



Finding of No Significant Impact

Arches National Park Transportation Implementation Plan

Background

The National Park Service will implement a transportation plan that includes various actions for improving conditions in Arches National Park, including improvements to parking areas and roadside pull offs, traffic calming treatments, motorized interpretive tours, and intelligent transportation system applications. The NPS also will continue to pursue partnerships with local and regional interests, maintain ongoing Visitor Experience and Resource Protection (VERP) program implementation and monitoring, and employ various visitation and congestion management strategies.

The actions included in the plan are needed to manage the quality of visitor experiences at popular attractions in the park, which have deteriorated over time as a result of traffic congestion and crowding at parking areas, trailheads, and popular rock formations. As the popularity of Arches National Park continues to grow, the transportation system will need to be upgraded to enhance visitor experience and manage twenty-first century levels of use. While the plan focuses on the needs of the park, potential solutions will also benefit the surrounding region, including the City of Moab, the park’s gateway community.

Development of the transportation implementation plan was one of the primary outcomes of the multi-year transportation planning process. The transportation implementation plan (Alternative B) focuses on actions that can be realistically and reasonably accomplished within the next six years. The transportation implementation plan was developed through extensive coordination with local, state, and federal agencies and an interactive, multi-phased public involvement process. Potential elements to be included in the implementation plan were evaluated in accordance with the following criteria.

- Consistency – with regional and park goals and policies
- Mobility – the ability to accommodate visitor access to park features, balanced with the need to enhance visitor experience and protect resources
- Capital, Maintenance and Operating Costs – of the proposed elements and considering affordability and cost effectiveness to users, providers, and taxpayers in general
- Visitor Experience – a qualitative determination of whether a proposal provides for a range of experiences and a high quality park experience to a diversity of visitors
- Safety and Security – addressing a diversity of visitor needs
- Resource Protection and Environmental Impacts – determination of whether proposed elements

have any clearly irresolvable environmental impacts and analysis of appropriate measures for mitigating impacts

- Regional Land Use and Visitation – potential effects on land use patterns and visitation, tourism and socioeconomic patterns that affect the park and the region
- Public Support – a determination as to whether or not a proposal has obvious or overwhelming support or opposition within the visiting public it is intended to serve

The Transportation Implementation Plan included an environmental assessment (EA) prepared in accordance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508). The EA analyzed the potential environmental effects of two alternatives: Alternative A – No Action, and Alternative B – the National Park Service preferred alternative. The preferred alternative is implementation of the transportation implementation plan.

The Transportation Implementation Plan/Environmental Assessment was released for public review and comment on September 18, 2006. After consideration of comments from the public, agencies, and organizations, Alternative B has been selected for implementation.

Preferred Alternative: Alternative B

The preferred alternative, Alternative B, is implementation of the Transportation Implementation Plan. Alternative B includes the following elements.

- Formal roadside pull off improvements: 21 locations will be paved and improved and 5 additional locations will remain unpaved and continue in use as informal pull off areas. Roadside pull off areas will enhance the driving experience of the park.
- Rehabilitation of over 170 existing social pull off areas. These disturbed areas will be rehabilitated over time through protection, raking, contouring, soil amendments, and other treatments.
- Parking area improvements at Devils Garden, Sand Dune Arch, the Windows/Double Arch, and other areas to better direct visitors and enhance access to park features, while at the same time protecting the park's cultural and natural resources from further damage due to overflow parking along roadsides and related creation of social trails.
- Motorized interpretive/sight-seeing tours to expand visitor access and travel mode opportunities while at the same time enhancing visitor experience.
- Various types of traffic calming treatments to improve traveler safety and reduce speeds in congested areas and areas of high pedestrian activity.
- Intelligent Transportation System (ITS) actions such as the provision of advance information about parking conditions at the park through various methods.
- Ongoing coordination and partnerships with regional interests. These partnerships will be strengthened through project and program implementation processes.

Mitigation

The mitigation measures for Alternative B, listed in Chapter 2 of the Transportation Implementation Plan/Environmental Assessment, will reduce potential effects on natural resources, cultural resources, visual resources, visitor use and experience, traffic and transportation, and other elements. Mitigation measures are described below.

Resource conditions will be monitored based on the impact evaluation criteria described under the impact topics in the EA. Existing Arches National Park and National Park Service rules, regulations, and policies will be closely followed, including mitigation measures identified in the park's *General Management Plan/Development Concept Plan and Environmental Assessment* (USDI National Park Service 1989).

Best management practices and various mitigation measures as described in the EA will be used during all phases of construction activity, including pre-construction, actual construction, and post-construction.

A soils treatment and revegetation plan will be developed to rehabilitate disturbed areas. Appropriate methods of rehabilitation and treatment of disturbed areas will be evaluated on a case-by-case basis and may involve protection, raking, and contouring in some areas depending on park natural resource specialists' recommendations.

Measures to mitigate the loss of biological soil crusts at the Sand Dune Arch Trailhead parking site will be identified and finalized during the detailed design phase. Measures may include (but will not be limited to) restoration of a partially-disturbed soil crust area in another part of the park to compensate for the on-site loss, using crust "mined"(excavated and removed) from the development site.

Ground surface treatment will include grading to natural contours, topsoil and topsoil mantle replacement, seeding, and planting. This work will occur as soon after the completion of construction as possible.

In an effort to avoid introduction of nonnative/noxious plant species, no imported hay bales or untreated straw will be used during construction. Alternate materials, as described in the EA, will be used for any erosion control dams that may be necessary.

Salvage of topsoil mantle, topsoil, and incidental native vegetation will occur separately from construction areas (as feasible), for reuse during rehabilitation of disturbed areas. Topsoil removal and salvaging will occur in accordance with provisions described in the EA.

Disturbance to existing native vegetation will primarily be contained in previously disturbed areas or within narrow construction limits. Whenever practicable, soils and plants affected by construction will be salvaged for reuse in site restoration. Revegetation, when implemented, will use salvaged plants and/or seeds or propagules from native species (genetic stocks originating in the project area) to the maximum extent feasible. Any revegetation plantings will strive to reconstruct the natural spacing, abundance, and diversity of native plant species. Undesirable

plant species will be monitored and controlled, as necessary. To prevent the introduction, and minimize the spread, of non-native vegetation and noxious weeds, the related specific measures described in the EA will be implemented during construction.

Best management practices for storm water management and sediment control in desert areas that apply specifically to the construction sites will be implemented, and appropriate erosion and sediment control measures will be in place at all times. An erosion and sedimentation control plan will be required as part of the construction contract documents associated with parking and pull off area improvement projects. The purpose of the plan and its recommended best practices will be to prevent or reduce nonpoint source pollution and minimize soil loss and sedimentation due to construction activities.

Reconfigured and new parking facilities will be designed to minimize long-term effects on water quality through the use of best management practices for runoff control. Best management practices, such as the use of curbing to control and direct stormwater to detention facilities or the use of filter strips for water quality control, will be implemented.

Although selection and implementation of the preferred alternative will require soil recontouring and pavement removal and replacement, silt screens or other methods of erosion and sedimentation control, including best management practices, will diminish impact to water quality. In potentially erosive areas, silt fencing may be installed to rest on the soil surface, secured by stakes, weights, or boulders, rather than by burying the bottom of the fence, to reduce soil disturbance.

Sediment traps will be inspected weekly or immediately following rain and silt will be removed when the traps are 75 percent full. During periods of heavy rainfall, the NPS field supervisor may elect to issue a temporary stop order, in which case work will be halted. During these work stoppage periods, project personnel will be required to continue to check the silt fences and check dams, maintain the silt fences in effective condition, and remove accumulated sediment, as necessary, to ensure stabilization is maintained.

Construction and staging areas will be fenced to prevent access by wildlife, and to help prevent wildlife from consuming possible equipment fluid leaks such as antifreeze. Contractor will be required to maintain strict garbage control to prevent scavengers from being attracted to the project area. Food scraps will not be discarded or fed to wildlife.

Before construction, the NPS will conduct additional surveys for rare and special status species before taking any action that might cause harm. In consultation with the USFWS and the state of Utah, the NPS will take measures to protect any sensitive species, whether they were identified through surveys or presumed to be present. Construction will be scheduled during the calendar year to avoid impacting special status species.

Reclaimed areas will be monitored annually after construction (for a time period to be determined by NPS natural resource specialists) to determine if reclamation and revegetation efforts are successful or if additional remedial actions are necessary. Monitoring techniques currently in use by NPS resource staff at Arches (including evaluation of aerial photo changes

annually and in- the- field visual inspection) will be implemented in these areas.

Remedial actions could include installation of erosion control structures, reseeding, replanting the area, or other measures for controlling non-native plant species in accordance with NPS-13, *Integrated Pest Management Guidelines*.

Pre-construction surveys for archaeological resources and onsite monitoring of all subsurface excavation will be undertaken if necessary at construction sites located in Moab.

If, through further tribal consultation, the Ute or other consulted tribes subsequently identify the presence of ethnographic resources, appropriate mitigation measures will be undertaken in consultation with the tribes. The location of ethnographic sites will not be made public.

In the event that archaeological resources are discovered during construction, the National Park Service archaeologist responsible for monitoring during construction will immediately notify the NPS field supervisor, who will direct that work be halted or redirect it to another area of the project until the finds can be documented, their significance assessed, and appropriate mitigation strategies developed in consultation with the Utah State Historic Preservation Officer.

In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, work will be stopped in the area of the find, and provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) and its implementing regulations (43 CFR Part 10) will be followed.

If unknown paleontological resources are discovered during construction, work in that location will be stopped until the resources can be properly recorded and evaluated. Measures will be taken to avoid further resource impacts or to mitigate their loss or disturbance

To minimize intrusions on visual resources, final design and placement of all new construction will be sensitive to the context of the desert landscape and compatible with the scenic characteristics of the Arches National Park experience.

A signing plan will be developed as part of the construction contract documents. The contractor will provide the plan to the park superintendent for review and approval prior to implementation. The plan will address appropriate placement and design of new signs, including proper locations for traffic safety and preferred design treatments for visual compatibility and cohesion. The signing plan will address new wayfinding/orientation, interpretive, and regulatory signs.

Fencing and other edge treatments (lines of boulders) will be designed and constructed to be compatible with the desert landscape and consistent with other types of fencing and edge treatments already in place at the park (such as the post and rail fencing common at trailheads).

To the extent practical, work will be scheduled to avoid construction activity and construction related delays during peak visitation times. No holiday or night time work will be allowed. Weekend work (Friday through Sunday) will not be allowed unless authorized in writing by the park superintendent.

A public information program to warn of temporary closures, delays, and road hazards during construction will be implemented. This program will help convey appropriate messages to the public and aid in mitigating potential impacts on visitors' expectations and experiences. Announcements to public information outlets will be provided as needed. The contractor also will provide daily delay schedules, variable message boards, coordinated with the project engineer, and temporary construction signs in and outside the park.

Temporary short-term full closure of parking areas may be necessary on limited occasions. Such full closures will be for the minimal time required to complete the work activity or correct the problem. The contractor will provide a weekly delay schedule with daily updates to the NPS field supervisor to assist the park in management of visitation and park operations during construction.

After construction, information will be distributed at the visitor center and within the park newsletter to inform the public about actions that have been implemented, to reinforce visitation and congestion management activities, to discourage ongoing social pull offs and trails activities, and to encourage long-term stewardship and resource protection.

Traffic signs and pavement markings on park roads will be consistent with the standards contained in the Manual on Uniform Traffic Control Devices, as supplemented by the National Park Service Sign Manual (USDI National Park Service 1988). Special traffic calming devices and signs not yet recognized in these manuals may be installed with FHWA approval.

A Traffic Control Plan will be developed in conjunction with the construction documents for use during the construction period(s) associated with roadside pull offs and parking area improvements. The plan will be provided by the contractor to the park superintendent for review and approval prior to implementation. This plan will include: proposed areas of construction, anticipated delays, safety considerations, estimated lengths of delay, and estimated number of vehicles stopped at any one point, as applicable to the construction.

Construction-related traffic delays resultant from work at pull offs and parking areas will be limited to a maximum of 20 minutes in each direction. Flaggers will record delay times at stopping points and the results will be reported to the project engineer. Immediate access will be provided to any emergency vehicles. If required, flaggers, pilot cars, signing, variable message signs and/or the newest technology, as appropriate, will be used to manage traffic around work at pull offs and parking areas.

Fugitive dust will be controlled by periodic application of water to the construction areas. Water used for dust control will be obtained from approved sources outside the park.

Construction equipment will be maintained in satisfactory operating condition (i.e., it will be equipped with required safety components, and will not be leaking hazardous liquids or emitting hazardous or undesirable fumes above allowable local air quality legal limits). Construction vehicle engines will not be allowed to idle for extended periods of time (exact time will be determined in consultation between park resource staff and project engineer). Visitors stopped due to construction delays will be encouraged to turn off their engines.

Other Alternatives Considered

One other alternative in addition to Alternative B was considered in the EA: Alternative A, No Action. Alternative A represents the current management direction for Arches National Park. The existing use and development of the park is based on planning initiated and implemented through the *Arches National Park General Management Plan and Development Concept Plan* (USDI National Park Service 1989) and the *Visitor Experience and Resource Protection Implementation Plan* (USDI National Park Service 1995a). Alternative A does not include actions featured in the transportation implementation plan, including roadside pull-off improvements, motorized interpretive/sight-seeing tours, traffic calming improvements, and intelligent transportation system elements. Under Alternative A, minimal parking area improvements and management would continue to occur as part of routine maintenance activities in the park, but parking improvements to the extent described under Alternative B would not occur. Ongoing partnerships with regional agencies and organizations would continue to occur under Alternative A, but would not be facilitated through the actions included in the transportation implementation plan. Alternative A does not include actions to ease traffic and parking congestion and to increase opportunities for transportation alternatives to driving private vehicles, thus it does not meet the plan purpose and need as well as Alternative B.

Other actions and alternatives with longer implementation timeframes were considered but dismissed. The NPS initially considered a broader range of long-term transportation options for Arches National Park, but after further scoping and consultation, decided to create a transportation implementation plan with scaled back alternatives that remained within the scope of the current park General Management Plan (GMP) and could be implemented within a six year timeframe. The scaled-back planning effort discontinued consideration of a park-based alternative transportation system (shuttle bus), a multi-purpose trail system, bicycle improvements, and long-term Intelligent Transportation System (ITS) strategies that would have supported the park-based shuttle system. The transportation plan focuses on near-term actions to address traffic congestion and related effects to natural and cultural resources. Consideration of longer term actions will be deferred until a new GMP can be completed. Given the reduced scale of alternatives, the National Park Service determined that the appropriate level of analysis for the implementation plan was an Environmental Assessment.

Environmentally Preferred Alternative

After careful review of potential resource and visitor impacts, and identification of measures to mitigate impacts to natural and cultural resources, the National Park Service has determined that the environmentally preferred alternative is Alternative B.

The environmental preferred alternative is defined by the Council on Environmental Quality (CEQ) as:

The alternative that will promote the natural environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment. It also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources (46 Federal

Register 55:18026-18038, March 23, 1981).

Section 101 of NEPA has three subsections. Section 101(a) recognizes the importance of environmental quality related to overall welfare of man, and declares a continuing policy to promote conditions under which man and nature can exist in productive harmony. Section 101(b) establishes a continuing responsibility for the federal government to improve and coordinate federal plans, functions, programs, and resources to the end that the Nation may:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural, and natural aspects of our national heritage and maintain, whenever possible, an environment that supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.”

Section 101 (c) recognizes that each person should enjoy a healthful environment and has a responsibility to contribute to the preservation and enhancement of the environment.

According to NPS policy (Director's Order 12, 2001), the environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA Section 101(b), which includes alternatives that accomplish the goals from this section (listed above).

While some specific actions under Alternative A may achieve similar levels of protection for specific cultural resources, natural resources, and/or visitor experience to Alternative B, in aggregate, Alternative B best achieves the full range of national environmental policy goals as stated in Section 101 of the National Environmental Policy Act.

Compared to Alternative A, Alternative B will provide a higher level of natural and cultural resource protection while concurrently providing for a wider range of beneficial uses of the environment. For example, this alternative will improve public safety and ensure pleasing surroundings throughout the park by reducing traffic congestion and crowding at existing pull offs, parking areas, and trailheads, thus more successfully complying with NEPA goals 2 (ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings) and 3 (attain the widest range of beneficial uses of the environment without degradation).

Alternative B will also provide substantial cultural and natural resource benefits in accordance with NEPA goal 4 (preserve important environmental aspects and maintain an environment that supports diversity and variety of individual choice) by formalizing pull off locations throughout

the park, and thereby discouraging spontaneous stopping and social pull offs that have resulted in disturbance to cultural resources and natural vegetation and soils. Implementation of this alternative will result in a disturbance of approximately 11,900 square feet of parkland for improvements to pull offs and 15,000 square feet for parking areas. However, this alternative will have a long-term beneficial effect on cultural and natural resources by reclaiming approximately 201,689 square feet of currently disturbed areas at more than 170 social pull off locations and 18,095 square feet of disturbed landscape at parking areas, resulting in a net benefit of rehabilitated areas of 189,789 square feet and 3,095 square feet respectively.

Alternative B will more successfully promote the conservation of renewable resources compared to Alternative A by reducing vehicle fuel consumption. Increased use of public motorized interpretive tours will reduce fuel consumption by eliminating some private vehicle trips entering the park, particularly during peak periods. The type of vehicle to be used for motorized interpretive tours in Arches National Park will be highly fuel efficient with low emissions and may run on alternative fuel (such as propane or biodiesel). Therefore, Alternative B will be more effective in achieving goal 6 (enhance the quality of renewable resources).

Why the Preferred Alternative Will Not Have a Significant Effect on the Human Environment

The following criteria were considered in determining whether or not the proposed action would have significant impacts, and thereby require preparation of an Environmental Impact Statement (EIS):

1. Impacts that may be both beneficial and adverse.

The preferred alternative will have long-term beneficial effects related to transportation and traffic conditions, visitor use and experience, park operations, biological soil crusts, visual resources, and land use, and both short and long-term beneficial effects on socioeconomic conditions in the region. The preferred alternative will have adverse effects in the short term during construction on transportation and traffic conditions, visitor use and experience, park operations, biological soil crusts, visual resources, and land use but these effects will be offset by mitigation measures. Impact levels range from negligible to moderate.

2. The degree to which public health and safety are affected.

Beneficial effects to public health and safety are expected to result from implementation of the preferred alternative. Safety on park roadways will be enhanced from parking lot improvements, traffic calming improvements, discontinuing hazardous roadside pull offs and formalizing suitable pull offs.

3. Any unique characteristics of the area, such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

Effects from the preferred alternative will be negligible to historic and archeological resources and ecologically critical areas. There are no prime farmlands, wetlands, or wild and scenic rivers in proximity to areas where improvements are planned under the preferred alternative.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

Environmental impacts from the plan are generally not controversial. No substantial questions were raised about the size or nature of effects of the preferred alternative during scoping or during the public review period for the EA.

5. The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.

No highly uncertain impacts or unique or unknown risks were identified from the preferred alternative.

6. Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

The preferred alternative establishes no precedent for future actions with significant effects, and does not represent a decision in principle about a future consideration.

7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.

Cumulative impacts, resulting from the preferred alternative combined with other past, present or foreseeable future actions, were analyzed in the EA. This combination of effects was not cumulatively significant.

8. The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

The impact topic “Cultural Resources and Section 106 of the National Historic Preservation Act” was dismissed from detailed analysis in accordance with CEQ “Regulations for Implementing the National Environmental Policy Act” (40CFR Part 1500-1508) and NPS Policy (Director’s Order 12), which allow dismissal of certain impact topics from detailed analysis if the expected adverse impacts would be negligible or minor.

The NPS/Southeast Utah Group archeologist conducted field surveys for each of the proposed pull off locations and parking areas, and did not find cultural resources. Consequently NPS determined that no historic properties would be affected by implementation of the transportation plan. The Utah State Historic Preservation Office concurred with this finding in a memo on

April 10, 2007.

9. The degree to which an action may adversely affect an endangered or threatened species or its critical habitat.

No adverse effects were identified for any endangered, threatened or sensitive species or designated critical habitat. The U.S. Fish and Wildlife Service concurred with this finding on November 17, 2006.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

Implementation of the plan does not violate any federal, state, or local law or requirements imposed for the protection of the environment.

Impairment

The National Park Service has determined that implementation of the preferred alternative will not constitute an impairment to the resources or values of Arches National Park. This conclusion is based on a thorough analysis of the environmental impacts described in the EA, the public comments received, relevant scientific studies and data, and the professional judgment of the decision-maker, guided by the direction provided in the NPS Management Policies (2006). Although the preferred alternative will have some negative impacts, in all cases, these adverse impacts are the result of actions taken to preserve and restore other park resources and values and enhance visitor experience. The severity, duration, and timing of impacts associated with this alternative, and their direct, indirect, and cumulative effects, do not constitute impairment of park resources and values, and will not violate the National Park Service Organic Act.

Public Involvement

Public involvement was an integral part of the development of potential transportation solutions, and of the Transportation Implementation Plan/Environmental Assessment. A variety of public involvement and community outreach activities were conducted over the course of the planning process, including public meetings and workshops, printed information sheets and newsletters, website postings, and visitor travel surveys.

The Transportation Implementation Plan and Environmental Assessment (TIP/EA) was made available for public review and comment from September 18, 2006 to November 1, 2006. To facilitate public comment, the National Park Service held two public open houses at the Arches National Park Visitor Center on Thursday September 21, 2006 from 2:00 to 4:00 pm and 5:00 to 6:30 pm. Printed copies of the document were made available for public review at the Grand County Public Library (Moab, UT), Moab Information Center, Arches National Park Visitor Center, and the NPS Southeast Utah Group Headquarters (Moab, UT). The TIP/EA was posted on the Arches National Park web site and copies were sent to a number of state and federal

agencies. The document was also made available in print and on compact disk by request. Notices of availability were sent to local and regional newspapers, interested tribes, and the Park's mailing list. The park received comments from about 15 people at public meetings, and nine comment letters. Comments are summarized below.

Conclusion

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There will be no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or on other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection laws.

Based on the foregoing, the National Park Service has determined that an EIS is not required for this project and thus will not be prepared.

Approved: /s/ Anthony J Schetzle (for) 8/3/07
Michael D. Snyder, Director, Intermountain Region Date

Errata to the Arches National Park Transportation Implementation Plan and Environmental Assessment

Page 2-14. Figure 2.4 was incorrectly labeled as “Proposed Improvements to the Devils Garden Parking Area” in the earliest printed copies of the document. The correct name of Figure 2.4 is “Proposed Improvements to the Windows and Double Arch Parking Area.”

Summary of Public Comments on the Arches TIP/EA and Responses

The following summary of comments was transcribed and paraphrased from oral comments made by attendees at the September 21, 2006 public open house as well as comments submitted in written form and through e-mail to Arches National Park during the comment period.

The open house was held for the purpose of obtaining public comments and input on the Arches Transportation Implementation Plan and Environmental Assessment. Approximately 15 people attended the open house held at the park’s community room. Comments are organized by topic. Individual attendees may have made more than one comment or a series of comments.

In addition to the comments received at the public meeting, nine separate written and e-mail communications were received from organizations, agencies and private citizens (including comments submitted through the National Park Service Planning Environment and Public Comment [PEPC] program). Within each of these communications, there were multiple comments that are summarized below under various topic areas. Responses are provided for each comment.

Shuttle Service/Motorized Interpretive Tours

The following comments pertain to shuttle service and motorized interpretive tours.

Comment:

Several commentors mentioned how much they enjoyed riding the shuttle systems at Zion and Bryce Canyon national parks, asked if the proposed motorized interpretive tours would provide a similar experience, and/or suggested the need for a shuttle system at Arches National Park.

Response:

The NPS elected to focus this plan on actions that could be implemented within a six year timeframe, thus a continuously operating shuttle system like those at Zion and Bryce Canyon will not be established at this time. The motorized interpretive tour program for Arches will have some similarities to the Zion and Bryce Canyon shuttle systems, such as transportation of visitors in large-capacity vehicles. The Arches system will be operated through a private entity, whereas the Zion and Bryce systems are operated more directly by the National Park Service.

Visitors on the Arches interpretive tours will remain with the same vehicle throughout their tour and will not be able to follow an independent itinerary, transferring from one tour vehicle to another, as is possible with the Zion and Bryce systems. As with the Zion and Bryce Canyon shuttles, the Arches motorized interpretive tour system will provide an alternative means for accessing and traveling within the park. It is likely that the provision of a general motorized interpretive tour service will reduce the number of individual vehicles in the park, and as such will reduce vehicle and parking congestion and related impacts.

Comment:

An organization currently providing Arches tours requests that the TIP/EA include more specific information on the services provided by this and other organizations, including the provision of educational trips for schools and teachers, in the description of current services. This organization also requests that the selection of a motorized tour operator not preclude the potential for this or other organizations to conduct school programs or specialty tours.

Response:

The summary of existing motorized interpretive tours under the no action alternative in the TIP/EA describes generally the range of types of independent tours currently provided by several different operators in the park. In the future the NPS's intent is that commercial motorized tours will be in compliance with the provisions of 33 CFR 5.3, under either commercial use authorizations or concession contracts. Additional planning and feasibility analysis will be required before the specific details of the motorized interpretive tour service can be determined.

Comment:

The National Park Service should consider the potential of providing shuttle service between Arches National Park and Canyonlands National Park.

Response:

At this time, there are no specific plans for the National Park Service to provide shuttle service between Arches and Canyonlands National Parks. There are private touring and guiding services operating out of Moab that offer tours to both parks within a day. The National Park Service will take this comment under advisement in future transportation planning efforts that relate to Arches and Canyonlands national parks.

Comment:

The motorized interpretive tour program will provide another way for people to access the park and learn about its unique features, while at the same time potentially reducing traffic congestion in the park.

Response:

The Transportation Implementation Plan and Environmental Assessment document addresses these potential benefits of the motorized interpretive tour program.

Roadway Safety, Including Roadside Pull Offs and Traffic Calming

The following comments relate to roadway safety, as well as roadside pull offs, traffic calming and speed of travel in the park.

Comment:

Traffic calming is a great idea. People drive too fast in the park and exceed the speed limit on a regular basis.

Response:

The Transportation Implementation Plan includes traffic calming measures that will be implemented through various strategies and physical improvements to reduce the traveled speed on roadways while maintaining vehicular capacity in Arches National Park.

Comment:

Traffic calming is a good idea, but rumble strips could create undesirable noise in the park and could create potential hazards for bicyclists.

Response:

The Transportation Implementation Plan suggests the use of textured paving and/or recessed pavement markers to alert drivers to pedestrian crossing areas and provide traffic calming effects (vehicles slowing). Various treatments emit different levels of sound. Recessed pavement markers do not create the potential hazards for bicyclists that raised pavement markers do. Raised pavement markers, such as buttons, would not be desirable in the park due to concerns related to bicycle safety, as well as vulnerability to damage from snow plows.

The National Park Service will be analyzing the best approach for traffic calming treatments as part of final design of such treatments before they are implemented. Appropriate methods to avoid introducing undesirable noise levels in the park will be addressed during this final design process.

Comment:

The travel lanes are very narrow in the park. Large vehicles take up the entire lane and sometimes have to move into the opposing lane in tight areas.

Response:

Although specific roadway/shoulder widening is not included in the Transportation Implementation Plan, the park has applied for funding as part of ongoing roadway maintenance to rehabilitate roadway shoulders.

The plan includes development of roadside pull off areas, which will enhance safety in the park by providing more paved locations for vehicles to pull off, allowing others to pass.

Comment:

It is probably time to ban RVs (recreational vehicles) in the park and construct an alternate Bureau of Land Management campground in the vicinity of Salt Valley near Highway 191.

Shuttles could then take visitors from this campground to Arches National Park. The Devils Garden campground should be closed; it is too small and conditions for RV access are too tight. The proximity of overnight lodging facilities in Moab negates the need for camping at the park.

Response:

Arches National Park has no immediate plans to close the Devils Garden campground. Demand for campsites here continues to be high.

Comment:

Consider reducing the speed limit in the park. A lot of people speed through the park, driving faster than the speed limit – which is higher than it should be. Are people trying to get to all the sites the NPS promotes?

Response:

The park will take this comment under advisement. Traffic calming actions in the Transportation Implementation Plan are intended for the purpose of reducing traveled speeds in the Park.

Comment:

Related to pull outs, we have observed spontaneous pulling off by visitors dispersed throughout the park for photo opportunities and scenic viewing of park features. As such, we suggest more rather than fewer pull outs throughout the park. The new pull outs should be safe and well-designed.

Response:

The Transportation Implementation Plan includes development of 21 new formal (paved) pull offs throughout the park and five additional informal (unpaved) pull offs. These will be developed in locations where there is currently social pull off activity along the park roadways. All existing formal, paved pull off areas in the park will remain. The new pull off areas will be designed and constructed in accordance with all applicable safety requirements. The plan also calls for closing and rehabilitating the degraded landscape in several other areas along the park road that are being used for social pull off activity.

Bicycling in the Park and Surrounding Region / Bicycle Safety

The following comments relate to bicycling in the park and the need to improve safety for bicycling.

Comment:

Several people commented that bicycle safety is an important issue that should be addressed in the transportation plan. A bicyclist was hit in the park in 2005. More signs may be needed to encourage “sharing” the roadway since shoulders are very narrow. Several people commented on the need for improved bicycling safety, “share the road” signs, and education of motorists to be more aware of, and more courteous to, bicyclists on the roadway.

Response:

In 2007, Arches National Park worked with a local bicyclist on the design and installation of improved “share the road” signs in the park. The park frequently publishes safety messages to park visitors through newsletters, the park website, and other material. Educational messages encouraging visitors to share the road are being updated.

Comment:

Several people commented that they were disappointed that the Transportation Implementation Plan did not propose bike lanes and bike paths, and that the focus on bicycling in the plan was inadequate. Comments suggested stronger consideration of shoulder widening for on-road cycling, but also separated pathways off the main roadway, between major destinations in the park.

Response:

Although roadway/shoulder widening is not included in the Transportation Implementation Plan, the park has applied for funding as part of ongoing roadway maintenance to rehabilitate the roadway edges and provide consistent two-foot shoulders.

In addition to pursuing funding for this roadway project in the near term, Arches National Park will be continuing to consider potential options enhancing bicycle safety in the park as part of future planning. Long range options for improving and enhancing access, safety, and mobility for bicyclists and pedestrians within the park through potential shoulder widening and multi-use pathways will be considered as part of this future planning.

Comment:

A new “transportation hub” has been proposed at Lions Park, across the river from Arches National Park. The park should be a co-sponsor in applications for grant funding for this facility.

Response:

Arches National Park is participating as a co-sponsor in the 2007 grant submission for the Lions Park transportation hub.

Comment:

If more bicycling is promoted in the park, this will decrease pollution and impacts related to traffic and parking congestion, but it might also create additional impacts to the landscape if bicyclists leave the road. Also bicyclists do not like to leave their bikes at trailheads. Currently the roadway shoulders are not wide enough for bicyclists anyway, particularly if they ride in groups, side by side. Are bicyclists really interested in experiencing features at the park or purely in riding through the park for exercise and recreation?

Response

See responses above. Detailed planning and environmental analysis could be completed as part of a broader study of bicycling and pedestrian issues and needs, potentially as part of a future General Management Plan update.

Visitation Management and Visitor Experience

Comment:

Was a model developed to determine what the “limit” is today related to quality visitation in Arches National Park with the existing system and what the limit of numbers should be with proposed improvements? Without a model how can you handle a particular venue such as Delicate Arch?

Response:

The Transportation Implementation Plan and Environmental Assessment was based on earlier planning, including the Arches National Park General Management Plan (GMP) and Visitor Experience and Resource Protection (VERP) plan. The VERP plan addresses carrying capacity by establishing desired conditions and standards for resources and visitor experiences in the park, based in part on surveys of park visitors on tolerance for various levels of crowding. The GMP and VERP provisions identify specific capacities of parking areas at park features including the Delicate Arch viewpoint and trailhead, as well as at other locations in the park. The desired conditions, standards and capacities of the VERP plan guided the development of alternatives in the Transportation Implementation Plan.

Comment:

There is a need for more picnic areas at Arches National Park. The current picnic facilities at Balanced Rock are often full and more tables should be added there. Picnic areas with shade, parking and restrooms should be added. Focus on providing these facilities at the lower end of the park.

Response:

The TIP/EA includes the addition of picnic tables at the Delicate Arch Viewpoint and Park Avenue parking areas. This proposal is intended for the purpose of dispersing picnicking activity away from other congested areas. The TIP/EA states that seasonal/temporary shade-providing elements at these locations will help to encourage more picnicking activity, but that the design and placement of these shade canopies will need to be fully sensitive to the surrounding visual context. The National Park Service will continue to evaluate needs for picnicking facilities in the park with future planning efforts.

Comment:

It may be necessary to limit park visitation at some point in the future, as is done with big game hunting. Visitors would be required to submit a request to visit and if it is not fulfilled their name would go through a process for selection to visit the park (such as a reservation system or permit system).

Response:

There is currently a process for visitors to obtain guided tours of the Fiery Furnace, and the Transportation Implementation Plan suggests that the park may need to consider implementing more guided tours and reservations to certain features during peak visitation times in the future, if visitation levels increase. However, since National Park Service funding for additional management staff and rangers is extremely limited, and because park visitation has been

relatively steady over the last few years, it was determined that a broad-based park reservation program will not be needed in the near term horizon of the Transportation Implementation Plan.

Comment:

Tell visitors to come at times other than peak periods. Inform the public that once a certain number of folks have arrived at a certain area, that area will be closed for a few hours (when daily limits to these areas are reached).

Response:

The Transportation Implementation Plan includes visitation and travel demand management through outreach and education, such as promoting off peak times during the day for visitation and off season periods of visitation. Educating the public to avoid the busiest times in the park in brochures, newsletters, and on the website is also included.