



Commercial use under the Wilderness Stewardship Plan

Sequoia and Kings Canyon National Parks

Allocation Alternatives and Analysis

Outline

- **Background**
- **Implementation Timeline**
- **Allocations and Data**
- **Alternatives**
- **Criteria**
- **Analysis**
- **Impact**
- **Questions and Discussion**

Background

- **Wilderness Act of 1964**
- **California Wilderness Act of 1984**
- **Backcountry Management Plan, 1986**
- **General Management Plan, 2007**
- **Lawsuit, 2009**
- **Court ruling, 2012**
- **Backcountry Access Act, 2012**
- **Wilderness Stewardship Plan, 2015**
 - **Visitor encounter data**
 - **Campground impact analysis**

Implementation Timeline

- **2016 and 2017 seasons**
 - **WSP implementation**
 - **Grazing restrictions, party size, trail usage, fires, etc.**
- **2018 season**
 - **WSP-END implementation**
 - **Commercial Service Day (CSD) allocations in place**
 - **January 2018: Two-year CUAs, WW and/or MWMA**

WSP-END CSD Allocations

- **Creates four categories of CSDs**
 - **Stock and Non-stock, and**
 - **Wilderness Wide (WW) and Mount Whitney Management Area (MWMA)**
- **Increases commercial use WW**
- **Reduces commercial use in MWMA**
- **Overall, maintains current level of commercial use**

WSP-END CSD Allocations

	Wilderness-Wide	Mount Whitney	Total
Non-Stock	4,110	930	5,040
Stock	2,860	500	3,360
Total	6,970	1,430	8,400

Baseline Data

- Four years, 2010-2013
- Commercial operator self-reported data
 - Monthly commercial use reports
 - Monthly stock use reports
- Validated against
 - SEKI and NF wilderness permits
 - SEKI wilderness ranger observations

Allocation Alternatives

1. Even distribution
 - No limit on CUAs
 - CSDs allocated evenly (100% CSDs / total CUAs)
2. First come, first served
 - No limit on CUAs
 - CSDs allocated on first come, first served basis
3. Hybrid – even distribution 50%, first come first served 50%
 - No limit on CUAs
 - 50% CSDs allocated evenly (50% CSDs / total CUAs)
 - 50% CSDs allocated on first come, first served basis
4. Competitive CUAs
 - Limited CUAs (bid and panel process)
 - CSDs allocated by CUA
5. Lottery System - not considered

Decision-Making Criteria

1. Maximize fairness
 - Does allocation reflect market distribution?
 - Is impact of allocation shared by all operators?
2. Maximize efficiency
 - Are all CSD utilized?
3. Maximize stability
 - Can operators plan year-to-year? Make investments?
4. Maximize competition
 - Do clients have options? Are prices competitive?
5. Minimize administrative workload
 - Is new process a headache for operators? For NPS?

Analysis

- To what extent does alternative satisfy the criterion?
- Following slides show NPS analysis of alternatives
- We need your input and perspective

Analysis of Even Distribution

1. Maximize fairness
 - **Low**, everyone gets the exact same thing... seems fair, but doesn't reflect operator desire or capacity
2. Maximize efficiency
 - **Very low**, won't mirror market, many 'unused' CSDs
3. Maximize stability
 - **Very high**, distributed CSDs will fluctuate with CUA numbers, but operators know how many CSDs they have
4. Maximize competition
 - **Very high**, no limit on number of operators, even shares
5. Minimize administrative workload
 - **Very High**, normal application process for operators and simple administration for NPS

Analysis of First Come, First Served

1. Maximize fairness
 - **High**, some concern over tying 'success' to an operator's computer savvy or connectivity
2. Maximize efficiency
 - **Very high**, CSD distribution matches confirmed bookings (market distribution), few to no 'unused' CSDs
3. Maximize stability
 - **Low**, operators will reserve CSDs for confirmed bookings until caps are met, but will not have guaranteed allocations
4. Maximize competition
 - **Very High**, no limit on number of operators, varying shares
5. Minimize administrative workload
 - **Medium**, operators reserve CSDs for confirmed bookings via online or internal reservation system

Analysis of Hybrid

1. Maximize fairness

- **High**, some concern over tying 'success' to an operator's computer savvy or connectivity

2. Maximize efficiency

- **Very high**, CSD distribution matches confirmed bookings (market distribution), few to no 'unused' CSDs

3. Maximize stability

- **High**, operators receive guaranteed base allocation, then reserve CSDs for confirmed bookings as needed

4. Maximize competition

- **Very High**, no limit on number of operators, varying shares

5. Minimize administrative workload

- **Medium**, operators reserve CSDs for confirmed bookings via online reservation system

Analysis of Competitive CUAs

1. Maximize fairness
 - **High**, operators compete against known, published criteria, places NPS in position of selecting 'winners' and 'losers'
2. Maximize efficiency
 - **Medium**, CSD allocations to competitive CUAs will approximate historical market distribution, no ability to shift or sweep 'unused' CSDs, will not accommodate market changes
3. Maximize stability
 - **Low**, high for those w/CUA, but recurring risk of no CUA
4. Maximize competition
 - **Very High**, limited operators with predetermined market shares
5. Minimize administrative workload
 - **Very Low**, Operators submit bids via FedBizOpps, NPS conducts panel reviews for each competitive CUA

Summary Table

	1. Maximize Fairness	2. Maximize Efficiency	3. Maximize Business Stability	4. Maximize Market Competiveness	5. Minimize Administration
Even distribution	Low	Very Low	Very High	Very High	Very High
<i>Score (1-5)</i>	2	1	5	5	5
First come, first served	High	Very High	Low	Very High	Medium
<i>Score (1-5)</i>	4	5	2	5	3
Hybrid	High	Very High	High	Very High	Medium
<i>Score (1-5)</i>	4	5	4	5	3
Competitive CUAs	High	Medium	Low	Very High	Very Low
<i>Score (1-5)</i>	3	3	2	5	1

Summary Table

	1. Maximize Fairness	2. Maximize Efficiency	3. Maximize Business Stability	4. Maximize Market Competiveness	5. Minimize Administration
Even distribution	Low	Very Low	Very High	Very High	Very High
<i>Score (1-5)</i>	2	1	5	5	5
First come, first served	High	Very High	Low	Very High	Medium
<i>Score (1-5)</i>	4	5	2	5	3
Hybrid	High	Very High	High	Very High	Medium
<i>Score (1-5)</i>	4	5	4	5	3
Competitive CUAs	High	Medium	Low	Very High	Very Low
<i>Score (1-5)</i>	3	3	2	5	1

Hybrid Alternative

- Adds business stability to First Come, First Served by providing base number of CSDs to all qualified CUA holders that meet application deadlines
- Retains balance of CSDs to distribute on first come, first served basis for confirmed bookings
- Sweep unbooked base CSDs before season and add to CSD balance to minimize unused CSDs
- Limit number of monthly first come, first served bookings per operator, to ensure single operator doesn't book them all

Potential Impact on Operators

- Where you operate
 - Most affected area is MWMA
 - CSDs will encourage activity outside MWMA
- What services you provide
 - Maximizing revenue per CSD may impact services and pricing
- Growth potential in SEKI wilderness
 - CSD caps will limit growth potential in SEKI wilderness
- Advanced bookings
 - Risk of advanced booking without guaranteed CSDs

Exemptions

- Educational trips
 - If for academic credit, no CSD required
 - If not for credit, must have NPS-approved curriculum, learning goals/outcomes, course completion document, certified instructor(s), and educational marketing.
- Administrative/Scientific trips
 - If for NPS or authorized scientific partner, no CSD required

Questions and Discussion

- Your input, reaction, and questions are important!
 - What are we missing?
 - What's confusing or doesn't make sense?
 - What problems or complications do you anticipate?
 - What do you like?
 - What could be improved, and how?
- **Contacts:**
 - jason_watkins@nps.gov, or 559-565-3107
 - alexandra_maki@nps.gov, or 559-565-4235