



Categorical Exclusion Documentation Form (CE Form)

Project: COVID-19 Response: Zion Canyon Shuttle Ticket System

PEPC Project Number: 101393

Description of Action (Project Description):

Purpose & Need:

In response to COVID-19, the National Park Service (NPS) began implementing a temporary timed ticket system for the park shuttle in the Summer of 2020 at Zion National Park (ZION). This system established predictable access to the Zion Canyon Scenic Drive while addressing COVID-19 health and safety guidelines recommended by the Centers for Disease Control (CDC). In addition to minimizing large crowds and congested conditions, specific conditions the temporary timed ticket system addressed include providing an opportunity to be adequately physically distanced (6 ft.) from other groups both in queue areas and while on the shuttle buses.

Proposed Action:

The shuttle ticket system was implemented on July 1, 2020 and was anticipated to remain in place until later that Fall; however, the system was not discontinued until the Spring 2021 ([NPS 2020](#)). While in place, ZION staff remained present in multiple locations to assist ticket holders, answer questions about the shuttle system and other park opportunities, provide critical safety information, manage queue lines, and assist in loading shuttles to ensure physically distancing was made possible. During 2020, costs and staffing associated with the ticket system were covered by reallocating existing funding from other projects and redirecting staff from other public programs and services. As public programs and services were reestablished and work resumed on critical park operations in 2021, the park was not able to continue diverting funds to cover the costs or staffing needs associated with the shuttle ticket system.

Tickets were originally set at one dollar (\$1) to cover the transaction fee paid to operate Recreation.gov. However, to address shuttle system ticket expenditures, the fee was increased on May 16, 2021 for tickets beginning June 1st by one dollar (\$1) to fund park operational costs to administer the system. The two-dollar (\$2) fee would be in place only while the temporary shuttle ticket system was needed to respond to the progression of the response to the global pandemic. This fee would be under the authority of Federal Lands Recreation Enhancement Act ([36 USC 87](#)), of which Zion retains 80% of the recreation fees it collects. All fees collected under this authority are used for projects focused on improvements to visitor services, facilities and visitor safety. Revenues from this fee increase would be dedicated to costs associated with operating the shuttle ticket system under COVID conditions ([NPS 2021a](#)).

On May 27, 2021 ZION, In response to updated national-level guidance that no longer necessitated physically distancing requirements on transit systems in National Parks, ZION stood down the temporary Zion Canyon shuttle ticket system effective May 28, 2021 ([CDC 2021](#); [NPS 2021b](#); [NPS 2021c](#); [NPS 2021d](#)). Shuttles immediately returned to a first-come, first-serve system and park returned to pre-COVID seating capacities. Masks are still required while on federal property, including the Zion Transportation System shuttle buses, and in compliance with CDC recommendations and Executive Orders.

Consistent with President Biden's COVID-19 Action Plan ([The White House 2021a](#)) and the Executive Order on Protecting the Federal Workforce and Requiring Mask-Wearing ([The White House 2021b](#)), the NPS released a memorandum on August 16, 2021 stating, "the NPS is immediately requiring visitors, employees and contractors to wear a mask inside all NPS buildings and in crowded outdoor spaces, regardless of vaccination status or community transmission levels." In accordance with this memorandum as one of the units of the NPS, ZION

currently requires masks in buildings and crowded outdoor spaces ([NPS 2021e](#); [NPS 2021f](#)). NPS Deputy Director Shawn Bengé further states in the NPS memorandum, “Visitors to national parks are coming from locations across the country, if not across the world. Because of this and recognizing that the majority of the United States is currently in substantial or high transmission categories, we are implementing a service-wide mask requirement to ensure our staff and visitors’ safety.” It is also stated that, “This requirement will be in effect until further notice and applies to all NPS buildings and public transportation systems. It also applies to outdoors spaces where physical distancing cannot be maintained, such as narrow or busy trails and overlooks.”

Environmental Consequences:

Potential impacts of the proposed undertaking were considered by an interdisciplinary team (IDT) which found that no extraordinary circumstances currently apply. Environmental resources with a potential for impact are described in the Environmental Screening Form (ESF) and required mitigations have been identified. As a result, no significant impacts to environmental resources would occur.

Project Locations:

Location

County:	Washington	State:	UT
District:	Zion Canyon	Section:	Front Country High Development Zone

CE Citation: D.2 Minor changes in amounts or types of visitor use for the purpose of ensuring visitor safety or resource protection in accordance with existing regulations.

CE Justification: Management actions taken by ZION staff were in line with CDC guidance and Executive Orders as a means to reduce the transmission of the COVID-19 virus. The shuttle ticket system lasted 10 months which represents a minor change to protect visitor safety during an unprecedented global pandemic. Other methods of transportation outside of the ZION shuttle system also remained available to access the Zion Scenic Drive. These alternate forms of travel have become exceedingly popular to include commercial shuttle vans, traditional bicycles, electric bicycles, and pedestrian travel.

Decision:

I find that the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply. The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*.

Signature

Superintendent:

Jeffrey Bradybaugh

References:

Centers for Disease Control and Prevention (CDC). 2021. "Requirement for Persons to Wear Masks While on Conveyances and at Transportation Hubs" (January 29, 2021). *Website*.

https://www.cdc.gov/quarantine/pdf/Mask-Order-CDC_GMTF_01-29-21-p.pdf. Accessed 12/15/2021.

National Park Service. 2020. Press Release: "Zion National Park to Begin Shuttle Bus Operations and Resume Collecting Entrance Fees July 1, 2020" (June 25, 2020). *Website*.

<https://www.nps.gov/zion/learn/news/shuttleresumesjuly1.htm>. Accessed 12/15/2021.

NPS. 2021a. Press Release: "Zion National Park Accepting Comments on Proposed Temporary Increase in Shuttle Ticket Cost." (April 9, 2021). *Website*. <https://www.nps.gov/zion/learn/news/zion-national-park-accepting-comments-on-proposed-temporary-increase-in-shuttle-ticket-cost.htm>. Accessed 12/15/2021.

NPS. 2021b. Memorandum. "Updating COVID-19 Guidance on Park Transportation Systems" (May 27, 2021). *Internal Communications*. Deputy Director Exercising the Delegated Authority of the Director, NPS.

NPS. 2021c. Press Release: "Zion National Park Shuttle Ticket Update" (May 27, 2021). *Website*.

<https://www.nps.gov/zion/learn/news/zion-national-park-shuttle-ticket-update.htm>. Accessed 12/15/2021.

NPS. 2021d. "Transportation Systems Operations: COVID-19 Management Practices National Park Service." *Website*. https://www.nps.gov/subjects/partnerships/upload/Transportation-System-Operations_COVID19_2021-06-09.pdf. Accessed 12/15/2021.

NPS. 2021e. Press Release: "National Park Service implements national mask requirement" (August 16, 2021). *Website*. <https://www.nps.gov/orgs/1207/covid-mask-update-aug-2021.htm>. Accessed 9/28/2021.

NPS. 2021f. "Zion National Park Superintendent's Compendium." *Website*.

https://www.nps.gov/zion/learn/management/upload/2021-Superintendent-s-Compendium-9-22-2021_FINAL508.pdf. Accessed 9/29/2021.

The White House. 2021a. "Path out of the Pandemic: President Biden's COVID-19 Action Plan." *Website*. <https://www.whitehouse.gov/covidplan/>. Accessed 10/1/2021.

The White House. 2021b. "Executive Order on Protecting the Federal Workforce and Requiring Mask-Wearing." *Website*. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-the-federal-workforce-and-requiring-mask-wearing/>. Accessed 10/1/2021.

Extraordinary Circumstances:

If implemented, would the proposal...	Yes/No	Notes
A. Have significant impacts on public health or safety?	No	No significant adverse impacts to public health or safety have been identified during the IDT Review Process. Impacts are largely perceived to be beneficial to NPS visitors and potential adverse impacts would be mitigated using standard safety precautions. Refer to ESF.
B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas?	No	No significant impact to natural and cultural resources have been identified during the IDT Review process. Refer to ESF and OCC.
C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	No controversy or unresolved conflicts have been identified during the IDT Review process.
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	No uncertain effects, or unique/unknown environmental effects have been identified during the IDT Review process.
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	No precedent or principle has been identified during the IDT Review process.
G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?	No	No significant impacts to historic or eligible properties have been identified during the IDT Review process. Refer to ESF.
H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?	No	No significant impacts to T&E, MBTA, or State species of concern nor critical habitats have been identified during the IDT Review process. Refer to OCC, ESF.
I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	No violation of federal, state, local, or tribal laws or requirements has been identified during the IDT Review process.
J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	No effects to low income or minority populations have been identified during the IDT Review process.
K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 130007)?	No	No access constraints to sacred sites have been identified during the IDT Review process. Refer to ESF.
L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?	No	No contribution to the presence of noxious or non-native invasive species has been identified during the IDT Review process. Exotics monitoring and removal and/or native plant/seed revegetation efforts would occur. Refer to ESF.



ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

A. PROJECT INFORMATION

Project Title: COVID-19 Response: Zion Canyon Shuttle Ticket System
PEPC Project Number: 101393
Project Type: Other Administrative Activities (ADM)
Project Location: Washington, Utah
County, State: District, Section: Zion Canyon, Front Country High Development Zone
Project Leader: Susan McPartland

B. RESOURCE IMPACTS TO CONSIDER:

Resource	Potential for Impact	Potential Issues & Impacts
Other Human Health and Safety <i>Employee and Visitor Health & Safety</i>	Potential	Issue: Disease transmission COVID-19 Impact: Employees and visitors may be exposed to infected individuals. In effort to help protect visitors from unprecedented transmission rates, ZION adhered to CDC guidance and Executive Orders to social distance by reducing capacities on the shuttle buses by one-third. Rows of seating were removed and visitors were directed to refrain from standing or congregating in groups on the shuttle. As a result, the implementation of the shuttle ticket system and face covering requirements represent the most effective mitigations available to protect human health and safety of visitors and employees.
Visitor Use and Experience Recreation Resources <i>Visitor Access</i>	Potential	Issue: Temporary reduction of shuttle bus capacity Impact: Visitor access to the shuttle bus was reduced to ensure visitor and employee safety and fewer visitors were able to access the Zion Canyon Scenic Drive via the ZION Transportation System. However, other opportunities for access were available to include walking, cycling (traditional and e-bikes), as well as organizing a privately owned shuttle from outside the park. As a result, implementation of the temporary reduction in shuttle bus capacity did not result in significant impacts to visitor access.
Visitor Use and Experience Visitor Use and	Potential	Issue: Increased planning required by the Visitor Impact: With reduced shuttle capacities and the need to obtain shuttle tickets in advance (or make alternative plans), the Zion Canyon Scenic Drive had the potential required more planning on behalf of the visitor. Visitors arriving without engaging in any pre-trip planning expectedly found Zion Canyon more

Experience		difficult to access and may have found their experience have added stress.
<i>Visitor Use & Experience</i>		However, visitors who developed a pre-trip found the predictability of their known shuttle times an advantage for their trip to ZION. Those actively engaged in trip planning benefitted from a higher quality experience with more space available to remain physically distant while boarding shuttles and fewer visitors on trails and other areas in the canyon proper. As a result, visitors experienced both beneficial and adverse impacts to the visitor experience. Adverse impacts were not significant and only rose to a level of minor inconvenience which could be resolved when visitors engage in pre-trip planning.

IDT Team Members:

Jeffrey Bradybaugh - Superintendent

Cassity Bromley - Chief of Natural Resources

Amanda Dworak Rowland - Chief of Interpretation

Shauna Ertolacci - NEPA Specialist

Daniel Fagergren - Chief Ranger

Deirdre Hanners - Safety/Hazmat

Courtney Mackay - NHPA Specialist

Susan McPartland - Project Leader

Susan McPartland - Visitor Use Management Specialist

Zak Skelton - Environmental Protection Specialist

Jennifer Staroska - Transportation

Treacy Stone - Chief of Maintenance

David Webster - Administrative Officer



Other Compliance/Consultations Form

Park Name: Zion National Park

PEPC Project Number: 101393

Project Title: COVID-19 Response: Zion Canyon Shuttle Ticket System

Project Type: Other Administrative Activities : Visitor Use Management

Project Location:

County, State: Washington, UT **District, Section:** Zion Canyon, Front Country High Development Zone

Project Leader: Susan McPartland

ESA

Any Federal Species in the project Area? No

If species in area: No Effect

Was Biological Assessment prepared? No

If Biological Assessment prepared, concurred? No

Formal Consultation required? No

Formal Consultation Notes:

No effect determination for federally listed or candidate species, critical habitats, & MBTA with potential to occur in the proposed action area.

Formal Consultation Concluded:

Any State listed Species in the Project Area? No

Consultation Information: No effect determination for state listed species with the potential to occur in the proposed action area.

General Notes: Action having little or no potential for environmental impacts of any kind on wildlife.

Data Entered By: Shauna Ertolacci

Date: Apr 9, 2021

ESA Mitigations

No ESA mitigations are associated with this project.

Floodplains/Wetlands/§404 Permits

Question	Yes	No	Details
A.1. Is project in 100- or 500-year floodplain or flash flood hazard area?		No	Not in floodplain or flash flood hazard area.
A.2. Is Project in wetlands as defined by NPS/DOI?		No	Not in wetland as defined by NPS/DOI.
B. COE Section 404 permit needed?		No	No placement of fill in waters of the United States.

C. State 401 certification?		No	
D. State Section 401 Permit?		No	Issue Date: Expiration Date:
E. Tribal Water Quality Permit?		No	
F. CZM Consistency determination needed?		No	Date Review Requested: Date Reply Received: Date State Concurred:
G. Erosion & Sediment Control Plan Required?		No	
H. Any other permits required?		No	Permit Information:
Other Information:			

Data Entered By: Shauna Ertolacci

Date: Apr 9, 2021

FloodPlains & Wetlands Mitigations

No FloodPlains & Wetlands mitigations are associated with this project.

Wilderness

Question	Yes	No	
A. Does this project occur in or adjacent to Designated, Recommended, Proposed, Study, Eligible, or Potential Wilderness?		No	
B. Is the only place to conduct this project in wilderness?		No	
C. Is the project necessary for the administration of the area as wilderness?		No	
D. Would the project or any of its alternatives adversely affect (directly or indirectly) Designated, Recommended, Proposed, Study, Eligible, or Potential Wilderness? (If Yes, Minimum Requirements Analysis required)		No	
E. Does the project or any of its alternatives involve the use of any of the Wilderness Act Section 4(c) prohibited uses: commercial enterprise, permanent road, temporary road, motor vehicles, motorized equipment, motorboats, landing of aircraft, mechanical transport, structure, or installation? (If Yes, Minimum Requirements Analysis required)		No	
If the answer to D or E above is "Yes" then a Minimum Requirements Analysis is required. Describe the status of this analysis in the column to the right.			Initiation Date: Completed Date: Approved Date:

Other Information:			
--------------------	--	--	--

Data Entered By: Shauna Ertolacci **Date:** Apr 9, 2021

Other Permits/Laws *Questions A & B are no longer used.*

Question	Yes	No
C. Wild and scenic river concerns exist?		No
D. National Trails concerns exist?		No
E. Air Quality consult with State needed?		No
F. Consistent with Architectural Barriers, Rehabilitation, and Americans with Disabilities Acts or not Applicable? (If N/A check Yes)		NA
G. Other:		No

Other Information:

No inconsistencies with ABA, ABASS, ADA, or other accessibility regulations have been identified during the IDT review process.

Data Entered By: Shauna Ertolacci **Date:** Apr 9, 2021