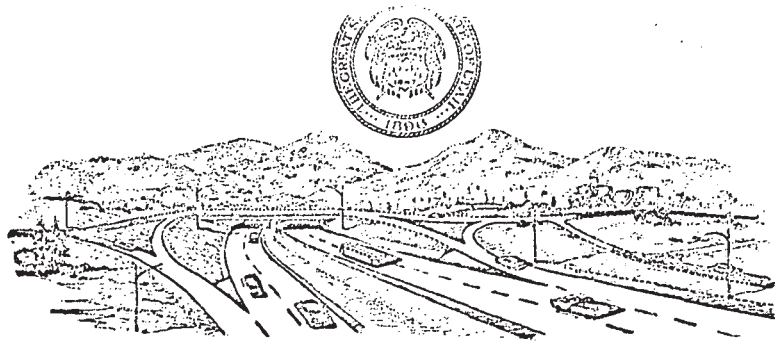
Perhaps adverse uses are impairing wilderness values in Zion National Park. If this is the case, there is no specific documentation regarding such in the draft environmental impact statement or the wilderness study. I, therefore, restate my opposition to the proposed wilderness designation and ask postponement until after we have a National and State land use planning and policy act.

Sincerely,

101

  
Governor

DIRECTOR  
BLAINE J. KAY



## Utah State Department of Highways

State Office Building

Salt Lake City, Utah 84114

United States National Park Service  
125 South State Street  
Salt Lake City, Utah 84138

Gentlemen:

We have reviewed the Wilderness Area Study for Zion National Park and concur in general with the proposed Wilderness Area designations. However, there are two points we believe should be considered further.

Reference the Potential Wilderness Area between units 1 and 2. We believe the text should state the intent to retain the minor road traversing this area. This section of National Park Road is a segment of a loop road between I-15 just south of Hamilton Fort and I-15 at Harrisburg Junction. Because of the terrain through which this road passes, it is a possible candidate for Utah's Scenic and Recreational Highway System - currently in the study stage. Even if the loop is not included in this system, it can provide the average motorist with a magnificent view of this rugged countryside in and around Zion Park.

Also, we note that all of the nearby (125 mile radius) recreation areas in southern Utah are the subject of Wilderness Area proposals or studies, as are areas within Arches, Capitol Reef and Canyonlands National Parks and the Glen Canyon National Recreation Area. We believe that these proposals should be studied as a "package" rather than individually and coordinated with other Federal and State land management agencies to determine the area effect that the combined designations would produce. From this type of study, an area master plan could be developed to provide for foreseeable recreation needs.



While the Wilderness Area concept is essential to ensure retention of such areas for our future generations, it would be possible to inadvertently limit access to the average vacationer in an excessive degree. This could run the risk of denying a rugged area recreational experience to those who were not backpackers or could not afford the expense of licensed, guided pack trips run by concessionaires within the various national parks and recreation areas. Therefore, a balance is essential to ensure that both the family vacationer and the rugged outdoorsman seeking challenge can be accommodated within the available public lands in Utah.

Sincerely yours

A handwritten signature in black ink, appearing to read 'C. V. Anderson', written over the typed name.

C. V. Anderson, P.E.  
State Highway Engineer

Calvin L. Rampton  
Governor



Burton L. Carlson  
State Planning  
Coordinator

**STATE OF UTAH**  
Office of the  
**STATE PLANNING COORDINATOR**  
118 State Capitol  
Salt Lake City, Utah 84114  
(801) 328-5246

January 14, 1974

Mr. Phillip Iversen  
Utah State Director  
National Park Service  
U.S. Department of  
the Interior  
125 South State Street  
Salt Lake City, UT 84111

Dear Mr. Iversen:

Subject: Proposed Zion Wilderness, Zion National Park

Thank you for the opportunity to review the draft Environmental Impact Statement for the Proposed Zion Wilderness designation. The following comments shall represent the State Clearinghouse and Environmental Coordinating Committee (E.C.C.) response to the above EIS.

We think the draft EIS is generally a well prepared document. It rather clearly indicates the Park Services' Plans for Zion National Park.

There are some concerns voiced by members of the ECC that perhaps could be addressed in the final EIS, these include: the advisability of granting the Secretary of the Interior the authority to designate 13, 540 acres as wilderness when he determines that the lands quality is questionable. We hope that before such a designation is made, appropriate private persons, state and local officials will be a part of this decision-making process. Since much of the area in question is privately owned or involves private rights, an order by the Secretary to clarify those areas as wilderness might be done without proper hearing. While the Wilderness Area concept is essential to ensure retention of such areas for future generations, it would be possible to inadvertently

Mr. Phillip Iversen  
Page 2  
January 14, 1974

limit access to some users, especially the handicapped, in an excessive degree. This could run the risk of denying a rugged area recreational experience to those who werenot backpackers or could not afford the expense of licensed, guided pack trips run by concessionaires within the various national parks and recreation areas. A balance is essential to ensure that both the family vacationer and the rugged outdoorsman seeking challenge can be accommodated wthin the available public lands in Utah. For example, we should like to see some facilities and opportunities for recreation provided for non-backpackers near or along the minor road bisecting the park at the narrowest area between units 1 and 2. Also, we note that all of the nearby (125 mile radius) recreational areas in southern Utah are the subject of Wilderness Area proposals or studies, as are areas within Arches, Capitol Reef and Canyonlands National Parks and the Glen Canyon National Recreation Area. We believe that these proposals should be studied as a "package" rather than individually and coordinated with other Federal and State land management agencies to determine the area effect that the combined designations would produce.

Another unclear point in the draft EIS is whether the wilderness designation will preclude the future operation of the cabins and other visitor facilities within the park. For many park visitors the opportunity to stay within the park and take advantage of the cabins, restaurants and other facilities is an important part of the total park experience. We urge that the Park Service maintain its present facilities within the park and support private enterprise opportunities necessary to park visitors in towns and other areas on the perimeter of the park.

The State Comprehensive Outdoor Recreation Plan (SCORP) delineates the following high priority activity needs within the Southwest Planning District of which Zion Park is a part. Bike trails, general winter activity areas, wildland hiking trails, bicycle paths, camping sites, and picnicking sites. According to the SCORP, the primary responsibility for meeting these activity and facility needs lies with federal, private and state interests. This fits in with the general objective of Park Management which we hope will provide a multi-recreational park experience.

We are cognizant of the National Park Services' position concerning the Town of Grafton; we wish to voice disagreement with the Park Service justification for excluding the historic Town of Grafton from within the Zion Boundaries. It seems there

Mr. Phillip Iversen  
Page 3  
January 14, 1974

should be further investigation to determine the advisability of such action.

A major concern of the Division of State Lands relayed through ECC relates to the reserved mineral acreage within the proposed wilderness area. The state has 3,963.00 acres of reserved mineral interest. In addition to this, and not included in the report, the state has 200.00 acres where they own both surface and mineral interest; described as follows:

Southeast Quarter of the Northwest Quarter,  
Northeast Quarter of the Southwest Quarter  
of Section Twenty-seven; North Half of the Southwest Quarter of Section Twenty-eight, Township Thirty-nine South, Range Eleven West, and the Northeast Quarter of the Northeast Quarter of Section Thirty-one, Township Thirty-eight South, Range Eleven West

The State would be interested in exchanging their interest out of the Park. Under present management, and more so under the wilderness concept, effective use of the State's reserved mineral and surface interests are impossible. However, we might add that in other cases where the Federal Government has locked up State land through similar actions, the State has had a difficult time getting land values in return.

On Page Twelve, grazing, logging, mining, hunting, and power development are all called consumptive uses. Maybe in strict sense that the Park Service views these uses, they might be classified as consumptive; in general we think that term consumptive can be misleading. Consumptive use implies destructive or wasteful use, and the use of a nonrenewable resource. Grazing and logging, for example, involve the use of renewable resources, and the harvesting of that resource does not destroy it if the base is maintained and use does not exceed a critical zone.

Under Part V, Unavoidable Adverse Environmental Effects, no mention is made of the impact that the proposal might have on State and private holdings within the proposed wilderness areas. We would suggest that there will be some impact on alien rights, particularly when private and state land is considered as potential wilderness.

Mr. Phillip Iversen  
Page 4  
January 14, 1974

In Part VI, it is stated that wilderness designation will not adversely affect the long-term productivity of the area as a natural ecosystem. In some cases, wilderness designation may introduce unnatural conditions that may change the natural ecosystem.

We recognize that fire is an integral portion of many of the unique ecosystems within the proposed Zion Wilderness. However, if the maintenance of fire as a primitive value becomes a threat to adjoining ownerhsips, additional steps should be taken.

In the "Draft Environmental Impact Statement for Zion Wilderness", Section III - Environmental Impacts, Subsection B - Impacts Upon the Wilderness Proposal, fire entering the wilderness is mentioned in Paragraph I as a minimal impact, "because of the terrain configuration and small amount of forest cover". The possibility of fire leaving the wilderness is not considered. Fire originating within the park and spreading to adjacent private and public lands is a distinct possibility especially during adverse weather conditions. Fire is of particular consequence since wildfire presumably cannot be fought using mechanical equipment within the concept of wilderness.

Land use records in the State Forester's Office indicate that use patterns are changing on private ownerships along the north and east park boundaries. The use of these private wildlands is becoming more and more that of recreational subdivisions. Should the present trend continue, increased values will be at risk to wildfire and more humans will be present in the area. Those private wildlands of concern to State Forestry from a fire danger standpoint are portions of Sections 3, 10, 14, 15, 22, and 23 of Township 29 South, Range 11 West and Sections 28, 29, 30 of Township 38 South, Range 11 West, both S.L.B.M.

Since the statutory responsibilities of the Section of Forestry and Fire Control include preventing the origin and spread of fire on non-federal forest, range, and watershed areas, the following suggestions are submitted to the National Park Service for its considerations.

Suggestions to Reduce Fire Hazard to Lands Surrounding the Proposed Zion Wilderness

- A. Designate and train the Ranger Patrol to act as fire control officer in his area of jurisdiction.

Mr. Phillip Iversen

Page 5

January 14, 1974

- B. Provide the Ranger Patrol with several fire tool caches along the north and east park boundaries and provide him (them) with radio communications for suppression assistance if necessary.
- C. Allow the use of mechanized equipment and aircraft for fire emergency use within certain corridors along park boundaries.
- D. Fly fire detection flights on the north and east park boundaries within 12-14 hours after local lightning storms during the fire season.

We forward the following comments regarding statements concerning Wildlife:

Page Ten - Third Paragraph - The statement regarding deer populations - "One of their natural checks, the cougar, occurs in sub-normal numbers, attributed to heavy killing outside the park. This factor contributes to a complex deer management problem." How was this conclusion derived? It is not uncommon for the National Park System to have problems associated with over-populations of ungulates.

Division of Wildlife Resources records indicate the cougar populations are stable. The harvest is not "heavy." Wildlife has a turnover whether hunted or not. Our information indicates that, at the present, transient animals make up the major portion of animals being harvested and that the population is stable. If there is a lack of predators, particularly the cougar, it is probably due to the 975,976 visitors to the park. The cougar, like some other predatory species is truly a sedentary species, thus avoiding people. We feel that this whole conclusion is open to question.

Page 18 - Third Paragraph - As we understand the Wilderness Act concept, the activities of wandering hunters does not necessarily intrude on wilderness values. It would as far as Park Service objectives are concerned, but not wilderness. We know of other proposed wilderness areas in Utah by the United States Department of the Interior, and hunting or grazing have not been mentioned as "intrusions upon wilderness values."

Page 19 - Third Paragraph - If the National Park Service is expecting the same nonintrusive activities such as hunting on Canaan Mountain this would not be true as we understand the



Mr. Phillip Iversen

Page 6

January 14, 1974

Wilderness Act. We would naturally oppose non-hunting moves towards Canaan Mountain.

Some representatives to the Environmental Coordinating Committee registered their agencies' opposition to the proposed wilderness designation in Zion Park. For example, the Division of Water Resources regards the proposal for the most part as undesirable for the following reasons:

The restrictions imposed by a wilderness designation could be very detrimental to the people in the drainage area of streams originating within Zion National Park.

The Division of Water Resources suggests that the natural beauty of the park area should be protected. It should be remembered though, in any land classification discussions, that the region around Zion National Park, Southern Utah in general, is very arid and water supplies are scarce. It is, therefore, imperative that no water supply be tied up in a wilderness area. The State of Utah, the towns in Washington County, and Cedar City, have definite plans and proposals for developing waters of the Virgin River and its tributaries for municipal and agricultural supplies. Some of these developments will be rendered impossible by the wilderness proposal. A particular case in point is Grapevine Springs on the Left Fork of North Creek which is the only good source of untreated culinary water for the Town of Virgin, Utah. This, of course, would call for the construction of a diversion structure and a pipeline, but with proper planning the impacts can be minimal. As the wilderness area is proposed, Grapevine Springs is within the wilderness boundary and the possibility of tapping the source would become very remote. Whereas if the Park remains under National Park Service jurisdiction, the possibility of using Grapevine Springs as a water source is feasible. We would be interested in seeing the wilderness boundary moved to the east, such that Grapevine Springs is not included in the wilderness proposal.

The Division points out that water originating from within the Park is capable of carrying heavy loads of silt and sediment and has been known to damage land and property below. This may call for proper control measures such as catchment basins to be constructed within the Park at strategic locations. It may also be necessary to repair some man-made facilities already in the Park. It may be necessary to reseed an area that experiences serious

Mr. Phillip Iversen  
Page 7  
January 14, 1974

erosion and is not an original trait of the area but was caused by man and should be corrected by man now, or in the near future. All of these controls and corrections would be impossible if land were reclassified as a wilderness area, but they would be possible if the land remained under National Park jurisdiction.

The secondary effects (spillover effects) of wilderness designation in relation to the small communities near Zion Park are not fully dealt with in the draft statement. For example, the discussion of alien water rights, and the importance of these rights to the local people, and economy is not adequate.

The provision of culinary water supply to communities surrounding Zion National Park is not a requirement to the National Park Service. However, we suggest that the National Park Service cooperate in all possible respects in assuring that local water needs are met.

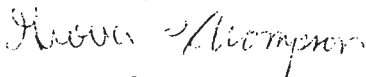
We would also suggest that there be greater cooperation in planning efforts among Washington County communities in this area for possible better solutions to their common problems, especially the provision of water.

Sincerely,

Dale Carpenter, Chairman  
Environmental Coordinating Committee



Grover Thompson, Secretary  
Environmental Coordinating Committee



DC:GT:ml



**STATE OF UTAH**

Calvin L. Rampton, Governor

**DEPARTMENT OF  
DEVELOPMENT SERVICES**

Division of State History

Melvin T. Smith, Director  
603 East South Temple  
Salt Lake City, Utah 84102  
Telephone: (801) 328-5755

October 23, 1973

Mr. Phillip R. Iversen  
Utah State Director  
National Park Service  
U. S. Department of the Interior  
125 S. State Street  
Salt Lake City, Utah 84111

Dear Mr. Iversen:

We appreciate the opportunity to review the draft Environmental Impact Statement for the proposed wilderness areas in Zion's National Park.

The Cable Mountain Draw Works which has been nominated to the National Register of Historic Places does have historical significance and we feel the statement adequately insures its protection.

In the discussion of the section on history, perhaps some statement explaining, would be useful about why the early attempts at colonization were unsuccessful and the area therefore has remained in a wilderness state.

We would like to inquire if any attempt has been made to acquire the old Mormon townsite of Grafton as part of Zion's National Park. The Governor's Historic and Cultural Sites Review Committee has listed the Grafton church on the State Register of Historic Sites and has requested that a survey be made of the entire town for possible nomination to the National Register of Historic Places. It would seem to us that if this could become part of Zion's National Park, the town could be better protected and enjoyed by many more people than at present.

Again, we appreciate the opportunity to review the draft environmental statement.

Sincerely yours,

Kent Powell  
Preservation Historian

KP:hm

**RECEIVED**

**OCT 25 1973**

**UTAH STATE DIRECTOR'S  
OFFICE**

111

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**STATE OF UTAH**

Calvin L. Rampton, Governor

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DEVELOPMENT SERVICES**

Division of State History

Melvin T. Smith, Director  
603 East South Temple  
Salt Lake City, Utah 84102  
Telephone: (801) 328-5755

October 23, 1973

Phillip Iversen  
National Park Service  
125 So. State  
Salt Lake City, Utah 84111

Dear Phil:

I have been asked to review and comment on the draft Environmental Statement for the proposed Zion Wilderness area.

I read the statement with interest since that area is one of the more archeologically unique regions in the state. My initial concern was that designation as a wilderness area would preclude any archeological research. However, the subject was addressed in the statement and appears to have been adequately resolved.

The archeology of the proposed wilderness area appears to have been given considerable attention in the draft statement. The coverage and plans appear to be more than adequate. In view of some of the environmental impact statements I have seen, I would like to compliment your efforts in this area.

I have only one question. Are all 33 of the known archeological sites in Parunuweap Canyon significant enough to be placed on the National Register of Historic Places?

Sincerely,

David B. Madsen  
State Archeologist

DBM:hc



STATE OF UTAH  
DIVISION OF PARKS & RECREATION



1596 WEST NORTH TEMPLE  
SALT LAKE CITY, UTAH 84116

328-5881

HAROLD J. TIPPETTS  
DIRECTOR

January 15, 1974

CALVIN L. RAMPTON, Governor

DEPARTMENT OF NATURAL RESOURCES

GORDON E. HARMSTON

Executive Director

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Mr. James Isenogle  
National Park Service  
Federal Building  
125 South State  
Salt Lake City, Utah

Re: Environmental Coordinating Committee  
Comments On Zion Wilderness Proposal  
Environmental Statement

Dear Jim:

The Division of Parks and Recreation would like to compliment the National Park Service for adequately describing most impacts related to the Zion Wilderness. We are concerned, however, about two impacts which were not adequately covered.

Although the fact is mentioned that BLM is considering the Canaan Mountain area south of the park for primitive area management, the Park Service did not adequately describe the wilderness area considerations at Cedar Breaks National Monument or Bryce Canyon National Park. The roadless area studies of the Forest Service and their potential wilderness designations on the Pine Valley Mountain, on Forest Service lands near Cedar Breaks and on the Aquarius Plateau, all within the Dixie National Forest, were not mentioned. It is the cumulative effect of these management designations that is beginning to concern this agency.

From a recreation standpoint, these designations could result in all of the high quality recreation resources available only to the back-packer or at a distance to the sightseer. The concept of offering a variety of recreation opportunities through a balanced recreation system with adequate management should be encouraged.

In order to offer a wider variety of recreation experiences in Zion National Park, without hampering the valuable wilderness experiences available in most of the rest of the park, we recommend allowing mechanized access into the Potato Hollow-Horse Pasture area. The roads and trails in that area should be made available for such uses as trailbike riding and snowmobiling. The environmental statement does not adequately describe the loss of these choice recreation experiences under the proposed plan.

January 15, 1974

We appreciate the opportunity to comment on this statement. We wish to add that some of the Park Service comments for considering alternatives A or B sound much better than the proposal. These alternatives could more adequately meet the dual responsibility which we understand the National Park Service has: (1) Provide for recreation needs of the public and (2) protect the beautiful resources under their jurisdiction. It seems the Park Service is placing much more emphasis on the latter rather than intensifying management in selected areas and helping to meet the former.

Sincerely,

A handwritten signature in dark ink, appearing to read "Stan", with a horizontal line extending from the end of the name.

Stan Elmer, Special Projects  
& Environmental Specialist

SE/des

cc: Grover Thompson



United States Department of the Interior / National Park Service NPS 793

US NPS - Denver



DSC014295

