

# CHACO ALLIANCE

February 9, 2010

Barbara West, Superintendent  
Chaco Culture National Historical Park  
P.O. Box 220  
Nageezi, NM 87037

Re: GMPA Transportation Data and Visitor Projection Analysis by Evans & Associates

Dear Barbara,

Thank you for the opportunity to review the “General Management Plan Amendment Transportation Data and Visitor Projection Analysis” prepared for the National Park Service by David Evans & Associates (Nov. 13, 2009). We understand that Chaco Culture National Historical Park (“the Park”) plans to use this study to inform its General Management Plan Amendment planning process. The Chaco Alliance has serious concerns with the Park’s reliance on this report because of the many factual inaccuracies used to form the basis of the various analyses and conclusions contained in the report.

I have spoken to you on the phone a number of times about the inaccurate data used in the report. You have informed me that the contract is “closed” and, therefore, the Park cannot request that Evans & Associates correct the flawed data. While we are well aware that decisions made by the Park are under the oversight, if not direct control, of the NPS’s Intermountain Regional Office in Denver, the Chaco Alliance remains convinced that it is the obligation of Chaco Culture National Historical Park, and the obligation of the Intermountain Regional Office, to revise and correct the deficiencies in the report in order to adequately protect the Park. Using corrected data, the visitation projections are much higher than the report concludes, even if the road paving ends some miles short of the Park entrance. Please note that our comments presented below represent only a preliminary response to the GMPA Transportation Data and Visitor Projection Analysis (“the report”). We will not comment at this time on the accuracy of the lengthy discussion of the previous URS and Upchurch visitation studies evaluated in the report. Our focus is primarily on the final section concerning visitation and on several incorrect statements and assumptions in the report that underlie the conclusions reached in the final section of the report.

Although it is flawed in many respects, this new visitation study by Evans & Associates should also be considered by the Federal Highway Administration (“FHWA”) in its Environmental Assessment for CR 7950. The report evaluates both the Upchurch and URS visitation studies that FHWA relies on to inform its development of alternatives

for CR7950 and to evaluate potential adverse effects to the Park in its cultural resources report for the project. Furthermore, the report contains new information about visitation estimates different from both the Upchurch and URS studies. For these reasons, the Chaco Alliance is providing the report to FHWA so that it can be included in the planning process for CR7950. As you know, the Chaco Alliance is a consulting party under the National Historic Preservation Act for the CR7950 project. We expect FHWA to inform all of the consulting parties about the addition of the Evans & Associates report to the project record. We expect the Park to inform all consulting parties of the corrected visitation projections.

The Chaco Alliance also believes that the report and its errors should be considered in any discussions the Park may have with San Juan County regarding improvements to CR7950. We have been informed by both yourself and FHWA that such discussions are occurring outside the public NEPA process for CR7950. Therefore, it is not possible for the Chaco Alliance and other consulting parties to assess whether and to what degree the Park is relying on the erroneous conclusions in the report to inform the Park's position on improvements to CR7950 in its negotiations with the County and other cooperating agencies.

#### Report Comments

While we agree with the finding in the report that paving of any amount of roadway will increase visitation to the Park, there are a number of factual errors, omissions, and erroneous conclusions that impact the accuracy of the overall conclusions regarding projected visitation increases. On page 1, the report states, “[t]he County received Federal funding to improve the road surface treatment.” This is misleading and incorrect. The County received funding for improvements to the road that are not necessarily tied to road surface. Those improvements could be in the form of fencing, signing, or replacement of the current low water concrete crossing with a similar crossing. In fact, the low water crossing is probably the most important needed improvement. (Note that the replacement of the old concrete with new concrete will not necessarily produce a different or smoother crossing, only one that is more stable.) More importantly, on pages 7 and 34 the report makes a critical factual error. When the access distance was changed from old state road 57 to CR7950, the report states that the “access change resulted in a much shorter drive over unpaved roads to enter the park (13 miles versus 26 miles).” The report uses this 13-mile figure to compute all of its remaining statistics. **In fact, the unpaved distance to the Park using CR7950 was reduced from 26 to 21 miles, not 13, when the access was changed, a change of only five miles. The unpaved roadway was only reduced by approximately 20 percent.** According to the URS Transportation Needs Analysis, it was “[i]n 2000, San Juan County reconstructed CR7900 from US 550 for a distance of approximately 5 miles to the intersection of CR7950. These improvements included a bituminous pavement, whereas the road was previously unpaved.” In addition, it wasn't until 2006 that the County paved three more miles of CR7950. Both of these paving improvements happened after the years used in the Evans & Associates study (1996-1999). It is important to note this error because of the final methodology used to predict visitation. Using the methodology of the report, a

change of only five miles less of unpaved road, not 13 miles, produced a growth rate in visitation of 10.6 percent per year for the three following years.

Compounding this statistical error is the omission of the fact that the old access road (state road 57) had a bridge over the Escavada Wash while the crossing over the Escavada on the newly created access (CR7950) was the current, unimproved low water crossing. **The visitation increase that resulted from the shift to use of CR7950 occurred even with the current, unimproved low water crossing, a much less inviting crossing than the bridge on state road 57. Given that visitation increased with the shift to CR7950 in spite of the unimproved low water crossing, and applying the document's own methodology with corrected distances, paving even nine more miles of CR7950, as is the County's current proposed action, would increase the visitation well beyond the 10.6 percent per year for three years brought about by the change in access from state road 57 to CR7950, to as high as a 50 percent increase in visitation per year.** This is a conservative estimate because it is reasonable to believe that with only 4.4 miles of unpaved road versus 21 miles of unpaved road, the increase in visitation could probably exceed 50 percent. The report correctly states on page 35 that "the shorter unpaved distance was a substantial access improvement" but makes the unsupported conclusion that "[i]f the 4.4 mile segment of CR7950 northeast of the park is not improved, a lower increase in visitation could be expected" of three percent per year. This conclusion is not supported by the report's own methodology. The "constraints on tour busses and deterrents to visitor traffic that the low water crossing at the Escavada presents" were present at the time of the initial visitation increases when the access was changed to CR7950. The only new variable is the shortening of the unpaved distance on CR7950 that postdates the report's study period, and that shortening of unpaved distance produces well over a 10.6 percent increase in visitation per year.

To summarize, the graph on page 34 shows the increase in visitation with a partial unpaved roadway reduction of approximately 20 percent. **Since the Escavada crossing cannot be used as a mitigating factor on visitation when it was already present as a factor in the original comparison (as was the current unpaved road condition), the graph on page 35 shows what partial, not full, improvement would do (although, as noted, the increase would be much greater than shown). Partial roadway improvement (paving) could increase visitation 150 percent over three years since it represents an 80 percent reduction of unpaved roadway when compared to the old access on state road 57. Full roadway improvement would result in an even greater increase in visitation that one could reasonably estimate would vastly surpass the 33 percent increase projected by the report, pushing visitation increase to well over 300 percent.**

Please be assured that our intent in examining the report by Evans & Associates is to protect the Park, a World Heritage Site, and we appreciate your commitment to that goal. It is clear that the report underestimates the increase in visitation that will result from either of the paving options (full paving and leaving 4.4 miles unpaved). We expect that our comments will be used to amend the report and to re-calculate visitation

projections based on the correct information that we have provided. We look forward to your timely response.

Sincerely,

s/Anson Wright

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