

**ANGELS LANDING PILOT PROGRAM
RESPONSE TO CIVIC ENGAGEMENT
2021**

**NATIONAL PARK SERVICE
ZION NATIONAL PARK**

In August 2021, Zion National Park (ZION) proposed to pilot day-use permits for Angels Landing. As part of civic engagement for the proposal and an associated fee, the public was asked for feedback during a comment period. The park received almost 3,000 comments from 1,000 individual entries made through the NPS Planning, Environment, and Public Comment (PEPC) website between August 13 and September 12, 2021. Additional input was also received from social media and during meetings with local stakeholders. Overall, comments showed greater support than opposition for the implementation of the pilot program for Angels Landing, with most people anticipating a higher quality experience during their time in the park. Those who were opposed were concerned at the loss of spontaneity and with various aspects of implementation and rollout of the program. Much of the feedback received asked for additional details of how the program would work. Below, the major themes of public feedback are presented along with a park reply that addresses each topic.

VISITOR EXPERIENCE

COMMENT SUMMARY

About a third of those providing comments remarked on current conditions at Angels Landing or in the park. Of these commenters most thought that Angels Landing or Scout Lookout had become too crowded and that the park needed to make some form of change to administrating the trail. Many felt that the proposed pilot would enhance experience, reduce stress and safety concerns, or make it easier to find solitude while on the trail. Others did not support the pilot program as they believe it would decrease the spontaneity of using the trail, that getting a permit could be difficult, and that access to the trail and park should not be changed.

RESPONSE

Angels Landing is a highly sought-after hike at ZION with more than 300,000 visitors making the ascent in 2019. Growth has continued rapidly in 2021 and increasing park popularity has led to intense crowding and congestion along the Angels Landing trail. Crowding continues to raise concerns for the experiences visitors have on the trail, including how safe they feel. In 2017, ZION initiated a trail study to understand hiking patterns and visitor experience on Angels Landing and in The Narrows. In 2019 and 2021, results from the study were used to pilot an informal means of managing hiker flow along Angels Landing on holiday weekends. This allowed the park to understand levels and rates of visitor use that alleviate congestion and safety concerns along the trail. This knowledge is being applied to the permit system as it is piloted in 2022.

OPERATING HOURS & SEASONS

COMMENT SUMMARY

Questions and concerns were raised over how the program would be implemented over the course of a day and seasons. Suggestions included to only require permits during peak seasons, holiday weekends, weekends, or for a portion of each day. For some, having a time of day or year when Angels Landing could be hiked without a permit was desired; while others expressed concern that non-permitted times would encourage visitors to hike during dangerous conditions. Commenters raised questions of what would happen if someone were not able to arrive during their permitted time due to unexpected travel delays. Commenters sought clarification if visitors can still travel up the West Rim trail without a permit.

RESPONSE

Starting on April 1, 2022 permits are always needed for Angels Landing. Permits are issued for three time slots that collectively cover all times of the day. Time slots are when a visitor should start their hike from the Grotto (shuttle stop 6) and may vary slightly by season, but generally are before 9am, between 9-12pm, and after 12pm. By timing when hikers arrive, use along the trail is more evenly spread out throughout the day rather than most visitors hiking at the same time. Doing so will alleviate most crowding and congestion along Angels Landing. The chosen time slots account for current use patterns, particularly sought-after times of the day when weather conditions are generally more favorable and allow flexibility in arrival time. At this time, the permits will be required throughout the year. Hiking on the West Rim Trail, including to Scout Lookout, does not require a permit. A permit is needed for hiking any portion of Angels Landing Trail itself. Wherever feasible and reasonable, park staff will work with park visitors as issues arise with permits.

USE OF A LOTTERY PROGRAM

COMMENT SUMMARY

The most frequent topic discussed within public comments was Zion's choice to use lotteries rather than reservations for the Angels Landing permits. Commenters often relayed frustrations over applying for existing lotteries within the park and other well-known destinations. These concerns led many commenters to recommend that reservations be used, often pointing to other National Park Service programs that currently use first come, first served on-line reservation systems. For many who commented, counting on one's own ability to navigate and compete in a reservation system was preferred over not having any control over a lottery that randomizes who is awarded a permit.

Additional comments concerning how the permits would be issued included concerns for trip planning and fairness. Trip planning was also mentioned in support for reservations rather than lotteries to be used, with comments expressing frustration over not knowing if you have a permit right away with a lottery. Fairness was also raised, with commenters frequently being under the impression that you would need to be at the park to enter the lottery while others were concerned that any on-line system would disadvantage those without computers and internet.

RESPONSE

While planning for the Angels Landing pilot, the park considered multiple ways to issue permits. While an on-line first come, first served reservation system allows someone to almost instantly know if they have a permit, it also requires the ability to be on a computer with good internet at an exact date and time. While implementing the temporary COVID-19 related shuttle ticket program in 2020, the park received many reports of frustration from visitors that tickets sold out very quickly, that new users had difficulty navigating the system, and that one had to plan their entire day around a specific time to obtain a permit. As the park anticipates high demand for Angels Landing, lessons learned from the shuttle ticket program were considered.

The park determined that lotteries are currently the best option for issuing permits as they are the most equitable system to allocate a limited resource to a large group of people. Because the lottery is open for multiple weeks before permits are awarded for the seasonal lotteries and open for many hours before the day-before lotteries, it reduces the need for applicants to be available on-line at an exact time and ensures there is no preference given to one individual over another, for those with high-speed internet access or those with schedule flexibility. The on-line system allows applications to be made from anywhere and does not require visitors to be at the park when applying or to receive their permit.

To address concerns for trip planning, the application period for seasonal lotteries has been adjusted so that an applicant will know in less than a month if they have been awarded a permit. This will allow a minimum of one month and a maximum of three months between when someone is issued a permit and when they arrive to hike. Surveys of Zion visitors indicate that most visitors plan their trips about two months in advance. The current timeline for seasonal lotteries allows the park to make improvements to the system throughout the year. As the pilot progresses, the park will consider future changes to provide longer term planning horizons.

TRIP PLANNING

COMMENT SUMMARY

The topic of trip planning was raised in public comments, with people describing a variety of preferred time frames for when permits should be issued. Those planning farther in advance, raised the suggestion to release some or all the permit's months or even a year in advance. Those planning on shorter time frames, suggested various timeframes; from releasing some or all permits the day-before, two-days before, or weeks before. Comments often advised the park to release permits on multiple time frames. Having a portion of permits available at the park for walkup use was also suggested. Commenters also raised a desire for timelines for permit releases to align with camping reservations and other existing park system.

RESPONSE

Permits are issued in two-time frames: seasonally and day-before. Seasonal permits will be available during four seasonal lotteries, run 1-3 months prior to a visitor's hike. Day-before permits will be issued the day prior to a visitor's hike. The two-time frames provides both a longer-term planning horizon and a shorter term one. The current timeline for seasonal lotteries allows the park to make improvements to the

system throughout the year. As the pilot progresses, the park will consider future changes to provide longer term planning horizons.

MONITORING AND ADJUSTMENTS

COMMENT SUMMARY

Public comments that addressed how the pilot would be implemented, the need to adjust the system over time was raised. Comments often sought reassurance that as the program is developed, the park would adjust the program to ensure it is a system that works and to listen to public feedback. Questions about how many permits will be issued per day were raised. Accounting for people who purchase and then do not use their permits was specifically raised as a concern. Commenters feared that the actual number of people on Angels Landing would be very low and visitors who otherwise would have hiked the trail would not be able to.

RESPONSE

Angels Landing permits are being implemented under a pilot program with the understanding that close monitoring will be needed. Park managers anticipate changes to be made to the program to better meet the needs of the public and the park. The park will issue public notice of any changes through our website, press releases, and social media to make sure everyone is aware as these changes take place. The park will be comparing the number of permits issued to those used and will adjust how many permits are available to account for no-shows and provide maximum opportunity within the desired outcomes of the pilot program.

ESTABLISHMENT OF NEW FEES

COMMENT SUMMARY

Feedback on proposed fees related to the Angels Landing pilot was specifically sought during the public comment period. Many who supported the proposed fees argued for the amount to be higher (see 'per person fee' topic below). Some commenters pointed out that permit fees, when compared to other expenses that travelers pay are relatively small. Opposition to the fees was given for a variety of reasons, including disadvantaging underprivileged communities, a desire for locals to be exempt from fees, taxes having already covered fees, entrance fees having already covered fees, and commenters not liking being charged to use specific parts of the park once they have entered the gates.

Within the topic of fees, the most common comment was in opposition to the six-dollar application fee. Commenters believed that the application fee should be lower or eliminated (suggestions ranged from zero to five dollars). Opposition often centered on the idea of paying for something if you did not get a permit and the fact that the money goes to a government contractor rather than to ZION.

Commenters expressed willingness to support or even increase the proposed per person fee (suggestions ranged from four to ten dollars a person), particularly if those fees support park staff and trail maintenance. Some asked for clarification on how the three dollars was determined and how the fees will be spent.

RESPONSE

When considering a change to fees or a new fee, careful consideration is made to ensure that the fee is necessary and at an appropriate level. The six-dollar application fee covers the cost for Recreation.gov to build and operate the on-line lottery platform. The three-dollar per person fee is charged to successful lottery applicants and covers the cost to implement and manage the permit program in the field at ZION.

When a visitor makes a reservation or applies for a lottery on Recreation.gov, they are securing a recreation opportunity through the reservation platform at a cost to the government. To recuperate these costs, a reservation fee is applied. The fee pays for contracted services through the [Recreation.gov](https://www.recreation.gov) platform, for on-line, call-center and field reservations. On-line reservations are available 24/7 and call center hours are available year-round, 10 a.m. – 12 a.m. Eastern Time (closed on Thanksgiving, Christmas, and New Year’s Day). When lottery applications are made on-line, one dollar of the six-dollar fee goes directly to ZION to address implementation costs.

The reservation fee reflects the cost of providing an on-line public reservation service, which includes recreation sites and activities for seven participating agencies for more than 3,600 locations and 103,000 individual sites across the country.

The park sought to keep the per-person fee as low as possible while also covering most of the anticipated costs for staffing and management of the Angels Landing program. The three dollars is lower than other similar lottery programs run by federal agencies. The per-person fee will primarily be used to hire staff dedicated to the Angels Landing program to ensure it runs smoothly and efficiently. All the per-person fee is retained by the National Park Service, the majority which remains at ZION and will be used to staff the pilot program.

RESELLING OF PERMITS

COMMENT SUMMARY

Many people were concerned about the development of a black market for resale of permits at a higher price, utilization of bots to buy tickets with the intention of resale, and people over-buying tickets hoping to find friends to fill slots on the day of the hike; the concern being that these activities would take away opportunities from the public to obtain permits for Angels Landing.

RESPONSE

Reselling or redistributing permits is not permissible and is an illegal activity; permits are nontransferable. Valid permits can only be purchased through Recreation.gov. Any permits sold by third parties are not valid.

To address permit reselling and redistribution, actions are taken both within Recreation.gov and at the park. Recreation.gov consistently monitors the system to detect bot activity or other cyber-attacks and diligently works to mitigate impacts to deliver a fair and transparent reservation system for equal access to customers, especially for high-demand locations and activities. A dedicated engineering team protects the system from suspected bots that attempt to make reservations during high-demand sale periods. The lottery application fees support these preventative efforts. Additionally, lottery systems make it harder for black markets to work since potential resellers are capped at 6 tickets per quarterly lottery, and they are not as likely to get tickets as they were in an internet speed based first come first serve system.

At the park, lottery applications are reviewed to identify duplicate or unauthorized applications. In addition, photo IDs matching the name(s) on permits must be presented when hiking Angels Landing. Park staff will be checking permits on-site. Checking photo IDs was an effective way to discourage reselling under the recent COVID-19 shuttle ticket program and the park is therefore starting with this approach for Angels Landing.

ENFORCEMENT FOR PERMITS

COMMENT SUMMARY

Within the topic of enforcement, the largest concern raised was how the park will check permits at the start of Angels Landing and that visitors are following the rules at Scouts Lookout. General sentiment was that permits will only work if they are enforced so that visitors following the rules are rewarded and those who are not are caught and held accountable. The presence of park staff was often discussed as important to ensuring the system works well.

RESPONSE

Park staff will be on-site to verify, and check-in permits, and to monitor conditions along Angels Landing Trail. Visitors will be asked to present their permits at Scout Lookout before they begin Angels Landing Trail itself. Staff may also verify permits at the Grotto (shuttle stop 6) where the West Rim trail begins. Law enforcement rangers will also be present and conducting spot checks for permits at various times of the day and in various locations along the trail.

EXPANDED FACILITIES

COMMENT SUMMARY

During civic engagement, the public was asked about other ideas related to the Angels Landing pilot and other strategies for addressing crowding, congestion or levels and timing of visitation. Within this topic, commenters often suggested that additional trails or expansion of current trails be developed to spread visitation out within the park. Other commenters requested more facilities across the park including additional parking, additional bathrooms, additional shower facilities, and more bathrooms at Angels Landing. Some requested that currently closed trails be reopened including Hidden Canyon and East Rim to address crowding and congestion. At times these suggestions were provided as an alternative to implementing a pilot at Angels Landing, believing these actions would reduce use along the trail.

RESPONSE

Zion is currently preparing a Visitor Use Management Plan/ Environmental Assessment (VUM Plan) that will identify management actions to sustainably manage fundamental resources and values and provide high quality visitor experiences. The plan will aim to address crowding, congestion, and other visitor experience issues both for site-specific areas such as Angels Landing and holistically for the park. The Angels Landing pilot will inform this larger planning effort. The additional strategies mentioned during public comments will be considered as the VUM Plan is further developed.

A rockfall and landslide in August of 2019 closed the East Rim Trail from the Weeping Rock area to Echo Canyon, including Hidden Canyon. In September the park conducted a second UAV flight to assess movement of material that is continuing even two years after the initial slide. The park is in the process of decision making on next steps on management related to this trail.

CONCLUSION

Public feedback on the implementation of a permit system to hike Angels Landing was robust. The park received nearly 3,000 total comments from almost 1,000 participants during the open comment period on the NPS Planning, Environment, and Public Comment (PEPC) website from August 13 to September 12, 2021. Additional input was also received from social media. These comments included general support, general opposition, recommendations for improvements, concern and confusion over lotteries vs reservation systems, trip planning and/or timelines, fees, future adjustments to be made, and concerns for implementation. Overall comments showed greater support for the implementation of the pilot program, most people highlighting a higher quality experience during their time in the park. Those who were opposed were concerned at the loss of spontaneity and with various aspects of implementation and rollout of the program. Above, park staff have addressed many of these comments. We look forward to working with the public to find the best possible means to maintain a balance between access and conservation for the benefit of current and future generations.