

National Park Service  
U.S. Department of the Interior

Wupatki National Monument  
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**FINDING OF NO SIGNIFICANT IMPACT  
BACKCOUNTRY MANAGEMENT PLAN/GMP AMENDMENT/  
ENVIRONMENTAL ASSESSMENT**

April 2022

**Wupatki National Monument**

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## BACKGROUND

Wupatki National Monument (the monument) protects one of the most densely populated archeological landscapes in the Southwest. Located about 26 miles north of Flagstaff, Arizona, the monument encompasses more than 35,000 acres of open, rugged lands characterized by dramatic geologic features, climatic extremes, scarce water, and a diverse range of plant and animal species. Wupatki National Monument is most renowned for its exceptionally well-preserved archeological record, with around 2,700 known archeological sites dating mostly to the period after the eruption of nearby Sunset Crater Volcano in the late 11th century. A 2013 wilderness eligibility assessment found the majority of lands within the monument—34,198 acres, or roughly 96.5% of its total acreage—are eligible for wilderness designation. The National Park Service refers to these lands as the Wupatki eligible wilderness. Publication of the final eligibility determination is pending, and per National Park Service (NPS) Director's Order #41, the eligible wilderness areas will be managed to maintain their wilderness character as not to preclude them from wilderness designation in the future.

Currently, visitor use is concentrated at the monument visitor center and four primary frontcountry archeological areas: Wupatki Pueblo; Wukoki Pueblo; Citadel and Nalakihi Pueblos; and Lomaki and Box Canyon Pueblos. These areas have been developed for public use and include short, self-guided trails and interpretive media. However, most of the monument, including the Wupatki eligible wilderness, remains undeveloped and is closed to unguided visitor entry under management zoning outlined in the monument's 2004 general management plan (GMP) and modified through a categorical exclusion process in 2020. Under the amended general management plan, access to the backcountry is limited to individuals with research permits, tribal access, or visitors taking part in NPS-guided activities. The National Park Service periodically offers ranger-led discovery hikes to destinations in the undeveloped backcountry portions of the monument. Over time, monument staff and the public have expressed growing interest in reevaluating the general management plan and determining if portions of the backcountry could be opened for unguided visitor experiences without harming the resources the monument was established to protect. Additionally, the National Park Service wished to revisit and amend certain elements of the monument's general management plan to support enhanced visitor access and use and resource protection.

The Wupatki National Monument Backcountry Management Plan/GMP Amendment/EA (plan/EA) was released to the public for review on December 15, 2021. The document and a newsletter summarizing the two management alternatives considered were shared via the project website and through a press release sent to the monument's listserv. Initially, a 30-day public comment period was announced, but after the National Park Service received requests for additional time, the comment period was extended to 45 days (December 15, 2021–January 30, 2022). Summaries of public comments received and responses by the National Park Service are provided in the “Public Comments and NPS Responses” section of this document.

## SELECTED ACTION AND RATIONALE FOR DECISION

The National Park Service has selected the NPS proposed action (preferred alternative) from the plan/EA for implementation. The selected alternative best meets the purpose and need for action without causing significant impacts on monument resources. The selected alternative will update management zoning descriptions and boundaries to provide additional visitor opportunities in backcountry portions of the monument, including the Wupatki eligible wilderness. Management zone descriptions will also be updated to address preservation of wilderness character and incorporate the updated desired conditions prepared as part of the planning effort and included in chapter 1 of the plan/EA. Under the new management zoning boundaries and NPS selected alternative, approximately 1,437 acres will be removed from the Resource Preservation Zone and included within the Discovery Zone to allow for potential visitor access. The plan/EA also includes visitor capacity identification for all backcountry areas of the monument, as directed by legal mandate in the 1978 National Parks and Recreation Act. Details of the selected alternative and other alternatives considered are described in chapter 2 and appendix E of the plan/EA.

Under the selected alternative, the National Park Service will increase day-use visitor opportunities in the monument's backcountry by expanding the frequency and locations of guided hikes. Monument staff will evaluate current NPS capacity to guide additional hikes and will consider various approaches to increasing the frequency of guided backcountry hikes. These approaches could include redirecting staff capacity, pursuing funding opportunities for seasonal or intern positions, exploring cost recovery methods from hike participants, considering outside partner organizations to act as additional guides, and considering commercial entities that support the mission of the National Park Service and emphasize interpretive themes and wilderness values for future partnerships. Preferred partners would emphasize education and interpretation and include groups such as nonprofit organizations, volunteer organizations, and tribal members. Any future backcountry commercial use proposals in the Wupatki eligible wilderness that are received by the monument will be individually evaluated under an extent necessary determination and minimum requirements analysis, as required by NPS management policies and subject to additional environmental compliance.

Additionally, the National Park Service will evaluate the potential for new opportunities for unguided, permitted day-use hiking in the Pronghorn Plateau area and/or along the Kaibab Crossing route, as well as the potential for a new, guided overnight experience in the Pronghorn Plateau area (figure 2). Implementation of unguided hiking opportunities is dependent on staff capacity, the creation of a detailed monitoring plan that incorporates the indicators and thresholds described in appendix C, development of public education and orientation materials for visitors pursuing the unguided hiking experience, coordination between the National Park Service and US Forest Service (USFS), and creation of an operating plan to guide the administration of the unguided hiking program. National Park Service maintenance responsibilities for the Doney Picnic Area parking lot and archeological monitoring along the USFS portion of Pronghorn Plateau and Kaibab Crossing will be included in an update to the

existing interagency service first agreement between Flagstaff Area Monuments and the Coconino National Forest.

Management zoning boundaries will be revised to accommodate expanded guided hikes and potential unguided hiking routes (figures 1 and 2). A total of 4,105 acres in the monument will have the potential for visitor access through guided discovery hikes and/or unguided experiences. This change represents an increase of approximately 1,437 acres in management zone acreage. If the selected alternative is implemented in full, the expanded guided hiking program and permits for unguided day use in the proposed Pronghorn Plateau area and Kaibab Crossing route will provide access to the backcountry for up to 1,244 visitors per year. This maximum number of backcountry visitors represents an approximately 156% increase from the number of annual backcountry visitors allowed to participate in the existing guided hiking program (486 visitors). Visitor capacity analysis is included in chapter 2 and appendix D of the plan/EA.

In addition, the National Park Service is pursuing a permanent backcountry closure via a special regulation to provide the highest level of resource protection for in situ cultural resources and natural resources located within the updated Resource Preservation Management Zone (approximately 30,419 acres).

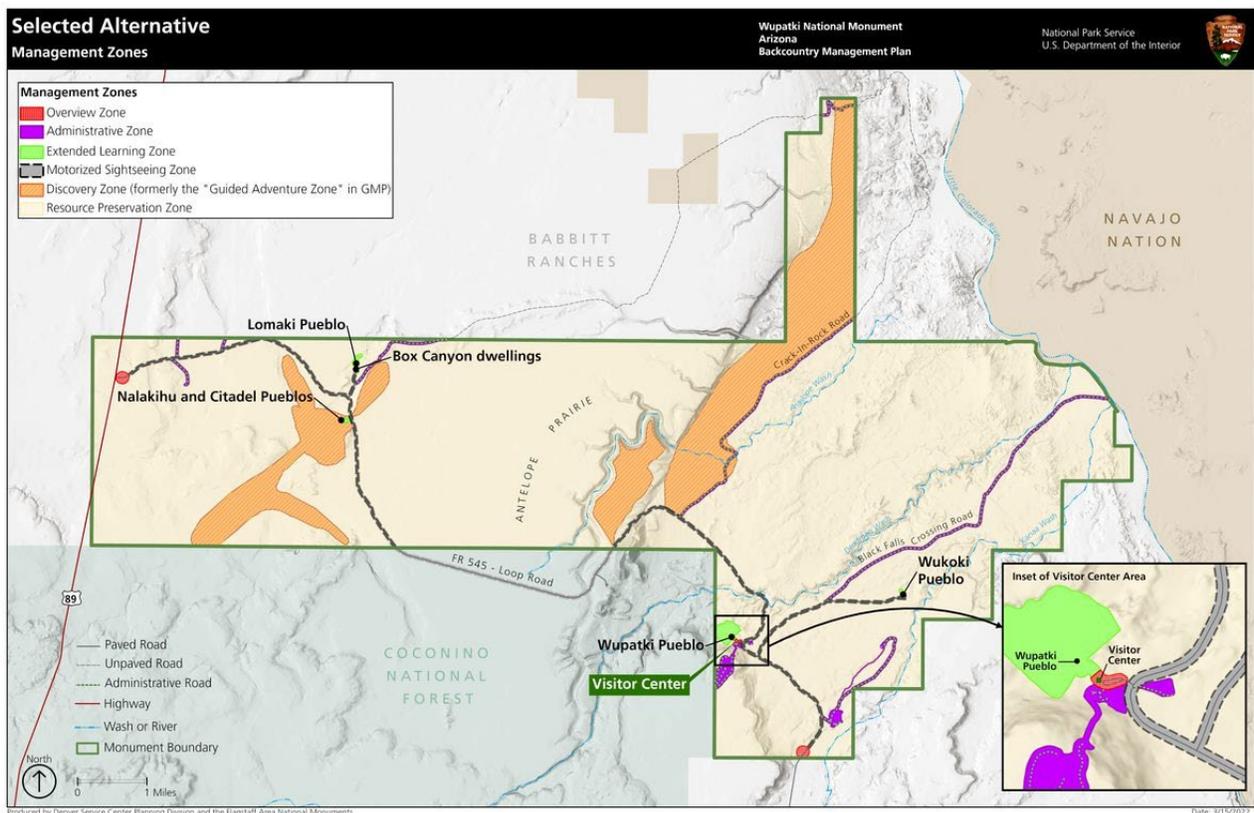


FIGURE 1. MANAGEMENT ZONING UNDER THE SELECTED ALTERNATIVE

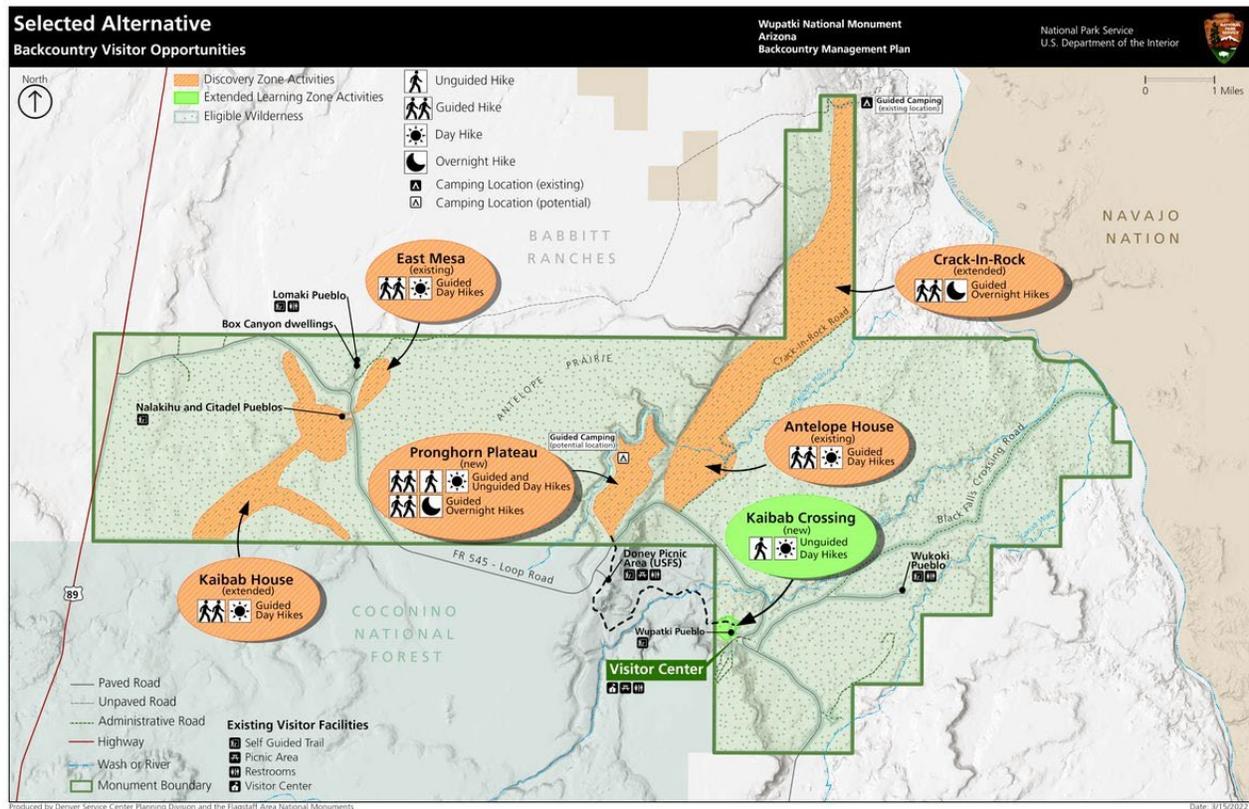


FIGURE 2. BACKCOUNTRY VISITOR OPPORTUNITIES UNDER THE SELECTED ALTERNATIVE

## MITIGATION MEASURES

The National Park Service strongly emphasizes avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the National Park Service will require multiple mitigation measures and best management practices to protect environmental and cultural resources potentially affected by the project. These measures and practices are described in chapter 2 of the plan/EA; additional monitoring measures are described in appendix C. Management strategies and actions designed to reduce the potential for visitor-related effects to desired conditions are outlined in appendix D.

The authority for mitigation for this project comes from laws and policies, including:

- NPS Organic Act [16 U.S.C. §1.]
- The Redwood Act [(H.R. 3813 (95th)]
- 1978 National Parks and Recreation Act
- Endangered Species Act, as amended [16 U.S.C. § 1531 et seq.]
- National Historic Preservation Act of 1966, as amended [54 U.S.C. § 300101 et seq.]

- Director’s Order #41: Wilderness Stewardship (NPS 2013)
- NPS *Management Policies 2006* (chapters 4, 5, and 6) (NPS 2006)

## **FINDING OF NO SIGNIFICANT IMPACT**

- Based on the information contained in the plan/EA, the National Park Service has determined that the selected alternative does not constitute a major federal action having a significant effect on the human environment. Therefore, an environmental impact statement will not be required.
- This finding is based on consideration of the Council on Environmental Quality (CEQ) criteria for significance (40 CFR 1501.3(b) [2020]), both regarding the affected environment and the degree of effects of the impacts described in the plan/EA (which is hereby incorporated by reference) and as summarized below. The plan/EA is available at <https://parkplanning.nps.gov/WUPAbackcountry>.

## **POTENTIALLY AFFECTED ENVIRONMENT**

The project area for the plan/EA includes the approximately 34,457 acres of undeveloped areas of the monument that were included within the 2004 GMP Resource Preservation Zone (31,859 acres) and the Guided Adventure Zone (2,598 acres). This project area includes the four areas (totaling approximately 34,198 acres) within the monument that the National Park Service determined meets the criteria for eligible wilderness consistent with NPS *Management Policies 2006* and the Wilderness Act.

### **Visitor Access and Experience**

Because of the highly sensitive cultural resources in the backcountry and throughout the entire monument, the National Park Service currently manages access through guided hikes only. Visitation to the backcountry comprises just a small percentage of the monument’s total visitation, with an average of 4.5% of visitors engaging in guided discovery hikes or the overnight Crack-In-Rock hike. Up to 486 visitors and 84 accompanying guides have the opportunity to access the backcountry through discovery hikes. Under current management, 2,668 acres of the Wupatki National Monument backcountry have the potential for visitor access through guided discovery hikes.

The National Park Service offers three discovery day hike routes and one guided overnight route to different areas of the monument and locations of interest. Half-day, guided discovery hikes occur on Saturdays and Sundays between October and March to three areas of the monument: Antelope House, Kaibab House, and East Mesa. Spots on these hikes are reservable by phone and are limited to 13 visitors plus two NPS-sanctioned guides (NPS staff or volunteers). The Antelope House, Kaibab House, and East Mesa guided discovery hikes can each accommodate a maximum number of 130 visitors per year (managed as 13 visitors and two guides per day not to exceed 10 days per year) for a total of 390 visitors per year between the three hikes (excluding guides).

The monument offers one guided overnight experience that provides visitors with the opportunity to experience challenge and adventure over a 14- to 16-mile round-trip hike through rugged terrain and to enjoy the monument's dark night skies. The Crack-In-Rock guided overnight hiking area can accommodate up to 96 visitors, managed as groups of 12 participants and 3 guides up to eight times a year. Participants are selected through an online lottery system.

### **Wilderness Character: Solitude or Primitive and Unconfined Recreation**

Wilderness character is a holistic concept, and managers have identified five distinct, yet interrelated, qualities of wilderness character that are derived from the language in the Wilderness Act. These five qualities are natural, untrammeled, undeveloped, solitude or a primitive and unconfined type of recreation, and other features of value. Opportunities to experience areas of Wupatki National Monument that possess qualities of wilderness character are unparalleled and enhance the values of solitude, opportunities for reflection, and primitive recreation. This experience is identified as a fundamental resource and value (FRV) in the monument's 2015 foundation document and allows visitors to connect to the vast human history represented at Wupatki National Monument.

Access to the areas with wilderness values is through NPS guided hikes as described in "Visitor Access and Experience" above. As visitors are with a group for the duration of their hike, opportunities to experience being alone or remote from the sights and sounds of other people are very limited, though visitors are still afforded with the sense of being in an unfrequented or secluded place, allowing for some sense of solitude. Visitors do not experience primitive or unconfined recreation, as they are following a guide on a predetermined route. Requirements for self-reliance are minimal, as hikers can depend on help and support from their trained guides or other group members, if needed.

### **Cultural Resources (Wilderness Character: Other Features of Value)**

Cultural resources—which include archeological sites, historic and prehistoric structures, ethnographic resources, cultural landscapes, and continuing cultural practices—are named in the monument's foundation document as an FRV essential to maintaining the monument's legislated purpose. Additionally, the monument's vast archeological record has been identified in the 2017 Wupatki Wilderness Character Narrative as an "other feature of value" that contributes to the distinct character of the areas that possess wilderness qualities. The National Register-listed Wupatki National Monument Archeological District boundary is congruent to the boundary of the monument and includes more than 2,700 contributing cultural sites spread across the entire 35,254 acres that make up the NPS unit. In some areas of the monument's backcountry, archeological site density exceeds 100 sites in a square mile, creating an astounding temporal and geographic record of life in the high desert. Prehistoric sites with architectural elements—which may include multistory pueblos, fieldhouses, and pit houses—make up the majority of sites found in the planning area. Surface artifacts, such as sherds and lithics, are scattered throughout the district and are highly visible even to the untrained eye.

As part of the backcountry planning process, monument cultural resource staff created a tool to evaluate sites' overall vulnerabilities and assist future monitoring and mitigation efforts

(appendix H of the plan/EA). The vulnerability assessments captured the condition of individual sites and analyzed factors that contribute to the potential for human impacts: accessibility of the site, fragility of resources, portability of artifacts, visibility of the site or artifacts, and signs of previous disturbances. A total of 362 sites across the proposed expanded Discovery Hike areas were assessed between January and July 2020 as part of the backcountry planning effort. Of the sites, approximately 71% (256 sites) were considered to have low vulnerability, 20% (73 sites) were rated as having moderate vulnerability, and only 5% (19 sites) were considered to have high vulnerability. The vulnerability assessment findings helped shape the visitor activities considered by the planning team and provide additional information for future monitoring.

Any human activity in areas where there are archeological sites can cause damage to archeological resources. Surface artifacts, sensitive sites, and/or fragile cultural resources are more prone to localized impacts. Anyone travelling in the backcountry of Wupatki National Monument—including professionals conducting permitted research activities and NPS staff performing routine preservation or maintenance activities—could contribute to soil compaction or erosion at archeological sites. Surface artifacts are also at risk for trampling or unauthorized collection. Current visitation to the backcountry is limited to the 2,668 acres of the Wupatki National Monument included in the four guided hiking areas. Visitor-related impacts are minimal because of the NPS presence on all discovery hikes, the highly controlled number of people allowed in the backcountry, and the types of NPS operations and research activities allowed in the backcountry and eligible wilderness sections of the historic district.

## **THE DEGREE OF EFFECTS OF THE ACTION**

The following have been considered in evaluating the degree of the effects (40 CFR 1501.3(b)(2) [2020]) for the selected alternative:

### **Beneficial, Adverse, and Short- and Long-term Effects of the Proposed Action**

The implementation of backcountry management under the NPS selected alternative will result in improved opportunities for visitors to access and experience the backcountry and Wupatki eligible wilderness. Beneficial effects to visitor use and experience will occur due to increased educational opportunities through guided hikes and a robust unguided hiking orientation, increased guided access to areas previously closed to visitor use in the backcountry, and the possibility of permitted, unguided day-use access to portions of the backcountry and Wupatki eligible wilderness. The maximum number of visitors that could experience the backcountry will increase by 156% (from 486 annual visitors under current management to up to 1,244 annual visitors under the selected alternative). If fully implemented, the selected alternative will also offer new visitor opportunities for unguided, permitted day use in the Pronghorn Plateau area and along the Kaibab Crossing route. The overall quality of the experience for backcountry users will be enhanced through the continued use of registration and permitting systems that allow for small group sizes and immersive experiences.

A total of 4,105 acres would have the potential for visitor access through guided hikes and/or unguided experiences, an increase of approximately 1,437 acres from current management; however, the vast majority of the backcountry (more than 30,000 acres) would remain in the

Resource Preservation Zone and continue to be closed to visitor access. This increase in the area of management zones that allow visitor use will provide management flexibility in rerouting discovery hikes and continuing to provide access if certain locations need to be closed for restoration or recovery, thus largely preserving visitor access, even when closures occur. In most locations, reroutes for visitor access are available, so impacts to visitor access will be minimal, even if some closures do occur. While 4,105 total acres of the backcountry and Wupatki eligible wilderness would be zoned for potential visitor access, only a small portion of the zones would see visitation due to the small footprint of hiking routes. Access to individual visitor use areas would also be limited by seasonal closures related to natural resource protection and visitor safety.

Because of the increased opportunities for visitors to experience solitude and primitive and unconfined recreation through potential unguided day use and new small group, guided overnight experiences, full implementation of the selected alternative provides a beneficial impact to wilderness, an FRV at the monument. Under the revised management zoning descriptions and boundaries, lands in the backcountry or Wupatki eligible wilderness within management zones that allow for solitude and/or primitive recreation expand from 2,645 acres to 4,078 acres. Up to 168 visitors per year could have an unguided, primitive, and unconfined experience in the Pronghorn Plateau area and up to 640 visitors per year could have a similar experience along the Kaibab Crossing route. This change is a substantial increase from current management, which provides no unguided access to the backcountry.

Updates to management zone boundaries will allow visitors access to up to 1,437 acres of backcountry and Wupatki eligible wilderness that are currently part of the Resource Preservation Management Zone and are protected by the 2004 GMP backcountry closure. More than 30,000 acres—approximately 86% of the monument and the overlaying Wupatki National Monument National Register Archeological Historic District—will remain in the Resource Preservation Zone and will continue to receive the highest level of resource protection. It is unlikely that zoning revisions included in the plan/EA will impact the integrity of the historic district and associated landscape because of the vast size and large number of documented sites that make up the Wupatki National Monument Archeological Historic District.

Full implementation of the selected alternative—including permitted day-use in the Pronghorn Plateau area and Kaibab Crossing route—results in long-term, beneficial impacts to the Wupatki eligible wilderness. Additional guided hikes and new unguided experiences in the expanded Extended Learning and Discovery Zones will allow more visitors to experience solitude or primitive and unconfined recreation—a quality of wilderness character—and to pursue challenging recreational opportunities. If the selected alternative is fully implemented, up to 168 visitors per year could have an unguided, primitive, and unconfined experience in the Pronghorn Plateau discovery hike area, and up to 640 visitors per year could have a similar experience along the Kaibab Crossing discovery hike route. The introduction of unguided visitor use will not likely impact overall opportunities to experience solitude, as access would be managed via permits. Even in the unlikely situation where the weekly capacity of 2 groups of 8 visitors were given Kaibab Crossing permits simultaneously when a guided Pronghorn Plateau

discovery hike was scheduled, the number of total people in these areas would not exceed 24 (16 people in Kaibab Crossing and 8 people in a guided Pronghorn Plateau hike).

Increasing the frequency of guided discovery hikes, expanding the visitor use areas, and adding the potential for unguided backcountry access in Pronghorn Plateau and Kaibab Crossing would increase the potential for surface disturbances, inadvertent damage, intentional damage, soil compaction, and trampling of in situ archeological resources, ethnographic resources, and/or architectural ruins within the Wupatki National Monument National Register district. Increased guided discovery hikes to sites not previously developed may result in similar visitor-related impacts within backcountry areas that are currently protected by the closure. Social trailing in areas where unguided hiking could be allowed could lead to exposure or damage of in situ archeological resources. Increased vandalism and artifact collecting may occur as more members of the public know where archeological sites, historic structure remains, and surface artifacts are located. Individuals who previously participated in a guided discovery hike or spent time unaccompanied in the backcountry could return to the area for unlawful activities. Active resource monitoring and the addition of three monitoring measures identified as part of the resource condition indicators and thresholds included in chapter 2 and appendix C in the plan/EA—including converting unguided hiking to a guided hiking opportunity or closing areas to public access—will allow monument staff to minimize adverse effects, respond to any changes to the conditions of cultural resources in Wupatki National Monument’s backcountry and eligible wilderness, and protect these FRVs for the monument.

### **Degree to Which the Proposed Action Affects Public Health and Safety**

The selected alternative will provide additional opportunities for visitors to experience the backcountry through an expanded guided hiking program and the potential for the monument to issue day-use permits for unguided hiking in the Pronghorn Plateau area and the 0.3-mile NPS segment of Kaibab Crossing route. Visitor capacity and implementation strategies for the backcountry visitor use areas include seasonal closures that correspond with the hot summer months and the monsoon season. These closures should limit the possibility for visitors to experience flash flooding or heat exhaustion, two major concerns when considering visitor use in the backcountry.

Guided hikes will follow the standard operating procedure developed for the discovery hike program. Current practice for these hikes is to have 3 guides for every 12 visitors, for a ratio of 4 visitors to every 1 guide so staff can effectively manage and educate the group. Guides are required to have training in resource stewardship, interpretation, and safety (e.g., GPS, illnesses, slips or falls, route safety, radio use), as well as Leave No Trace principles. Additionally, guides maintain regular prearranged contact with visitor center staff using a radio or other approved mobile communication device.

Any future unguided day use in the Pronghorn Plateau area or the Kaibab Crossing route will be managed via a permit system that allows the monument to manage the amount and timing of unguided visitors in the backcountry. Permit distribution will require hikers to complete an orientation process and provide necessary information that would aid any emergency response or search efforts if an unguided backcountry hiker needed assistance. Orientation materials will

focus both on backcountry safety and resource protection and will be developed in partnership with the US Forest Service.

### **Effects That Would Violate Federal, State, Tribal, or Local Law Protecting the Environment**

The selected alternative does not threaten or violate applicable federal, state, or local environmental laws or requirements imposed for the protection of the environment.

The selected alternative will not violate any provision or requirement identified under legislation addressing Wupatki National Monument, the National Park Service Organic Act, or any other subsequent legislation. Further details can be found in the non-impairment determination below.

The National Park Service coordinated with the US Fish and Wildlife Service Field Office to ensure compliance with section 7 of the Endangered Species Act for the Fickeisen plains cactus and its critical habitat. On August 3, 2021, the US Fish and Wildlife Service concurred with the National Park Service's determination of "No Effect" for federally listed species and designated critical habitat described in appendix F of the plan/EA.

In accordance with section 106 of the National Historic Preservation Act, the National Park Service initiated consultation with the Arizona State Historic Preservation Office and associated tribes in April 2020. The National Park Service provided a draft of the backcountry management plan and the *2020 Backcountry Management Plan Vulnerability Assessments at Wupatki National Monument* for review on September 21, 2020. The National Park Service found that implementation of the selected alternative would have an effect on historic properties, but the effect would not be adverse, and actions support the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, the National Park Service determined that this undertaking constitutes a determination of "no adverse effect." The determination was disclosed on the NPS project website to coincide with the public release of the plan/EA.

The Arizona State Historic Preservation Office provided concurrence with "no adverse effect" in a letter dated September 30, 2020. The White Mountain Apache Tribe Office of Historic Preservation also provided written concurrence with the no adverse effect finding in a letter dated September 21, 2020. The Hopi Tribe and Navajo Nation expressed concerns over the expansion of guided hiking and the potential for unguided access to portions of the backcountry due to visitor impacts to archeological resources. The National Park Service continued government-to-government consultation about the planning effort and plan/EA in February 2022 and will continue to consult with the Arizona State Historic Preservation Office and associated tribes on a project-level basis throughout the implementation and lifespan of the plan/EA. In the future, all visitor use will be managed within identified visitor capacities, and if monitoring indicates impacts to resources exceed thresholds for specific indicators established in the plan, the National Park Service will implement adaptive strategies, such as increased visitor education or temporary area closures, to achieve the desired conditions identified in chapter 1 of the plan/EA.

**SIGNATURES**

Recommended:

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MINTON** Digitally signed by  
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Lucas Minton  
Superintendent (Acting), Flagstaff Area National Monuments  
National Park Service

Date

Approved:

**MICHAEL  
REYNOLDS** Digitally signed by  
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Michael T. Reynolds  
Regional Director, Interior Regions 6, 7, and 8  
National Park Service

Date

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## NON-IMPAIRMENT DETERMINATION

### BACKCOUNTRY MANAGEMENT PLAN, WUPATKI NATIONAL MONUMENT

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and the National Park Service to manage units “to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 U.S.C. 100101). National Park Service *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values:

“While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.”

An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, section 1.4.5). To determine impairment, the National Park Service must evaluate the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. “An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance” (NPS 2006, section 1.4.5).

Fundamental resources and values for Wupatki National Monument are identified in the enabling legislation of the monument and the monument’s 2015 foundation document. Based on a review of these documents, the fundamental resources and values for Wupatki National Monument are archeological resources and the natural setting/wilderness, including the largely undeveloped terrain, wilderness values, scenic views, and local wildlife and habitat.

Cultural resources, including archeological and ethnographic resources, and natural resources—pronghorn and pronghorn habitat—are subject to the non-impairment standard established by the Organic Act and clarified further through section 1.4.6 of NPS *Management*

*Policies 2006.* These resources are considered necessary to fulfill the purpose identified in the establishing proclamation and following legislation for the monument.

The topics of “Visitor Access and Experience” and “Wilderness Character: Solitude or Primitive and Unconfined Recreation” were carried forward for detailed analysis in the plan/EA; consistent with NPS policy and guidance, a non-impairment determination does not include discussion of these impact topics.

This non-impairment determination has been prepared for the selected alternative, as described above in “Finding of No Significant Impact.”

## **Cultural Resources**

Cultural resources—which include archeological sites, historic and prehistoric structures, ethnographic resources, cultural landscapes, and continuing cultural practices—are featured prominently in the monument’s foundation document. These resources are central to three of the four identified significance statements (archeology, connections from past to present, and scenery and setting) and weave through the monument’s interpretive themes. As fundamental resources essential to maintaining the monument’s legislated purpose, archeological resources “warrant primary consideration during planning and management processes.” Additionally, the monument’s vast archeological record has been identified in the 2017 Wupatki Wilderness character narrative as an “other feature of value” that contributes to the distinct character of the Wupatki eligible wilderness.

Increasing the frequency of guided discovery hikes, expanding the visitor use areas, and adding the potential for unguided backcountry access in Pronghorn Plateau and Kaibab Crossing would increase the potential for surface disturbances, inadvertent damage, intentional damage, soil compaction, and trampling of in situ archeological resources within the historic district. Increased guided discovery hikes to sites not previously developed may result in similar visitor-related impacts within backcountry areas that are currently protected by the closure. Social trailing in areas where unguided hiking could be allowed could lead to exposure or damage of in situ archeological resources. Increased vandalism and artifact collecting may occur as more members of the public know where archeological sites, historic structure remains, and surface artifacts are located.

Although the management zones allowing visitor use in the backcountry will be expanded from 2,598 acres to 4,034 acres under the selected alternative, the majority of the monument’s lands (30,419 acres or approximately 86% of the monument) will remain under the Resource Preservation Zone and will have no change in visitor use. While the Discovery Zone allows for hiking, each guided hiking route covers only a small portion of the management zone, and potential impacts related to unauthorized activities will continue to be mitigated by the presence of trained guides. Only the Pronghorn Plateau and Kaibab Crossing areas will be considered for unguided access. Implementation of the proposed action may result in a loss of surface artifacts within the approximately 1,437 acres of the backcountry that will be newly opened to visitor use. Future management actions related to visitor-use impacts for these areas include temporary location closures to visitor use to allow for resource specialists to examine the area and analyze impacts, increased emphasis on orientation and education about Leave No

Trace principles and the responsibility of each visitor to protect the cultural resources in the backcountry, increasing orientation requirements, alternating discovery hike routes offered by the monument, and removing locations from the list of eligible guided hiking routes.

### **Pronghorn and Pronghorn Habitat**

The pronghorn and the grassland ecosystem on which they depend are both identified as key resource values in the 2004 general management plan, as well as identified as fundamental resources in the 2015 foundation document. Under the backcountry management plan, an additional 4,034 acres will be zoned for backcountry visitor use, with an annual maximum of 1,244 visitors (up to 1,384 people, including guides). This zoning equates to a 4.2% change in amount of additional monument acreage available for recreation and a corresponding amount of affected pronghorn habitat within the monument. A total of 30,474 acres of total habitat will remain closed, providing ample habitat area for individual animals to evade visitor groups. A small group of visitors in the backcountry once per week in the new access zones may encounter individual pronghorn. The predicted effect is that not more than a few animals will be compelled to move to the nearest habitat area that is screened from pedestrian view. Additionally, the areas proposed for new visitor access will be closed during calving periods and seasonal movements between summer and winter range, which will eliminate the potential for temporary human disturbance and maintain habitat connectivity when pronghorn are most vulnerable. Therefore, pronghorn and pronghorn habitat will continue to be available for the enjoyment of present and future generations.

### **Raptors**

The monument conducts periodic nesting surveys and maintains monitoring data and reporting for three raptor species: the prairie falcon (*Falco mexicanus*), the golden eagle (*Aquila chrysaetos*), and the great horned owl (*Bubo virginianus*). In places, unguided backcountry visitors would be traveling over land in remote areas and not following a prescribed trail; thus, the potential would exist for increased impacts to raptor behavior and their habitat. Raptor responses to increased presence of people may depend on how individual species react (avoid, attract, tolerate). While impacts to raptors would occur from increased pedestrian use, there would be no impacts during raptor nesting season and other sensitive periods, and while individual birds may be affected, this would not affect current population level of these species. As a result, and based on best available information, the available habitat would continue to support the raptor species associated with the monument, which will continue to be available for the enjoyment of present and future generations.

### **Fickeisen Plains Cactus**

The Fickeisen plains cactus (*Pediocactus peeblesianus* var. *fickeiseniae*; “cactus,” “plant”) is a cactus endemic to the Colorado Plateau in Coconino and Mohave Counties, Arizona, whose widely distributed populations are restricted to a specific type of habitat. The species is identified in the 2004 general management plan as a “species of concern [...] known from similar habitats nearby the monument [...]” To date, however, this species has not been encountered inside monument boundaries in habitats identified as appearing suitable, and the US Fish and Wildlife Service did not report a range expansion or adjustments to the current

knowledge of its range in 2020. Further, the Arizona Natural Heritage Program (Arizona Game and Fish Department) surveyed monument lands in past years and did not encounter this species. The monument's biologists and field botanists will continue to survey for this cactus, and should populations be found, the National Park Service will initiate consultation with the US Fish and Wildlife Service on potential effects on this species.

### **Cave Resources (Earthcracks and Blowholes)**

Known earthcracks and blowholes will remain in the Resource Preservation Zone, where general visitor access is prohibited, and protected under the Federal Cave Resources Protection Act of 1988 (16 U.S.C. 4304 – Confidentiality of information concerning nature and location of significant caves). Backcountry access has been carefully zoned to entirely avoid all earthcrack openings and blowholes.

### **Paleontological Resources**

All proposed backcountry access areas are sited to entirely avoid areas that are known to contain the monument's most important and vulnerable paleontological resources.

### **CONCLUSION**

Based on the preceding analysis and in consideration of the monument's purpose and significance, it is the superintendent's professional judgment that these resources will continue to be present for enjoyment by current and future generations. Therefore, implementation of the selected alternative will not constitute an impairment of cultural resources—including archeological resources and ethnographic resources—and natural resources found within the Wupatki National Monument backcountry.

## ATTACHMENT A: ERRATA SHEET AND RESPONSE TO PUBLIC COMMENT

The public was provided with two formal opportunities to comment on the backcountry management strategies and actions being considered by the National Park Service. In November 2019, the National Park Service released a newsletter to inform the public about this planning effort. A press release issued on November 25, 2019, announced the availability of the newsletter and directed interested individuals to the NPS Public, Environment, and Public Comment (PEPC) website that was established for this planning effort. The planning newsletter described draft desired conditions for natural resources, cultural resources, and visitor experience, as well as potential future backcountry activities. The newsletter was made available on the monument's website, and hard copies were made available at the public open house meeting held January 16, 2020, and at key locations in the monument.

The Wupatki Backcountry Management Plan/EA was released in digital format on the NPS PEPC website for a 45-day public review period from December 15, 2021, to January 30, 2022. A press release was distributed to approximately 50 media outlets, numerous local chambers of commerce, local visitor centers, public officials, social media, the monument's website, regulatory agencies, and associated Native American tribes. The National Park Service received a total of 30 individual pieces of correspondence, which were reviewed and considered. The comments and suggestions received are incorporated as several minor modifications to the plan/EA, as described in these errata. None of the commenters provided additional, new, or substantive information that changed the determination of effects in the plan/EA.

### ENVIRONMENTAL ASSESSMENT TEXT CHANGE ERRATA

In reference to changes to the plan/EA, the topic heading and page number are shown in bold text. Original text from the plan/EA is included to provide context and to allow for comparison to the text change. Additions to the text are shown in **bold typeface** and deleted text is shown in ~~strikeout~~.

#### **Unguided Day Hiking Opportunities: New Hiking Areas – Kaibab Crossing (page 18): Clarification**

The majority of this route would follow an existing two-track road on USFS property; ~~unguided hiking non-motorized, cross-country travel is an allowed current use on USFS land and the proposed Kaibab Crossing Hiking Route would not change management of USFS lands adjacent to Wupatki National Monument.~~

#### **Unguided Day Hiking Opportunities: New Hiking Areas Supporting Infrastructure – Signage (pages 18–19): Clarification**

Any signage or other markers on NPS or USFS land would be minimal, designed to harmonize with the surrounding landscape, and used only as necessary to protect wilderness resources or support visitor safety, such as those identifying routes and distances ~~per NPS Management Policies 2006 6.3.10.4.~~

**References (page 58): Formatting Correction (space added between two sources)**

Hartman, Dana, and Arthur H. Wolf

- 1977 "Archeological Assessment of Wupatki National Monument." Museum of Northern Arizona, Department of Anthropology.

Henderek, R. L., V. Santucci; B. Rizner, J. Tweet, and J. R. Wood

- 2017 Wupatki National Monument paleontological resources inventory. Natural Resource Report. NPS/WUPA/NRR—2017/1524. National Park Service. Fort Collins, Colorado.

**Appendix C: Indicators and Thresholds for Visitor Use Management Monitoring –  
References (page 78): Addition**

Gallenstein, Gwenn M.

- 2021 "Remorseful Returns: What to Do With Returned Surface-Corrected Items from National Park Service Units." *Collections: A Journal for Museum and Archives Professionals* 17(1): 54–67.

**Appendix D: Visitor Capacity Identification and Strategies for Implementation –  
References (page 97): Correction**

Presidential Proclamation No. 1721

- 1924 President of the United State of America. Wupatki National Monument, Arizona. December 9, 1924. ~~Vol. 34: 225-~~

**Appendix F: Issues and Impact Topics Considered but Dismissed from Analysis –  
References (pages 107–108): Additions**

National Park Service (NPS)

- 1997 **The National Parks: Lesser-Known Areas.** US Department of the Interior. Washington, DC 2015. Published Report 2206368.
- 2013 **Wupatki National Monument: Acoustical Monitoring 2010.** Natural Resource Technical Report. NPS/NRSS/NRTR—2013/764. National Park Service. Fort Collins, Colorado. Published Report 2195869.

Wood, L.

- 2015a **Acoustic Environment and Soundscape Resource Summary, Wupatki National Monument.** NPS NRSS Natural Sounds & Night Skies Division. Resource Brief 2225752.
- 2015b **Night Sky and Lightscares Resource Summary, Wupatki National Monument.** NPS NRSS Natural Sounds & Night Skies Division. Resource Brief 2226081.

## PUBLIC COMMENTS AND NPS RESPONSES

This section summarizes comments that were received during public review of the plan/EA. The National Park Service must consider all comments that are timely received, and the standard NPS practice is to respond to substantive comments that are submitted during the public review period of the plan/EA. Substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response. Comments about this plan/EA were synthesized into concern statements, and a response to each statement is provided below.

**Concern Statement:** *Some commenters felt the purpose of the backcountry management plan and actions presented in the NPS selected alternative—specifically providing new unguided hiking opportunities, expanding guided discovery hike areas, and considering the use of commercial guides—are inconsistent with the purpose of the monument as outlined in the monument’s enabling legislation and the 2015 Wupatki National Monument Foundation Document.*

**NPS Response:** As stated in the monument’s 2015 foundation document, “The National Park Service preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations.” All units of the national park system, including Wupatki National Monument, are united by this same overarching mission, which is rooted in the 1916 Organic Act that created the National Park Service. The purpose of Wupatki National Monument emphasizes resource preservation, but the monument must also fulfill the dual mandate of the Organic Act.

The selected alternative preserves natural and cultural resources while also providing appropriate opportunities for enjoyment, education, and inspiration of visitors, including increased opportunities to experience wilderness character through primitive and unconfined recreation. The National Park Service will implement the actions described in chapter 2 of the plan gradually to ensure that the monument can maintain the desired conditions identified in chapter 1. Additional monitoring indicators and management strategies outlined in appendix C will help the monument document, evaluate, and address impacts to backcountry cultural and natural resources. As demonstrated in the non-impairment determination attached to the FONSI, resources will continue to be available for the enjoyment of present and future generations, as mandated by the Organic Act.

**Concern Statement:** *Some commenters did not agree that there is current demand for additional visitor opportunities (e.g., unguided use) in the backcountry and felt that the National Park Service should not attempt to meet potential future demand, instead maintaining current use levels and focusing on resource protection.*

**NPS Response:** The backcountry management plan/EA does not attempt to meet additional visitor use demand but rather attempts to better address NPS policies, including wilderness stewardship, and to provide, on a limited scale and with management oversight, more diverse visitor experiences. Through this planning

process, an interdisciplinary NPS team identified visitor capacities for all areas of the backcountry to fulfill requirements of the 1978 National Parks and Recreation Act. Due to the presence of sensitive resources, the vast majority of the backcountry will not accommodate any visitor use. For backcountry areas where visitation may occur, annual visitor capacities have been identified to emphasize resource protection. In the future, all visitor use will be managed within these identified capacities, and if monitoring indicates impacts to resources exceed thresholds for specific indicators established in the plan, the National Park Service will implement adaptive strategies, such as increased visitor education or temporary area closures, to achieve the desired conditions identified in chapter 1 of the plan/EA. Please see appendix D of the plan/EA for the full visitor capacity analysis and the management actions to support implementation.

The National Park Service is committed to a thoughtful and deliberate approach to implementing the selected alternative. Expanding the guided discovery hike program and/or introducing unguided backcountry access is dependent on staff capacity to fully support additional interpretation, resource protection, and administrative demands. A detailed monitoring plan that incorporates the indicators and thresholds described in appendix C, an operations plan for unguided hiking, a permit system, and visitor orientation materials are needed before unguided hiking would be considered in the Discovery Zone. Once these supporting documents and practices are in place, monument leadership can evaluate the current status of resources and visitor experiences and determine if unguided access should be gradually allowed in the backcountry.

**Concern Statement:** *Some commenters felt that the guided hike program currently offered, including the overnight Crack-in-Rock hike, provide opportunities for visitors to experience “solitude and primitive and unconfined recreation” in the Wupatki eligible wilderness, and therefore no need exists to expand these opportunities.*

**NPS Response:** Per section 6.3 of *NPS Management Policies 2006*, the National Park Service must manage all categories of wilderness—including areas that have been determined eligible for the national wilderness preservation system—to preserve wilderness character, which includes outstanding opportunities for solitude or primitive and unconfined recreation. This quality of wilderness character directly relates to personal experiences in natural environments and emphasizes self-reliance, self-discovery, and minimizing encounters with other visitors. However, under current management (i.e., the no-action alternative) the National Park Service provides access to the backcountry and Wupatki eligible wilderness only via guided hikes. These hikes are highly facilitated, and participants stay in a group of up to 15 people contained to a specified route. Using a measured and phased approach, the selected alternative could provide unguided day use where visitors can experience solitude, reduced encounters with others, and mental and physical challenges that encourage self-reliance and discovery.

**Concern Statement:** *Commenters wondered if public comments received during previous rounds of civic engagement (December 2019–January 2020) that were critical of unguided backcountry access were considered when deciding on the NPS preferred alternative.*

**NPS Response:** NPS staff considered all public input throughout the backcountry planning process. The January 2020 round of civic engagement, which included a newsletter, public open house, and comment period on the NPS Planning, Environmental and Public Comment website, provided the planning team with a variety of input. Some members of the public supported expanding guided opportunities, new or longer hiking trails or routes, and self-guided hiking and/or overnight opportunities. Other commenters supported continuing guided visitor access and use as currently offered. All of these perspectives were taken into consideration, and because of this input received during civic engagement, the National Park Service determined that several visitor opportunities that had been under consideration—such as unguided overnight use and access to eastern portions of the monument—were inconsistent with the purpose of Wupatki National Monument and did not meet the purpose and need of the plan. These ideas were removed from consideration. The selected alternative reflects a considered and balanced approach to new visitor uses, emphasizing monitoring and using a phased approach to prioritize resource preservation.

**Concern Statement:** *Commenters expressed concerns over potential impacts to resource types not analyzed in detail in the plan/EA, including soils, vegetation, and groundwater (seeps, springs, and natural pools).*

**NPS Response:** Over the course of the multiyear backcountry planning effort, the National Park Service considered numerous management actions and approaches to balance protection of the monument's resources and enable more visitors to experience and appreciate the backcountry of Wupatki National Monument, including Wupatki eligible wilderness. The NPS interdisciplinary planning team included natural resource specialists who considered the potential impact each suggested route or hiking area may have on soils, vegetation, wildlife, and other backcountry resources. The areas included in the selected alternative's expanded Discovery and Extended Learning Zones were chosen, in part, because of factors that made these areas more resilient to visitor use than other areas; for instance, the presence of cinder-based soils or specific types of vegetation. There are no identified seeps or springs located within the Discovery or Extended Learning Zones that would be impacted by the selected alternative's changes to visitor use. Seasonal closures will also limit the potential impacts of proposed visitor use during times where wildlife, and vegetation may experience high stress associated with calving, extreme temperatures, droughts, and flash flooding. Consistent with the direction in CEQ regulations and the NPS *NEPA Handbook* to focus on important issues and only address other issues briefly, these resource types were not carried forward for further analysis in the plan/EA. Appendix F of the plan/EA includes detailed rationale for the following dismissed topics: pronghorn and pronghorn habitat, raptors, Fickeisen plains cactus, cave resources (earthcracks and blowholes), paleontological resources, and the untrammeled, natural, and undeveloped qualities of wilderness character.

**Concern Statement:** *One commenter suggested that the National Park Service consider constructing check dams and/or swales to restore seeps, springs, and natural pools in the backcountry environment.*

**NPS Response:** The purpose of the backcountry management plan and GMP amendment is to provide for the protection and preservation of resources and wilderness character while establishing long-term direction for public access and experience of eligible wilderness. While natural resource restoration efforts are an important part of the National Park Service’s mission and Wupatki National Monument’s legislation, groundwater restoration is outside the scope of this planning effort.

Most of the surface groundwater—for example, Heiser Spring, Peshlakai Spring, and Spece Seep—is located in the Wupatki eligible wilderness within the Resource Preservation Management Zone. Per NPS management policies, “the National Park Service will take no action that would diminish the wilderness eligibility of an area possessing wilderness characteristics until the legislative process of wilderness designation” (6.3.1). Constructing check dams and/or creating swales would impact the natural, undeveloped, and untrammled qualities of wilderness character. If, in the future, the monument determines that active management of seeps, springs, and natural pools in the Wupatki eligible wilderness is necessary, a minimum requirements analysis and additional compliance would be required.

**Concern Statement:** *One commenter expressed concern that unguided hiking would have a greater impact to backcountry archeological resources than described in the plan/EA and may constitute an “impairment” to the resource.*

**NPS Response:** The purpose of the backcountry management plan is to provide for protection of resources while establishing long-term direction for public access and the experience of the Wupatki eligible wilderness. Throughout the planning and alternative development process, preservation of the backcountry’s archeological resources was a primary concern. Some hiking areas and routes considered early in the planning process were dismissed due to the presence of sensitive or fragile resources and concerns related to potential visitor impacts. Wupatki cultural resource staff conducted vulnerability assessments in the proposed Discovery Hike and Extended Learning Zones, and potential routes/areas were revised to further avoid sites that were classified as “high vulnerability.” The selected alternative presents a cautious and highly managed approach to increasing visitor opportunities in the backcountry. Visitor capacities for backcountry use areas represent the maximum visitor use that would still support desired conditions outlined in chapter 1 of the plan/EA. Indicators, triggers, and thresholds for visitor use monitoring and the related management strategies described in appendix C were created to help the monument document any changes resource conditions and take action to stop future impacts from occurring. Cultural resources—a broad category that includes ethnographic resources, archeological resource, historic structures, and architectural remnants—was retained as an impact topic and is fully analyzed in “Chapter 3: Affected Environment and Environmental Consequences” of the plan/EA.

After thoughtful consideration of backcountry resources as part of compliance required under section 106 of the National Historic Preservation Act, the National Park Service found that implementation of the NPS selected alternative would have an effect on the Wupatki archeological district but the effect would not be adverse, and actions outlined in management strategies and mitigation measures support the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, the National Park Service determined that this undertaking constitutes a determination of "no adverse effect." The Arizona State Historic Preservation Office provided concurrence with "no adverse effect" in a letter dated September 30, 2020.

The NPS regional director considers the information conveyed in the plan/EA before determining if there is potential for significant impacts to resource or if any resource would be impaired. Based on that analysis, the regional director has issued a finding of no significant impact and a determination of non-impairment as part of the decision-making process.

**Concern Statement:** *Some commenters worried about potential impacts to Coconino National Forest resources included in and adjacent to the proposed Kaibab Crossing hiking route and the expanded Kaibab House guided discovery hike area.*

**NPS Response:** The National Park Service and the US Forest Service are partners in public land stewardship. The US Forest Service identified the National Park Service as the lead federal agency for section 106 compliance efforts related to this plan/EA. National Park Service staff completed cultural resource inventories and vulnerability assessments for NPS and USFS cultural resources/sites located in the vicinity of the Kaibab Crossing route. Actions in the selected alternative do not represent changes to the current USFS management of Coconino National Forest land or resources as described in the *USFS Land and Resource Management Plan for the Coconino National Forest (2018)*.

Any changes in visitation patterns related to the use of the Doney picnic area would be guided by the visitor capacities identified in chapter 2 and appendix D of the plan/EA. The capacity for Kaibab Crossing discovery hike area is a maximum of 16 people per week during the open season of September through May. This reflects 2 groups of up to 8 visitors. The capacity for Pronghorn Plateau is a maximum of 16 people per week during the open season of September through November. This number represents 2 groups of 6 visitors and 2 guides. Even if 2 guided Pronghorn Plateau hikes of 8 individuals were scheduled for the same day that the maximum of 2 groups of 8 people received permits for unguided hiking, only 32 individuals would be using the Doney picnic area and parking lot. This number falls below the 50 people per day USFS capacity currently in place for the Doney picnic area. Considering the seasonal closures for the visitor use areas, this could only occur September through November and would be unlikely due to NPS scheduling and management of the discovery hike program and any future unguided, permitted day-use hiking.

Throughout implementation of the selected alternative, the National Park Service will continue to work with the US Forest Service to determine the appropriate approach to monitoring on USFS lands adjacent to Kaibab Crossing, maintenance of the USFS Doney picnic area and parking lot, and visitor orientation materials. Details related to each of these

efforts would be included as updates to the existing service first agreement between NPS Flagstaff Area Monuments and the USFS Coconino National Forest.

**Concern Statement:** *Some commenters suggested climate change and projects on privately owned lands adjacent to the monument, such as the Roden Crater installation, could contribute to future resource impacts.*

**NPS Response:** The Wupatki National Monument Backcountry Management Plan/GMP Amendment/EA follows current CEQ regulations related to describing “the environment of the area(s) to be affected or created by the alternatives under consideration, including the reasonably foreseeable environmental trends and planned actions in the area(s)” (40 CFR 1502.15). Relevant trends and ongoing actions in the vicinity of the monument were taken into consideration when proposing management alternatives and preparing the plan/EA. The impacts of climate change, visitation trends, and other park and private actions are described in the trends and planned actions sections of each affected environment and are included within the impacts analysis of the no-action alternative and NPS preferred alternative.

Wupatki National Monument staff actively engages with neighboring landowners and continues to partner with Babbitt Ranches for ongoing pronghorn research. While a large-scale art installation at Roden Crater has been proposed and promoted by the artist James Turrell, it is currently unknown when the property may be open for public visitation, what facilities or visitor experiences at the site would entail, and what impacts these may or may not have on monument resources. Not enough information currently exists to analyze potential impacts within the plan/EA. The National Park Service looks forward to continuing conversations with the private landowner about plans for the site.