

# NPS WILDERNESS REVIEW PROCESS

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## **Introduction**

Congress enacted the Wilderness Act on September 3, 1964. The Act designated over 9 million acres of wilderness within the nation's national forests, administered by the Department of Agriculture. For the lands administered by the Department of the Interior within the national park system, Congress required the Secretary to "review every roadless area of five thousand contiguous acres or more...and shall report to the President his recommendation as to the suitability or nonsuitability of each such area...for preservation as wilderness. The President shall advise the President of the Senate and the Speaker of the House of Representative of his recommendation with respect to the designation as wilderness of each such area...on which review has been completed, together with a map thereof and a definition of its boundaries." 16 U.S.C. 1132(c). Congress directed that the Secretary complete this review by September 3, 1974.

## **Park Wilderness Recommendations**

### Parks in Existence on September 3, 1964

In the ten years after 1964, Presidents Johnson, Nixon and Ford transmitted to Congress many recommendations "as to the suitability or nonsuitability" of roadless areas in the national park system. The last significant wilderness recommendation transmitted to Congress was on May 11, 1978 during the Carter Administration, a message that revised and enlarged several previous park wilderness recommendations. After May 11, 1978, wilderness recommendations to Congress for the national park system largely ceased. A few anomalous exceptions exist, such as the 1991 Bush Administration wilderness recommendation of public lands administered by the Bureau of Land Management (BLM) in Idaho that were later incorporated by President Clinton's proclamation into Craters of the Moon National Monument. (See Proclamation 7373, November 9, 2000).

### Parks Established after the Wilderness Act

For parks established after the Wilderness Act, Congress often included a wilderness review requirement that is separate from the Wilderness Act. The Secretary and the National Park Service (NPS) have not faithfully obeyed these requirements. The most glaring example is Channel Islands National Park, California. Congress created Channel Islands on March 5, 1980 (i.e. in Fiscal Year 1980) and required that the Secretary submit a wilderness recommendation to the President "[W]ithin three complete fiscal years from the date of enactment..." 94 STAT. 77. The recommendation was due on September 30, 1983 (i.e. at the end of Fiscal Year 1983). Shamefully, thirty years later, the NPS has yet to accomplish this task. Channel Islands is now undertaking a wilderness study.

The NPS failure to conduct the wilderness review where required by specific enabling acts was challenged in court by The Wilderness Society. On January 17, 2006, the

Circuit Court of Appeals for the District of Columbia held that the NPS was not shielded from suit by the longstanding nature of its failure. Rather, the NPS remains in a continuous violation of its statutory obligations. However, the Court issued no order because they found that The Wilderness Society had no standing to sue. Still, this decision may have influenced the NPS to reverse course in 2007 and include wilderness review in the Big Cypress Addition General Management Plan (GMP) after an almost implacable refusal to do so during 2005 and 2006.

Congress has employed another method to elicit wilderness recommendations from the Secretary and the President for parks established after the Wilderness Act. The enabling act for El Malpais National Monument, New Mexico offers a ready example. Established by Congress on December 31, 1978, Public Law 100-225 required that the Secretary develop and transmit to Congress a GMP for the new monument by September 30, 1990 (i.e. within three full fiscal years after enactment). Congress required that the monument's GMP "shall review and recommend the suitability or unsuitability for preservation as wilderness of all roadless lands" within the monument. 101 STAT. 1544. The NPS transmitted the GMP to Congress on April 18, 2002. Only twelve years late, nonetheless, this transmittal constitutes a wilderness recommendation.

Another approach is illustrated by the insertion of language in P.L. 107-20, the Supplemental Appropriations Act for Fiscal Year 2001, that funded a wilderness study at Apostle Islands National Lakeshore, Wisconsin. 115 STAT. 177. While the appropriations act did not require transmittal of the study, the study proved to be the basis of subsequent congressional designation.

### **A Brief History of the NPS Wilderness Review Process**

The Department of the Interior promulgated regulations at 43 Code of Federal Regulations (CFR) Part 19 – Wilderness Preservation that govern wilderness review. Adopted in final on February 22, 1966, the rules made a notable contribution to the review process by defining the term "roadless area;" a term that the Wilderness Act itself did not define. Agency reviews that may have otherwise decided to exclude lands with rough dirt roads from wilderness recommendations were forestalled by the regulatory definition. "*Roadless area* means a reasonably compact area of undeveloped Federal lands which possesses the general characteristics of a wilderness and within which there is no improved road that is suitable for public travel by means of four-wheeled, motorized vehicles intended primarily for highway use." 43 CFR 19.2(e).

In addition to the rules, Secretary of the Interior Stewart Udall issued a Secretarial Order No. 2893 on February 17, 1966 that established procedures for wilderness review by both the National Park Service and the Bureau of Sport Fisheries and Wildlife (now the U.S. Fish and Wildlife Service). But, as his term in office drew to a close, the NPS had forwarded only four wilderness recommendations to the Secretary who transmitted them to Congress. They were for Craters of the Moon, Lassen Volcanic National Park, Lava Beds National Monument, both in California, and Petrified Forest National Park, Arizona. Unhappy with what some perceived as agency foot-dragging, Secretary Udall issued a new directive, Order No. 2920, on his last day in office – January 20, 1969. The

new order vested significant wilderness review responsibility with the Assistant Secretary for Fish and Wildlife and Parks.

Early NPS wilderness recommendations left much to be desired. The NPS recommended, for example, that wide cordons be excluded from wilderness between the proposed wilderness boundary and the existing park boundary. The purpose was to provide administrative access for fence maintenance and boundary patrol. This feature still mars the designated wilderness of the first two NPS wilderness areas – Petrified Forest and Craters of the Moon. Similarly, the NPS created “enclaves” in wilderness recommendations if they contained backcountry patrol cabins or fire lookout towers, primitive camps or scientific data gathering equipment. NPS also routinely excluded areas from wilderness recommendation if they contained a nonconforming facility, or private, or other nonfederal lands, assuming that they would remain as such forever. These and other NPS practices soon drew the attention of Congress.

On May 5, 1972, the Subcommittee on Public Lands of the Senate Interior and Insular Affairs Committee conducted hearings on the “Preservation of Wilderness Areas.” Chaired by Senator Frank Church of Idaho, the floor manager of the Wilderness Act, the hearings offered an opportunity to clarify the lands that the NPS (and other agencies) could recommend as wilderness. Senator Church examined several aspects of the law as follows:

- **Grazing:** Church’s first target was the NPS’ decision that areas under established and authorized livestock grazing were unsuitable for wilderness. (It was precisely upon this basis that the NPS concluded that none of Wupatki National Monument was wilderness suitable; a decision the NPS has never revisited despite even the cessation of grazing in 1987!). Grazing does not disqualify roadless areas as wilderness.
- **Motorboats:** Senator Church criticized the NPS for excluding waters such as the surface of Crater Lake and Yellowstone Lake from wilderness recommendation because they contained motorboat use. He pointed out that Section 4(d)(1) of the Wilderness Act allows continuation of existing motorboat use.
- **Boundary and Road Buffers:** Senator Church criticized wide buffer zones along park boundaries or alongside roads that had “the effect of excluding the critical edge of wilderness from full statutory protection.” Hearing Record, p. 59. Many early NPS recommendations had wide swaths alongside roads, like the Generals Highway in Sequoia National Park, and also the aforementioned wilderness boundary buffers at Petrified Forest and Craters of the Moon. As for the General Highway, Church said this “...I note that...wide swaths of land are excluded from wilderness adjacent to the Generals Highway.... Yet, I find no plans for any new development in that area in the recently-approved park master plan. So, I fail to see the reason for excluding these wild lands, the critical fringes of wilderness, while there seems to be good reason for putting them within the full protective boundary of the designated wilderness.” (It is ironic then, that the current effort to designate wilderness at Big Bend National Park, Texas involves a

demand by the local park manager that Congress only designate wilderness there if road corridor widths abutting wilderness are 300 meters each side of road centerline – a dimension without precedent in the history of NPS wilderness.)

- Outside Influences: Sen. Church admonished the Interior Department that the suitability of wilderness acres is to be judged on their wilderness character, and not upon outside influences. “Sights and sounds from outside the boundary do not invalidate a wilderness designation or make threshold exclusions necessary, as a matter of law.” *Ibid.* (The NPS used precisely this reasoning to determine that none of the roadless islands in Biscayne National Park, Florida were suitable as wilderness; a decision the NPS has never revisited.)
- Enclaves: “I am especially concerned about the no wilderness “enclaves” which seem to pepper all of these national park wilderness proposals. There are more than 30 separate Swiss-cheese-like enclaves within Sequoia and Kings Canyon National Parks. I find no convincing rationale for this practice.” Senator Church continued later on “ [F]or example, there are 22 enclaves, nine acres each, for telemetering precipitation measuring equipment in Sequoia and Kings Canyon...” Hearing Record, p. 61. Sen. Church pointed out that Section 4(c) of the Wilderness Act allows for the “minimum necessary” facilities and activities that would otherwise be prohibited by the Act for the purpose of administering wilderness.

With remarkable alacrity, on June 24, 1972, Assistant Secretary of the Interior Nathaniel Reed prescribed new “Departmental Guidelines For Wilderness Proposals” that adopted Senator Church’s insights. On July 20, 1972, NPS Director George Hartzog transmitted the new guidelines to his subordinates with instructions to implement them. Among the many clear directions, Assistant Secretary Reed reiterated that “[A]reas that otherwise qualify for wilderness will not be excluded because they contain unimproved dirt roads created by vehicles repeatedly traveling over the same course, structures, installations or utility lines, which can and would be removed upon designation as wilderness.”

### **The Origin of “Potential Wilderness” in NPS Recommendations**

As for nonfederal lands or interests in lands within an otherwise roadless area, Senator Church advised that the NPS should not wholesale exclude such lands from recommendations. Senator Church explained that the Wilderness Act exempts “private rights” from its prohibitions. Thus, private rights, including private lands or valid mining claims, “need not be specially enclaved or otherwise segregated from the wilderness area within which they lie.” Hearing Record p. 61. Church continued “...the private mineral claims and other private inholdings...may be designated now, without further complication as encompassed within wilderness ... Upon termination of these various private rights, the land will already be a part of the wilderness within which it lies, with no need for further procedures or legislation. *I would point out that this is the way the Forest Service routinely handles inholdings within its wilderness areas, and the same practice should be used for parks...*” *Ibid.* Emphasis added.

On this point, the Reed Guidelines went only part way. The last paragraph says “When nonqualifying lands are surrounded or adjacent to an area proposed for wilderness designation and such lands will within a determinable time qualify and be available Federal land, a special provision should be included in the legislative proposal giving the Secretary of the Interior the authority to designate such lands as wilderness at such time as he determines it qualifies.”

Director Hartzog’s memo to his subordinates on July 20, 1972 titled and defined these lands within an NPS wilderness proposal as “Wilderness Reserve(s): Lands classified in the master plan as potential wilderness, but which have been excluded from previous wilderness recommendations because of conflicting private uses or interests therein, may now be recommended as Wilderness Reserves when such lands “will within a determinable time qualify and be available Federal land.” With respect to these reserves, the new policy provides that “a special provision should be included in the legislative proposal giving the Secretary of the Interior the authority to designate such lands as wilderness at such time as he determines it qualifies.” Normally, this would be a time subsequent to the elimination of private uses and necessary restoration work or acquisition of the private interests by the United States.”

Soon after the Hartzog memo on “Wilderness Reserves,” the NPS substituted the term “potential wilderness” in its recommendations. A source of some confusion ever since, Congress enacted its first NPS wilderness containing designated “potential wilderness” in 1976 (at Point Reyes National Seashore, California on October 18 (and 20<sup>th</sup>) 1976). The special provision for Point Reyes (and every other park wilderness that contains “potential wilderness”) authorizes the Secretary to convert potential wilderness to wilderness “upon publication in the Federal Register...that all uses thereon prohibited by the Wilderness Act have ceased.” (Note: It may seem odd that Congress enacted the Point Reyes Wilderness twice, in two separate laws, one on October 18, 1976 and the other on October 20, 1976. But only the second law contained the “special provision.”). Congress designated a total of 22 parks with “potential wilderness,” of which 20 remain as of February 2010. No other agency that administers wilderness uses “potential wilderness.”

**THE TABLES: Five Tables recapitulate the history of wilderness review for the national park system. Corrections and updated information are *welcome* and invited!**

**TOTAL PARKS WITH DESIGNATED WILDERNESS – 53**

**TABLE NO. 1 - EXECUTIVE WILDERNESS RECOMMENDATIONS AND CONGRESSIONAL DESIGNATIONS (45 Parks outside of Alaska);**

**TABLE NO. 2. - ALASKA PARKS (8 Parks with designated wilderness; 13 parks with lands qualified as wilderness, includes the 8 with designated wilderness);**

**TOTAL PARKS WITH RECOMMENDED WILDERNESS - 17**

**TABLE NO. 3 - EXECUTIVE WILDERNESS RECOMMENDATIONS SENT TO, AND PENDING BEFORE, CONGRESS (17 Parks, including Craters of the Moon also found on Table No. 1);**

**TOTAL PARKS WITH PROPOSED WILDERNESS - 6**

**TABLE NO. 4 - NPS WILDERNESS PROPOSALS DEVELOPED BUT NOT SENT TO CONGRESS (6 Parks, including Lake Mead also found on Table No. 1), and**

**TABLE NO. 5 - NPS DETERMINATIONS OF PARKS WITH NO ACRES SUITABLE AS WILDERNESS (10 Parks)**

**TABLE NO. 6 - PARKS DETERMINED TO HAVE WILDERNESS SUITABLE/ELIGIBLE LANDS IN A FORMAL PLANNING PROCESS - AWAITING ACTION**

**TABLE NO. 1**

**EXECUTIVE WILDERNESS RECOMMENDATIONS AND CONGRESSIONAL WILDERNESS DESIGNATIONS (in alphabetical order of park).**

Congress is not obligated to enact wilderness, let alone exactly as the Secretary or President recommends it. Table No. 1 shows that Congress has most often designated MORE wilderness than the Department recommended. There are only three examples where Congress designated fewer acres than the Administration’s latest recommendation – Guadalupe Mountains, Sequoia-Kings Canyon and Zion.

Note 1: This Table aggregates both the “wilderness” and “potential wilderness” acres for the total acres in the “recommended or “designated” columns.

Note 2: “Date ?” means that the compiler has yet to determine the date when the recommendation was transmitted to Congress but is fairly certain that a recommendation was made.

<b>DATE Reco- mmendatio</b>	<b>AGEN CY</b>	<b>STA TE</b>	<b>DOI/PRESIDEN TIAL RECOMMENDA</b>	<b>DESIGNA TED by</b>	<b>PENDI NG</b>	<b>NOTES</b>
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<b>n Sent to Hill</b>			<b>TION</b>	<b>Public Law # on Date</b>		
				<b>Number of Acres</b>		
Proposal not formally sent to Hill	NPS	WI	<b>Apostle Islands NS</b> 33,500 acres proposed in NPS Wilderness Study/EIS of March 2004	P.L. 108-447 12/08/2004 33,500 acres	Nothing	Enacted as NPS study proposed
9/21/72	NPS	SD	<b>Badlands NP</b> 58,924 acres recommended	P. L. 94-567 10/20/1976 64,250 acres	Nothing	Enacted more acres than recommended
11/28/73	NPS	NM	<b>Bandelier NM</b> 21,110 acres Recommended	P. L. 94-567 10/20/76 23,267 acres	Nothing	Enacted more acres than recommended
2/8/72	NPS	CO	<b>Black Canyon of the Gunnison NP</b> 8,780 acres recommended	P. L. 94-567 10/20/1976 11,180 acres  P.L. 106-76 10/21/99 4,419 acres	Nothing	Enacted more acres than recommended
5/11/78	NPS	MO	<b>Buffalo NR</b> 36,000 acres Recommended	P. L. 95-625 11/10/1978 36,000 acres	Nothing	Enacted as recommended
9/21/72  5/11/78	NPS	NM	<b>Carlsbad Caverns NP</b> 30,530 acres Recommended  Revised Recommendation 33,445 acres	P. L. 95-625 11/10/1978 33,445 acres	Nothing	Enacted as recommended in May 1978 revision
2/8/72	NPS	AZ	<b>Chiricahua NM</b> 9,442 acres	P. L.94-567	Nothing	Enacted more acres

			Recommended	10/20/1976 9,442 acres  P.L. 98-406 8/28/84 850 acres		than recommended
Date ?	NPS	SC	<b>Congaree NP</b> Unknown acreage recommended	P. L. 100-524 10/24/1988 21,850 acres	Nothing	Unknown
4/1/68  10/18/91  11/9/00	NPS	ID	<b>Craters of the Moon NM and Preserve</b> Unknown acreage recommended in 1968  President recommend 396,696 acres of BLM Great Rift WSA to Congress.  Presidential Proclamation 7373 adds 410,000 BLM acres to Monument, including much of the Great Rift WSA.	P. L.91-504 10/23/1970 43,243 acres  NPS estimates that 346,800 of the Great Rift WSA lands recommended as wilderness in 1991, are now in the Craters of the Moon	346,800 acres	Unknown  See Table No. 3 – Recommended Wilderness
Date ?	NPS	GA	<b>Cumberland Island NS</b> 19,586 acres Recommended	P. L.97-250 10/8/1982 20,558 acres	Nothing	Enacted more acres than recommended
Date ? when sent to	NPS	NV/CA	<b>Death Valley NP</b> 1,980,000 acres	P. L. 103-433	Nothing	Enacted wilderness as



Hill, for original N.Mon.  7/8/10			Recommended	10/31/1994 3,164,878 acres (includes BLM acres added to park)  NPS recalculation determines that 3,202,456 acres are wilderness and 118 acres potential wilderness		recommended in original Monument; enacted much more on lands added to park in 1994
Not sent to Hill	NPS	CA	<b>Devils Postpile NM</b>	P.L. 98-425 9/28/1984 747 acres	Nothing	No acres recommended by DOI
12/4/74  5/11/78	NPS	FL	<b>Everglades NP</b> 1,296,500 acres Recommended  Revised Recommendation 1,378,400 acres	P. L. 95-625 11/10/1978 1,378,400 acres	Nothing	Enacted as recommended in May 1978 revision
Date ?	NPS	NY	<b>Fire Island NS</b> 1,347 acres Recommended	P. L.96-585 12/23/1980 1,381 acres	Nothing	Enacted more acres than recommended
9/21/72	NPS	CO	<b>Great Sand Dunes NM</b> <b>NPr</b> Unknown acreage Recommended	P.L.94-567 10/20/1976 34,120 acres  P.L. 106-530	Nothing	Unknown

				11/22/2002 c. 42,000 acres transferred from F.S. to NPS		
9/21/72  5/11/78	NPS	TX	<b>Guadalupe Mts. NP</b> 46,850 acres recommended  Revised Recommendation 56,449 acres	P. L. 95- 625 11/10/1978 46,850 acres	Nothing	Enacted fewer acres than May 1978 revised recommendat ion; same acres as original recommendat ion
Date ?  5/11/78	NPS	MI- FL	<b>Gulf Islands NS</b> 3,592 acres recommended  Revised Recommendation 4,592 acres	P. L. 95- 625 11/10/1978 4,600 acres	Nothing	Enacted slightly more acres than May 1978 revised recommendat ion
9/21/72	NPS	HI	<b>Haleakala NP</b> 24,770 acres recommended	P.L. 94- 567 10/20/1976 24,770 acres	Nothing	Enacted as recommende d
12/4/74  5/11/78	NPS	HI	<b>Hawaii Volcanoes NP</b> 123,100 acres recommended  Revised Recommendation 130,950 acres	P. L. 95- 625 11/10/1978 130,950 acres	Nothing	Enacted as recommende d in May 1978 revision
4/29/71	NPS	MI	<b>Isle Royale NP</b> 120,588 acres recommended	P. L. 94- 567 10/20/1976 132,111 acres	Nothing	Enacted more acres than recommende d
11/28/73  No agency	NPS	CA	<b>Joshua Tree NP</b> 405,800 recommended	P. L. 94- 567 10/20/76 467,240	Nothing	Enacted more acres than recommende d

recommendation  Proposal not formally sent to Hill			No recommendation  GMP Amendment of 2000 recommended 9,060 acres wilderness and a study area of 27,000 acres	P. L. 103-433 10/31/1994 131,780 acres  P.L. 111-11 3/30/2009 80,000 acres		No agency recommendation for lands added to park in 1994;  Enacted more acres than proposed in GMP of 2000
Not sent to Hill  12/4/74  Not sent to Hill	NPS	AZ-NV	<b>Lake Mead NRA</b> 717,300 proposed by Secretary of the Interior to President 9/10/74  Message from Gerald Ford to Speaker requests deferment of any congressional action, due to pending national need for electric power  NPS prepares revised map dated January 1978 with 680,780 acres proposed. Decrease in acreage from 1974 may reflect transfer of Colorado River gorge lands from Lake Mead NRA to Grand Canyon NP under the Grand Canyon Enlargement Act	P. L. 107-282 11/6/2002 184,439 acres	532,300 acres  496,341 acres of proposed wilderness remain	Enacted wilderness proposals located only in the Nevada portion of the NRA  Remaining proposed wilderness is found almost entirely in either the Arizona portion of the NRA, or east of the Virgin River/north of the Colorado River (Lake Mead) in the Nevada

			of January 3, 1975			portion of the NRA  See Table No. 4 – Proposed Wilderness
4/1/68	NPS	CA	<b>Lassen Volcanic NP</b> 73,333 acres recommended	P. L.92-510 10/19/1972 78,982 acres	Nothing	Enacted more acres than recommended
4/1/68	NPS	CA	<b>Lava Beds NM</b> 9,197 acres recommended	P.L.92-493 10/13/1972 18,460 acres	Nothing	Enacted more acres than recommended
11/28/73	NPS		<b>Mesa Verde NP</b> 8,100 acres recommended	94-567 10/20/1976 8,100 acres	Nothing	Enacted as recommended
No agency recommendation	NPS	CA	<b>Mojave NP</b> No recommendation	P. L. 103-433 10/31/1994 695,200 acres	Nothing	No agency recommendation
Date ?  5/11/78	NPS	WA	<b>Mt. Rainier NP</b> 210,700 acres Recommended  Revised Recommendation 208,165	P. L. 100-668 11/16/1988 216,855 acres	Nothing	Enacted more acres than recommended in original AND revised recommendations
4/29/71  5/11/78	NPS	WA	<b>North Cascades NP, Ross Lake and Lake Chelan NRAs</b> 515,880 acres recommended  Revised Recommendation 538,628	P. L. 100-668 11/16/1988 639,840	Nothing	Enacted more acres than recommended in original AND revised recommendations
6/13/74	NPS	WA	<b>Olympic NP</b> 862,139 acres recommended	P. L. 100-668 11/16/1988	Nothing	Enacted more acres than

5/11/78			Revised Recommendation 864,064	877,047 acres		recommended in original AND revised recommendations
Date ?  5/11/78	NPS	AZ	<b>Organ Pipe Cactus NM</b> 299,600 acres recommended  Revised Recommendation 313,840	P.L. 95-625 11/10/1978 313,840 acres	Nothing	Enacted as recommended in May 1978 revision
4/1/68	NPS	AZ	<b>Petrified Forest NP</b> 50,260 acres	P.L. 91-504 10/23/1970 50,260 acres	Nothing	Enacted as recommended
Proposal not formally sent to Hill	NPS	MI	<b>Pictured Rocks NL</b> 11,739 acres	P.L. 111-11 3/30/2009 11,740 acres	Nothing	Enacted as NPS study proposed
6/13/74	NPS	CA	<b>Pinnacles NP</b> 11,300 acres	P.L. 94-567 10/20/1976 13,942 acres  P.L. 107-370 12/19/2002 2,715 acres	Nothing	Enacted more acres than recommended  No agency recommendation
11/28/73	NPS	CA	<b>Point Reyes NS</b> 25,500 acres	P.L. 94-544 and P.L. 94-567 10/18/1976 and 10/20/1976 33,373 acres	Nothing	Enacted more acres than recommended
6/13/74	NPS	CO	<b>Rocky Mountain NP</b> 240,314 (wilderness	P.L. 96-560 12/22/1980 2,917 acres	Nothing	Land exchange with Forest Service

5/11/78			239,835 and potential 479)  Revised Recommendation 240,314 acres (240,030/284)	P.L. 111-11 3/30/2009 249,339 acres		placed part of Indian Peaks Wilderness in park; no agency recommendation  Enacted more acres than recommended
11/28/73	NPS	AZ	<b>Saguaro NP</b> 69,500 acres	P.L. 94-567 10/20/1976 71,400 acres	Nothing	Enacted more acres than recommended
6/13/74  5/11/78	NPS	CA	<b>Sequoia/Kings Canyon NPs</b> 721,970 acres  Revised Recommendation 809,450	P.L. 98-425 9/28/1984 737,080 acres  P.L. 111-11 3/30/2009 85,056 acres	Nothing	Enacted fewer acres than recommended in May 1978 revision  No agency recommendation
4/29/71	NPS	VA	<b>Shenandoah NP</b> 73,280 acres	P.L. 94-567 9/28/1976 79,579 acres	Nothing	Enacted more acres than recommended
Not sent to Hill	NPS	MI	<b>Sleeping Bear Dunes NL</b> 23,775 acres proposed 7,128 acres	P.L. 113-87 3/13/2014 32,557 acres	Nothing	Park established October 1970. Contains

<p>October 22, 1982</p>		<p>proposed potential Total 30,903 acres Map No. 634-20,018C January 1981.</p> <p>P.L. 97-361 Congress mandated that the President submit recommendation to Congress by June 1, 1983.</p>			<p>over 57,000 acres of Federal lands. The enabling act required that the NPS submit a wilderness recommendation to the President by October 21, 1974. NEVER DONE.</p>
<p>March 16, 1987</p>		<p>Congress mandated that the NPS manage as wilderness areas recommended as wilderness, depicted on the January 1981 map “until Congress determines otherwise.”</p>			<p>NPS/DOI sent recommendation to the President in 1983. NOT SENT TO CONGRESS .</p>
<p>January 2009 Transmitted to OMB. Not sent to Hill.</p>		<p>Notice of Interim Wilderness Management in Federal Register.</p> <p>New proposal of 33,600 acres superseded 1981 proposal.</p>		<p>33,600 acres</p>	<p>Unique example of statutory (not just policy) protection for NPS recommended wilderness.</p>

						NPS concluded a new GMP. A new Wilderness Study accompanied the GMP. The NPS conducted formal public hearings on the Wilderness Study. The NPS proposed 33,600 acres reconfigured wilderness.
Date ?  5/11/78	NPS	ND	<b>Theodore Roosevelt NP</b> 28,335 acres  Revised Recommendation 29,920	P.L. 95-625 9/10/1978 29,920 acres	Nothing	Enacted as recommended in May 1978 revision
Date ?  6/13/74	NPS	CA	<b>Yosemite NP</b> 646,821 acres	P.L. 98-425 9/28/1984 681,150 acres	Nothing	Enacted more acres than recommended
5/11/78			<b>Zion NP</b> 129,660 acres  Revised Recommendation 130,984 acres	P.L. 111-11 3/30/2009 124,406		Enacted fewer acres than recommended



## TABLE NO. 2

### ALASKA PARKS

On December 2, 1980, the President signed into law the Alaska National Interest Lands Conservation Act (ANILCA), P.L. 96-487. The law vastly expanded three existing national park system areas in Alaska and established 10 new areas. Section 701 of ANILCA designated nearly 33 million acres of wilderness in 8 national park system areas in Alaska. ANILCA, Section 1317 (16 U.S.C. 3205), required that the Secretary study the undesignated national park system lands for wilderness suitability by December 1985 and that the President make a recommendation to Congress by December 1987.

The NPS conducted wilderness studies and prepared Environmental Impact Statements for all 13 Alaska parks enlarged or established by ANILCA. The NPS EIS found 16,898,774 additional acres were fully qualified as wilderness. In the late 1980's, dictates from then Assistant Secretary of the Interior William Horn reduced the NPS' preferred alternative to 7.1 million acres. The NPS held formal public hearings on the proposals. After public review, Horn's acting successor, Susan Reece, further reduced the area that would be recommended to 4.6 million acres. However, the Secretary of the Interior never made a formal recommendation to the President, nor the President to Congress as required by ANILCA. The "wilderness qualified" acres thus remain as the lands that the NPS manages as wilderness, as a matter of Management Policies.

Note: This Table cites the wilderness acreages as enacted by ANILCA. The acreages were approximations only. On September 30, 1992 the NPS published legal descriptions of the Alaska wilderness areas in the FEDERAL REGISTER. The published legal descriptions concluded that the number of acres differed from the rough approximations made by ANILCA.

<b>DATE Reco- mmendati on Sent to Hill</b>	<b>AGENCY</b>	<b>STATE</b>	<b>DOI/PRESIDE NTIAL RECOMMEND ATION</b>	<b>DESIGNATED by Public Law # on Date, Number of Acres</b>	<b>PENDING</b>	<b>NOTES</b>
NA	NPS	AK	<b>Aniakchak NM and NPr -</b> No proposal or recommendation transmitted	None	602,779 acres are qualified	
N/A	NPS	AK	<b>Bering Land Bridge NPr -</b> No proposal or recommendation transmitted	None	2,690,179 acres are qualified	
N/A	NPS	AK	<b>Cape Krusenstern NM -</b> No	None	633,587 acres are qualified	

			proposal or recommendation transmitted			
Date ?	NPS	AK	<b>Denali NP and NPr</b> – Unclear if recommendation made for original Mt. McKinley NP. No proposal or recommendation transmitted for other lands.	P.L. 96-487 12/2/80 1,900,000 acres in ANILCA. NPS recalculated as 2,124,783 acres	3,726,343 acres qualified	
N/A	NPS	AK	<b>Gates of the Arctic NP and NPr</b> – No proposal or recommendation transmitted	P.L. 96-487 12/2/80 7,052,000 acres in ANILCA. NPS recalculated as 7,167,192 acres	1,052,561 acres qualified	
Date ?	NPS	AK	<b>Glacier Bay NP and NPres</b> – Unclear if recommendation made for original monument. No proposal or recommendation transmitted for other lands.	P.L. 96-487 12/2/80 2,770,000 acres in ANILCA. NPS recalculated as 2,664,876 acres	62,790 acres qualified	
6/13/74	NPS	AK	<b>Katmai NP and NPr</b> – 2,603,547 acres recommended for original monument. No proposal or recommendation transmitted for other lands	P.L. 96-487 12/2/80 3,473,000 acres in ANILCA. NPS recalculated as 3,384,358 acres	643,448 acres qualified	
N/A	NPS	AK	<b>Kenai Fjords NP</b> – No proposal or recommendation transmitted	None	668,165 acres qualified	

N/A	NPS	AK	<b>Kobuk Valley NP</b> – No proposal or recommendation transmitted	P.L. 96-487 12/2/80 190,000 acres in ANILCA. NPS recalculated as 174,545	1,494,500 acres qualified	
N/A	NPS	AK	<b>Lake Clark NP and NPr</b> – No proposal or recommendation transmitted	P.L. 96-487 12/2/80 2,470,000 acres in ANILCA NPS recalculated as 2,619,550	1,240,820 acres qualified	
N/A	NPS	AK	<b>Noatak NPr</b> – No proposal or recommendation transmitted	P.L. 96-487 12/2/80 5,800,000 acres in ANILCA. NPS recalculated as 5,765,427 acres	757,175 acres qualified	
N/A	NPS	AK	<b>Wrangell-St. Elias NP and NPr</b> – No proposal or recommendation transmitted	P.L. 96-487 12/2/80 8,700,000 acres in ANILCA	3,174,000 acres qualified	
N/A	NPS	AK	<b>Yukon-Charley Rivers NPr</b> – No proposal or recommendation transmitted	None	2,220,576 acres qualified	

### TABLE NO. 3

#### PRESIDENTIAL WILDERNESS RECOMMENDATIONS SENT TO, AND PENDING BEFORE, CONGRESS (“RECOMMENDED” WILDERNESS)

This table lists the 17 parks for which various administrations have transmitted formal requests that Congress designate wilderness.

Note 1: The date shown for recommendation is only the date of the last official recommendation. In several cases, the May 11, 1978 recommendation superseded an earlier recommendation and became the official recommendation.

Note 2: This table aggregates both the recommended “wilderness” and recommended “potential wilderness” into a single number and then shows the breakdown of each in parentheses.

<b>DATE Recommendation Sent to Hill)</b>	<b>AGENCY</b>	<b>STATE</b>	<b>DOI/PRESIDENTIAL RECOMMENDATION</b>	<b>DESIGNATED Public Law # Date Acres</b>	<b>PENDING</b>	<b>NOTES</b>
5/11/78	NPS	UT	<b>Arches NP</b> 70,008 acres recommended (61,547/8,461)	None	70,008 acres	Map No. 138-20,014-A January 1978 (Superseded an earlier recommendation of Map No. 138-20,014 October 1974)
12/4/74	NPS	MD	<b>Assateague Island NS</b> 5,200 acres recommended (440/4,760)	None	5,200 acres	Map entitled “Assateague Island Wilderness Proposal,” dated January 1974, revised July 1974
5/11/78	NPS	TX	<b>Big Bend NP</b> 583,000 acres recommended (538,250/44,750)	None	583,000 acres	Map No. 155-20,004-D January 1978 (Superseded an earlier recommenda

						tion of Map No. 155-20004-C January 1973)
5/11/78	NPS	UT	<b>Bryce Canyon NP</b> 20,810 acres recommended (20,810/0)	None	20,810 acres	Map No. 129-20,004- C January 1977 (Superseded an earlier recommenda tion of Map No. 129-20004-B April 1971)
5/23/77	NPS	UT	<b>Canyonlands NP</b> 278,420 acres recommended (260,150/18,270)	None	278,420 acres	Map No. 164-20,015- A October 1974
5/23/77	NPS	UT	<b>Capitol Reef NP</b> 183,865 acres recommended (179,815/4,050)	None	183,865 acres	Map No. 158-20016 October 1974
1/12/76	NPS	UT	<b>Cedar Breaks NM</b> 4,830 acres recommended (4,830/0)	None	4,830 acres	Map No. 154-20,000 May 1973
5/11/78			Reaffirmed earlier recommendation			Same as an earlier recommenda tion
5/11/78	NPS	CO	<b>Colorado NM</b> 14,779 acres recommended (13,842/937)	None	14,779 acres	Map No. 119-20,006- C January 1978 (Superseded an earlier recommenda tion of Map No. 119-20,005 March 1971)
5/11/78	NPS	OR	<b>Crater Lake NP</b>	None	127,058	Map No.

			127,058 acres recommended (127,058/0)		acres	106-20,006-E January 1978 (Superseded an earlier recommendation of Map No. 106-20006-D March 1974)
10/13/91	NPS	ID	<b>Craters of the Moon NM and Pres</b> President recommended Congress designate BLM wilderness in Great Rift Wilderness Study Area (WSA) of 396,696 acres (346,800)	See Table No. 1. NPS estimates that 346,800 of the Great Rift WSA lands recommended as wilderness in 1991, are now within Craters of the Moon	346,800 acres	
5/11/78	NPS	KY-VA-TN	<b>Cumberland Gap NHP</b> 14,091 acres recommended (12,191/1,900)	None	14,091 acres	Map No. 380-20,026-C January 1978 (Superseded an earlier recommendation of Map No. 380-40,001-A August 1972)
5/11/78	NPS	CO-UT	<b>Dinosaur NM</b> 210,727 acres recommended (205,672/5,055)	None	210,727 acres	Map No. 122-20,009-B January 1978 (Superseded an earlier

						recommenda tion of Map No. 122-20099 June 1974)
4/18/02	NPS	NM	<b>El Malpais NM</b> 97,428 acres recommended (82,267/11,161)	None	97,428 acres	Map No. 103/20,020B July 1990
6/13/74	NPS	MT	<b>Glacier NP</b> 930,910 acres recommended (927,550/3,360)	None	930,910 acres	Map No. 117-20,010- A March 1974
5/11/78			Reaffirmed earlier recommendation			Same as earlier recommenda tion
5/11/78	NPS	WY	<b>Grand Teton NP</b> 143,454 acres recommended (122,604/20,850)	None	143,454 Acres	Map No. 136-20,013- A January 1978 (Superseded an earlier recommenda tion of Map No. 136-20005-B July 1972)
12/4/74	NPS	NC- TN	<b>Great Smoky Mtns. NP</b> 390,900 acres recommended (390,500/400)	None	390,900 acres	Map No. 133-20,003A June 1974
5/11/78			Revised proposal sent to Secretary BUT not to Congress: 425,384 acres and 52,286 potential  Message to Congress requests a			Map 133- 20,003B January 1978

			delay in enactment until dispute over a road in park (North Shore Road) is resolved			
5/11/78	NPS	MT-WY	<b>Yellowstone NP</b> 2,032,721 acres recommended (2,032,721/0)	None	2,032,171 acres	Map No. 101-20,005-A January 1978 (Superseded an earlier recommendation of Map No. 101-20004-A July 1972)



## TABLE NO. 4

### NPS WILDERNESS PROPOSALS DEVELOPED BUT NOT SENT TO CONGRESS (“PROPOSED” WILDERNESS)

There are seven parks that Congress required the NPS to develop a wilderness recommendation, and for which a recommendation has yet to arrive at Congress. The wilderness review history of those parks follows.

Note: There are several parks for which Congress required wilderness review but that do not appear on this chart because the NPS has not initiated any wilderness review and has yet to develop a wilderness proposal.

DATE Recommendation Sent to Hill)	AGENCY	STATE	DOI/PRESIDENTIAL PROPOSAL	DESIGNATED Public Law # Date Acres	ROAD-LESS ACRES	NOTES
Proposal not sent to DOI, Pres. or Hill	NPS	MT-WY	<b>Bighorn Canyon NRA</b> 8,108 acres proposed (Roadless area “A” only) Map No. 817-20037 March 1981	None	NPS study found 41,871 acres of roadless lands in 6 separate areas (Areas “A through F”)	Park established October 1966. Park is 120,296 acres. Federal acres are 68,490. NPS study disqualified Roadless Areas because of grazing and 67 pre-existing mining claims. Mining claims have long expired.
Proposal not sent to DOI, Pres. or Hill	NPS	NC	<b>Cape Lookout NS</b> 2,990 acres proposed 2 acres proposed potential Total 2,992 acres (Shackleford Banks only) Map No. 623-20,050D	None	19,990 roadless area acres; land and water.	Park established March 1966. Park is 28,243 acres. Land acres only 8,741 acres. NPS study disqualified

			July 1985			large roadless area of Core Banks so that Off-Road Vehicle use could continue unimpeded. First things first!
Proposal not sent to Pres. or Hill	NPS	UT	<p><b>Glen Canyon NRA</b> 588,855 acres proposed 48,955 proposed potential Total 637,810 acres Map No. 608-40,067B, February 1980.</p> <p>NPS study excluded 27,640 acres of State of Utah lands that are now Federal under Utah School Lands Improvement Act of October 1, 1993.</p>	None	1,152,740 roadless acres	Park established in October 1972. The park contains 1,239,000 acres of Federal lands, includes surface waters overlying Federal lands. Enabling act required NPS to study Glen Canyon for suitability and conducted public hearings. The law required that the NPS submit the determination of suitability to the President

						by October 27, 1974. NPS submitted proposal to the Secretary of the Interior on November 6, 1980. Assistant Secretary concurred on November 7, 1980. The Secretary never transmitted it to the President or to Congress.
Proposal not sent to Pres. or Hill	NPS	AZ	<p><b>Grand Canyon NP</b>  980,088 acres proposed  131,814 acres proposed potential  Total 1,111,902 acres  Map No. 113-40,047B  August 1980  Submitted to Secretary by NPS Director 9/11/80  Assistant Secretary signed 9/15/80</p> <p>A 1980 in-park revision proposed 1,109,257 acres as wilderness and 29,820 acres as</p>	None	1,139,077 roadless acres  The Colorado River corridor of 240 free-flowing miles proposed as potential wilderness in 1980 and 1993 proposals due to	Park established February 1919. Significant expansion in January 1975. Expansion Act amended in June 1975 required NPS submit a new wilderness recommendation to President for the reconfigured park by January 3, 1977. Not

			potential for a total of 1,139,077. Revision accounts for land acquisitions, inclusion of Havasupai Use lands and Navajo Trust Lands within park boundary.		operation of motorboats	yet done.
Proposal not sent to Hill	NPS	AZ-NV	<p><b>Lake Mead NRA</b> 712,100 proposed 5,200 potential wilderness Total 717,300 proposed by Secretary of the Interior to President 9/10/74 Map No. 602-20,005 July 1974</p> <p>Message from Gerald Ford to Speaker requests deferment of any congressional action, due to pending national need for electric power</p> <p>NPS prepares revised map with 680,780 acres (418,655/262,125) proposed. Map No. 602-20,000G January 1978. Decrease in acreage from 1974 may reflect</p>		532,300 acres would remain but that figure reflects 1974 proposal / boundaries altered by Grand Canyon Act of January 1975	Park established October 1964. Land area 1,314,516 acres.
12/4/74						
January 1978 not sent to Hill				P. L. 107-282 11/6/2002 184,439 acres	496,341 acres of proposed wilderness remain. Hard to determine	Enacted wilderness proposals located only in the Nevada portion of the NRA. Remaining proposed wilderness is found almost

			transfer of Colorado River gorge lands from Lake Mead NRA to Grand Canyon NP under the Grand Canyon Enlargement Act of January 3, 1975. Proposal not sent to President.		amount of wilderness or potential wilderness due to the partial designation of 11/2002.	entirely in either the Arizona portion of the NRA, or east of the Virgin River/north of the Colorado River (Lake Mead) in the Nevada portion of the NRA
Not sent to Hill	NPS	MN	<b>Voyageurs NP</b> 87,736 acres proposed 3,917 proposed potential Total 91,653 acres Map No. 172-40,108A April 1982	None	127,436 acres	Park authorized in January 1971; established April 8, 1975. Land area, almost entirely Federal, 134,246 acres. Enabling act requires that the NPS submit recommendation to the President by April 8, 1979. NOT DONE
1991/92			Court Order(s)			
Not sent to Hill			New proposal: 124,994 acres proposed 2,442 acres proposed potential Total 127,436 acres Map No. 172-40,057A; April 1992			NPS ordered to produce a wilderness recommendation for submittal to the President by July 14,

						1992. President never sent recommendation to Congress.
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**TABLE NO. 5**

**NPS DETERMINATIONS OF PARK WITH NO SUITABLE ACRES – 9 PARKS**

During more than forty-five years of wilderness review, the NPS has concluded that 10 parks contain no areas suitable as wilderness. The first such recommendation was made to Congress in 1971 for Chaco Canyon National Monument (now Chaco Culture National Historical Park). In the beginning, the Executive Branch transmitted these conclusions to Congress. In later years, the Executive appears to have failed to transmit messages to Congress about a park’s absence of wilderness suitable lands. The reasons given for some of the nonsuitable recommendations have since been invalidated by facts on the ground and/or by changes in Management Policies. Nine of the parks are, in some ways, the forgotten wilderness reviews. The chart reveals a lack of some basic facts that would probably require a search of old park files. Perhaps, knowledgeable individuals may supply the missing data. The most recent park is New River Gorge where the NPS determined that no lands were eligible in 2009. In 2013, the NPS reversed itself and found that thousands of acres of Wupatki National Monument were eligible as wilderness. Thus, that park has been moved from Table 5 to Table 6.

<b>DATE Recommendation Sent to Hill</b>	<b>AGENCY</b>	<b>STATE</b>	<b>DOI/PRESIDENTIAL RECOMMENDATION</b>	<b>DESIGNATED Public Law # Date Acres</b>	<b>PENDING</b>	<b>NOTES</b>
Not sent to Hill  10/11/74  8/79  1990	NPS	FL	<b>Big Cypress NP</b> NPS 1979 study finds no lands suitable as wilderness.  P.L. 93-440 established park and required a report to the President on wilderness suitability or nonsuitability by October 11, 1979.	None	Almost entire area roadless. NPS Map No. unknown.	Park established in 1974; approximately 570,000 acres.  NPS study finds no suitable acres due to nonfederal oil and gas rights, ORV use and inholdings. NPS pledged to restudy

4/29/88						area in five years. No record that NPS report ever sent to President.
6/2002			P.L. 100-301 adds approximately 146,000 acres to Preserve and required a report to the President on wilderness suitability by April 29, 1993.		238,000 acres found suitable in old Preserve	1990 GMP concluded that 1979 finding still valid for original Preserve.
2006			Park Superintendent sends a suitability assessment to Regional Director		; 128,600 in Addition	
12/2011			NPS Draft GMP for Big Cypress Addition		Finds 109,000 acres as suitable	Regional Director Hooks declined to send to Director, on June 25, 2002; leaving statutory requirement of 4/88 unmet.
			Final GMP finds only 79,000 eligible acres and proposes that 46,000 acres be made wilderness. This episode is in litigation at the time of this report.		79,000 eligible acres	Now under formal study.
Not sent to Hill	NPS	TX	<b>Big Thicket NPres.</b> NPS finds no lands suitable as wilderness.	None	NPS Study found lands within 5 units to	Park established 1974, expanded 1996; approximatel



<p>10/11/74</p> <p>12/80</p>			<p>P.L. 93-439 established park and required a report to the President on wilderness suitability or nonsuitability by October 11, 1979.</p>		<p>be “wilderness objective areas” of 60,000 acres. (Beaumont Lance Rosier, Big Sandy Crk, Beech Crk, Neches-Jack Gore) Maps No: 175-20,059C 20,061C 20,084C 20,067B 20,069B November 1980</p>	<p>y 98,000 acres.</p> <p>NPS finding based upon existence of privately-owned oil and gas rights.</p> <p>No record that NPS/DOI report was sent to the President.</p> <p>Wilderness Study states that wilderness objective areas “are to be restudied in the future for possible wilderness designation.” NEVER RESTUDIED</p>
<p>Not sent to Hill</p> <p>6/28/80</p>	<p>NPS</p>	<p>FL</p>	<p><b>Biscayne NP</b> NPS finds no lands suitable as wilderness.</p> <p>P.L. 96-287 enlarged and renamed a “national park.” Required a recommendation of</p>	<p>None</p>	<p>NPS study of 5/83 found only several small keys as “possibly eligible.” Arsenicker Keys, keys</p>	<p>Park established 1968, approximately 172,000 acres, only 4,600 acres of land.</p> <p>Congress intended that wilderness review should also</p>

7/19/83			suitability or nonsuitability be submitted to President and Congress by Sept 30, 1983.		south of Caesar Creek, Elliot Key, Sands Key. Acreage s unknown. Map No. 169-20,026A Dec 1982	<p>consider aquatic and submerged resources. (Dec 7, 1979 – House Report)</p> <p>NPS study. NPS recommendation based upon a finding that nearby spatial, visual and acoustic motorized activity and development “is not conducive to an experience of solitude” therefore not suitable as wilderness.</p> <p>No record that the NPS recommendation (signed by Director on July 19, 1983) ever sent to President or Congress.</p>
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Not sent to Hill.  1/3/75	NPS	FL	<p><b>Canaveral NS</b> NPS finds no lands suitable as wilderness.</p> <p>P.L. 93-626 established park and required that Secretary shall report to President recommendation on suitability/nonsuitability as wilderness by 1/3/78.</p>	None	Roadless areas unknown; NPS Map No. unknown.	<p>Park established 1975; approximately 58,000 acres.</p> <p>NPS study of 9/81 finds no suitable lands. Reasons given in study unknown.</p> <p>No record that NPS or Secretary ever sent report to President.</p>
8/28/71  12/19/80	NPS	NM	<p><b>Chaco Canyon NM</b> NPS finds no lands suitable as wilderness.</p> <p>P.L. 96-550</p>	None	Unknown if any roadless areas described. NPS Map No. unknown.	<p>Park established 1907, approximately 21,000 acres. At time of nonsuitability recommendation, NPS was</p>

2004			<p>Expanded and renamed as Chaco Culture NHP</p> <p>Park Superintendent sends a suitability assessment to Regional Director</p>			<p>seeking to reduce size of the park.</p> <p>Park increased to 33,974 acres.</p> <p>19,800 acres found suitable as wilderness. Assessment not sent to Director.</p>
1999	NPS	KY	<p><b>Mammoth Cave NP</b> NPS finds no lands suitable as wilderness</p>	None	<p>NPS study finds 39,185 acres as "roadless" in 4 units. Map No. 135-40,001-A, April 1972</p>	<p>Established 1941, approximately 53,000 acres. NPS recommendation based upon the finding that "Vegetative cover has not recovered sufficiently to resemble its pristine condition; further, man's abandoned works are still generally visible."</p> <p>Secretary commits to President in letter of 8/23/74 to reassess the</p>

2011					<p>wilderness and “report back to Congress at a later date.” NEVER DONE.</p> <p>NPS designates 6.5 miles of single track trail in Roadless Unit “B” as open to bicycles (Sal Hollow Loop). No special regulation adopted to allow bicycle use in violation of NPS rules at 36 CFR 4.30(b).</p> <p>NPS adopts a special rule allowing for the use of mountain bicycles on a specifically constructed trail (Big Hollow Trail) within Roadless Unit “C” as defined in map of April 1972. Sal Hollow Loop</p>
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						closed to bicycles.
Not Sent to Hill  5/27/09	NPS	WVA	<b>New River Gorge NR</b>  NPS finds no lands eligible as wilderness	None		The NPS conducted a wilderness eligibility assessment dated May 27, 2009 and concluded that there were three areas for possible consideration (Glade Creek, Dowdy Creek and Backus Mountain – totaling over 11,000 acres) but that none of the land were eligible because of scars from past coal mining, haul roads, etc..
9/21/72	NPS	TX	<b>Padre Island NS</b> NPS finds no lands suitable as wilderness	None	NPS study finds 108,000 roadless acres. Map No. 613-	Park established in 1962, approximately 130,000 acres.  Preliminary

					20,002, June 1972	NPS study of 10/71 suggests a 43,600 acre wilderness proposal. NPS then recommends none due to subsurface privately owned oil and gas rights.
9/21/72	NPS	NM	<b>White Sands NM</b> NPS finds no lands suitable as wilderness	None	NPS study finds 118,700 roadless acres NPS Map No. unknown.	Park established in 1933, approximately 144,000 acres.  NPS recommendation based upon finding that military tests of aerial vehicles from White Sands Missile Range may accidentally land in park with the need to remove wreckage by motor vehicles or helicopter.

**TABLE NO. 6****PARKS DETERMINED TO HAVE WILDERNESS SUITABLE/ELIGIBLE LANDS IN AN NPS FORMAL PLANNING PROCESS - AWAITING ACTION**

<b>DATE Recommendation Sent to Hill</b>	<b>AGENCY</b>	<b>STATE</b>	<b>NPS DETERMINATIONS</b>	<b>DESIGNATED Public Law # Date Acres</b>	<b>PENDING</b>	<b>NOTES</b>
Not sent to Hill 11/16/04	NPS	TX	<b>Big Bend NP</b> NPS GMP of 2004, Appendix E determined that two units, comprising, 62,700 acres of the North Rosillos Addition were suitable as wilderness. Record of Decision on GMP, including Appendix E, signed 11/16/04. This constitutes a formal NPS determination.	None	NPS assessment finds 62,700 acres suitable	Park authorized in 1935; established in 1944. Wilderness recommended May 11, 1978. North Rosillos unit added to park in 1987.
Not Sent to Hill	NPS	MA	<b>Cape Cod NS</b> On January 10, 2005, U.S. District Court for District of Columbia ordered the NPS to prepare a wilderness suitability assessment for Cape Cod. The NPS prepared a suitability assessment for	None		Park authorized in 1961.  It is unclear how many Federal acres are in the "natural zone."



			<p>Cape Cod on January 6, 2006. The assessment found that the areas zoned as “Natural” in the parks 1998 and current General Management Plan were suitable for further study as wilderness.</p>			
Not Sent to Hill	NPS	GA	<p><b>Fort Pulaski NM</b>  In 2013 the NPS adopted a Final GMP and wilderness assessment for Fort Pulaski. The Record of Decision was signed on September 30, 2013. That assessment determined that 4,500 acres, consisting of undeveloped salt marsh, were eligible as wilderness</p>	None		<p>Fort Pulaski was proclaimed a twenty-acre national monument in 1924. Congress added lands in 1936 and 1959. The monument now encompasses over 5,000 acres of Federal lands.</p>
Not Sent To Hill	NPS	CO	<p><b>Great Sand Dunes NP and Pr</b>  NPS GMP of</p>	None		<p>Monument established in 1911; Congress</p>

			April 2007 studied and held formal hearings on 69,000 acres added in 2000 and concluded that 4,556 acre be recommended as wilderness and 48,457 be recommended as potential wilderness.			designatd wilderness in 1976. Name changed to National Park and Preserve in 2000
Not Sent To Hill	NPS	TX	<b>Guadalupe Mountains NP</b> NPS GMP of June 2103 2004, Appendix D, determined that six units, comprising, 35,484 acres of the 1988 additions and of the original park were eligible as wilderness. Record of Decision on GMP, including Appendix D, signed December 23, 2013. This constitutes a formal NPS determination	None		Park established in 1966, with a significant expansion in 1988. Wilderness designated in 1978.
Not Sent to Hill 6/18/12	NPS	HA	<b>Hawaii Volcanoes NP NM</b> NPS finds over 121,000 acres of 2003 addition lands (150,865 acres) as eligible for wilderness; Over 29,000 acres ineligible because	None	NPS assessme nt finds 121,015 roadless acres eligible NPS Map dated 04/23/20	Park established 1916; several expansions by statute; now over 330,000 acres. Wilderness designated

			of mostly dirt roads.		12	1978.
Not Sent to Hill 2/25/02	NPS	CA	<b>Lassen Volcanic NP</b> NPS GMP of 2002 selects the alternative that “approximately” 25,000 acres be added to existing wilderness. Record of Decision on GMP signed 2/25/02. This constitutes a formal NPS determination.	None	Park manager in 2005 states that the “actual desired wilderness expansion” is 13,151 acres. This figure may have no official weight because it is at wide variance with the GMP/ROD, followed no detectable process	Park established 1907. Wilderness designated in 1972.
X	NPS	MO	<b>Ozark NSR</b> Draft GMP/Wilderness Study closed for comment February 2014. Wilderness Study found 3,434 acres as eligible	None		Park established in 1964
Not Sent to Hill	NPS	AZ	<b>Saguaro NP</b> NPS GMP of	None	NPS assessme	Park established

March 2008			2008, Appendix F, finds 4,716 acres eligible for wilderness. ROD on the GMP Signed March 2008. This constitutes a formal NPS determination.		nt of 2006 finds 4,716 acres suitable as wilderness; in three units in the Tucson Mountain District and 1 district in the Rincon Mountain District.	and expanded by proclamations in 1933 and 1961 with several statutory expansions. Wilderness designated in 1976.
Reported to be in Nixon message to Hill. of 2/8/72	NPS	AZ	<b>Wupatki NM</b> NPS finds no lands suitable as wilderness	None	NPS study finds 18,500 roadless acres NPS Map # 322/2000 0-A Dated November 1969	Park established 1924; several expansions by proclamation or statute; now over 35,000 acres.  NPS recommendation finds that grazing on the lands disqualifies them. (Grazing ended in 1988).
Not Sent to Hill 3/29/13	NPS		NPS finds 34,194 acres out of 35,423 as eligible for wilderness		NPS assessment finds 34,194 roadless acres in 4 units	

					eligible	<i>First, and only park thus far, to reverse a previous finding of no suitable acres!</i>
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## **POSTSCRIPT TO THE TABLES**

Some will notice an absence of particular parks from the six wilderness review tables. First is a class of parks, in existence on the date of enactment of the Wilderness Act (i.e. September 3, 1964), for which the NPS did not conduct a wilderness review or provide a recommendation to Congress. This class includes:

- Acadia NP, Maine (1919- 47,000 acres)
- Cape Hatteras NS, North Carolina (1937 – 30,000 acres)
- Wind Cave NP, South Dakota (1912- 33,000 acres)

Second is a single park, created after the Wilderness Act, whose enabling act requires a wilderness review and for which the NPS has yet to fulfill its statutory obligation. The single park is:

- Channel Islands NP, California (1980 – over 120,000 Federal acres). P.L. 96-199 requires a report to the President by March 3, 1983. The NPS prepared a Draft GMP/EIS/Wilderness Study at the end of 2013 with a preferred alternative that over 66,000 acres (53% of the park's Federal lands) be proposed as wilderness. Not yet made final.

Third is a class of parks, created after the Wilderness Act, that do not fall under the statutory requirement of that Act for wilderness review and whose enabling acts do not require a wilderness review. However, the NPS should conduct a review under Management Policies, Chapter 6. Many, if not all, of the following parks possess roadless tracts of land and/or water but it appears that no review has been conducted for:

- Amistad NRA, Texas (1990 – 58,000 acres land and water surface)
- Big South Fork NRA, Tennessee and Kentucky (1990- 125,000 acres)
- City of Rock NP, Idaho (1988 – 9,000+ Federal acres)
- Delaware Water Gap NRA, Pennsylvania and New Jersey (1965 – 67,000 acres)
- Dry Tortugas NP, Florida (1992 – 64,700 acres, mostly waters)
- Great Basin NP, Nevada (1986 – 77,000 acres)
- John D. Rockefeller Memorial Parkway, Wyoming (1972 – 24,000 acres)
- Redwood NP, California (1968 – 71,000 acres)
- St. Croix NSR, Wisconsin-Minnesota (1968 - nearly 40,000 Federal acres)
- Whiskeytown NRA, California (1965- 42,000 acres)

Lastly, there are parks that Congress has significantly expanded after wilderness was designated in that park. The expansion legislation did not prescribe a wilderness review but NPS Policies call for a review. The NPS has initiated but not yet completed a review for:

- Black Canyon of the Gunnison NP (Additions of 1999 and 2003), CO  
Wilderness review as part of Wilderness Stewardship Plan. Comments closed October 2011. Not yet made final.
- Everglades NP (East Everglades Addition of 1989), Florida (1989 -107,000 acres)  
Draft Wilderness Study released in February 2013 with 90,100 acres of wilderness and 9,900 acres of potential wilderness. GMP not yet adopted