

Appendix B

Examples of Completed Extent-Necessary Determinations

Zion NP

Zion National Park recently completed a commercial services evaluation utilizing a similar multi-step process. The park completed a general management plan (GMP) in 2001. The plan created two zones for the Zion Wilderness; a primitive zone and a pristine zone. Through the GMP, the decision was made to not allow commercial use in the pristine zone. The GMP called for a wilderness stewardship plan (WSP) to be completed within five years. Two goals for the WSP were to determine a carrying capacity based on resource protection and visitor experience standards for the area, and to decide whether commercial services were necessary in the primitive zone. Through two comment periods, members of the public were asked if commercial use should be allowed in the primitive zone. A strong majority of respondents indicated that they did not wish for commercial use to occur. Additionally, many areas within the primitive zone were already at or near capacity. Based on these two factors, the park made the decision not to allow commercial use in any portion of the Zion Wilderness.

Yosemite NP

Yosemite National Park completed an Extent Necessary Determination for the Half Dome Trail Stewardship Plan. The Half Dome analysis looked at commercial use according to the primary wilderness purpose it achieved. Due to the overwhelming public, non-commercial demand on the Half Dome Trail, it was determined that recreational use was at capacity, and therefore the recreational purpose “fully realized.” Commercial use which fulfills the recreational purpose was determined to be unnecessary. The educational and scenic purposes were determined to be “unrealized”, or not fully taken advantage of, and the plan allowed for commercial services which serve those purposes. The plan limited overall use of the trail to 300 people per day; commercial hikes that focus on education about wilderness topics can get permits for up to 30 people per day (10% of use) while groups that focus on formal interpretation of scenery, such as photo workshops, can get permits for up to 15 people per day (5% of use).

Death Valley NP

Death Valley National Park completed a Wilderness and Backcountry Stewardship Plan in 2012 to manage the 3.4 million acre park’s resources. As part of the plan, park staff made a determination of the “extent necessary for commercial services”. Death Valley staff applied the minimum requirement decision (MRD) concept to decisions about commercial use in wilderness. First, an interdisciplinary team used the application screening process to determine whether the activity was wilderness dependent. For example, commercial trips whose primary purpose was to teach subjects that are not wilderness dependent like weight loss, yoga, and cooking were not allowed in wilderness.

If the activity was wilderness dependent, an analysis was completed to determine the impacts to wilderness and how it could be implemented with the least impact to wilderness character. Commercial activities that realized more than one purpose accrued more benefit to wilderness

character and received preference over those that only realized one purpose but had the same amount of impact.

An example of a permitted commercial activity to take place within wilderness is Guided Day Hiking. The interdisciplinary team considered issues such as the size and scope of the wilderness area, its many remote and rugged locations for exploration, and the fact that many routes and trails in Death Valley National Park Wilderness are underutilized or not substantially full. In addition to formal hiking trails there are informal routes in canyons, up peaks, along ridgelines, or cross country travel. Commercial day use hiking achieves the recreation and scenic purposes of wilderness by leading visitor to many of these lesser-visited locations dispersed throughout the park. Because the scenic qualities of Death Valley vary greatly over its large and diverse landscape, the informal appreciation of wilderness scenery is enhanced by commercial day-hiking groups visiting low use areas. Commercial day hiking is also an activity that naturally pairs with education, as the pace of travel while hiking across a desert landscape lends itself to frequent stops at points of natural or cultural interest and delivery of information related to those features. The park examined four qualities of wilderness character: untrammeled, natural, undeveloped, and having outstanding opportunities for solitude or primitive and unconfined recreation. Of the four, there is the possibility that commercial groups could negatively impact noncommercial visitors' experience of the wilderness, degrading the opportunities for solitude or primitive or unconfined recreation. This is particularly an issue in four canyons that are popular day use wilderness locations. Because these locations, by nature of their geography, have more limited opportunities to disperse, they tend to concentrate impacts to wilderness character. For this reason, the group size for commercial groups is restricted to 12, and only one commercial group per day will be permitted in these four canyons.