

## Capitol Reef National Park Scenic Drive Project Response to Public Comments

The following are responses to generalized statements of concern expressed during the public comment period.

*Construction Design: Project design elements should focus on the need for additional roadside parking and space for RVs to park, while retaining the narrow winding character of Scenic Drive.*

A primary focus for the project is to address the deteriorating condition of Scenic Drive while retaining the existing narrow and winding feel of the road. In some curved locations, the roadway is not wide enough for two large on-coming vehicles to pass without leaving the paved surface. The result is broken and eroding pavement along the road edge, a situation that occurs elsewhere because road surface consists only of multiple chip-seal applications rather than full-thickness pavement. The situation is further exacerbated by poor drainage. This project seeks to rebuild the entire road foundation including full thickness asphalt pavement. The current road width is 17-22 feet. This project will result in a consistent 20-foot road width except around curves where the width will be increased to approximately 21-23 feet.

An additional purpose of the project is to reduce parking area congestion and enhance visitor safety. To this end, parking areas at the visitor center and Chimney Rock Trailhead have been redesigned to improve access and parking for RV's and vehicles with trailers with a goal of reducing instances of traffic backing onto or parking on Utah State Route 24. In the case of the visitor center, there will be approximately 21 additional parking spaces with more room for larger vehicles and two drive lanes to reduce parking wait times and traffic backups. At Chimney Rock Trailhead, overall parking spaces increase by one parking spot, with a sufficient turning radius and pull-through parking spots for larger vehicles. Additional parking at the junction of Grand Wash Road and Capitol Gorge is being added to provide more formal parking when the respective wash roads are closed due to flooding.

The proposed actions are viewed as the minimum acceptable to address degraded infrastructure and safety concerns. Additional roadside parking and new facilities such as picnic areas are beyond the scope of the current project as they will require substantial additional planning, design, and compliance.

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

Capitol Reef National Park seeks to minimize disruptions caused by this project. Fully closing the road reduces the construction time from 2 years to 4-6 months and substantially reduces visitor-construction traffic congestion and safety concerns. Much of the project involves paving that requires temperatures above 50°F precluding winter work.

Approximately 25% of park visitors travel on Scenic Drive south of the campground annually. Given that the proposed closure would affect one of two busy seasons, the impact to other park areas and associated congestion are expected to affect less than 20% of annual park visitation and not result in measurable impacts to park resources and visitor safety. All other park roads and facilities will remain open when Scenic Drive is closed, including the visitor center, the Gifford House, orchards, the campground and picnic areas, as well as all SR24 trailheads (Sulphur Creek, Chimney Rock, Petroglyph Panel, Hickman Bridge, and Grand Wash).

*Addressing Climate Change: The NPS should evaluate project alternatives that reduce fossil fuel use and increase climate change resilience.*

This project increases resilience of park facilities and enhances visitor safety in the face of climate change. Scenic Drive and parking area drainage and durability will be substantially improved helping to control future maintenance costs. Furthermore, visitor safety will be increased by enhancing parking outside of washes subject to increasing monsoon driven flooding.

The scope of the project is to enhance existing facilities. Addressing needs such as vehicle charging stations and shuttle systems requires substantial additional planning and funding that are well beyond the scope of this project.

*Visitor Use Impact Analysis: The NPS should analyze project impacts to park resources resulting from increased visitor use associated with expanded parking areas.*

The intent of this project is to accommodate existing use that increases visitor safety through improved traffic circulation efficiency and modest changes to parking capacity. The proposed changes to parking areas will not result in a measurable increase in visitor use. Details for each parking area are as follows:

- 1) Chimney Rock Trailhead. Improvements to this parking area will result in one additional parking space.
- 2) Visitor Center. Improvements to this parking area will result in approximately 21 additional parking spaces depending on the mix of cars and larger vehicles. This increase minimally accommodates existing overflow parking that occurs on most days during the spring and fall high visitation seasons. 10 of the added spaces are for large vehicles that contribute substantially to existing parking congestion as well as safety concerns resulting from parking in drive lanes. 4 of the added spaces are accessible parking, an outstanding need throughout the park. The net result is very few additional parking spaces and no measurable increase in visitor use.
- 3) Grand Wash at the intersection with Scenic Drive. Actions at this location will result in approximately 20 formalized parking spaces to accommodate existing parking needs when Grand Wash Road is closed due to flooding. (Flooding closed the road on 70 days in 2022.) 10 of the 20 spaces formalize existing informal parking along Scenic Drive. Given that this informal parking often appears inadequate when Grand Wash Road is closed, an additional 10 roadside spaces will be added along Grand Wash Road near the intersection with Scenic Drive. These parking areas are not at a trailhead and likely will be little used when Grand Wash Road is open based on current observations. Therefore, addition of these flood-safe parking spaces will not result in a measurable increase in visitor use.
- 4) Capitol Gorge at the end of Scenic Drive. Similar to Grand Wash parking additions, 21 spaces will be added to the existing lot to accommodate visitors wanting to access Capitol Gorge when it is closed due to flooding. (Flooding closed the road on 70 days in 2022.) These additional parking spaces are not at a trailhead and likely will be little used when Capitol Gorge Road is open. Therefore, addition of these flood-safe parking spaces will not result in a measurable increase in visitor use.

While the park is currently monitoring visitor use patterns and volumes, formally addressing changes to visitor capacity is beyond the scope of this project.

*Impacts to Wilderness: Commenters were concerned that project elements may occur in recommended wilderness and expansion of Chimney Rock Trailhead, Grand Wash, and Capitol Gorge parking areas will facilitate increased visitor use of recommended wilderness.*

The project area does not occur in recommended or potential wilderness, but it does occur adjacent to those areas. The parking areas at Grand Wash and Capitol Gorge are not located at trailheads accessing the park's wilderness area and visitor access to wilderness will remain unchanged. The parking area at Chimney Rock is located at a trailhead entering wilderness but will only expand visitor access by one vehicle, which would result in no measurable increase to wilderness use. Wilderness character and values, including the primeval character and influence of the wilderness; the preservation of natural conditions; and the existing outstanding opportunities for solitude will remain along with the existing primitive and unconfined types of recreational experience. Nothing in the proposed action would diminish the wilderness eligibility of an area possessing wilderness characteristics and the park will continue to manage the area as such until the legislative process of wilderness designation has been completed.

*Public Safety: 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.*

The speed limit on Scenic Drive will remain 25 miles per hour (mph) outside of the 15 mph zone between the picnic and campground areas. The state of Utah determines the speed limit on Utah State Route 24, though the NPS may make speed limit recommendations. The latter is outside the scope the current project.

The primary purpose for parking lot improvements at the visitor center and Chimney Rock trailhead is to reduce congestion and enhance safety. Improvements to traffic circulation including additional parking for large vehicles (RVs and vehicles with trailers), an additional drive lane at the visitor center parking area, and improved turn radii will reduce traffic backing up onto SR24, instances of vehicles parking on SR24, and the number of pedestrians on SR24.

All areas of the park are subject to seasonal flooding. This was particularly evident during the 2022 UDOT project in the park. Despite frequent storms and flooding during that project, the contractor was able to complete the work safely and on schedule. We would expect similar performance for this project.

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

This project reduces congestion by providing adequate and safe parking off of Utah State Route 24. Parking lot improvements at the visitor center and Chimney Rock trailhead increase traffic circulation efficiency via multiple or wider drive lanes and increased large vehicle parking capacity. Overall parking capacity will increase by 21 spaces at the visitor center and 1 space at Chimney Rock trailhead.

Scenic Drive will retain the look and feel of a narrow backcountry byway. The road width will remain largely unchanged as will the alignment including curves. This will continue to encourage low vehicle speeds.

Visual intrusions will remain minimal. There will be no additional delineators or guardrails, except as needed to mark culvert locations. Existing stone curbing will be replaced in kind. New curbing and sidewalks will be constructed with concrete colored to match surrounding rock and soil. Additional parking at Grand Wash will impact visual resources when Grand Wash is closed. This portion of the project will formalize 10 parking spaces along Scenic Drive that have developed during extensive closures in 2022. It will also include additional roadside parking for 10 vehicles along Grand Wash Road. It is anticipated that these parking areas will be lightly used when Grand Wash Road is open as there are no trails in the area.