

WUPATKI NATIONAL MONUMENT BACKCOUNTRY MANAGEMENT PLAN

CIVIC ENGAGEMENT SUMMARY REPORT

EXECUTIVE SUMMARY

The National Park Service (NPS) is currently in early (pre-NEPA) phases of planning to develop a backcountry management plan for Wupatki National Monument. When complete, this plan will establish long-term direction for public access and use of backcountry lands, while providing for the protection and preservation of park resources. Roughly 97 percent of the monument includes backcountry areas or areas that are eligible for wilderness designation. Currently, public access within Wupatki's backcountry is limited to protect thousands of archeological sites from unacceptable impacts, such as vandalism and artifact collection. From November 25, 2019, through January 31, 2020, NPS staff solicited public input on backcountry management, including potential future visitor opportunities. The National Park Service conducted this civic engagement because public input is critical to understanding outside perspectives on visitor opportunities in backcountry portions of the monument, which are currently closed to unguided public use.

In November 2019, the National Park Service released a newsletter to inform the public about this planning effort. This 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 (parkplanning.nps.gov/wupa), and hard copies were made available at the public open house meeting and at key locations in the monument. A press release issued on November 25, 2019, announced the availability of the newsletter; the dates the National Park Service would accept comments; and the date, time, and location of a planned public open house. The newsletter directed interested individuals to the NPS Public, Environment, and Public Comment (PEPC) website that was established for this planning effort.

The National Park Service held the public open house at Flagstaff High School (Flagstaff, AZ), on Thursday, January 16, 2020. Approximately 100 people attended to hear NPS staff give brief, informal presentations related to potential management strategies and actions and the planning process at various stations. Attendees were able to ask questions, provide comments, and interface with park staff. A primary issue for those in attendance was the concern that the National Park Service may consider closing Black Falls Crossing Road, which is an important access route to/from the Navajo Nation. Park staff assured attendees the National Park Service was not considering any changes to the road and access would not be affected by future backcountry planning efforts or potential wilderness designation. To further address this concern, the park mailed letters affirming this to five chapters of the Navajo Nation adjacent to or near the Wupatki boundary. The letter invited chapter residents to continue sharing their ideas and concerns through the PEPC site.

METHODOLOGY AND CORRESPONDENCE ANALYSIS

The National Park Service collected public comments during this early phase of the planning effort to understand the public's perspectives on planning issues and potential future backcountry opportunities at Wupatki National Monument. This report summarizes all public comments received during the November 2019 through January 2020 civic engagement period.

A total of 89 correspondences were collected on-site at the public meeting through the online PEPC site and via direct communication with NPS staff. The monument received 46 correspondences through the PEPC site, 41 handwritten comment cards at the public open house, and 2 correspondences that were sent directly to the park, all of which were entered into the PEPC system for review and analysis.

The comments received at the public meeting did not require participants to share their addresses; therefore, geographic information is only known for those who submitted directly to the PEPC site. Geographically, correspondences submitted directly to the PEPC website came from:

- Arizona (42 correspondences, approximately 91% of total PEPC correspondences)
 - 38 correspondences from Flagstaff area (approximately 82% of the total)
 - 4 correspondences from other parts of Arizona (approximately 9% of the total)
- North Carolina (1 correspondence, approximately 2% of the total)
- Nebraska (1 correspondence, approximately 2% of the total)
- California (1 correspondence, approximately 2% of the total)
- Minnesota (1 correspondence, approximately 2% of the total)

The following organizations provided comments:

- Sierra Club - Grand Canyon Chapter (Arizona)
- Black Falls Bible Church (Coconino County, AZ)
- National Park Conservation Association

In addition to general public comments, the National Park Service received a letter from official representatives of the Navajo Nation chapters identifying key concerns related to any potential changes to monument management. The letter emphasized the importance of the roads in Wupatki to Navajo people and that closing them could jeopardize the safety and livelihoods of individuals who rely on them to access their homes and land. Additionally, the letter encouraged the continued engagement of NPS staff with local residence and Navajo Nation chapters within the vicinity of Wupatki throughout the planning process. Monument staff will continue to informally consult with the five Navajo Nation chapters on issues related to resource management. Formal government-to-government consultation will be completed as part of any planning effort or departmental action related to backcountry management.

It is important to note that the vast majority of commenters were from the local Flagstaff area and other neighboring communities, including the Navajo Nation chapters near or adjacent to Wupatki National Monument. Many of these commenters had visited the monument, with some having participated in existing guided, NPS-led interpretive hikes in the backcountry (i.e., Discovery Hikes

and Crack-in-Rock overnight hike). Overall, commenters were familiar with the monument's history, resources, and NPS management policies.

An interdisciplinary team of NPS personnel read every correspondence received and analyzed comments. Staff noted common themes that were expressed by multiple commenters as well as viewpoints expressed only once. Collectively, the content of comments rather than the number of times a comment was received will be used to guide the development of management strategies for resource preservation and visitor experience.

DEFINITION OF TERMS

Correspondence. A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, or open house transcript.

Comment. A comment is a portion of the text within a correspondence that addresses a single subject or issue. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis. The correspondence identification number is provided at the end of quotes in brackets.

Comment Summary. A grouping that is centered on a common subject. Comment summaries combine similar comments. Representative quotes from the comments may be presented to create a comment summary.

COMMENT SUMMARY

The National Park Service posed four questions to solicit targeted feedback from the public. These questions were included in the aforementioned newsletter, on the PEPC site, and in other materials on hand at the public open house. These questions were:

1. What do you value about Wupatki's backcountry?
2. What kinds of backcountry experiences would you like to be considered?
3. What strategies do you think could support future backcountry access?
4. What concerns do you have with potential changes to backcountry access?

The following narratives summarize responses for each of the four questions. These summaries present major concepts that were expressed often as well as perspectives voiced by only one or two commenters.

1. What do you value about Wupatki's backcountry?

In response to question 1, commenters expressed that they valued a range of park resources and experiential components they associate with Wupatki's backcountry. More than a quarter of respondents mentioned scenic views/vistas and the beauty of the area as important components of the backcountry. Cultural resources—including unique intact historic structures and remnants, archeological artifacts, pot sherds, and rock art—were highly valued, as well as the cultural values and continuing cultural associations with the land and resources found within the monument.

Commenters mentioned the importance of the history of the area and the opportunity to learn more about human history on the land. Natural resources were also valued, with specific mentions of ecological processes, wildlife, wildflowers, geology, and fossils. Commenters also listed dark night skies as an important attribute of the backcountry. The “potential for future scientific research” was also mentioned as an important value of the monument’s backcountry.

Additionally, commenters used this question to describe what they value about the current approach to backcountry management at Wupatki. They described the backcountry as “wilderness” and/or mentioned its “natural,” “untrammeled,” and “undeveloped” nature. Additionally, the backcountry’s state of preservation, feeling of remoteness, and limited access currently allowed through guided, NPS-led hiking opportunities were described as positive attributes. So too were the “solitude” and “quiet” that visitors—in theory—could experience within the monument’s backcountry.

2. What kinds of backcountry experiences would you like to be considered?

Commenters included hiking as a desired backcountry experience. There were suggestions that the National Park Service continue offering guided hiking opportunities similar to the established Discovery Hikes, while others suggested expanding guided opportunities, providing longer hikes, allowing hiking along developed trails or routes, and/or self-guided hiking opportunities. Camping was another idea, with those commenters who supported camping suggesting that overnight camping experiences be guided, or ranger led. Other camping suggestions included backpacking, unguided camping by permit, and developing a campground near the visitor center. Commenters requested more physically accessible opportunities in the backcountry, such as shorter guided hikes or increased vehicle access. A youth outreach program that allowed tribal youth to connect to the resources associated with the monument and help with management activities was also mentioned as a potential backcountry opportunity. Commenters suggested a variety of approaches to potential fee collection related to backcountry access, stating that fees for reservations, permits, guided hikes, non-local visitors, or self-guided access could help support additional NPS staff or programs. However, it was also requested that the monument offer fee-free days and/or hikes without reservations to serve different portions of the public.

Commenters strongly supported the continuation of *current* management and access to the backcountry. General consensus among these correspondences was for limited (or no) unguided access, with NPS staff-guided hikes as the primary mechanism for visitors to experience the backcountry. Other commenters stated that there should not be any backcountry visitor access because of the sensitivity of cultural resources and the cultural importance to the indigenous community.

Additional suggestions for backcountry experiences expressed in single correspondence included:

- Night sky visits
- Mountain biking
- Vehicle access to Crack-in-Rock
- Bike lanes on the highway
- Designated selfie or “photo op” points
- Enlarged parking areas
- Authorized research

3. What strategies do you think could support future backcountry access?

Similar to the responses to question 2, commenters supported the National Park Service leaving backcountry access as it currently is, requiring visitors interested in experiencing the backcountry to reserve spots on the NPS-guided hikes. Of the correspondences that considered or supported expansion of backcountry use, there was emphasis on the value of the guided hikes being led by NPS staff or NPS-trained partners. Site stewards and partnerships were identified as potential avenues to increase capacity for guided experiences, resource protection, and/or monitoring. Visitor education was also seen as an important strategy related to access.

Commenters supported continuing to limit the number of people allowed in the backcountry to minimize or avoid impacts and preserve aspects of the current experience. Commenters mentioned using waivers, fees, permits, and reservation lotteries as potential ways to manage public access. To protect resources, they suggested limiting group size, implementing seasonal closures, installing fences or boundary markers, creating designated areas for use, creating trails to concentrate use in specific areas, and employing GPS tracking and/or cameras to monitor backcountry use.

Those commenters who indicated they were hesitant to suggest increases in backcountry access suggested the monument consider a gradual approach to any changes. Ideas included inventorying cultural sites/resources; continued monitoring; allowing the monument to reserve management decisions if impacts were observed; and piloting access with a single, small route. One commenter stated that the National Park Service should establish visitor capacities or impact thresholds to guide future park management. Others encouraged the National Park Service to continue consulting with locals and tribes for their perspectives on future backcountry use and management. Finally, commenters suggested taking the conservative management approach a step further by permanently closing the backcountry area to all visitor use and/or limiting public access through official means.

4. What concerns do you have with potential changes to backcountry access?

Overall, commenters were concerned that increased visitation to backcountry, in particular unguided access, may result in impacts to cultural resources, natural resources, and wilderness characteristics. Approximately half of received correspondences expressed strong concerns for the protection of the many archeological sites and other cultural resources in the backcountry. Another serious concern was the National Park Service's continued commitment to consult with associated tribes and the neighboring Navajo Nation chapters, with commenters questioning the protection of sacred sites and the privacy of tribal members if visitors were allowed unguided access to the backcountry. Commenters identified concerns about impacts from human activity to ecological processes, wildlife, and plants, as well as erosion from visitor-created trails impacting geological resources and archeological artifacts. An increase in the number of people who could access the backcountry could also affect some of the experiential components mentioned in response to question 1, such as quiet, solitude, dark night skies, and "wilderness."

Overall, visitor-related impacts in the backcountry were a primary concern. Vandalism, theft, trash, human waste, trespassing into restricted areas and/or adjacent property, privacy for park neighbors, resource degradation related to overuse, and off-road bicycle use were all called out as being concerns. Commenters also expressed concerns with increased access in combination with social

media use—i.e., that as more people visit the backcountry, they would publicize their visits on social media, in turn leading to unauthorized entry into restricted areas and to additional impacts.

Commenters expressed concerns about the National Park Service’s ability to manage unguided access to the backcountry. They worried that if the public were allowed unguided access to the backcountry, limited staffing and ability to enforce regulations as well as increased risk to visitor safety, may lead to additional resource impacts and management challenges. Additionally, commenters expressed wariness related to increased commercial services and/or commercialization in the park connected to expanded visitor opportunities.

While there were commenters that expressed concerns, others responded they had no concerns directly related to changes in the backcountry, or if they did, any impacts from increased visitor access would be too minor to be of concern.

Overall Topics of Interest or Concern

Comments expressed similar viewpoints. Common themes arose that were repeated by multiple commenters, independent of the question being answered. The National Park Service identified overall topics of interest or concern, which are summarized below. These summaries provide a general understanding of the main perspectives regarding backcountry use and management of Wupatki National Monument among those who provided comments.

Closure of Black Falls Crossing Road. Members of the Navajo Nation who attended the open house expressed concern related to the potential closure of Black Falls Road, an unpaved administrative road that crosses the Little Colorado River and enters Navajo Nation lands, related to the possibility of future wilderness designation. Nation members use the road as a primary access route to Flagstaff, and there was an outcry against any administrative road closures. Park staff present at the open house assured attendees the National Park Service was not considering any changes to the road in terms of access or use by tribal members and access would not be affected by future backcountry planning efforts or wilderness designation—should that occur in the future. Open house attendees submitted hard copies of their responses to the public comment questions following the open house, with comments relating to continued use of Black Falls Crossing Road. Commenters also suggested further improving the road through paving or bridge construction. Hard copies of comments received at the open house were uploaded to the NPS project website and transcribed. These comments were included as part of public comment analysis.

Maintain Current Backcountry Management and Access. Commenters expressed concerns related to any change to backcountry visitor access and management. The general consensus was to maintain visitor access much as it currently is, allowing managed access through the NPS/volunteer-guided Discovery Hike program. There was strong support and positive feedback related to these hikes and their emphasis on resource preservation and interpretation. Commenters felt the current system was working, and they supported maintaining the closure of the backcountry to unguided access. Considering the possibility of expanded access, commenters wanted the National Park Service to thoroughly evaluate its options and to adopt a cautious approach toward new access and uses.

Potential Wilderness Designation. Open house attendees asked NPS staff about the status of the monument’s wilderness study and/or wilderness designation, as interest in this topic continues among the public. When describing values associated with the backcountry or concerns related to potential backcountry access and use, commenters used terms that are associated with federal policy for wilderness stewardship, including “undeveloped,” “untrammeled,” “natural,” “solitude,” “pristine,” and “wilderness.” Per a wilderness eligibility study approved in 2013, approximately 96.5% of the monument (34,194 acres) is eligible for wilderness designation. The National Park Service intends to conduct a wilderness study at a future date still to be determined to fulfill requirements under the Wilderness Act and NPS policy.

Concern with Commercialization. In response to question 4, commenters expressed serious concerns about commercial uses and the commercialization of the monument. Concerns were related to commercial outfitters, trips, tours, and guides and the potential for crowding and vandalism related to these services. There were comments that mentioned commercial services as a potential strategy in response to question 3, but others were opposed to that option. Overall, commenters had negative associations with commercial services, connecting outside vendors and outfitters with an unwanted increase in commercialization of the park and visitor opportunities and potential overuse. However, there were also commenters who admitted that the National Park Service would likely have to consider partnering with other entities (volunteers, formal partners, commercial groups) if it wished to expand guided experiences.

Existing Visitor Opportunities Available on Nearby Public Lands. Commenters that supported only limited public access and/or no unguided opportunities cited the various backcountry opportunities currently offered to Flagstaff-area visitors on nearby public lands managed by the US Forest Service and Bureau of Land Management. Commenters argued that there was no need to provide additional visitor access or backcountry opportunities when camping, hiking, and other recreational activities were available on lands in the area that did not have the extent of intact archeological resources present at Wupatki or were managed by government agencies with missions that emphasize resource preservation less than the National Park Service. Additionally, it was noted that visitors do not currently take advantage of these existing opportunities on neighboring public lands and that as an NPS unit, the primary responsibility for Wupatki must be “to retain the highest level of protection”; thus, there was no need to open the backcountry to further recreation and visitor access.