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Greg Heitmann
US Department of Transportation
Federal Highway Administration
New Mexico Division
604 West San Mateo Blvd.
Santa Fe, NM 87505

Re: *"Transportation Needs Analysis, County Road 7950, San Juan, New Mexico,"* prepared by the URS Corporation, June 2008.

Dear Mr. Heitmann:

I apologize for the delay in responding to the above referenced analysis. We have had a very demanding summer and are short staffed. In reviewing this report, I have a number of concerns about the study and feel there is contradictory and unsubstantiated information that have me questioning the adequacy of the analysis. The analysis needs substantial unbiased improvements before it can stand as a basis for decision-making. In addition, this document must accurately evaluate the conditions and use of the road based on the most up to date information. To do so, it should take into account the information presented by consulting parties. I suggest FHWA reconcile the various URS reports with the 2005 draft NPS Analysis and NPS review of the URS reports.

The purpose of the proposed improvements is to address and correct physical deficiencies along San Juan County Road 7950 (CR7950) to:

- Improve safety and operability of the corridor
- Enhance mobility and access to all properties served by the roadway
- Reduce San Juan County's current and future maintenance commitment to the corridor
- Adhere to current legislative mandate

Safety

I am very concerned that the discussion of road conditions is taken from the 1995 Lee and Stephens report that concerns NM57, and not CR7950. Please explain why it is reasonable to use that study as something directly applicable to CR7950.

I am also concerned that the definitions used are inadequate. Statements are made that “hazardous conditions” exist on CR7950. Could you elaborate on what constitutes a hazard and what requires motorist assistance? Are these terms directly related to accident data along this road?

From previous discussions and the analysis, the low-water crossing at Escavada Wash is likely the biggest safety problem along the road. From the analysis, I think improvements to this section of the road are necessary. It seems to me the other? safety and roadway condition problems identified in the document are correctable through road realignment, signage, fencing and regularly scheduled maintenance.

Enhanced Mobility and Access

In my opinion increased traffic and visitation to the park has not been adequately addressed. One week of traffic counts does not provide an adequate basis for assessing traffic volumes. According to Park management, the data used as adjustment factors are known by the NPS to have been inflated. I suggest you work to balance the various reports, not dismiss the NPS studies because another method was used to estimate potential impact.

Actions the county takes may have significant impacts on the park, how it is managed and how it is experienced. If the road is chip sealed or paved, thereby increasing visitation, the impact on the historic resource needs to be evaluated and the NPS should be asked if it will need to change its management and operation of the park, including the way it serves visitors and the resources. The analysts need to take into account potential changes as articulated by NPS that may result from increased visitation as a result of the proposed project. The park has expressed it will be faced with changing infrastructure to accommodate increased visitation, or taking steps to manage visitation of the resources in a different manner which could significantly alter the visitors' appreciation for the setting and feeling of the historic resources by such actions as limiting access to archeological sites, requiring reservations, and shuttling people in, etc.

It is not clear how numbers were derived to support the claim that “half of the vehicle trips” on CR7950 are associated with the park? The conclusion that it is “unlikely that improvements to CR7950 will... significantly increase demand to visit the park by tour bus,” has not been demonstrated or supported by the analysis. Is this consistent with the NPS data looking at changes in park visitation when road improvements have been made at other parks? Further, this conclusion appears to be contradictory to the information in Table 3.8 which projects visitation in 2029 at Chaco to increase by 58% from 2006 visitation. The assertion that visitation is unlikely to increase as a result of the proposed undertaking is difficult to accept given contradictory and selective presentation of the data. In addition, the number of primary residences and lease accesses has not been adequately addressed. How many are there? How many school-aged children live off this road? How do these numbers compare to other nearby Navajo Nation communities?

This document frequently states conclusions (i.e. that increased speeds would not cause more accidents because the improvement road configurations would offset the speeds) that should be supported with statistics. We suggest rigor be put forth in the analysis.

Maintenance – According to the analysis, improvements to CR7950 are needed to reduce the current and anticipated commitment of County resources required to maintain and repair the roadway for continued public use. Maintenance records demonstrate a trend of increasing

requests for maintenance of CR7950 and maintenance attention to CR7950. According to the analysis San Juan County seeks to change this trend to ensure that adequate resources can be committed to all County roadways and other public works needs in the coming years. Nevertheless, the issue of scheduled maintenance has not been adequately addressed in the report. Maintenance must be evaluated and assessed along with the other alternatives. It is hard to see how the No Action alternative "Maintain Unpaved Road" fully describes the current situation. Maintenance on an "as-needed" basis sounds as if maintenance is provided after a problem occurs and seems contradictory to ensuring the road functions consistently for users as any road needs regularly scheduled maintenance. Presenting a realistic maintenance plan would be useful.

Further, the data used for calculating frequency of requests for maintenance appear flawed. The document uses the period starting in 1991 as its basis. In 1991, the park entrance was NM57. It is our understanding that CR7950 only began to be used as the park entrance road after September 6, 1994. So the 1991 to 1994 numbers do not appear to relate to any "park generated" requests for maintenance.

Legislative Mandate – This project was earmarked in the Safe, Accountable, Flexible, Efficient Transportation Equity Act, a Legacy for Users (SAFETEA-LU) as High Priority Project No.2995, *Improvements to San Juan County Road 7950*. Funding was set aside by the Congress to complete this study and potential subsequent improvements to CR7950. As such, there is a demonstrated legislative mandate to consider – and if appropriate, construct – improvements to CR7950. Improvements can mean a number of alternatives, all of which need to be fully evaluated in concert with the consulting parties to meet the legislative intent.

I look forward to seeing a revised report and analysis that addresses the deficiencies identified here and look forward to moving forward to working with FHWA and the other consulting parties to address the road improvement issues in a way that minimizes harm to the world-class cultural resources in the park.

Sincerely,



Katherine A. Slick
NM State Historic Preservation Officer