

National Park Service
U.S. Department of the Interior

Glen Canyon National Recreation Area
Utah / Arizona



Programmatic Environmental Assessment for Organized Group Activities along Hole-in-the-Rock Road

FINDING OF NO SIGNIFICANT IMPACT

INTRODUCTION

The Bureau of Land Management (BLM), Grand Staircase-Escalante National Monument (GSENM), and the National Park Service (NPS), Glen Canyon National Recreation Area (GLCA), have jointly prepared a Programmatic Environmental Assessment (EA) to disclose and analyze the environmental consequences of Organized Group Use along Hole-in-the-Rock Road. The EA has been prepared to analyze the effects of authorizing organized group activities that exceed existing group size limits along the Hole-in-the-Rock (HITR) Road corridor. Site specific analysis of day-use sites such as Dance Hall Rock and Hole-In-The-Rock, as well as proposed camping locations, has also been completed.

The HITR Road, a State Scenic Backway, is located in Garfield and Kane Counties, Utah, on lands managed by BLM and NPS. The gravel and dirt road is 57 miles long and terminates at Hole-in-the-Rock. It is accessed via Utah State Route (SR) 12 (an All-American Road) five miles east of the town of Escalante, Utah. From its intersection with SR 12, the first 45 miles of the road are within GSENM and the last 12 miles traverse GLCA lands.

Hole-in-the-Rock Road is within the GLCA Development Zone and adjacent areas are in the Natural Zone. Existing GLCA land use prescriptions only allow groups up to 100 people in the Development Zone and 60 people in the Natural Zone.

This document records 1) a Finding of No Significant Impact (FONSI) for the NPS portions of land analyzed in the EA as required by the National Environmental Policy Act of 1969 (NEPA) and 2) a determination of no impairment as required by the NPS *Management Policies* for these lands.

All permits will be managed under the policies outlined in 43 CFR 2932 (BLM) and 36 CFR Part 1.6 (NPS).

SELECTED ALTERNATIVE

The Selected Alternative (Alternative C) will allow a maximum of 145 people, 29 vehicles, and 1 predetermined camp location at Soda Cabin; require sanitation facilities, a 3-day / 2-night maximum length of stay, and no concurrent issuance of permits. As part of the decision,

Appendix C, Glen Canyon Special Use Permits Stipulations for Organized Groups, will be incorporated in this decision.

ALTERNATIVES CONSIDERED

The EA considered four alternatives: the No Action Alternative (Alternative A), Moderate Use Alternative (Alternative B), Highest Use (Alternative D), and the Proposed Action (Alternative C), which is the alternative selected by the BLM and NPS.

Alternatives were considered based upon collaborative consideration by the BLM and NPS of resource issues and management direction across the planning area, which includes both BLM and NPS lands.

The No Action Alternative represents the current land use prescriptions for a group size of 100 people in the Development Zone of Glen Canyon National Recreation Area (GLCA). Latter-day Saints groups expressed their desires through previous applications, comment letters and consultation to have 250 people at heritage events at Dance Hall Rock and Hole-in-the-Rock. The purpose of this EA was to analyze groups larger than the current land use prescriptions. Alternative A was not selected because it would not meet the purpose and need for permitting groups larger than the current land use plan prescriptions of 100 people in the Development Zone along Hole-in-the-Rock Road. This alternative would also not accommodate the ethnographic needs identified by the LDS for groups up to 250 people.

The Moderate Use Alternative was added into the EA based on public comments received during the EA public comment period. This alternative was included in the EA to provide an alternative for a group size between 25 and 145 people. The BLM and NPS analyzed group capacity at all day use and camp locations to determine the maximum group size that may be accommodated at each day use site and camping location analyzed in the EA. This alternative was not selected because BLM and NPS capacity calculations have determined that the primary day use sites, Dance Hall Rock and Hole-in-the-Rock, can accommodate more than 60 people while still protecting Monument and GLCA resources.

The Proposed Action Alternative (Alt C) analyzed a maximum group size of 145 people. Alternative C was selected based on the capacity calculations developed by the BLM and NPS. Based on the capacity calculation Dance Hall Rock, the most requested destination, is able to accommodate 145 people and 29 vehicles through the incorporation of the design features and stipulations included in the EA. Furthermore, this group size limit is accommodated within the capacity calculation (205 people and 41 vehicles) for Hole-in-the-Rock on GLCA. Though the user and vehicle capacity at this site has been calculated to accommodate more than the Selected Alternative limits, selection of this alternative will allow for a consistent management of group numbers on both NPS and BLM lands. Consistent management across bureau boundaries was an interest brought up from user groups and other members of the public throughout the scoping and EA comment periods.

The Highest Use Alternative (Alt D) analyzed the maximum group size based on one camping location which could accommodate a group of 395 people for heritage events. Alternative D would meet the Purpose and Need by accommodating the requested group size of 250 people by the LDS proponents. This alternative was not selected because the BLM and NPS capacity calculation at Dance Hall Rock identifies this site as being able to accommodate only 145 people. Taking into consideration resource concerns for Dance Hall Rock, parking

capacity, and safety and resource considerations for 395 people and 70 vehicles parking along Hole-in-the-Rock Road, this day use site does not currently have the capacity to accommodate this large of a group. Furthermore, capacity calculations at Hole-in-the-Rock would limit groups to 205 people, as the capacity at this location on GLCA land would not accommodate the larger group numbers requested by the LDS.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The GLCA environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (Sec. 101 (b)).

This includes alternatives that:

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.
2. ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings.
3. attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
4. preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.
5. achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The NPS environmentally preferred alternative has been identified to be the Selected Alternative, which would best balance the opportunities for resource use and enjoyment, while protecting the environment from further degradation. This alternative would address elements 1, 2, and 3 of Section 101 of NEPA by identifying and providing for the opportunities of groups to enjoy the cultural and aesthetic resources of the Hole-in-the-Rock corridor. The stipulations included would allow a safe and healthful experience for both permitted users and other visitors. The Selected Alternative would also respond to elements 4 and 5 by extending more opportunities for the public to enjoy group activities along the HITS Road. Lastly, a diverse and preserved environment would be best addressed by the Selected Alternative through the incorporation of the many design features intended to reduce impacts to natural resources.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse. A significant effect may exist even if the agency believes that on balance the effect will be beneficial.

The Selected Alternative will impact resources as described in the attached EA. Authorizing groups of up to 145 people will increase opportunities for heritage, educational and recreational activities, which is a beneficial impact to recreational users and members of the Latter-day Saints that have a cultural affiliation to the area. Measures to reduce the identified adverse impacts to cultural resources, recreation, and Proposed Wilderness were incorporated in the design of the Selected Alternative. None of the adverse environmental effects discussed in detail in the EA and associated appendices are considered significant.

Degree of effect on public health or safety

Risks to public health and safety will not increase or decrease based on this decision. There are inherent dangers in all outdoor activities that include but are not limited to driving an automobile, hiking and camping. Design features incorporated within the Selected Alternative address public health and safety impacts associated with the greater numbers of vehicles and visitors associated with permitted activities. This project does not increase any health and safety concerns beyond current conditions.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas

The historic and cultural resources of the area have been inventoried and potential impacts addressed in the design of the Selected Alternative. Inventory for cultural resources and consultation with the State Historic Preservation Officer (SHPO) have been completed. The SHPO concurs that there will be no adverse effect to historic properties.

Issues related to cultural resources and Proposed Wilderness were analyzed in detail in Chapter 4. Neither of these resources will be significantly impacted because the overall cumulative impact among the identified issues related to cultural and Proposed Wilderness resources has been determined minimal.

Degree to which effects on the quality of the human environment are likely to be highly controversial

There is no scientific controversy over the nature of the impacts to cultural, BLM WSA, recreation, visual resources or NPS Proposed Wilderness resources. Controversy does exist regarding impacts to BLM non-WSA lands with wilderness characteristics. The EA concludes that impacts would occur from organized group camping on lands with wilderness characteristics. However, the BLM and NPS have included adaptive management strategies within the EA that will allow the BLM and NPS to monitor and mitigate impacts.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks

The project is not unique or unusual. The environmental effects to the human environment are fully analyzed in the EA. There are no predicted effects on the human environment that are considered to be highly uncertain or involve unique or unknown risks. GLCA and GSENM will apply adaptive management practices by monitoring and recording special event activities. Based on findings from event and site monitoring, the BLM and NPS will make necessary changes to future permit stipulations to minimize potential risks.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration

The Selected Alternative was evaluated in the EA for potential future impacts related to increased interest and application numbers, as well as a cumulative impacts reasonable foreseeable action scenario that included other future actions. No significant impacts were identified as a result of these direct, indirect or cumulative impacts. Although the analysis is programmatic in nature, the decision to approve or deny NPS SUPs remains at the discretion of the authorized official on a permit-by-permit basis.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts

The actions considered in the Selected Alternative were considered by the interdisciplinary team within the context of past, present, and reasonably foreseeable future actions. Significant cumulative effects are not predicted. A complete analysis of the direct, indirect and cumulative effects of the Selected Alternative and all other alternatives is described in Chapter 4 of the EA. The NPS has identified two potential future actions along Hole-in-the-Rock Road: possible installation of permanent toilets at the Hole-in-the-Rock parking area and ORV management actions associated with the ORV Management Plan currently being developed. Both future actions are not proposed as a part of this EA, but are currently being considered based on the need to provide these actions to protect natural resources and public health. These two reasonably foreseeable future actions will be addressed in separate environmental analyses.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The project will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places, nor will it cause loss or destruction of significant scientific, cultural, or historical resources. A cultural inventory has been completed for the Selected Alternative, and consultation with SHPO has been completed in accordance with Section 106 of the NHPA and they have concurred with a "no adverse effect" on cultural resources. Refer to the Appendix F of the EA for the SHPO concurrence signed and, dated 5/3/11.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat

No threatened or endangered plants or animals are known to occur in the area.

Whether the action threatens a violation of Federal, state, or local environmental protection law

The project does not violate any known federal, state, local or tribal law or requirement imposed for the protection of the environment. State, local and tribal interests were given the opportunity to participate in the environmental analysis process. Furthermore, letters were sent to seven Native American tribes concerning consulting party status; there were two responses from tribes. The Hopi tribe requested a copy of the EA when it became available for public comment, which was provided. The Navajo tribe stated "the project area will not impact Navajo traditional cultural resources." The project is consistent with applicable land management plans, policies and programs.

PUBLIC INVOLVEMENT

A scoping letter was sent out on November 18, 2010 to 200+ interested parties via GSENM and GLCA mailing lists. The comment period ended on December 12, 2010. No public scoping meetings were held due to the localized nature of this project. The EA was posted to the BLM Environmental Notification Bulletin Board on November 18, 2010.

Eleven scoping comment letters were received; staff compiled and organized the public comments which were received to be brought forward in the EA analysis. On January 25, 2011 GSENM met with Ranchers who hold grazing allotments along HTR Road; 14 people attended, including one Garfield County Commissioner. A BLM/NPS meeting was held on March 2, 2010. Mr. Jerry Roundy represented the Escalante Heritage Center at the March 2nd meeting to discuss the projected future needs for visitation down Hole-in-the-Rock Road. Mr. Roundy supported BLM and NPS efforts in being proactive to support larger group permits to the area. On May 13, 2011 a Draft EA was published for public review. A public open house was held in Escalante, UT on June 1, 2011.

A total of 182 comments including twenty-two public comment letters were received from private citizens, nonprofit organizations, church groups and other special interest groups. Of these, 164 were substantive and were related to the proposed action in general or were specific to actions by the BLM. None of the substantive comments were directed towards NPS actions. All substantive comments were analyzed in regards to the proposed action rather than to the specific agency (BLM or NPS). None of the comments raised major substantive issues that are not addressed within the scope of the EA. Two other parties submitted comments beyond the public comment period. Although these comments were considered by decision-makers prior to the decision, these comments were not formally responded to within the project file or addressed within the EA.

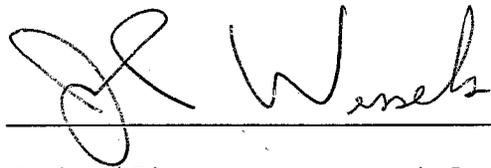
CONCLUSION

As described above, the Selected Alternative does not constitute an action meeting the criteria that normally require preparation of an environmental impact statement (EIS). The

Selected Alternative will not have a significant effect on the human environment. Environmental impacts that could occur are limited in context and intensity, with generally adverse impacts that range from localized to widespread, short- to long-term, and negligible to moderate. There are no unmitigated adverse effects on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Approved:



4/6/12

Regional Director, Intermountain Region

Date

ERRATA SHEETS

Programmatic Environmental Assessment for Organized Group Activities along Hole-in-the-Rock Road

Substantive comments to the Programmatic Environmental Assessment for Organized Group Activities along Hole-in-the-Rock Road centered on eight topics: purpose and need and scope of analysis, additional alternatives, environmental effects to recreational users, environmental effects to cultural resources, environmental effects to BLM lands with wilderness characteristics, other environmental effects not analyzed in the EA in detail, and BLM land use plan conformance and consistency. The topics, which are addressed below, resulted in minor changes to the text of the environmental assessment.

TEXT CHANGES

In response to comments questioning the scope of the project, "heritage, cultural, or educational group" was added to the purpose and need sections 1.3 and 1.4 on page 12 of the document. Further, a bulleted Objectives of the Proposed Action paragraph was added to the purpose to further elucidate the scope of analysis referenced in the Conformance with Land Use Plans and Relationship to Statutes, Regulations, or Other Plans sections on pages 13 and 14. This included bullets highlighting the non-commercial scope of analysis and objectives to protect the GSENM objects and values, GLCA resources, frontier character, and positive visitor experience. Another paragraph clearly identifies the heritage, cultural, and educational permitting focus of analysis.

An additional Moderate Use Alternative was added to the EA based upon public comments. This alternative was a minor change to the range of alternatives, as it fit within the existing spectrum of alternatives and did not result in much of a change within the effects analysis in comparison to the larger group size limit.

The action alternatives were also adjusted to prohibit permits on the busy weekends of Memorial Day, Independence Day, and Labor Day, as well as actual use of the corrals adjacent to many of the camp locations. An existing EA covering equestrian-specific use was incorporated by reference in a new section within the Actions Common to All Action Alternatives section.

A few additional stipulations were added to Appendix C in order to respond to comments related to noise (including quiet hours), types of temporary camping facilities and vehicles allowed, prohibition of use of the historic trail, and required use of fire pans.

Additional sections on impacts to Visual Resources were included in the Affected Environment and Environmental Consequences sections, based upon existing analysis.

Changes in Table 5 on page 25; the heading in column six read "Permitted use limited to the following dates." This header was incorrect and now reads "Permitted Use Prohibited during the Following Dates." Further, the following text has been added under Cultural Monitoring on page 26 "adaptive management strategies have been included to monitor and mitigate impacts." All references to "sites" within the Environmental Effects section were changed to "historic properties" to be consistent with the NHPA legal definitions.

SUBSTANTIVE COMMENTS

Purpose and Need and Scope of Analysis

Comments: These comments either raised issues with the BLM/NPS identified purpose and need objectives or the overall scope of analysis. Comments questioned whether the purpose and need addressed commercial SRP use or groups other than those focused on heritage and educational goals. Other comments requested an extension of the scope to include larger-scale planning efforts across the entire Hole-in-the-Rock trail, development of facilities along the planning area, Hole-in-the-Rock road improvements, and plan amendments to the GSENM Monument Management Plan.

Response: Though the purpose and need section outlined some objectives within the text, the BLM/NPS decided to outline the objectives in the final EA, including defining the types of groups to be analyzed (educational and heritage groups) and clarifying the limited scope of analysis along the HITS road corridor. This clarified the scope to clearly differentiate this planning effort for educational and heritage-focused large organized groups from other planning efforts that may need a higher-scale level of analysis and a much greater planning area.

Additional Alternatives

Comments: Comments requested other alternatives or elements of alternatives. These comments included requests for smaller and larger group limits from those analyzed in the existing range of alternatives, as well as more specific requests for permit management components (such as annual allocations) and additional stipulations.

Response: In response to concerns over the range of alternatives, the BLM/NPS added an additional alternative within the spectrum of the existing range of alternatives to consider a user limit of 60 people. Some small additional design features and stipulations were also added to the existing alternatives to address issues raised relating to recreational conflicts and public health and safety. Annual allocations were not incorporated, as no rational basis for establishing a correlation between frequency of use and environmental effects could be identified based upon current monitoring data and use. This was left to the adaptive management strategy discussed within the EA, which may limit such numbers based upon permit and other recreation monitoring. The new camping areas and additional facilities proposed did not fit within the existing scope of analysis, which was focused only on primitive experience relating to the historic sites along HITS Road.

Environmental Effects to Recreational Users

Comment: Comments raised concerns regarding the impacts of permitted groups on other recreational users along Hole-in-the-Rock Road. These impacts included displacement of other recreational users at points of interest and effects to the frontier and solitude character of the Corridor.

Response: Design features of the action alternatives were established to reduce impacts to other recreational users. This includes time limits on permitted use of areas and non-exclusive use of areas. The temporary nature of the permitted uses is also expected to reduce the potential for large increases in visitor conflicts along the corridor. Impacts to all recreational users is disclosed in the recreation environmental effects section of the EA.

Environmental Effects to Cultural Resources

Comment: Comments primarily focused on the ethnographic importance of the heritage experience to members of the LDS. This included the importance of sites considered in the alternatives and those not included. One comment raised concerns of the impacts to other cultural resources at sites considered for activities.

Response: Recognition and impacts of the alternatives to the historical and religious importance to members of the Latter-day Saints is documented in the Ethnographic Resources section of the Cultural Resources portions of the EAs Affected Environment and Environmental Effects chapters. Ethnographically important sites outside of the planning area, including Fortymile Springs, were not considered since they would require greater planning efforts than the scope of this analysis considers. A cultural resource inventory was completed for all sites considered for permitted activities and submitted to the Utah SHPO, who concurred with the agency determination of "No Adverse Effect".

Environmental Effects to BLM Lands with Wilderness Characteristics

Comment: Comments raised concern for impacts to BLM lands with wilderness characteristics and whether such an analysis was appropriate.

Response: Impacts to BLM lands with wilderness characteristics were evaluated in the EA, consistent with policy direction current in Sections 201 and 202 of FLPMA.

Other Environmental Effects Not Analyzed in the EA in Detail

Comment: Comments related to impacts to the local economy, grazing uses, soils, vegetation, and visual resources.

Response: BLM and NPS considered all of these resources early in the planning process and found no appreciable impacts to these resources, as a result of the careful design of the action alternatives. These included specific dates for uses outside of grazing operation seasons, limited use of sites adjacent to grazing facilities, and use of only disturbed sites devoid of soils or vegetation issues. IMPLAN economic modeling found none of the action alternatives likely to have more than a negligible impact on local economics. Visual resources analysis was added to the environmental effects chapter of the EA. Further rationale for dismissing further analysis of the other resources is included in the IDT checklist attached to the EA.

BLM Land Use Plan Conformance and Consistency

Comment: Comments raised concerns regarding conformance with the GSENM Monument Management Plan, protection of monument objectives, and other laws and policies relating to agency management.

Response: The Monument Management Plan allows for consideration of groups larger than 25 people with further NEPA analysis. This document is not intended to be a plan amendment to change all passage zones prescriptions, as the scope is defined only by the heritage and educational uses along the Hole-in-the-Rock Corridor. BLM has considered the protection of monument objects and resources throughout the planning process (see IDT Checklist and resource analysis sections within the EA). Objectives of the Purpose and Need included the protection of the frontier character and protection of monument objects.

Appendix - Determination of No Impairment

National Park Service's *Management Policies, 2006* require analysis of potential effects to determine whether or not actions will impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within park, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute an 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
- identified as a goal in the park's general management plan or other relevant NPS planning documents.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to pursue or restore the integrity of park resources or values and it cannot be further mitigated.

The park resources and values that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources;; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and

- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The NPS's threshold for considering whether there could be an impairment is based on whether an action will have significant effects.

Impairment findings are not necessary for visitor use and experience, socioeconomic, public health and safety, environmental justice, land use, and park operations, because impairment findings relate back to park resources and values, and these impact areas are not generally considered park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. After dismissing the above topics, topics remaining to be evaluated for impairment include cultural resources and Proposed Wilderness.

Fundamental resources and values for the Glen Canyon National Recreation Area are identified in the General Management Plan. According to that document, of the impact topics carried forward in this EA, only cultural resources and Proposed Wilderness are considered necessary to fulfill specific purposes identified in the establishing legislation of the national recreation area; are key to the natural or cultural integrity of the park; and/or are identified as a goal in the park's General Management Plan or other relevant NPS planning document.

- **Cultural Resources**

- **Historic Properties: Historic Cultural Resources** – There are two historic sites located along Hole-in-the-Rock Road. Dance Hall Rock is located on BLM-administered lands and Hole-in-the-Rock is located on NPS-administered lands. Both sites are destination locations for cultural groups and the general public along Hole-in-the-Rock Road. The Selected Alternative considered the historical significance of these sites and resource protection while also allowing large permitted groups to visit and/or hold special events at these locations. The Selected Alternative will result in only short-term, site-specific adverse effects to the historic sites. Adaptive management strategies have been included to monitor and mitigate any potential impacts to cultural resources. There will be no impairment to these cultural resources.
- **Historic Properties: Archaeological Cultural Resources** - Inventory for cultural resources within the area of potential effect for all activities associated with the project and consultation with the State Historic Preservation Officer (SHPO) have been completed. The SHPO concurs that there will be no adverse effect to historic properties as a result of activities permitted based upon the proposed action. The Selected Alternative will not result in impairment to these cultural resources.
- **Ethnographic Resources** – The Hole-in-the-Rock Trail and the associated historic sites along it are of great importance to members of the Latter-day Saints. An ethnographic report was completed to identify the impacts to this ethnographic group and was incorporated within the analysis of the EA. Impacts were identified in restricting use below the historic number of participants of the San Juan Mission (250 people), but

the Selected Alternative does allow for heritage trips by the Latter-day Saints. Therefore, no impairment has been identified to this ethnographic group.

- **Proposed Wilderness** – Most of the project traverses the Development Zone within GLCA, though the one camping location within GLCA, Soda Cabin, abuts the Natural Zone, which includes all lands proposed in the 1980 GLCA Wilderness Recommendation for wilderness protection. Design features of the Selected Alternative will preclude any impacts to these surrounding areas, as the site will only be used for smaller reenactment groups. Therefore, the Selected Alternative will not result in impairment to Proposed Wilderness.

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of the Selected Alternative.