

A Review Of Wilderness Management Issues
At Bryce Canyon National Park

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Responsibilities under the Wilderness Act as presented in Director's Order 41

During the 30 years prior to the legislation for the Wilderness Act, many NPS personnel were concerned that the service was placing too much emphasis on development and not enough on preservation of pristine lands. Thus, congress included the National Park Service within the scope of the wilderness act. The wilderness act (first signed in to law in 1964) uses many of the same words that are found in the NPS organic act. The law states that even the National Park Service shall administer wilderness areas within parks "for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness".

NPS policies have been established that direct the service to "take no action that would diminish the wilderness suitability of an area possessing wilderness characteristics until the legislative process of wilderness designation has been completed. The superintendent of each park must develop and maintain a wilderness management plan (or equivalent planning document) to guide the preservation, management and use of these resources. A portion of the plan needs to identify work group responsibilities, an inventory of administrative facilities, a way to measure recreational effects on wilderness character, a process to complete minimum requirement analyses, and visitor use levels. An important component is the strategy for how wilderness issues will be interpreted and visitors and staff educated about wilderness in the park.

Wilderness Recommendation of 1971

A preliminary recommendation for wilderness designation was drafted and published in October of 1971. The proposal included 16,303 acres and was depicted in exhibit A of the recommendation (map NP-BC 7403-B). The proposed wilderness is a long and irregular landform. The guiding principals were to include the lands below and east of the plateau rim. The proposal did exclude Water Canyon and areas north of Water Canyon. The irrigation ditch right-of-way, highway 12 and the power line were not included in the proposed wilderness. The boundary of the proposed wilderness is generally along the Rim's edge and within 1/16th mile of the east boundary. The small water collection system at Bryce Spring was excluded. In addition, the south halves of sections 19 and 20, T. 37 S., R. 3 W., located in Sheep Creek watershed near park boundary, were excluded because they were thought to be important soil erosion and plant community restoration areas. Another water collection system near Yovimpa Pass was excluded. An area between Bryce Point and Upper Campbell Canyon (North of Sunrise Point) the boundary of the proposal follows two straight line segments for a distance of approximately 11,200 feet. This area of the Bryce Canyon amphitheater was

intended to be excluded in order to allow for more intensive management practices along the Navajo Loop, Queen's Garden and Peek-A-Boo Loop trails.

A portion of the Plateau west of the rim and southeast of the Paria View was included.

An environmental impact statement was drafted and released for public and CEQ (Council for Environmental Quality) review in January of 1972. The decision document of the time was called a Final Environmental Statement and was signed in January of 1974.

The General Management Plan of 1987

The GMP provides very little discussion of wilderness management. The wilderness subzone is described in the land use and management section of the plan. The wilderness subzone is identified at 22,325 acres and consists of 62 percent of park lands. The GMP notes that "the Bryce Amphitheater and several other parcels of land below the rim are excluded from the wilderness subzone. Management of this zone strictly conforms to the wilderness management policy."

Backcountry and Proposed Wilderness Plan

One copy of a draft Backcountry and Proposed Wilderness Plan was discovered in the files. The plan was drafted in 1989 by Nate Inouye and Ken Kerr. The plan does not appear to have involved public input or to have ever been endorsed or approved by the park superintendent. The plan does describe a minimum tool concept and identifies that motorized and mechanical equipment may be appropriate if the health and safety of humans are threatened. A section titled stock use notes that horses are only allowed on the Peek-A-Boo Loop and the concessioner horse trail

Draft Trails Management Plan

The plan was drafted in 1994. The plan does not appear to have involved public input or to have ever been approved by the park superintendent. The plan needs to be reviewed and at least one correction made to the final version that is presented for public review. The correction should be a change in status for the Fairyland Loop and Tower Bridge Spur trails from Type A Maintenance Level 3 to Type C Maintenance Level 3 as both of these trails are clearly within the wilderness zone as identified by the wilderness recommendation of 1971.

Issues to resolve here at Bryce Canyon National Park

- No wilderness management plan has been completed
- Current minimum tool policy does not conform to guidelines in Directors Order 41 and may be in violation of Wilderness Act.
- Recent minimum requirement analysis found to be poorly justified.
- Location of the Horse Trail as it drops off of Sunrise Point: Whether portions of this trail are in fact within the recommended wilderness.
- Draft trails management plan proposes heavy equipment use in recommended wilderness
- Maintenance of the composting toilet on the Peek-A-Boo loop may be performed using mechanized equipment that accesses the toilet by traveling through the recommended wilderness area.
- Researchers are being denied access to Campbell Creek to transport equipment and research material because it is in the wilderness area. Yet there is abundant evidence of trespass 4-wheeler impacts in the Campbell Creek streambed.
- Are we applying wilderness management policies in a consistent manner?

Recommendation to resolve issues

Convene a work group or planning team to study the issues, determine whether other issues can be identified, draft alternatives to resolve these issues, and complete a wilderness management plan for Bryce Canyon National Park. The workgroup should be interdisciplinary and should report periodically to the leadership council of the park to seek resolution for differences in opinion and guidance for completing the planning process.