CAPITOL REEF NATIONAL PARK ROAD REPAIR AND REHABILITATION

COMMENT SUMMARY REPORT

PREPARED FOR:

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Contract Number 140L0618A0008 PMIS Numbers: 249639, 249640, 265911

August 1, 2023



ICF. 2023. Capitol Reef National Park Road Rehabilitation and Repair Civic Engagement Comment Summary Report. August 2023. Prepared for National Park Service, Denver, CO. This report was accomplished with assistance from the U.S. Department of the Interior, National Park Service. The statement, findings, conclusions, recommendations, and other data in this report are solely those of the author(s) and do not necessarily reflect the views of the U.S. Department of the Interior, National Park Service.

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Introduction

The National Park Service (NPS) at Capitol Reef National Park (CARE) is planning a project to conduct repairs on various roadways and parking areas in the park. The project proposes to rehabilitate Chimney Rock Trailhead parking, Visitor Center Parking Lot, and Scenic Drive including construction of a parking area at the junction with Grand Wash and expanding the parking lot at Capitol Gorge. This project would provide needed repairs and improvements to critical roads and parking locations that provide safe access to visitors and park staff. Design and construction for the project is being led by the Federal Highway Administration (FHWA) Central Federal Lands Highway Division.

This report summarizes the civic engagement efforts conducted by NPS for this project and subsequent public comments submitted in NPS's Planning, Environment & Public Comment (PEPC) system.

Civic Engagement Overview

The NPS held civic engagement for the proposed project between June 13 and July 6, 2023. The NPS encouraged public input on the proposed action, identification of resources that would be affected, and suggestions for impacts that should be addressed. NPS issued a press release on June 13, 2023, posted a map board displaying project locations and information at the CARE Visitor Center, and posted a Microsoft PowerPoint presentation summarizing the proposed project and potential impacts, a draft memorandum of agreement to resolve adverse effects to the Capitol Reef Mission 66 and Scenic Drive Cultural Landscape, 70 percent design drawings, and fact sheet on the proposed project's PEPC site. A virtual public meeting was held on June 21, 2023, during which CARE staff presented the PowerPoint presentation and answered questions from participants.

A total of 12 correspondence was received in the PEPC system during the comment period. No hardcopy correspondence was received during the comment period. Correspondence was largely received from Utah.

Virtual Meeting

The virtual meeting was held via Zoom Webinar on June 21, 2023. 13 participants attended the meeting. During the meeting, 4 questions were asked. While these questions are not considered to be formal comments and were not submitted in PEPC as part of the project record, they are summarized here for informational purposes and NPS's consideration.

Q: Is the park's message essentially to avoid the park next summer because of this construction?

A: CARE is aware that this a big disruption to visitation to the park and the park will try minimizing closures and impacts. CARE's messaging will not be to avoid the park. Most of the park will still be open – the projects would occur only in a small percentage of the park. Hikes in Grand Wash will be open from the other end of Grand Wash. Most of CARE's messaging will offer

other activities that people can do in the park. CARE will get the message out about the project so that people can be aware of the projects and can make plans given the closures.

Q: Can Scenic Drive stay open on weekends when presumably road crews would not be working?

A: CARE would like to keep Scenic Drive open as much as possible and will work on incorporating opportunities to minimize closures as the project moves forward into final project design and contracting. Mobilization and demobilization of crews/equipment is dependent on ensuring safety of the public and crews. Entire portions of the road may be milled and it may not be feasible to open it up during breaks in work. It may take more construction time if CARE tries to open the road for shorter periods of time than if the road were to stay closed for the duration of construction, allowing construction crews to focus on getting the work done and reopen the road as quickly as possible.

Q: What about leaving one lane open during the project?

A: CARE looked at this during project design, and how it could work and how to stage construction operations. Doing so increases the cost, and drastically increases the construction time. It would likely take two busy summer seasons rather than just one. Looking at those tradeoffs, CARE decided that closing the whole road to get it done as quickly and efficiently as possible makes more sense. CARE was also concerned about safety with big trucks working and only one lane open for public travel on this narrow roadway.

Q: Is there concern over another active monsoon season? Could that disrupt the current construction timeline?

A: This is always a possibility as Scenic Drive crosses a number of washes. Based on recent experience of reconstruction of State Route 24 west of the Visitor's Center, which is similar distance and terrain to the proposed projects, CARE feels confident that contractors can work around an active season and get the project done.

Comment Analysis

All correspondence was received into the PEPC database. Each correspondence was read, and substantive comments within each correspondence were identified and summarized by developing concern statements. In all, there were 22 comments coded in the PEPC system. Of these, 8 comments directly expressed support and acknowledgement of the need to conduct the proposed project. There were no comments that expressed that the projects should not take place; however, several comments offered suggestions for analysis of impacts, changes to project elements, and construction scheduling. Comments fell in six categories: Design, Construction Timing, Climate Change, Impact Analysis, Wilderness, General, Visitor Safety, and Visitor Experience and Use.

Summary of Substantive Comments

Design

Commenters request that the NPS consider additional alternatives or additional features to existing alternatives. One comment specifically requests an alternative that does not widen any portions of Scenic Drive. Other comments request the implementation of telecommunications, RV parking, and infrastructure to accommodate picnicking and photography along the roadways.

Concern Statements

- Commenter suggests not widening Scenic Drive, but to make all other proposed changes to the road that would repair or improve road surface and water structures.
- Commenter suggests more turn-outs and picnic areas on Scenic Drive to accommodate photographs and picknickers to increase those activities in the park.
- Commenter acknowledges that parking lot expansion and Chimney Rock and Visitor Center is needed; however, parking lots at Grand Wash and Capitol Gorge do not experience overflow parking and may not be necessary. Commenter further acknowledges that expansion at those locations would not do damage to resources or impact visitor experience at the park.
- Commenter suggests that greater visitor capacity could be considered in the plans.
- Commenter suggests that Scenic Drive should be kept in the same configuration winding and slow speed - to facilitate visitor experience and that needed repairs for safety should be completed, but requests that barriers to the viewing experience are kept to a minimum.
- Commenter suggests that Scenic Drive should be kept in the same configuration winding and slow speed - to facilitate visitor experience and that needed repairs for safety should be completed, but requests that barriers to the viewing experience are kept to a minimum.
- Commenter suggests that guardrails or delineator wands should not be used because they detract from the view.

Summary: Project design elements should focus on the need for additional wayside parking, space for RVs to park, while retaining the narrow, winding character of Scenic Drive.

Construction Timing

Commenters noted that closure of Scenic Drive and other areas of the park are scheduled to occur during the park's busy season. Commenters indicated that this may have impacts to local businesses, NPS staff, visitors, and the construction crews. Some commenters suggested that the construction timing should occur during the shoulder season, or in small parts to avoid closures during the busy season.

Concern Statements

• Commenter suggests construction occurs in smaller parts during shoulder seasons rather than during the busy season.

- Commenter expresses concern that closures during the busy season is not beneficial to the park, construction crews, park staff, and visitors.
- Commenter expresses concern that closures would result in decreased visitation during the year of construction and suggests construction during the offseason.

Summary: Completely closing Scenic Drive during the busy season will cause impacts to local businesses, visitor safety, and park resources.

Climate change

Comments discuss the need to consider climate change and the use of fossil fuel vehicles within the park. Comments request NPS to consider these impacts in their analysis.

Concern Statements

- Commenter suggests considering solutions that would reduce the number of fossil fueled vehicles in the park, including parking hubs in gateway communities, EV charging stations, and electric trams.
- Commenter expresses concern that encouraging use of fossil fueled vehicles would contribute to climate change.
- Commenter expresses concern that plans and materials used for construction may become obsolete
 or inadequate because of climate change, and offers that materials used should be resistant to
 climate change.

Summary: The NPS should evaluate project alternatives that reduce fossil fuel use and increase climate change resilience.

Impact Analysis

Comments voiced concern over the potential for increased visitation and associated impacts from increased parking. Specifically, comments discussed the potential impacts related to soils, vegetation, wildlife, invasive species, visual resources, and recreation. Commenters request NPS analyze the impacts of increased visitor use as a result of expanded parking and continue to monitoring the impacts from visitor use.

One comment discussed the need to evaluate whether an environmental assessment is needed to evaluate any potential impacts.

Concern Statements

- Commenter acknowledges that reasonable improvements are necessary to accommodate increased visitation.
- Commenter suggests that NPS should analyze the growth-inducing effects of larger parking lots and additional parking in the project areas specifically that larger parking lots would result in increased traffic to Chimney Rock, Grand Wash, and Capitol Gorge.
- Commenter suggests that increased recreational traffic is likely to result in ecological disturbance and should be analyzed as part of considering growth-inducing effects of the project.

 Commenter suggests additional visitor use monitoring and planning following infrastructure improvements to establish an updated baseline of visitor use information to consider future projects and actions.

Summary: The NPS should analyze project impacts to park resources resulting from increased visitor use associated with expanded parking areas.

Wilderness

An additional comment focuses on the potential impacts of the project on the recommended wilderness. The comment focuses on the proposed parking area expansions at Grand Wash, Capitol Gorge, and Chimney Rock Trailhead and the potential for overlap with recommended wilderness boundaries, impacts to wilderness character due to potential increases in visitor use in wilderness, and the potential need for an EA to fully address impacts caused by greater visitor use in wilderness.

Concern Statements

- Commenter states that the available information does not address or analyze how the proposed project would impact recommended wilderness in the park.
- Commenter states that NPS should prepare an EA to analyze impacts of the proposed project because the project may have significant impacts on natural resources, wilderness areas, and ecological significant or critical areas.
- Commenter states that the proposed projects growth-inducing effects could significantly impact recommended wilderness, and therefore, an EA is required.

Summary: The NPS should analyze project impacts to recommended wilderness resulting from increased visitor use associated with expanded parking areas.

Public Safety

Several commenters discussed the importance of public safety. Comments discuss the need for speed limit adjustments to improve safety. One comment requests the project account for increasing the safety of road cyclists. Several commenters discuss the increased safety as a result of the proposed project. One comment raises the concern of restricting access during the busy season could increase the risk of vehicle accidents. Construction during flood season also poses potential risks to safety.

Concern Statements

- Commenter expressed concern that limiting access to a popular and highly used part of the park
 during busy season may result in more people using fewer areas of the park, which may cause
 resource damage, increased stress on NPS staff, and safety concerns of unprepared people using
 backcountry or remote areas.
- Commenter expressed concern about construction during the flood season and that construction equipment may be damaged and construction crews could be at risk from flash flooding.
- Commenter acknowledges that the infrastructure improvements and repair will increase safety and reduce damage to park resources from informal parking. Further, the commenter acknowledges that

the projects all ensure visitor experience remain high-quality and are wise investments in resilient infrastructure.

- Commenter expresses concern that widening scenic drive would result in vehicles driving faster, which may ultimately cause severe accidents.
- Commenter suggests safety improvements for cyclists within the park, including reduction of speed limits.

Summary: The impact of the project on human safety should take into account vehicle speeds, impacts to crowding and congestion, and construction during the flood season.

Visitor experience and use

Comments regarding visitor experience and use focus on the benefits of expanded roadways and parking infrastructure to reduce risk and impacts of high visitor use. One comment discusses the impact of the project on visual resources and visitor experience. This comment requests NPS reduce visual impacts through the reduction in barriers and utilizing materials that will minimize visual impacts to visitors. An additional comment mentions the potential impact of increased traffic speed on visitor experience.

Concern Statement

 Commenter suggests that Scenic Drive should be kept in the same configuration and to keep speed limits the same to avoid increased traffic speeds that would detract from the scenic nature and visitor driving experience.

Summary: Project elements should enhance visitor experience by reducing congestion, retaining the experience of leisurely driving Scenic Drive, and reducing visual intrusions to the scenery.

Summary of Non-Substantive Comments

Non-substantive comments included comments that generally expressed support or opposition to the proposed projects. Comments that were outside of the scope of the project are also summarized here. These comments are provided to offer NPS an understanding of any rationale for support or opposition to the project. The comments considered non-substantive were coded as "General" in PEPC.

General

Commenters provided general comments on the project including comments outlining the need to for project. Commenters acknowledge that visitor use has increased dramatically recently, and that park infrastructure needs repairs. Some general comments specifically note that there are many vehicles that use Scenic Drive and there is overcrowding at Chimney Rock and the Visitor Center. Comments further discuss visitor experience in the park in general, such as visual impacts of vehicles and RVs. Eight comments express overall support for the project, and two comments specifically address damage to roads and parking lots and the need for repairs for park infrastructure.

Comment Table

Table 1. Public Comments Received for Capitol Reef National Park Road Repair and Rehabilitation Project

Category	Comment	Organization	Contact
Climate Change	Given the worsening climate and extinction crises, NPS should be striving for more innovative and environmentally responsible alternatives. Expanding roads and parking spaces only continues an unsustainable status quo of dependency on private mostly fossil fueled vehicles. What about parking hubs at gateway communities with electric trams to and from the park? How would adequate electric vehicle charging stations be provided, and would they be served by solar panels with battery backups? Where can NPS discourage fossil fuel uses for vehicles and generating electricity? Does public convenience supersede the need for protection of the park's cultural and natural resources? I urge NPS to reconsider this proposed action to advance better solutions.	Not Provided	Not Provided
Climate Change	Encouraging more fossil fueled vehicles would continue the current pattern that is causing the climate crisis.	Retired	Spotts, Richard
Climate Change	[a]nd then, there is Climate Change. Will projected changes render some of these plans obsolete or inadequate? Will there be a need to consider some climate-change-resistant materials for greater sustainability?		Fitch, Ken
Design	To this end, NPS should consider an alternative to the proposed project (or changing the scope of the proposed project) that would not widen any portion of Scenic Drive but would make all other proposed changes to the road (i.e., repair damaged pavement, clean and repair culverts and low-water crossings, improve drainage, install curbs). Increased signage and lower speeds, rather than widened curves, could mitigate safety concerns	Southern Utah Wilderness Alliance	Larsen, Hanna

Category	Comment	Organization	Contact
Design	Since the Scenic Drive is a "center-piece" of the Park and receives a high volume of traffic to include picture-takers and picnickers, it is suggested that more turnouts be added to accommodate the safe departure from the travel lanes for these activities, especially at locations that are already impacted from vehicles departing the pavement. The Scenic Drive already offers access to hiking and other strenuous recreation, but it could better accommodate other activities such as vehicle-picnicking and photography which add huge value to the Capitol Reef experience and gain appreciation for our National Parks		Hoover, James
Design	So building out the parking lots is well worth the closures along the road. Building telecommunications would be well worth it as well. even making sure that RV have ample parking and space to maneuver should be prioritized as the amount of RV travels seem to grow more and more.		Ruelle, James
Construction Timing	As a business owner in Torrey, why can't we prioritize the construction during the off season? I welcome the improvements and think it'll help in the long run, but am worried about decreased visitors next year if the construction is during the entire "busy" season of the park.	Casitas at Capitol Reef	Bolz, Kathryn
Construction Timing	Doing this construction in small parts, or during the shoulder seasons seem like a much better option. This is an incredibly important project and does need to be done, but the logistics of having it done during the busy season does not seem beneficial to the park, those working on the roads, the park staff, and to visitors.		
Design	Should even greater capacity be anticipated in these plans? There is also the impact of the sight of the vehicle presence on the viewshed in the Park. RV presence can quickly alter one's perception of a site.		Fitch, Ken
Design	Many of the park's parking lots were originally designed and built in the 1960s when visitation was about 160,000 visitors per year. Currently, more than 1.2 million visitors experience Capitol Reef National Park annually and improvements are needed for park infrastructure to accommodate the increased visitation. Parking lots are routinely overcrowded, resulting in visitors parking along adjacent roadways causing resource and safety concerns. The parking lot at Chimney Rock Trailhead and Scenic Drive show signs of pavement cracking, shoulder erosion, and damage to various drainage structures.		Fitch, Ken

Category	Comment	Organization	Contact
Design	I understand the decision to expand the Chimney Rock and Visitor Center parking areas. With exploding visitation, we need this. And the expansions do little damage to resources. I'm not convinced that those large parking lots at the mouths of Grand Wash and Capitol Gorge are necessary. I have never seen overflow random parking there, but, again, this expansion would do little damage to resources and will not harm		Trimble, Stephen
Impact Analysis	the experience of growing close to the Capitol Reef landscape. SUWA supports reasonable improvements to accommodate increased visitation in Capitol Reef National Park. However, the Park Service should analyze the growth-inducing effects of providing additional, larger parking lots at the Chimney Rock, Grand Wash, and Capitol Gorge areas. Specifically, NPS should consider the likelihood that expanding size and increasing the amount of parking lots in these areas will increase traffic to these areas and cause attendant impacts to the surrounding lands. Recognizing that these parking lots provide key access points to Chimney Rock, Grand Wash, and Capitol Gorge, the Park Service must analyze impacts to these iconic areas of Capitol Reef that are likely to occur outside of the proposed improvement area.	Southern Utah Wilderness Alliance	Larsen, Hanna
Impact Analysis	In particular, increased recreational traffic to trailheads stemming from each of these parking areas is likely to result in additional ecological disturbance. See generally, Christopher Monz, Outdoor Recreation and Ecological Disturbance (Sept. 2021) https://suwa.org/wp-content/uploads/RecreationReport_Sept2021.pdf. Human-powered recreational activities cause substantial ecological disturbance due to trampling of soil and vegetation, dispersion of aeolian dust, disturbing wildlife, and the introduction of non-native species. Id. at 7-11. All of these disturbances have the potential to detrimentally affect Capitol Reef's resources and values, and therefore should be considered as part of the NPS's analysis of growth-inducing effects of the proposed project.	Southern Utah Wilderness Alliance	Larsen, Hanna

Category	Comment	Organization	Contact
Impact Analysis	More specifically, such reasonably foreseeable impacts trigger NPS's obligation under the National Environmental Policy Act (NEPA) to prepare an environmental assessment (EA) rather than rely on an (undisclosed) categorical exclusion. Before categorically excluding the proposed project from further NEPA analysis, NPS must consider whether "extraordinary circumstances" are present such that the proposed project may "have significant impacts on such natural resourceswilderness areasand other ecologically significant or critical areas."t; Nat'l Park Serv., NEPA Handbook 40 (2015) ("NPS NEPA Handbook") (citing 43 C.F.R. § 46.215). If such circumstances may be present, NPS must prepare an EA. Because the proposed project's growth-inducing effects could significantly impact the Park's proposed wilderness, extraordinary circumstances preclude reliance on a categorical exclusion and require an EA. However, even if NPS determines extraordinary circumstances do not apply, it should nonetheless analyze the proposed project in an EA to ensure the reasonably foreseeable growth-inducing effects on the Park's proposed wilderness are sufficiently considered. NPS may also prepare an EA "any action in order to assist agency planning and decision making"; regardless of whether a categorical exclusion applies. See 40 C.F.R. § 1501.5(b); NPS NEPA Handbook at 17	Southern Utah Wilderness Alliance	Larsen, Hanna
Impact Analysis	As Capitol Reef works on these structural improvements to mostly existing visitor amenities, NPCA encourages the park to scale-up visitor use monitoring and planning. We have observed parks with robust monitoring and study plans are best equipped to implement strategies when visitor experience, resource protection or other emergent factors indicate visitor use management action is needed. Having defensible, data-driven understandings of visitor use patterns will allow Capitol Reef to confidently identify visitor use needs and intentionally invest in future projects and actions aligned with the park's vision and purpose.	National Parks Conservation Association	Jones, Cassidy

Category	Comment	Organization	Contact
Wilderness	Additionally, the available project files do not address how the proposed project (or certain aspects thereof), will impact the Park's proposed wilderness. See, Nat'l Park Serv. Capitol Reef Wilderness Study 16 (Dec. 1973), https://digitalcommons.usu.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1102&context=elusive_docs. For instance, it is unclear whether the proposed improvement and/or additional parking lots overlap with the proposed wilderness. But, even if they don't, NPS has not analyzed how the growth-inducing effects of the proposed project detailed above will impact the proposed wilderness and its eligibility for congressional Wilderness designation. NPS should do so before issuing a decision on the proposed project.	Southern Utah Wilderness Alliance	Larsen, Hanna
Visitor safety	As Capitol Reef National Park (CRNP) rehabilitates the facilities and roads of the park, I would ask that you also look at increasing the safety of road cyclists as they pass through the park. Three factors contribute to the safety of cyclists and accident avoidance: 1. The awareness of cyclists 2. The awareness of motorists 3. The closing speed of vehicles It is the third factor that I would like to briefly discuss. Closing speed is the difference between the speed the cyclist is traveling and that of the motor vehicle approaching from behind. The Department of Transportation has determined that 20mph is a safe closing speed. That is why speed limits at school zone crossings are 20mph. This speed allows the motorist to see the cyclist, recognize what it is, and decide what is the safe course of action. Currently, the CRNP has speed limits between 55mph and 20mph. I am proposing that CRNP incorporate the reduction of speed limits to safe closing speeds throughout the park into the scope of this proposed project. Doing so will increase the safety of all visitors to the park		Kuennemann, Pete

Category	Comment	Organization	Contact
Public safety	Finally, SUWA is concerned about the NPS's plans to widen some curves on Scenic Drive. Although the proposed project's purpose is, in part, to improve safety on Scenic Drive, it is unclear how widening curves will achieve that. Wider curves allow vehicles to drive faster around the curve, whereas the existing, tighter curves, force vehicles to slow down. And, it is well-known that faster vehicle speeds correlate with more severe accidents. See generally Nat'l Highway Traffic Safety Admin., An Analysis of Speeding-Related Crashes: Definitions that the Effects of Road Environments (Feb. 2009), https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/811090	Southern Utah Wilderness Alliance	Larsen, Hanna
Public safety	And the visitation itself brings additional hazards: The width of the road varies and in some places is too narrow to safely allow multiple large vehicles to pass at the same time, particularly on some tight curves with visibility obscured by the surrounding topography. There are also issues with informal parking throughout, These situations become unsustainable for safe visitation. (and compounded by the previous administration priority promotion of RV use and then eagerly promoted by industry advocacy groups for those modalities).		Fitch, Ken
Public safety	The structural improvements to the Scenic Drive and parking areas for Capitol Gorge, Chimney Rock and the Visitor Center will ensure visitors can safely navigate and park their vehicles with ease and without damaging park resources. New parking areas at Grand Wash will facilitate visitor access to trailheads in times of flooding, protecting infrastructure and resources during these inevitable times when recreation demand coincides with natural flood events. Overall, the repair, improvement and expansion projects all ensure visitor experiences remain high-quality and are wise investments in resilient infrastructure.	National Parks Conservation Association	Jones, Cassidy

Category	Comment	Organization	Contact
Public safety	This project is very important in order to sustain the number of visitors the park now receives. But limiting access to the area of the park that the majority of visitors drive through during the busy season seems like a huge accident waiting to happen. This will not only drive more people to fewer areas of the park, therefore drastically increasing resource damage in those areas, but this will also put more stress on employees who work with the public, having to explain to 1+ million people that they cannot visit the bulk of the accessible portion of the park. Additionally, it will drive more people to the more remote areas of the park, and the likelihood of more inexperienced, unprepared people traveling into the backcountry will increase. Visitors who are desperate to do something during their visit may try to drive those roads without the proper vehicle or experience. Additionally, doing construction during the flood season, where the scenic drive is prone to flooding does not seem like a good idea. If construction equipment are present along the road, this could result in equipment being flooded away if not properly taken care of. This also risks the lives of those working on the road.		
Visitor use and/or experience	Paving the Scenic Drive was necessary because of the number of vehicles using it. But keeping the road low-key, winding, and much like a "country road"; is crucial to the visitor experience. So I ask for minimal work. Repairs and safety measures are needed where the road is eroding. But please add as few barriers to the view as possibleIf you must use concrete curbs rather than rock walls, keep them inconspicuous and, if possible, stained red with the colors of the surrounding rockAdd no guardrails or delineator wands. I hate those delineators. Adding them to Highway 24 was completely unnecessary, and they detract from the view. At least they are brown in the park, rather than stark white. They are distracting, ugly, and separate the visitor from the land. Keep them out of the park and off the Scenic Drive! I'd advocate for slowing them down. Engineer the road for slow safety, not quick passage. Taking out curves allows people to drive faster. Please do the minimum to keep the Scenic Drive a "drive"; not a "highway"; and "scenic"; rather than simply a "route"; to Grand Wash and Capitol Gorge.		Trimble, Stephen

Category	Comment	Organization	Contact
Visitor use and/or experience	The structural improvements to the Scenic Drive and parking areas for Capitol Gorge, Chimney Rock and the Visitor Center will ensure visitors can safely navigate and park their vehicles with ease and without damaging park resources. New parking areas at Grand Wash will facilitate visitor access to trailheads in times of flooding, protecting infrastructure and resources during these inevitable times when recreation demand coincides with natural flood events. Overall, the repair, improvement and expansion projects all ensure visitor experiences remain high-quality and are wise investments in resilient infrastructure.	National Parks Conservation Association	Jones, Cassidy
Visitor use and/or experience	Furthermore, enabling vehicles to drive faster (regardless of the posted speed limit) detracts from the scenic and bucolic nature of the aptly-named "Scenic Drive"; road and Capitol Reef as a whole. Slower and windier roads encourage Park visitors to meet the natural world on its terms, rather than speeding along to a destination. Especially when NPS touts Scenic Drive as a point of interest for auto-touring, see Nat'l Park Serv. Guide to the Scenic Drive (Jan. 2, 2022) https://www.nps.gov/care/planyourvisit/scenicdrive.htm, it should consider how widening parts of the road will adversely affect these qualities and the visitor experience.	Southern Utah Wilderness Alliance	Larsen, Hanna