



STATE OF UTAH

GARY R. HERBERT
GOVERNOR

OFFICE OF THE GOVERNOR
SALT LAKE CITY, UTAH
80114-2220

SPENCER J. COX
LIEUTENANT GOVERNOR

December 18, 2017

Dear Superintendent Cannon,

The state of Utah is pleased to respond to the Traffic Congestion Management Plan for Arches National Park. Arches draws visitors from around the world and is a tremendous source of Utah pride. This national park and Delicate Arch are iconic symbols of Utah and the lifeblood of Moab's economy. This area is a key player in Utah's \$8.4 billion tourism industry. People travel from all over the world to experience Delicate Arch, similar to planning a trip to the Sistine Chapel or the Great Wall of China. We must preserve these iconic landscapes and natural resources within Arches National Park while maintaining a high quality experience for visitors and residents. We appreciate the thoughtful work you and your staff are doing to develop a long-term plan to protect this cherished place.

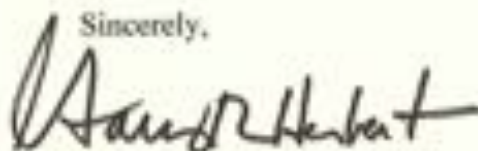
Two of my agencies, The Utah Public Lands Policy Coordinating Office (PLPCO) and Utah Office of Tourism (UOT) have carefully reviewed the Traffic Congestion Management Plan for alignment with their respective missions of public land management and tourism development. They have also engaged stakeholders in Moab and Grand County. I am pleased to note that we are aligned at the highest level. Collectively, we are united in seeking a management plan to protect and preserve these crown jewels of Utah without creating long-term harm to the local economy.

However, there remain concerns that not all feasible solutions have been explored and that the plan lacks sufficient detail in critical areas. Among these critical areas is a concern that the plan may create unintended negative consequences in the community of Moab and on surrounding public lands. Therefore, the state of Utah cannot support the plan as it is currently written. We encourage a more deliberate and inclusive planning process to anticipate potential consequences related to the plan's implementation. We are eager to work collectively to draft strategies that address negative outcomes before the plan is implemented.

On the following pages, our executive branch agencies have enumerated our concerns with the proposed management plan. We recognize the difficult balances you and your staff are working to strike and wish to be proactive partners to you and your staff in developing and implementing solutions to this formidable challenge.

It is in our shared interests to work together to get this right, not only for today, but for many years to come. The state of Utah looks forward to working the National Park Service to arrive at a successful plan that we can all be proud to support.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary R. Herbert". The signature is fluid and cursive, with a large initial "G" and a long horizontal stroke at the end.

Gary R. Herbert
Governor

Alternatives analyzed but dismissed in the NPS's environmental assessment ("EA") contain practical, effective solutions that we believe warrant further analysis by the NPS before proceeding with a decision.

Secondary Entrance Road and Fee Booth Alternative

The NPS should reevaluate one of the dismissed alternatives, the "Secondary Entrance Road and Fee Booth Alternative." This alternative would have opened additional entrances to Arches and helped disperse crowds to currently underutilized areas of the park. Specifically, this discarded alternative proposed paving either the Salt Valley Road or the Willow Springs Road, providing an additional entrance to Arches from U.S. 191. This alternative was dismissed in the EA for having "too great an environmental impact." But the EA does not demonstrate how this alternative would have a negative environmental impact, and thus should be further analyzed by the NPS.

The proposed plan states that the Salt Valley road, accessing the Klondike Bluffs and Tower Arch area of Arches, is wide, graded and currently "maintained at a level where two-wheel drive vehicles can safely travel." This view doesn't take into account that the road is frequently dusty and noisy due to wash-boarding along the road. Paving this road within the existing roadway could be accomplished without disturbing any untouched areas of the park and would likely reduce dust and noise generated on the road. If paved, more visitors could use the road to visit new areas such as Klondike Bluffs and Eagle Park, thereby relieving pressure on the park's more congested areas. The EA dismisses this idea by stating that "currently quite backcountry areas...would become crowded with more visitors without significantly reducing congestion in the popular front-country areas of the main park road." Yet this statement in the EA is unsupported by any analysis. Simple logic holds that as more visitors disperse to underutilized areas of the park, crowding in overused areas will lessen proportionally. A similar impact could occur if the NPS decided to pave the Willow Springs Road, which would draw more visitors to the Herdina Park areas and away from the park's congested center.

The EA asserts that "[p]aving these roads would not reduce significantly the number of visitors coming into the park from the main park entrance because this entrance is the most convenient from the city of Moab." This statement is unsupported by the EA. Many park visitors come from the northern part of Utah, and a paved Salt Valley Road would be far more convenient for visitors coming from the north. A secondary entrance road along the existing Salt Valley Road would likely encourage the development of more visitor accommodations near the city of Green River and should relieve congestion at the main park entrance. Similarly, a secondary entrance

along the Willow Springs Road would be very convenient to state Route 313 and the entrance to Canyonlands National Park, drawing visitors who visit both parks on the same day and relieving pressure on the main park entrance. The EA should be reopened so that the impact of paving either of these two roads can be analyzed in greater detail.

Build-for-Demand Alternative

The NPS should also re-evaluate certain elements in the dismissed "Build-for-Demand Alternative." While the EA's title of this alternative seems to conjure images of unending asphalt, this alternative actually contains ideas that could dramatically lessen crowding at congested areas with minimal environmental impact. As suggested in this alternative, the NPS should consider a dramatic increase in marked and designated hiking trails in areas of the park where trails do not currently exist. Underused areas ripe for new hiking trails include the Petrified Dunes, the base of the Great Wall, the Rock Pinnacles and the Courthouse Towers. Marked hiking trails along Courthouse Wash, Clover Canyon, Lost Spring Canyon, and upper and lower Salt Wash should also be considered. Existing trails systems at the Windows, Sand Dune Arch, and Devils Garden could be expanded to connect with other areas of the park. For example, new hiking trails originating at the main park road could cross the Petrified Dunes and end at the Windows Section. Other new hiking trails could cross the Salt Valley between Dark Angel and the Klondike Bluffs. These new hiking trails could be served by small, discrete road side parking areas, or even simply widened shoulders of existing roads. The construction of new designated hiking trails could occur with minimal cost or environmental impacts.

Although Arches has steadily expanded parking lots at existing sites and hiking areas, the Park appears to not have developed new hiking areas for many years. The ability of new hiking trails to lessen overcrowding at congested areas is an untapped tool that should be fully analyzed in this EA. A quick glance at the official park map shows that only a small fraction of Arches is accessible via designated hiking trails (depicted by green dashed lines). Much of the park's overcrowding problem could likely be mitigated through the construction of more low-impact hiking trails. While off-trail hiking may or may not be allowed in Arches (official park materials are unclear on this point) most visitors play it safe by only hiking on the park's mapped and designated trails.

The NPS dismisses the "Build-for-Demand Alternative" in part because "the park manages backcountry areas as primitive and remote with minimal development in order to ensure park visitors seeking that type of experience can still experience it, even as popular areas become more crowded." This rationale should not be used to dismiss the idea of new hiking trails under the "Build-for-Demand Alternative." Non-motorized hiking trails are an essential part of undeveloped public lands, and the responsible construction of new hiking trails will not impair the primitive and remote quality of the Arches' backcountry. While the construction of new hiking trails would likely bring more visitors to the backcountry, the development of hiking opportunities should be a core element of the NPS's mission to preserve national parks for the "enjoyment, education, and inspiration of this and future generations." Although the EA alleges that new trails would diminish "the ability to experience natural sounds and solitude," a thorough analysis

of trail expansion was not completed in the EA. The NPS should consider potential ways to increase trail access throughout the 76,000 acre park without dramatically reducing natural sounds and solitude. Expanded hiking opportunities, without eliminating natural sounds and solitude, could reduce overall congestion and make new areas more accessible to the public.

Additional Details Requested on Reservation System Implementation

We seek additional detail from you and your staff on how to make sure the implementation of the reservation system is structured in a way that supports positive outcomes for visitors, park staff and local businesses. We welcome the opportunity to work through these details with your staff prior to implementation of any reservation system. Key questions include:

- Will hoteliers, guides and online travel agencies be able to integrate the hotel bookings into their website, to facilitate the completion of the park reservation system, or will prospective visitors be required to make their reservation on recreation.gov?
- Will recreation.gov support multiple language options to facilitate international reservations? Without internationalization, the reservation system creates a barrier for independent international travelers to visit.
- In tests with UOT's in-market representatives in China, the recreation.gov website took an average of two minutes to load the homepage of the site. A reservation system requiring multiple steps to complete on a slow website will hinder Chinese travelers' ability to secure a reservation for Arches National Park.
- The six-month advance purchase disadvantages international travelers who frequently book their flights and hotels more than six months prior to their visit. We would like to see a portion of the advance reservations begin a full year in advance, with a second, six-month reservation window for domestic travelers. For context, in Utah's top international markets, the following percentage of visitors book their airfare more than six months in advance.
 - Germany: 17%
 - United Kingdom and Ireland: 24%
 - China: 4%
 - Canada: 17%
 - Australia and New Zealand: 28%
- Additionally, the proposed reservation system poses significant challenges for Utah residents. Will Moab locals have to queue for next-day or day-of passes? From UOT's annual visitor research, 37 percent of in-state travelers currently make no advance plans when traveling in Utah.
- How will reservations be reviewed at the park entrance? Will the reservation system issue a digital boarding pass, or is the visitor required to print out their reservation? How will this reservation system affect the number of visitors NPS gate attendants are able to process per hour?
- The visitation statistics proposed within the Traffic Congestion Management Plan are predicated on displacing a traveler from the busy season to a date in the off-season. This doesn't align with many travelers' needs to plan around summer holidays and

school vacations. Has your staff done research on the number of park visitors who could make this change in their travel plans?

The proposal may create unintended consequences on surrounding areas and other entities within the tourism ecosystem. Have these received sufficient consideration?

- What coordination has been done with BLM, Utah State Parks and other agencies to handle overflow traffic from Arches National Park? Will Arches gate staff provide a list of alternate destinations to visitors if they do not have a reservation?
- Could the redistribution of visitors from Arches National Park, with all its facilities (water, bathrooms, paved roads, proper signage) to other areas without these services create potential safety hazards and resource management issues?
- How will the displacement of visitors to other parts of the season affect the visitor experience? Will Arches have proper staffing in the shoulder season/winter if guests are able to rearrange their travel plans?
- What impact will this have on businesses in town? What engagement has been done with the Moab Area Travel Council and local business leaders to ensure a smooth transition, minimizing the potential for losses during peak summer season for visitors who are unable to get a reservation and choose to travel to another location?