

**WUPATKI NATIONAL MONUMENT
WILDERNESS STUDY**

CIVIC ENGAGEMENT SUMMARY REPORT

MAY 2023

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WUPATKI NATIONAL MONUMENT WILDERNESS STUDY CIVIC ENGAGEMENT SUMMARY REPORT

EXECUTIVE SUMMARY

The National Park Service (NPS) is currently in the early (pre-NEPA) phases of a wilderness study for Wupatki National Monument. When complete, this study will support the ongoing preservation of wilderness character at Wupatki National Monument and complement the recently completed backcountry management plan. Wupatki National Monument staff will work closely with federal agency partners and the 13 Tribes who possess ancestral connections to the monument's lands to complete the wilderness study. The 13 traditionally associated Tribes are:

- Fort McDowell Yavapai Nation, Arizona
- Havasupai Tribe of the Havasupai Reservation, Arizona
- Hopi Tribe of Arizona
- Hualapai Tribe of the Hualapai Indian Reservation, Arizona
- Kaibab Band of Paiute Indians of the Kaibab Indian Reservation, Arizona
- Navajo Nation, Arizona, New Mexico, and Utah
- San Carlos Apache Tribe of the San Carlos Reservation, Arizona
- San Juan Southern Paiute Tribe of Arizona
- Tonto Apache Tribe of Arizona
- White Mountain Apache Tribe of the Fort Apache Reservation, Arizona
- Yavapai-Apache Nation of the Camp Verde Indian Reservation, Arizona
- Yavapai-Prescott Indian Tribe, Arizona
- Zuni Tribe of the Zuni Reservation, New Mexico

The National Park Service embraces civic engagement as a fundamental discipline and practice and sought to engage and inform the public about the wilderness study and to gather initial comment early in the process. The agency's commitment to civic engagement is founded on the central principle that preserving the nation's heritage resources relies on continued collaborative relationships between the National Park Service and the American people.

From February 1, 2023, through March 3, 2023, NPS staff solicited public input on the wilderness study and the possibility of a wilderness designation. This engagement period began with a newsletter to inform the public about the study on the NPS Planning,

Environmental and Public Comment (PEPC) website (<http://parkplanning.nps.gov/WUPAwild>). The National Park Service provided printed copies of the newsletter at a public open house and at the Wupatki National Monument visitor center. A press release issued on February 4, 2023, announced the availability of the newsletter, the dates the National Park Service would accept comments, and information about a planned public open house. The newsletter directed interested individuals to the PEPC website to officially submit their comments.

The National Park Service held the public open house at the Flagstaff Aquaplex in Flagstaff, Arizona, on February 9, 2023. Approximately 17 people attended, during which NPS staff presented information on wilderness qualities, law and policy related to wilderness designation, how this wilderness study relates to previously completed efforts, and about the natural and cultural resources at Wupatki National Monument. Robin Martin, superintendent of the Flagstaff Area National Monuments, delivered an introductory presentation, and the room was organized into listening stations with NPS staff, maps, and other relevant materials. Attendees could ask questions, provide comments, and speak with monument staff. Printed comment cards were available for attendees to submit official comments.

A total of 17 correspondences were received during the comment period. Most commenters supported the National Park Service conducting a wilderness study and the possibility of a wilderness designation in the future. (Note: When complete, the study will be provided to the NPS director for review, and it may include a draft wilderness proposal; however, a wilderness designation is beyond the scope of this study. A wilderness study is only one step in the wilderness review and designation process described in law and NPS policy. Per the Wilderness Act of 1964, only Congress can designate wilderness.)

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 wilderness and their thoughts about wilderness proposals at Wupatki National Monument. The National Park Service received 10 correspondences through the PEPC website during the comment period. The agency also accepted handwritten comments on comment cards made available at the public open house and at the Wupatki National Monument visitor center. Commenters returned these cards by mail or submitted them in person via a comment card drop box. The National Park Service received 7 comment cards—3 of which were submitted at the public open house—for a total of 17 correspondences. This report summarizes all public comments received during the civic engagement period.

Correspondences came from the following geographic locations:

State	Total Correspondences	Percentage of Total
Arizona	12	71%
• Flagstaff area	9	53%
• Other parts of Arizona	3	19%
Massachusetts	1	6%
Michigan	1	6%
North Carolina	1	6%
Oregon	1	6%
Texas	1	6%

The following organizations provided comments:

- National Parks Conservation Association
- Arizona Game and Fish Department
- Arizona Public Service

A representative from the San Carlos Apache Tribe attended the open house, and several other attendees had experience as volunteers or former NPS staff at Wupatki National Monument or the Flagstaff Area National Monuments. Most of the commenters had visited the monument, with some having participated in the NPS-led discovery hikes in the eligible wilderness as members of the public or as guides. 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 the Wupatki National Monument wilderness study.

DEFINITION OF TERMS

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

Comment – A portion of the text within a correspondence that addresses a single subject or issue. A comment could include information such as an expression of support or opposition regarding the use of a potential management tool, additional data about the existing condition, or an opinion debating the adequacy of an analysis.

Comment summary – A grouping that is centered on a common subject. Comment summaries combine similar comments.

COMMENT SUMMARY

The National Park Service posed three questions to solicit targeted feedback from the public. These questions were included in the newsletter, on the PEPC website, and in other materials available at the public open house. These questions were as follows:

1. What does the term “wilderness” mean to you and how does it relate to Wupatki National Monument’s eligible wilderness?
2. What information can you share about the qualities of wilderness in Wupatki National Monument that would help inform the study?
3. Please share any additional comments you have about the wilderness study at Wupatki National Monument.

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

1. What does the term “wilderness” mean to you and how does it relate to Wupatki National Monument’s eligible wilderness?

Commenters expressed that wilderness is the highest level of federal protection for public lands, with many referencing the formal definition of the term specified in the text of the Wilderness Act of 1964. Commenters specifically mentioned concepts of wilderness areas as places where visitors can experience isolation and solitude and discover a wide variety of different resources. Some of the resources mentioned include natural sounds without noise pollution, night skies, and a variety of fauna and flora. Conversely, a commenter noted that wilderness designations can make it difficult to conduct habitat management and direct species monitoring and management.

Several commenters expressed their fondness for what they believed to be the more timeless qualities of wilderness. One commenter noted appreciation that the intangible qualities of light and silence present at Wupatki National Monument would remain. Another commenter expressed their belief that within wilderness, land is protected for the long term and that its conditions are not subject to the will of politicians. Several commenters mentioned the importance of preserving these lands for future generations.

Commenters also keyed in on the aspect of the Wilderness Act’s text that these lands are “untrammeled by man, where man himself is a visitor who does not remain.” One commenter emphasized the importance of the word “modern” as part of the definition of the untrammeled quality to acknowledge that the eligible wilderness in Wupatki National Monument has a long and significant history of human habitation and manipulation and that the concept of wilderness does not discount this use and history.

2. What information can you share about the qualities of wilderness in Wupatki National Monument that would help inform the study?

Commenters wrote about wilderness at Wupatki National Monument in the context of other land protection and wilderness areas. One commenter noted that by designating wilderness at Wupatki National Monument, the federal government would be one step closer to achieving the “30 by 30 goal,” a global effort to conserve 30% of terrestrial and marine habitat by 2030. Another commenter noted that the Wupatki eligible wilderness conserves an intact example of a high desert landscape that connects to surrounding protected public lands and allows natural processes to occur with minimal human intervention on a larger scale.

Another commenter offered that although it is not a large area, Wupatki National Monument contains biological and topographical areas not found elsewhere in the national wilderness preservation system. Most commenters supported keeping the eligible wilderness areas of the monument in a primitive state, limiting public access to them, and prioritizing the preservation of cultural resources and the Ancestral Puebloan structures to the highest level possible.

Some commenters wrestled with how wilderness affects NPS management of the monument. One commenter was concerned that a wilderness designation could preclude actions to protect resources that are fragile and may need continuing intervention. Another commenter described the NPS closure of the monument’s backcountry and eligible wilderness as “locked-up” and violating many wilderness concepts, specifically, the outstanding opportunities for solitude or primitive and unconfined recreation. One commenter asked why the National Park Service is seeking a wilderness designation at Wupatki National Monument, speculating that a wilderness designation could attract more people to visit the monument, which could lead to the destruction of the very characteristics such a designation seeks to protect. The commenter pointed to Bears Ears National Monument, which is comanaged by the Bureau of Land Management, the US Forest Service, and the five Tribes of the Bears Ears Commission, as an example of how these unintended consequences can play out.

The same correspondence that highlighted the use of the word “modern” as part of the Wilderness Act above shared thoughts around the language of the Wilderness Act itself, and the “European thinking” that informed its content, and the importance of traditional and ongoing human connections and the full historical context in understanding wilderness.

3. Please share any additional comments you have about the wilderness study at Wupatki National Monument.

Commenters had a wide variety of additional comments. One commenter noted appreciation for the quiet and minimal crowds when they visited the monument in 2019, and they encouraged the US Department of the Interior to designate wilderness in “as many areas as necessary/appropriate” in Wupatki National Monument. A separate commenter said they strongly support the proposal to further evaluate the undeveloped areas at Wupatki National Monument and hoped that NPS administrators would endorse all or most of the areas for wilderness protection.

Other commenters brought up the role of guides in wilderness areas. One stated that visitors on guided visits are more likely to be mindful and respectful in their interactions with wilderness. Commenters expressed concern that noise pollution or other resource impacts could occur with unguided visitors. A separate commenter was even more unequivocal, imploring the National Park Service not to open the backcountry to unguided backpacking, hiking, and overnight camping. Doing so, the commenter said, would cause irrevocable damage to the heritage sites.

One commenter expressed desire for the study process to be deliberate and focused and emphasized that the final boundary proposal should be consistent with the Wilderness Act and meet official wilderness characteristics. Another commenter said they were uneasy with what they perceived to be an aggressive rush to a wilderness designation and that such a designation could be dangerous to the site and its meaning and significance. Another commenter suggested that there can and should be different approaches for different wilderness resources, and while they supported restricting access to Wupatki National Monument's archeological sites, they favored unrestricted access to the monument's geologic formations.

In several correspondences and during the open house, some people expressed confusion about what a wilderness study would mean for visitor use at the monument and shared concerns about resource protection. Concerns included what wilderness means for Wupatki National Monument and whether a wilderness designation meant the National Park Service would have to allow increased and/or unguided use. Another commenter felt that wilderness *should* mean more access to the monument. While these concerns for resource protection are valid, the wilderness study will not provide management direction for the monument. The recently completed backcountry management plan provides this direction. The completion of the wilderness study will not affect future visitor use management at Wupatki National Monument.