

PHOTO: CHRIS CONRAD

Alternative Plan A+ Mill Creek Canyon 2021



CANYONLANDS WATERSHED COUNCIL

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Introduction

PLAN A+ SUMMARY

The goal of Alternative Plan A+ is simple: to keep Mill Creek Canyon clean, unadulterated, and beautiful for all who enjoy it.

Moab Solutions, joined by Living Rivers & Colorado Riverkeeper, Project Eleven Hundred, and the Canyonlands Watershed Council, wishes to offer an alternative for where consensus was not reached within the Mill Creek Community Collaborative (MCCC) recommendation. It is important for the BLM EA to consider a range of reasonable alternatives, and the Alternative Plan A+ addresses the concerns of many community members. Due to MCCC recommendations for large-scale infrastructure projects in and surrounding an entrance to the canyon and the designation of the canyon as an Area of Critical Environmental Concern (ACEC), Moab Solutions offers Alternative Plan A+ for the BLM's consideration, which recommends the following:

- Retain the primary entrance to the canyon at the end of Powerhouse Lane.
- Create designated parking spots to maximize parking capacity of the lot.

- Implement a continually-updating webcam feed of the Powerhouse Lane parking lot.
- Create a staffed booth with a swing-arm barrier at the beginning of the dirt road on Powerhouse Lane.
- Establish an electronic sign on either side of Mill Creek Drive to indicate the current parking status of the parking area.
- Formalize the secondary use of Potato Salad Hill as an alternative access to Mill Creek Canyon.

For the past eighteen years, as a citizen enacting community service since 2003, and as a recognized nonprofit partnering with the BLM since 2011, Moab Solutions has been present in Mill Creek Canyon, putting in time and labor each day to maintain the natural beauty and resilience of the canyon. Moab Solutions performs trail maintenance, erases ever-increasing user-created trails, removes trash and recycling, and holds volunteer work parties to engage the community in caring for our public lands. On a daily basis, Moab Solutions keeps the trail from the parking area to the waterfall, and beyond, clear and open to minimize damage to the surrounding land from off-trail usage. As visitation increases in the area, so

too does user impact, making local management of this natural gem all the more important.

We believe that maintaining the natural beauty of the canyon while keeping it open for all to enjoy enriches every visitor's experience at Mill Creek. Alternative A+, with its goal to maintain the beauty of the canyon, is reflective of the mission statement of Moab Solutions:

"To reduce and eliminate the waste of materials and human potential while nurturing the well-being of the natural world. We protect and restore natural areas, help the homeless help themselves, and promote the benefits of Respect, Rethink, Reduce, Reuse and Recycle practices. At our core is a deep respect for and love of the natural world, and all lives that depend upon it."

MOAB SOLUTIONS' ACTIVE PARTICIPATION IN MCCC

From the beginning of this assessment and planning process, Moab Solutions has served as an active member of the MCCC, which sought to "collaboratively address impacts from increasing

recreational use in Mill Creek Canyon by providing access to a quality experience for canyon visitors in a way that protects the natural and cultural resources of Moab's backyard and addresses impacts to nearby neighborhoods." Moab Solutions has been gracious in our inclusion from the beginning of this process and has continually been glad that the MCCC has valued the perspective of groups and individuals who tirelessly work to maintain the magic of Mill Creek Canyon.



PHOTO: SANDY HULTGREN

SHARED GOALS

Formed in 2018, The MCCC, a group of about 40 people representing 18 entities including City of Moab, Grand County, BLM, local non-profits, private landowners, and interested citizens, created a series of recommendations that were put to two public surveys and subsequent vote. Their final recommendation weighs in on management steps for the BLM going forward, based on increased visitation felt in previous years.

According to the MCCC Recommendations: “The Bureau of Land Management (BLM) figured that 32,393 visitors came to the Powerdam area in 2004, estimated by counting vehicles and using a multiplier of 2.52 persons per vehicle. Using that same metric for the 57,000 vehicles counted on Powerhouse Lane in 2020, the estimate is 143,640 visitors. That number does not include people who parked on Potato Salad Hill or on private property near the trailhead. This increase has resulted in damage to natural and cultural resources, highlighted public safety hazards, and impacted the watershed. As one of the only major trailheads in the region located in town, it has also impacted nearby neighboring residents. While most of the canyon is managed by the BLM, the Canyon and its

busiest trailhead are adjacent to the City of Moab and private property in Grand County.”

As a result of this visitation, the MCCC’s outlined goals fall into three categories:

NATURAL AND CULTURAL RESOURCE PROTECTION

- Preserve, restore, and maintain the ecosystem, habitat, plants and wildlife of the canyon.
- Protect water quality and quantity in the creek.
- Protect the rock art, historical sites, and other cultural resources in the canyon.

PUBLIC SAFETY

- Improve search and rescue (SAR) and emergency medical services (EMS) access for the area, and ensure access at other critical points to facilitate operations.
- Improve communication with visitors to make informed decisions, navigate and describe their locations to Search and Rescue (if needed).

PROTECTING SOCIAL RESOURCES AND ACCESS

- Maintain a trail network that is sustainable, connected within the canyon and to trails around the canyon, and sensitive to natural and cultural resources.
- Improve access points and trailheads to accommodate visitor use but also address the increasing numbers of people visiting the canyon and the degradation that is occurring as a result of these increases.

- Officially designate a trail system on BLM managed land.
- Determine what improvements are needed for currently established trailheads.
- Identify potential future access points and determine whether use may need to be accommodated or discouraged.
- Limit impacts to the environment and the private property in nearby neighborhoods.
 - Address traffic congestion.

These goals have largely reached consensus throughout the community and by the MCCC, and Moab Solutions is no exception. However, the means by which the BLM addresses the challenges that Mill Creek Canyon faces, especially within this third tier of goals (Protecting Social Resources and Access) has not reached consensus within the MCCC. The consideration of alternatives is thus important.

Moab Solutions has increasingly witnessed visitor number growth in the canyon and has played an active role in informing the BLM's next steps and sharing our thoughts over the course of this three-year process. For the majority of the MCCC's recommendations, Moab Solutions is in agreement, and greatly appreciates the great deal of time and labor this process has required. Ascertaining the most sustainable, local-oriented and least-

impactful plan for Mill Creek Canyon is a goal shared by both the MCCC and Moab Solutions. Plan A+ takes the work of the Collaborative a step further and focuses on balancing low-impact infrastructure and well thought-out methods to serve the growing number of visitors to Mill Creek Canyon.



PHOTO: SARA MELNICOFF

Process

COMMUNITY SURVEY #1

The MCCC sought to address and hear out the concerns, thoughts and suggestions of community members through two surveys: Survey #1 was conducted during the Spring/Summer of 2019 and Survey #2 was conducted during the Summer/Fall of 2020. 297 individuals took Survey #1 in 2019, indicating a wide range of expectations and hopes for the canyon. The common thread here was that Moab residents value the riparian habitat, peace and quiet, beauty, and appreciate Mill Creek as a local hangout close to town. The most prescient language that came out of this survey, used multiple times by different people, was that Mill Creek Canyon was “being loved to death,” resulting in a need for some sort of change in the way this precious land is being managed.

The MCCC summarizes the results of Survey #1 as follows:

69% of responses involved limits to use, such as limiting daily access or establishing a fee system (many mentioned a free or reduced price for locals)

59% of responses gave suggestions for management actions such as better signage,

patrols by volunteer stewards, or education about Leave No Trace principles

What do you think is important about Mill Creek?

- #1 Riparian habitat/ wildlife
- #2 Beauty
- #3 Primitive, undeveloped nature

What are your biggest concerns when it comes the canyon?

- #1 Too many people
- #2 Danger to the environment/resources
- #3 Social (unplanned) trails causing erosion/damage

What do you like to do when you come to Mill Creek?

- #1 Enjoy solitude or quiet
- #2 Enjoy nature
- #3 (tie) Swim/get wet
- #3 (tie) Hike

How do you access the canyon?

- 73% - Powerdam
- 46% - Kayenta Heights/Highlands/Cedar Hills
- 24% - Sand Flats into Left Hand

COMMUNITY SURVEY #2

Survey #2 presented four different potential management options for 393 survey-takers to consider. In order of increasing infrastructure involvement, Plan A proposed little to no change to the current management of Mill Creek Canyon. Plan

B “includes some improvements to mitigate for some impacts of current use level,” notably paving and striping the Powerdam parking lot, formalizing Potato Salad Hill as a secondary parking area, extending the parkway to the Powerdam area and building a footbridge across to Potato Salad Hill. Plan C, which happens to be the most detailed proposal, shifts primary access to Potato Salad Hill, closes the Powerdam access from Spring-Fall to allow only pedestrians and cyclists, includes a footbridge as in Plan B, establishes a fee booth/kiosk at the end of the Powerhouse Lane pavement, and hardens stream crossings from Potato Salad Hill. Plan D includes paved parking at Potato Salad Hill and the Powerdam, shade structures, picnic tables and additional toilets, establishing part of the old landfill as overflow parking, and requires permits to access BLM land above the powerdam in the Spring and Fall.

When asked to rank the four options, 21% of those surveyed voted for Plan A first, 27% voted for Plan B, 30% voted for Plan C, and 22% voted for Plan D. It is from these data that the MCCC decided by vote to offer its recommendation to the BLM based upon the language represented by Plan C. However, by reading the comments of survey takers in Survey #1, combined with the not-

particularly distinguished results of Survey #2, it is unclear that any of these plans presented by the MCCC are definitively the course of action the BLM should follow going forward.



SEPTEMBER 2021 GOAT HEAD AND TUMBLE WEED REMOVAL PARTY, MOAB SOLUTIONS, PHOTO: DIEGO VELASQUEZ

AREAS OF CONSENSUS

The primary goal of the MCCC is by and large agreed upon by survey-takers, users, and members of the Collaborative: to reduce the impact of users on the area. Moab Solutions agrees

with the common consensus areas in the MCCC's recommendation to the BLM, as the primary agreed-upon goal is met through their recommendations.

VEGETATION MANAGEMENT AND EROSION CONTROL OF THE RIPARIAN CORRIDOR

Moab Solutions agrees that it is imperative to provide well-marked, clear trails in designated locations to protect existing vegetation and crusts, provide opportunities for revegetation of disturbed areas, and to avoid damage to archaeological and other sites. These designated areas should be carefully chosen as to reduce the impact to the more remote areas of Mill Creek Canyon, such as the South Fork. Additionally, as part of the work that Moab Solutions already engages in and has engaged in for the past two decades, improving and regenerating vegetation by discouraging users from social trails and the immediate riparian area is crucial work. Moab Solutions agrees with the MCCC's recommendations on erosion control measures, which include blocking social trails, hardening certain trail sections, *only in a natural and sustainable manner*, and identifying areas that are in need of "constructed erosion structures."

TRAILS, SIGNAGE & USAGE

Moab Solutions believes that education is a vital piece to the preservation of desert ecology, archaeological sites, and the natural beauty of Mill Creek Canyon. To this end, Moab Solutions appreciates the involvement of Trail Ambassadors at Mill Creek Canyon at the busiest times of the year and will continue to work closely with other entities to do our best to inform the public on desert crusts, the flora and fauna of the area, and the fragility of the surrounding environment. Moab Solutions is currently part of a family of groups working on direct improvements to the canyon, including TerraSophia, Canyon County Youth Corps, Grand County Weed Department, American Conservation Experience, and others. Proper signage, as described by the MCCC's recommendations to designate a trail in Mill Creek, but leaving sections of it unsigned, will be an excellent step forward. Moab Solutions agrees with the MCCC general sign recommendations that "trailheads should have a kiosk and signage explaining elements such as: erosion, soil crust, and water quality; tips on how to stay safe in the canyon; protective measures visitors can take including staying on the trail, leashing dogs, not

carving in rock walls, not playing music (especially by trailheads); or other interpretive elements.”

In Backcountry zones, Moab Solutions agrees with the MCCC recommendations, that: “routes should be designated to allow for stabilization and repairs, but designating these trails should not be as high a priority as the areas previously listed. Moab Solutions agrees that no wayfinding signage should be placed in these areas. Trails should be minimally maintained to accommodate low use (intermittent and often indistinct) and may require route finding,” unexpected “obstacles, narrow passages, brush, steep grades, rocks and logs present (Trail Class 1).”

In Middlecountry zones, Moab Solutions agrees with the MCCC recommendations, to:

- Designate trails in this section of the canyon (noted in the MCCC recommendations map).
- Create best management practices for trail work.
- Determine locations for wayfinding signage for visitors to find their way out of the canyon on primary trails.
- Develop a local volunteer program through existing entities, however, add Moab

Solution’s network and expertise to this program.

In Front Country zones, Moab Solutions stresses the importance of quality data collection and analytics. Much of the data used to offer recommendations on user impact and increased traffic was gathered in 2020, a year unrepresentative of the general trends in tourism to the canyon. For part of the Spring, Moab essentially shut its doors to tourism, immediately followed by an explosion in visitation at the lifting of stay-at-home orders and COVID relaxation. Moab Solutions believes that in order to effectively measure the impact of tourism and new users in the canyon, traffic flow should be continually measured beyond 2020 and 2021, years impacted by the pandemic.

The Front Country zone is a heavily disputed area, as the MCCC notes that many of their efforts are dedicated to “reducing congestion in neighborhood areas,” and to “reduce overflow parking in nearby neighborhoods.” These neighborhoods should be clearly defined, however. The MCCC notes the development of two areas, including the Abbey subdivision at the intersection of Mill Creek Drive and Powerhouse Lane and the Lionsback Resort, on

Sand Flats Road, but fails to note the residential pressure to move the primary entrance to the canyon coming from those dwelling on Dream Drive.

Despite these challenges to Front Country stressors, Moab Solutions agrees with the following MCCC recommendations:

- To provide well-marked clear trails in designated locations to protect existing vegetation and crusts, provide opportunities for revegetation of disturbed areas, and to avoid damage to archaeological and other sites.
- To provide safe parking for visitors and Moab residents with clear access to the Powerdam area and the trail to the North Fork falls.
- To allow for SAR and EMS access when needed for rescue work.
- To reduce congestion in neighborhood areas by improving pedestrian and bicycle access for people wanting to hike in the Canyon.
- To reduce overflow parking in nearby neighborhoods and minimize the spread of this and other impacts to other locations if use is displaced.

Moab Solutions agrees with the following recommendations for the Front County zone as it sees these in alignment with the MCCC goals:

- Maintain the main route to accommodate high use, directing people to the Falls. The route should be continuous, clear, with minimal obstacles to prevent confusion and multi-trailing, “single lane” or wider in areas to allow passing (Trail Class 2 or 3).
- Install trail counters in several locations to gather data and monitor use. Use data to quantify how many visitors access various Front Country areas.
- Seed disturbed areas between the trails, and in some areas plant with desert shrubs or vertical mulch to help define them better.
- Designate stream crossings and design and maintain erosion control structures or work after flash floods as needed.
- Place wayfinding or directional signage in key locations to direct hikers to the waterfall and the parking area; signage should not encourage visitors to travel into the south fork (Right Hand) of Mill Creek.
- Place clear signage prohibiting bicycles off trail – and beyond the Powerdam.

- Place signage addressing graffiti issue at the junction and safety issues at the waterfall.
- Involve local archaeologists in decisions about interpretive signage for archaeological sites, including signage about not carving into canyon walls.
- Provide signage at key road intersections to direct people to the primary parking area.
- Provide visitors with information on other places to access or be near water recreationally, such as Mill Creek Parkway in town, Rotary Park, Lions Park, Ken’s Lake, and the Colorado River. Work with entities that provide information to visitors to direct them to those places.

ENFORCEMENT PROTOCOLS AND PRACTICES

Moab Solutions supports the piloted Trail Ambassador program and will continue to work closely with Grand County to ensure that our efforts can build upon one another to increase visitor education and limit user impacts. Moab Solutions also agrees with the continued monitoring of Front County areas and hopes that given available resources, the rest of Mill Creek Canyon can be selectively monitored at times of significant environmental or archaeological

destruction. Moab Solutions, as an entity consistently present in the canyon, will be forever available to make recommendations on the monitoring and enforcement practices within the canyon.

USER FEES

Moab Solutions agrees with the recommendation of the MCCC, that user groups be charged a fee for their entrance and enjoyment of the canyon. Moab Solutions suggests that the fee collection system be based upon residency and a yearly pass be required for entrance, like that at Sand Flats Recreation Area. Entrance will be free to senior residents unable to pay through trail work, and those unable to pay to access the canyon will be able to pay for their admission through trail work, discounted passes or other BLM-approved means.



PHOTO: SARA MELNICOFF

WHERE MCCC DOES NOT REACH CONSENSUS

The MCCC Powerdam Trailhead recommendations state that “Powerhouse Lane is a small dead-end agricultural/ residential road, and while it is used for recreational access to Mill Creek, it is currently not well equipped to handle large visitor traffic volumes.” However, historically, Powerhouse Lane has actually served as primary access to recreation, and the development of neighboring residential areas such as Dream Drive and the future Abbey Development are relatively recent undertakings. It is important to recognize this historical use of the area, as that can inform future management practices.

Moab Solutions objects to the following MCCC Recommendations and offers an Alternative Plan that will not only address increased visitation to the canyon, but will minimize user conflicts, allow for local residents to seek out the peace and serenity they indicated in both surveys, and will not require a massive infrastructure undertaking that will cost more than is otherwise required to address the challenges Mill Creek Canyon faces.

Elements of the MCCC recommendations to which Alternative Plan A+ objects include:

- Moving the primary entrance of Mill Creek Canyon to Potato Salad Hill.
- Paving either parking lot, on Powerhouse Lane or Potato Salad Hill, especially considering Mill Creek Canyon was designated as an Area of Critical Environmental Concern (ACEC) in October of 2008.
- Investing in a footbridge that crosses from the Powerdam Lane parking lot to Potato Salad Hill.
- Including any signage that adds to what is currently available to visitors that indicate how to navigate Back Country areas.

Recommendations

ABSTRACT

Alternative A+ addresses the general trend of comments made in Survey #1 which stress the importance of lessening user impact, largely capping visitation, and allowing for local residents to find the solitude and quiet they have found in Mill Creek, disrupted by increased visitation in recent years. Alternative A+ Plan acknowledges

the necessity of management change within the canyon and recognizes the concerns of those included within Surveys #1 and #2, which do not seek a drastic increase in infrastructure in the canyon or at the entrance to the canyon on Powerhouse Lane.



PHOTO: DIEGO VELASQUEZ

PLAN A+ RECOMMENDATIONS

- Leave the primary entrance to the canyon at the end of Powerhouse Lane instead of undertaking the massive infrastructure project, with all its associated costs, of moving to the primary entrance to Potato Salad Hill.
- Create designated parking spots via striping, which can accommodate 36-37 vehicles, with natural-colored rubber bumpers, to maximize parking capacity of the lot.
- Implement a continually updating webcam feed of the Powerhouse Lane parking lot to allow visitors to see before driving out in person if there are any spots left in the lot (this has been instituted successfully by Arches N.P.).
- Create a manned-booth with a swing-arm barrier at the beginning of the dirt road on Powerhouse Lane.
 - The booth will be occupied during peak visitation hours per traffic data collected by the BLM.
 - Alternatively, follow the MCCC's recommendation for a pipe safe or "iron ranger" with an accompanying

informational kiosk to inform visitors of parking regulations, note the current parking status of the parking lot.

- Establish an electronic sign on either side of Mill Creek Drive to indicate the current parking status of the parking area.
 - Provide a vegetated screen to a gravel turn-around (located at the gated entry) and to the gated entry itself, if denied entry at the booth.
 - Formalize the secondary use of Potato Salad Hill as an alternative access to Mill Creek Canyon. Provide 5-10 marked parking spaces, leaving the rest to mitigate user conflict with off-road vehicles utilizing Potato Salad Hill for motorized recreational use.
 - Institute a paid stewardship initiative, where young people will be trained as stewards for Mill Creek Canyon, complementing the daily work of Moab Solutions and the work of others in the canyon.
- Moving the primary entrance to Potato Salad Hill will not in fact “minimize user group conflicts” but will rather augment these user conflicts between off road users and picnickers, hikers, and other users at Mill Creek for foot-powered activities.
 - As noted as a goal for MCCC, access for SAR and EMS as it stands at Potato Salad Hill remains unimpeded by foot traffic from Mill Creek Canyon users. Additionally, SAR and EMS are able to avoid crossing the rocky ledge system above the powerdam when performing their search and rescue duties. By moving the primary entrance to Potato Salad Hill for visitors, overall usage to the trail systems on the North side of the creek will increase, congesting the work of SAR and EMS and potentially forcing these entities to shift their access points to less-congested but more logistically difficult areas.
 - By implementing several infrastructure projects, such as the footbridge, paving one or both parking areas and turn around areas, MCCC fails to take into account more cost-effective, less-impactful solutions.

A+ BACKGROUND & OBJECTIONS TO MCCC

Alternative A+ addresses the following concerns with the MCCC recommendations as follows:

Overshadowing all of the recommendations submitted by the MCCC stands the designation of

Mill Creek Canyon as an Area of Critical Environmental Concern (ACEC). The stated goal of the ACEC is “to protect the relevant and important values of cultural resources, scenery, natural systems (cold water fishery/riparian/watershed and wildlife).” The following management prescription applies to the 3,721 acres indicated in the Mill Creek Canyon ACEC: “No new mechanized or motorized routes. Motorized and mechanized travel limited to designated routes.”

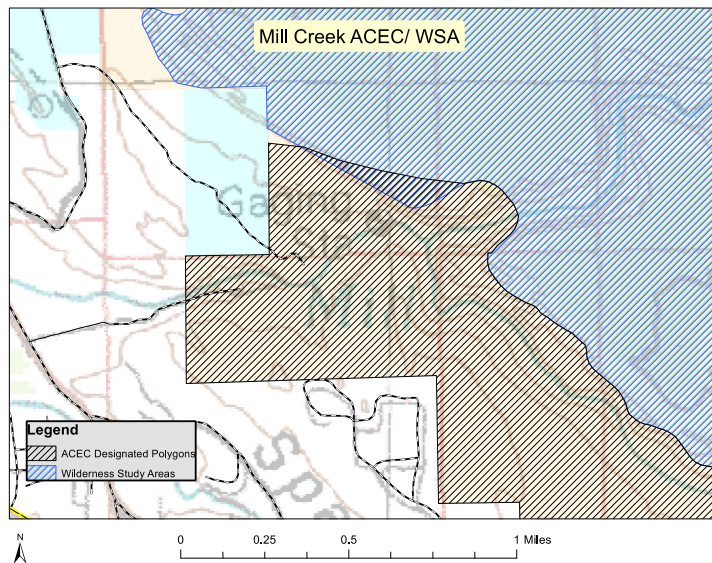


FIGURE: MAP OF POTATO SALAD HILL AND THE POWERDAM ENTRANCE TO MILL CREEK CANYON COVERED BY ACEC DESIGNATION; 2008 BLM RMP.

The designation of Mill Creek Canyon as an ACEC presents a challenge to the MCCC recommendations to build a footbridge between the Potato Salad Hill parking area and the Powerdam parking area, the potential “improvement” of a new parking area at Potato Salad Hill, and the invitation of mechanized travel into the area as the Canyon is governed by the special management rules of the ACEC.

Conclusion

As the MCCC states quite clearly, “the secret” that is Mill Creek Canyon, is out. Many local users have curbed their visitation to the canyon, throughout the year and especially during high tourism seasons, and the tourist impact is more prevalent than ever.

Mill Creek Canyon offers a perfect example of the challenges of increasing use and increasing degradation of natural resources that are being faced by public lands throughout the U.S. The reality is that use must be managed, and not merely accommodated.

Looking at the overall picture, the MCCC agreed to protect the resource, stop overcrowding, and

attempt to bring back those who have stopped visiting Mill Creek Canyon because of the exaggerated user impacts the canyon has faced in recent years. As noted by the MCCC in the conclusion to their recommendations, this group did *not* receive full consensus regarding all its recommendations. We recommend that the BLM compare the consequences of both the MCCC and Alternative A+ side-by-side, and offer their analysis to the public for consideration.



PHOTO: DIEGO VELASQUEZ



WINTER BREAK STUDENTS LINE TRAIL COMING DOWN FROM POTATO SALAD HILL, PHOTO: MOAB SOLUTIONS