



Office of The County Commissioners

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COUNTY COMMISSIONERS
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www.bighorncountywy.gov

March 5, 2026

The Honorable Mark Gordon
State Capitol
200 West 24th Street
Cheyenne WY 82002

Dear Governor Gordon:

Big Horn County is urgently requesting your assistance. We received the following document from Forest Supervisor Andrew K. Johnson giving notice of proposed changes to the current Medicine Wheel Historic Preservation Plan (MWHPP or HPP) and its amendment which have been in place and working well for almost 30 years. As you will see this document requires a response within 30 days which is on or before March 30, 2026.

We intend to file our extensive list of concerns with these proposed changes with Supervisor Johnson as quickly as possible and we will share that objection response with you immediately as well.

Items we respectfully request your assist with immediately include;

- Is a 30 day objection notice all that is required to change this HPP? Can you help us stop or ensure the appropriate process is followed?
- The current HPP sets the Historic Landmark Area within a 2.5 mile radius. The 2011 expansion agreement increased the protected area to 4,080 acres. The proposed change expands the protected area to 27,000 acres. This land grab directly effects private land owners, area lodges, cabin owners and federal grazing lease holders and creates economic hardship that is nearly impossible to quantify due to the ever evolving regulations and requests to protect view sheds and any item an individual or group may determine is sacred. What can you do to help us prevent this continued removal of public lands acreage from viable multiple use and economic benefit?
- What document gives a Tribal Historical Preservation Officer (THPO) the right to become a consulting party with the same cooperator status as the seven original parties to this HPP despite the Medicine Wheel not being on Tribal Lands? The most recent coalition meetings held August of 2025 and January of 2026 were the first interaction with this THPO. This turned our normally spirited but cooperative and respectful meetings into confrontational unproductive meetings and apparently, the start to a true fight that has begun with this document which demands a complete teardown and reconstruction of our HPP to virtually eliminate any authority Big Horn County has to protect our public lands and the multiple uses and livelihoods that lands provides to our citizens.
- How can we ensure the State Historic Preservation Officer (SHPO) doesn't relinquish their authority to the THPO?
- What about Section 106 supersedes the current management structure of our HPP/Coalition?
- How do we ensure the FAA is aware of and responds to this document that indicates the intentions of this group to have the Radar Dome removed? We have been told many times that this structure is critical to national security and will never be moved or relocated.



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Other items we will address in our objection response we are hoping you may also be able to help us prevent include.

- The current HPP took the original seven consulting parties 9 years to create and established a management plan that has worked well for almost 30 years. Proposed management changes reduce the role of Big Horn County and other parties and provides a dominate role to the THPO.
- The Forest Service and THPO's interpretation is that Forest Service Road 12 can be closed a minimum of 12 times per year for ceremonial purposes or whenever deemed necessary by Forest Service Personnel. Big Horn County has been respectful of the site and understands the disruption traffic may cause to those visiting the site. On multiple occasions we have formally objected any closures of Forest Service Road 12 as stipulated on page 31 in section IX.D- Transportation of the HPP. However, we are aware that the road has been closed for multiple short durations to accommodate scheduled ceremonies. In the interest of continued cooperation we have refrained from objecting to these isolated events. We understand the forest service should be able to close the road for hazards but not because the tribes have coerced forest service personnel into adding additional closures. Blocked access to this critical road creates a substantial economic hardship for the grazing lease holders, private land owners and the public. As difficult as this road is to navigate, it is still the only route accessible to a truck and trailer which are necessary to retrieve a sick or injured animal. Public Lands belong to all citizens of this country and one group should not be allowed to restrict access to others.

We hope the information we have shared gives you enough background and understanding of this area that you will be able to help us. We must prevent this attack and preserve access to our public lands and manage the Medicine Wheel with the current MWHPP. This document has worked well for the multiuse management of this area of the forest and ensure the respect and protection this historical site deserves.

For your convenience here is a link to the Medicine Wheel Historic Preservation Plan.
https://www.bighorncountywy.gov/images/MedWheelHPP_Sept1996_and_ammend.pdf

Respectfully,

Deb Craft, Chairman
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Bruce Jolley, Member
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Dave Neves, Member
Dave.neves@bighorncountywy.gov



File Code: 2360

Date: February 27, 2026

Dear Medicine Wheel/Medicine Mountain National Historic Landmark Consulting Parties:

I am writing to seek comments or recommendations on a proposed update and amendment to the Medicine Wheel/Medicine Mountain Historic Preservation Plan (HPP). The Forest has received the enclosed proposal from the Fort Peck Tribes, a member of the Medicine Wheel Coalition for Sacred Sites of North America and as such a member of the Consulting Parties.

For the last 29 years, the HPP has served as our guiding document and direction for the management of the historic, archeological and traditional cultural properties associated with the National Historic Landmark (NHL) and Medicine Mountain. During that time the Consulting Parties have reached consensus on many issues through compromise and mutual respect. Also, during that time laws and policies have changed and so have patterns of public visitation to the NHL. It is timely that we together consider the need for updates or changes to the HPP while also being cognizant of the work and values of those who have stewarded this place over time.

Consistent with Section VIII. (K) of the HPP, the Consulting Parties have 30 days from today to provide comments or recommendations regarding the attached proposal. The 30-day period will run from February 27, 2026, through Monday, March 30, 2026. The Forest will consider all responses received from the parties, and if no response is received from one of the parties, per the language of the HPP, the Forest will assume that party accepts the recommended updates.

The Forest will make a final decision on adoption of the recommendations, amending the HPP, should the Consulting Parties concur with the proposal. Should one or more of the Parties not agree with the proposed updates, consistent with the HPP the Forest will follow the dispute resolution process outlined in Attachment A of the HPP, the Programmatic Agreement (PA). Section IV (A) of the PA details this process as follows:

- A. Except where an alternative procedure is provided in this Agreement, should any party to this Agreement object within 30 days of receipt to any plans, specifications or actions proposed pursuant to this Agreement, the Forest shall consult with the objecting party to resolve the objection. If either party determines that the objection cannot be resolved, the Forest shall forward all relevant documentation to the dispute to the Advisory Council on Historic Preservation (Council). Within 30 days after receipt of all relevant documentation, the Council will either:
 1. Provide the Forest with recommendations, which the Forest will take into account in reaching a final decision regarding the dispute; or
 2. Notify the Forest that it will comment pursuant to 36 CFR Section 800.6(b), and proceed to comment. Any Council comment provided in response to such a



request will be taken into account by the Forest Service in accordance with 36 CFR Section 800.6(c)(2) with reference to the subject of the dispute. Any recommendation or comment provided by the Council will be understood to pertain only to the subject of the dispute; the Forest's responsibility to carry out all actions under this Agreement that are not the subject of the dispute will remain unchanged.

Should any of the Consulting Parties wish to meet to discuss the proposed updates, I would be happy to schedule a time to do so during the 30-day period. I will also keep the Consulting Parties informed of comments or objections received and the path forward to resolution of any objections and disposition of the enclosed recommendations.

Thank you to the Fort Peck Tribes and other tribal parties who developed the proposed updates for our consideration and thank you in advance to all of you for your thoughtful engagement.

Sincerely,



Digitally signed by
ANDREW JOHNSON
Date: 2026.02.27
14:29:43 -07'00'

ANDREW K. JOHNSON
Forest Supervisor

Recommended updates for the **Medicine Wheel/Medicine Mountain Historic Preservation Plan (HPP)** for 2026. After the last meeting (2025), participating Tribal Historic Preservation Officers reviewed several sections that must seek some type of revision to reflect modern legal standards, expanded boundaries, and evolving tribal sovereignty. These were some of the main takeaways and advocated for.

Table below summarizes key updates required to align the HPP with current federal mandates.

Summary of HPP Modernization Needs

Priority Area	Required Update	Legals
Consultation	Shift from "Consulting Parties" to formal Government-to-Government consultation with Tribal Historic Preservation Officers.	NHPA Section 101(d)(2) & 106
Land Base	Incorporate the 4,080 acres added to the National Historic Landmark (NHL) boundary in 2011.	2011 Boundary Expansion
Board Structure	Reorganize the Alliance/Coalition to ensure representation of federally recognized tribes and THPOs.	Federal Trust Responsibility
Compliance	Integrate specific Inadvertent Discovery Plans for human remains and cultural items.	NAGPRA (43 CFR 10)

1. Updating Section VIII: Management System & Section 106 The current HPP (Page 37) relies on a "Consulting Parties" model that treats tribes as stakeholders rather than sovereign entities. The HPP was largely drafted in the mid-1990s. Significant changes in federal law and tribal status require the following revisions:

Mandatory Legal & Jurisdictional Updates

- **Digitization:** Digitizing format on first finalization of the HPP, and any amendments thereafter. Also some updated cover work, or photos of evolution through the practice of the HPP.
- **THPO Integration:** Section VIII must be amended to state that for any undertaking, the Forest Service will consult with **Tribal Historic Preservation Officers (THPOs)** on the same basis as the State Historic Preservation Officer (SHPO).
- **Mandated 106 Process:** The HPP should formally adopt the four-step Section 106 process: 1) Initiate Consultation, 2) Identify Historic Properties, 3) Assess Adverse Effects, and 4) Resolve Adverse Effects.
- **Tribal Sovereignty:** References to the "Alliance" and "Coalition" (Page 11) should be updated to clarify that these bodies provide cultural expertise, but do not replace the legal requirement for direct consultation with federally recognized Tribal Nations.
- **THPO Integration and Section 106:**
 - **Current Issue:** The document repeatedly refers to "traditional Indian people" or "Native American tribes" as consulting parties.

- **Required Update:** Under **Section 101(d)(2)** of the NHPA, many tribes have now assumed the functions of the State Historic Preservation Officer (SHPO) on tribal lands and for sites of traditional religious and cultural importance. The HPP must be updated to mandate formal government-to-government consultation with Tribal Historic Preservation Officers (THPOs) for all Section 106 undertakings.
- **Citations to Update:** Section VIII (Management System) and the Programmatic Agreement (Attachment A) must explicitly include THPOs in the notification and review cycle for all Forest Service administrative decisions.

2. Reorganizing Board Roles (Alliance, Coalition, Commissioners) To better preserve the site, the existing "Consulting Parties" structure (Page 15, 38) needs a clear hierarchy. The existing board structure needs refinement to prioritize cultural expertise over administrative or political interests.

- **The Big Horn County Commissioners:** Currently, the Big Horn County Commissioners have a prominent signature and review role. Their role should focus on local infrastructure and socio-economic impacts within the Area of Potential Effect (APE), while deferring all cultural/religious significance determinations to Tribal authorities. Any other
 - **Recommendation:** The HPP should be amended to clarify that while the Commissioners consult on local economic and access issues, they do not hold jurisdictional authority over the sacred integrity of the site. Cultural management decisions should be restricted to the Forest Service and Tribal representatives.
- **Alliance/Coalition Termination/Re-chartering:** If these groups no longer represent the broad interests of the 70+ tribes that use the site, the HPP must invoke the **Withdrawal and Termination clause (Page 44)** to replace them with a unified **Inter-Tribal Management Board** composed of official tribal delegates.
 - **Alliance and Coalition:** The MWHPP allows for "replacement organizations" if current groups disband.
 - **Recommendation:** Consider reorganizing the *Medicine Wheel Alliance and Coalition* into a unified *Inter-Tribal Management Board* consisting of THPOs or official tribal delegates. This ensures that the experts "managing" the site have the legal authority of their respective Tribal Nations.

3. New Compliance: Inadvertent Discovery & NAGPRA The existing HPP lacks a detailed **Inadvertent Discovery Plan (IDP)**, which is critical given the site's high archaeological sensitivity.

- The recommended **Inadvertent Discovery Plan** (draft attachment) must be detailed to comply with the 2024 revised NAGPRA regulations (43 CFR Part 10), which prioritize tribal authority over human remains and cultural items. ARPA citations should be updated to ensure any "unauthorized articles" left at the site are handled according to contemporary tribal protocols rather than purely administrative removal.
- **NAGPRA Protocols:** The HPP must include a "Stop-Protect-Notify" protocol. If human remains or funerary objects are found, all activity (logging, grazing, construction) must cease within 30 feet, and the appropriate federal official and affiliated tribes must be notified within 24 hours.
- **ARPA Alignment:** The HPP should mandate that any archaeological excavation be authorized under the Archaeological Resources Protection Act (ARPA) and follow a written Plan of Action developed in consultation with THPOs.

4. Expanding Environmental & Forest Mitigation

- **Acquired Acreage:** Figures 5 through 14 (Pages 49–87) must be redrawn to include the **4,080 additional acres** added in 2011, ensuring the "Area of Consultation" covers the full cultural landscape.
- **Mitigation for Modern Threats:** Update Section IX.B (Visual Resources) to include mitigation for 2026-era threats, such as increased drone activity and light pollution, ensuring they are managed as "Retention" or "Rehabilitation" to protect the sacred nature of the site.

5. Expansion and Resource Mitigation Plans

- **Acreage Integration:**
 - **Update Needed:** The HPP currently refers to a 2.5-mile radius and specific land sections.
 - **Action:** The HPP must be updated to formally incorporate the **2011 National Historic Landmark boundary expansion** (approximately 27,000 total acres). Maps (Figure 12, 13, 14) must be redrawn to include this new acreage under the "Special Archeological Protection" zones.
- **Forest Health and Mitigation:**
 - **Current Plan:** Logging and salvage were allowed to "maintain overall health".
 - **Recommendation:** Strengthen **Section IX.I (Timber/Vegetation)** to prohibit commercial hauling on FDR 12 permanently, rather than on a case-by-case basis. Mitigation plans for the western spruce beetle should prioritize non-invasive treatments that do not require new road construction in the expanded boundary
 - **Action:** Prohibit any commercial timbering or vegetation manipulation that results in noise or visual intrusions detectable from the Medicine Wheel.
- **Fire Management:**
 - **Action:** Explicitly prohibit the use of retardant drops within the NHL boundary to prevent chemical damage to limestone features and sacred plant gathering areas.

6. Other Recommended Crucial Updates

- **Electronic Site Removal:** The 1996 Decision Notice for the FAA Radome suggested a potential relocation study. In the 2026 version of the HPP, the Forest Service should move from "monitoring technology" to a mandatory **decommissioning schedule** to restore the sacred viewshed.
- **Snowmobile Closure Orders:** Update **Section IX.D** to include a permanent, year-round motorized vehicle closure for all areas off FDR 12 within the expanded boundary to protect sensitive tundra and archaeological features.
- **Ethnobotanical Protocol:** Update the "Project List" to include a recurring, tribal-led study on the impact of climate change on sacred plant species within the subalpine and alpine zones.
- **Interpretive Shift:** Move away from "standardized oral presentations" by FS staff. The new HPP should authorize THPOs to design and lead all interpretive content to ensure Native American spiritual values are represented authentically.

7. Strengthening Board & Resource Management

To ensure the HPP addresses the expanded landmark and modern tribal needs, incorporate these suggestions:

Mitigation of Visual Intrusions: Update the FAA Long-Range Radar Facility goals (Page 80) to mandate an annual report on technological advances that will allow for the **removal of the radar dome** within the targeted 20-year window.

8. Updated Legal & Compliance Citations

The HPP must transition from its 1996 framework to modern standards by updating the following citations:

- **NHPA Section 106 & 110:** Modernize the "Management System" (Page 37) to explicitly state that the Forest Service will consult with **Tribal Historic Preservation Officers (THPOs)** on a government-to-government basis, recognizing them as having the same statutory standing as the SHPO.
- **ARPA Compliance:** Strengthen Section V (Page 26) by mandating that all sensitive archaeological data and site locations remain exempted from FOIA disclosure under Section 9 of the Archaeological Resources Protection Act.
- **NAGPRA Integration:** Incorporate the Native American Graves Protection and Repatriation Act (43 CFR 10) into the "Discoveries" section (Page 41) to provide legal protocols for the treatment of human remains.

ATTACHMENTS

Should the amendments take place, proposal steps for 2026 HPP Amendment Task Order: Statement of Work

I. Project Objective

The objective is to update the 1996 MWHPP to ensure the Medicine Wheel and Medicine Mountain are managed to protect the integrity of the site as a sacred place and a nationally important traditional cultural property. This update will formalize compliance with current federal mandates, including the **National Historic Preservation Act (NHPA)**, **NAGPRA**, and the **2011 National Historic Landmark (NHL) boundary expansion**.

II. Scope of Work & Required Amendments

A. Formalization of Tribal Consultation (Section VIII Updates)

- **THPO Integration:** Amend Section VIII.B to recognize **Tribal Historic Preservation Officers (THPOs)** as primary consulting parties with legal standing equal to the SHPO.
- **Government-to-Government Protocols:** Update the Management System to prioritize the American Indian Religious Freedom Act (AIRFA) and the trust relationship between the federal government and Indian tribes.
- **Advisory Board Reorganization:** Review the status of the Medicine Wheel Alliance and Coalition under the **Withdrawal and Termination clause** to ensure they continue to represent the interests of tribal government officials and traditional practitioners.

B. Landmark Boundary & Geographic Expansion

- **Boundary Update:** Revise the "Area of Consultation" and all resource maps (Figures 5–14) to incorporate the **additional 4,080 acres** (approximate) added to the NHL.
- **Acreage Management:** Apply the "Retention" Visual Quality Objective (VQO) to all new acreage to ensure management activities are not visually evident from the Wheel.

C. Inadvertent Discovery Plan (IDP) Implementation

- **NAGPRA/ARPA Compliance:** Replace the "Discoveries" section (Section VIII.G) with a modern IDP that mandates a **100-foot work stoppage** and 24-hour notification to THPOs.
- **Cultural Item Protection:** Establish that the Forest will not proceed with any undertaking that could harm the integrity of the NHL pending completion of a discovery review.

D. Forest Service Mitigation & Special Uses

- **Timber/Vegetation:** Re-evaluate all "Suited for Timber Production" lands within the expanded viewshed to ensure no commercial manipulation detracts from spiritual values.
- **Radar Facility Removal:** Update Section IX.G to require the FAA to provide an annual technological progress report focused on the eventual removal of the radar facility to restore the sacred landscape.

III. Implementation & Approval Process

- **Draft Submission:** The Forest Service will submit the proposed HPP Amendments to all parties (THPOs, SHPO, ACHP, and Commissioners) for a **30-day review period**.
 - **Dispute Resolution:** Any objections to the new IDP or boundary management will be resolved through the formal Dispute Resolution process involving the Council.
 - **Annual Review:** The 2026 Annual Monitoring Report must document the effectiveness of these new protective measures
-

Inadvertent Discovery Plan (IDP) Protocol Proposal Language

This template replaces or augments Section VIII.G (Discoveries) on Page 41.

Step 1: Immediate Cessation of Activity

- If a discovery is made during any undertaking (e.g., timbering, road maintenance, or grazing infrastructure), all activity must immediately stop within a **100-foot buffer zone** around the find.
- The area must be secured to prevent further disturbance, and no artifacts or remains may be moved or photographed for public release.

Step 2: Formal Notification

- The District Ranger or a Heritage Resource Specialist must be notified immediately.
- The Forest Service must notify the affiliated **Tribal Historic Preservation Officers (THPOs)** and the SHPO within **24 hours** of the discovery.

Step 3: Consultation & Assessment

- A qualified Heritage Resource Specialist must perform a field assessment to determine if the discovery is a "Contributing Element" to the National Historic Landmark or a Traditional Cultural Property (TCP).
- The Forest Service will consult with the **Alliance, Coalition, and THPOs** to develop a **Plan of Action** for the discovery, prioritizing "in-place" preservation over excavation.

Step 4: Dispute Resolution

- Should any party object to the proposed treatment of the discovery, the **Dispute Resolution** process (Page 42) will be triggered, involving the Advisory Council on Historic Preservation (ACHP).

Questions to the HPP compliance for actual practice pertaining to the Medicine Wheel site itself.

I. Initial Jurisdictional Review

- **Government-to-Government Verification:** Does this proposal require formal Section 106 consultation with affiliated THPOs rather than just "Consulting Parties" notification?
- **Boundary Verification:** Is the proposed activity located within the expanded NHL boundary (including the 2011 additions) or the broader Area of Consultation?
- **County Role Clarification:** Has the project been vetted by Big Horn County for economic impact *without* allowing County participation in the management of cultural or spiritual integrity?

II. Cultural & Spiritual Integrity Standards

- **Visual Impacts:** Will the activity be "visually evident" from the Medicine Wheel? (Activities must meet the **Retention VQO**, repeating only natural form, line, and color) .
- **Acoustic/Atmospheric Mitigation:** Does the proposal include measures to eliminate noise or atmospheric intrusions that could disrupt traditional ceremonial use?
- **Ceremonial Access:** Does the project schedule conflict with any of the 12+ mandated days for undisturbed American Indian ceremonial use?

III. Compliance & Emergency Protocols

- **NAGPRA/IDP Integration:** Does the applicant have a signed **Inadvertent Discovery Plan** acknowledging the 100-foot work-stoppage buffer and 24-hour THPO notification?
- **ARPA Confidentiality:** Has the applicant been briefed on the illegality of disclosing sensitive site locations or cultural data to the public?
- **Plant Gathering Rights:** Does the activity interfere with the recognized right of traditional practitioners to gather herbs, medicines, or natural materials?

IV. Special Use Denials (Non-Negotiable)

- **Outfitter/Guide Restriction:** Any application for commercial outfitter/guide trips directly to the Medicine Wheel must be denied.
- **Commercial Profit:** No for-profit operations (tour buses, resorts, or commercial filming) are permitted within the immediate vicinity of the Landmark.
- **Permanent Intrusions:** New electronics sites or permanent cabins within the Area of Consultation must be denied to maintain the "sacred landscape".

Proposal language & understanding for the 2011 Boundary Expansion of the Medicine Wheel NHL

I. Purpose of the Expansion

- **Holistic Landscape Protection:** The expansion recognizes that the Medicine Wheel is not an isolated monument but part of a "compelling landscape" where the prehistoric past and ethnographic present are unequivocally linked. The expansion recognizes that the Medicine Wheel is not an isolated monument but part of a "compelling landscape" where the prehistoric past and ethnographic present are unequivocally linked.
- **Integrity of Setting:** To protect the "integrity of the site as a sacred site," the boundary was expanded to include land that contributes to the "setting, feeling, and association" of the landmark.
- **Cultural Context:** The expansion encompasses numerous individual ethnographic and archeological sites that are interrelated through traditional Native American belief systems.

II. Key Management Changes

- **Increased Consultation Area:** The "Area of Consultation" now covers the additional 4,080 acres, requiring the Forest Service to seek the views of THPOs and other parties for any undertakings in these areas.
- **Visual Quality Objectives (VQO):** The expanded area is managed under **Retention** standards, meaning human-caused intrusions must be blended so they are not visually evident from the Wheel.
- **Mineral and Energy Restrictions:** The expansion supports the withdrawal of additional acreage from mineral entry to prevent intrusions into the sacred landscape.

III. Addressing Stakeholder Concerns

- **Access vs. Jurisdiction:** While public access to Road 12 remains a priority for the County, the management of cultural resources within the expanded boundary is a federal responsibility conducted in consultation with Tribal Nations.
- **Multiple Use Integration:** The HPP allows for multiple uses (grazing, recreation) to continue in the expanded area, provided they do not have a "significant negative impact" on the site's historic and contemporary religious use.

Expertise Requirements: Management of the expanded acreage requires "the assistance of Native American Traditional cultural practitioners" to identify sensitive areas that exhibit no material remains but are critical to belief systems.

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- **Expertise Requirements:** Management of the expanded acreage requires "the assistance of Native American Traditional cultural practitioners" to identify sensitive areas that exhibit no material remains but are critical to belief systems.