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 nonsuitability 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 the 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 20th) 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.

<table>
<thead>
<tr>
<th>DATE Recommendatio</th>
<th>AGENCY</th>
<th>STATE</th>
<th>DOI/PRESIDENTIAL RECOMMENDATION</th>
<th>DESIGNATED by</th>
<th>PENDING</th>
<th>NOTES</th>
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<tr>
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<td>Park/Site</td>
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<td>Acres Recommended</td>
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<tr>
<td>9/21/72</td>
<td>NPS</td>
<td>WI</td>
<td>Apostle Islands NS</td>
<td>33,500 acres</td>
<td>33,500 acres</td>
<td>P.L. 108-447</td>
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<td>9/21/72</td>
<td>NPS</td>
<td>SD</td>
<td>Badlands NP</td>
<td>58,924 acres</td>
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<tr>
<td>11/28/73</td>
<td>NPS</td>
<td>NM</td>
<td>Bandelier NM</td>
<td>21,110 acres</td>
<td>23,267 acres</td>
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<td>Buffalo NR</td>
<td>36,000 acres</td>
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<td>9/21/72</td>
<td>NPS</td>
<td>NM</td>
<td>Carlsbad Caverns NP</td>
<td>30,530 acres</td>
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<td>2/8/72</td>
<td>NPS</td>
<td>AZ</td>
<td>Chiricahua NM</td>
<td>9,442 acres</td>
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<tr>
<td>Date ?</td>
<td>NPS</td>
<td>SC</td>
<td><strong>Congaree NP</strong></td>
<td>Unknown acreage recommended</td>
<td>P. L. 100-524</td>
<td>10/24/1988</td>
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<tr>
<td>4/1/68</td>
<td>NPS</td>
<td>ID</td>
<td><strong>Craters of the Moon NM and Preserve</strong></td>
<td>Unknown acreage recommended in 1968</td>
<td>P. L. 91-504</td>
<td>10/23/1970</td>
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<tr>
<td>10/18/91</td>
<td>NPS</td>
<td>ID</td>
<td>Presidents recommend 396,696 acres of BLM Great Rift WSA to Congress.</td>
<td>Presidential Proclamation 7373 adds 410,000 BLM acres to Monument, including much of the Great Rift WSA.</td>
<td>NPS estimates that 346,800 of the Great Rift WSA lands recommended as wilderness in 1991, are now in the Craters of the Moon</td>
<td>346,800 acres</td>
</tr>
<tr>
<td>11/9/00</td>
<td>NPS</td>
<td>GA</td>
<td><strong>Cumberland Island NS</strong></td>
<td>19,586 acres Recommended</td>
<td>P. L. 97-250</td>
<td>10/8/1982</td>
</tr>
<tr>
<td>Date ?</td>
<td>NPS</td>
<td>NV/CA</td>
<td><strong>Death Valley NP</strong></td>
<td>1,980,000 acres Recommended</td>
<td>P. L. 103-433</td>
<td>Nothing</td>
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<tr>
<td>Date</td>
<td>Service</td>
<td>Location</td>
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<tr>
<td>7/8/10</td>
<td>NPS</td>
<td>Original Monument</td>
<td>NPS</td>
<td>Recommended</td>
<td>3,164,878 acres</td>
<td>10/31/1994</td>
</tr>
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<td>12/4/74</td>
<td>NPS</td>
<td>FL Everglades NP</td>
<td>Revised</td>
<td>Recommended</td>
<td>1,296,500 acres</td>
<td>11/10/1978</td>
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<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>NY Fire Island NS</td>
<td>Recommended</td>
<td>1,347 acres</td>
<td>1,378,400 acres</td>
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<tr>
<td>9/21/72</td>
<td>NPS</td>
<td>CO Great Sand Dunes NM</td>
<td>Unknown acreage</td>
<td>Recommended</td>
<td>34,120 acres</td>
<td>P.L. 94-567</td>
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</table>

- **NPS recalculati on** determines that 3,202,456 acres are wilderness and 118 acres potential wilderness.
- Recommende d in original Monument; enacted much more on lands added to park in 1994.
<table>
<thead>
<tr>
<th>Date</th>
<th>Agency</th>
<th>State</th>
<th>Park Name</th>
<th>Acres Recommended</th>
<th>Acres Enacted</th>
<th>Recommendation Changes</th>
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<tr>
<td>9/21/72</td>
<td>NPS</td>
<td>TX</td>
<td>Guadalupe Mts. NP</td>
<td>46,850 acres</td>
<td>P. L. 95-625</td>
<td>11/10/1978 46,850 acres</td>
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<td></td>
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<td>Revised Recommendation 56,449 acres</td>
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<td>5/11/78</td>
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<td>Enacted fewer acres than May 1978 revised recommendation; same acres as original recommendation</td>
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<tr>
<td>Date ?</td>
<td>NPS</td>
<td>MI-FL</td>
<td>Gulf Islands NS</td>
<td>3,592 acres</td>
<td>P. L. 95-625</td>
<td>11/10/1978 4,600 acres</td>
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<td>Revised Recommendation 4,592 acres</td>
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<td>5/11/78</td>
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<td>Enacted slightly more acres than May 1978 revised recommendation</td>
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<tr>
<td>9/21/72</td>
<td>NPS</td>
<td>HI</td>
<td>Haleakala NP</td>
<td>24,770 acres</td>
<td>P.L. 94-567</td>
<td>10/20/1976 24,770 acres</td>
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<td>Revised Recommendation 130,950 acres</td>
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<td></td>
<td></td>
<td></td>
<td>Enacted as recommended</td>
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<td>12/4/74</td>
<td>NPS</td>
<td>HI</td>
<td>Hawaii Volcanoes NP</td>
<td>123,100 acres</td>
<td>P. L. 95-625</td>
<td>11/10/1978 130,950 acres</td>
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<td>Enacted as recommended in May 1978 revision</td>
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<td>Enacted more acres than recommended</td>
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<td>11/28/73</td>
<td>NPS</td>
<td>CA</td>
<td>Joshua Tree NP</td>
<td>405,800 acres</td>
<td>P. L. 94-567</td>
<td>10/20/76 467,240</td>
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<td>Revised Recommendation 467,240</td>
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<td>Enacted more acres than recommended</td>
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<tr>
<td>Date</td>
<td>Agency</td>
<td>Location</td>
<td>Land Area Information</td>
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<tr>
<td>12/4/74</td>
<td>NPS</td>
<td>AZ-NV</td>
<td>Lake Mead NRA 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.</td>
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<tr>
<td>10/31/1994</td>
<td>P. L. 103-433</td>
<td>9,060 acres</td>
<td>GMP Amendment of 2000 recommended 9,060 acres wilderness and a study area of 27,000 acres.</td>
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<tr>
<td>3/30/2009</td>
<td>P.L. 111-11</td>
<td>80,000 acres</td>
<td>No recommendation</td>
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<tr>
<td>11/6/2002</td>
<td>P. L. 107-282</td>
<td>532,300 acres</td>
<td>Enacted wilderness proposals located only in the Nevada portion of the NRA.</td>
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<tr>
<td>11/6/2002</td>
<td>P. L. 107-282</td>
<td>496,341 acres</td>
<td>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.</td>
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<tr>
<td>Date</td>
<td>Agency</td>
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<td>Proposed Acres</td>
<td>Revisions</td>
<td>Enacted Acres</td>
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<tr>
<td>4/1/68</td>
<td>NPS</td>
<td>CA</td>
<td>Lassen Volcanic NP</td>
<td>73,333</td>
<td>10/19/1972</td>
<td>78,982</td>
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<td>4/1/68</td>
<td>NPS</td>
<td>CA</td>
<td>Lava Beds NM</td>
<td>9,197</td>
<td>10/13/1972</td>
<td>18,460</td>
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<td>11/28/73</td>
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<td>Mesa Verde NP</td>
<td>8,100</td>
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<td>NPS</td>
<td>CA</td>
<td>Mojave NP</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date ?</td>
<td>NPS</td>
<td>WA</td>
<td>Mt. Rainier NP</td>
<td>210,700</td>
<td>11/16/1988</td>
<td>216,855</td>
</tr>
<tr>
<td>6/13/74</td>
<td>NPS</td>
<td>WA</td>
<td>Olympic NP</td>
<td>862,139</td>
<td>11/16/1988</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>NPS</td>
<td>State</td>
<td>Location</td>
<td>Acres Recommended</td>
<td>Acres Enacted</td>
<td>Outcome</td>
</tr>
<tr>
<td>------------</td>
<td>----------</td>
<td>-------</td>
<td>-----------------------</td>
<td>-------------------</td>
<td>--------------</td>
<td>-------------------------------------------------------------</td>
</tr>
<tr>
<td>5/11/78</td>
<td>Revised</td>
<td></td>
<td>Organ Pipe Cactus NM</td>
<td>299,600</td>
<td>313,840</td>
<td>Enacted as recommended in May 1978 revision</td>
</tr>
<tr>
<td>5/11/78</td>
<td>Revised</td>
<td>AZ</td>
<td>Pictured Rocks NL</td>
<td>11,739</td>
<td>11,740</td>
<td>Nothing Enacted</td>
</tr>
<tr>
<td>4/1/68</td>
<td>Revised</td>
<td>MI</td>
<td>Pinnacles NP</td>
<td>11,300</td>
<td>13,942</td>
<td>More acres than recommended</td>
</tr>
<tr>
<td>11/28/73</td>
<td>Revised</td>
<td>CA</td>
<td>Point Reyes NS</td>
<td>25,500</td>
<td>33,373</td>
<td>Enacted more acres than recommended</td>
</tr>
<tr>
<td>6/13/74</td>
<td>Revised</td>
<td>CO</td>
<td>Rocky Mountain NP</td>
<td>240,314 (wilderness)</td>
<td>2,917</td>
<td>No action recommended</td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>State</td>
<td>Park/Region</td>
<td>Acres Proposed</td>
<td>Acres Enacted</td>
<td>Recommendation</td>
</tr>
<tr>
<td>------------</td>
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<td>-------</td>
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<td>----------------</td>
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<td>----------------</td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>AZ</td>
<td>Saguaro NP</td>
<td>69,500 acres</td>
<td>P.L. 94-567</td>
<td>P.L. 94-567</td>
</tr>
<tr>
<td>6/13/74</td>
<td>NPS</td>
<td>CA</td>
<td>Sequoia/Kings Canyon NPs</td>
<td>809,450 acres</td>
<td>P.L. 111-11</td>
<td>P.L. 111-11</td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>VA</td>
<td>Shenandoah NP</td>
<td>73,280 acres</td>
<td>P.L. 94-567</td>
<td>Nothing</td>
</tr>
<tr>
<td>4/29/71</td>
<td>NPS</td>
<td>MI</td>
<td>Sleeping Bear Dunes NL</td>
<td>32,557 acres</td>
<td>P.L. 113-87</td>
<td>Nothing</td>
</tr>
<tr>
<td>Not sent to Hill</td>
<td>NPS</td>
<td>MI</td>
<td>Sleeping Bear Dunes NL</td>
<td>23,775 acres proposed 7,128 acres</td>
<td>P.L. 113-87</td>
<td>Nothing</td>
</tr>
</tbody>
</table>

- **5/11/78**: 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
- **11/28/73**: Enacted more acres than recommended
- **6/13/74**: Enacted fewer acres than recommended in May 1978 revision
- **5/11/78**: No agency recommendation
- **4/29/71**: Park established October 1970. Contains
<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
<th>Acres</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 22, 1982</td>
<td>Proposed potential total 30,903 acres Map No. 634-20,018C January 1981.</td>
<td>30,903</td>
<td>NPS/DOI sent recommendation to the President in 1983. NOT SENT TO CONGRESS.</td>
</tr>
<tr>
<td>March 16, 1987</td>
<td>P.L. 97-361 Congress mandated that the President submit recommendation to Congress by June 1, 1983.</td>
<td>30,903</td>
<td>NPS/DOI sent recommendation to the President in 1983. NOT SENT TO CONGRESS.</td>
</tr>
<tr>
<td>January 2009</td>
<td>Congress mandated that the NPS manage as wilderness areas recommended as wilderness, depicted on the January 1981 map “until Congress determines otherwise.”</td>
<td>33,600</td>
<td>Unique example of statutory (not just policy) protection for NPS recommended wilderness.</td>
</tr>
<tr>
<td></td>
<td>Notice of Interim Wilderness Management in Federal Register.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>New proposal of 33,600 acres superseded 1981 proposal.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>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.</td>
<td>57,000</td>
<td></td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>Date</th>
<th>NPS</th>
<th>ND</th>
<th><strong>Theodore Roosevelt NP</strong></th>
<th>Acres</th>
<th>P.L. Date</th>
<th>Acres</th>
<th>Action</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>ND</td>
<td><strong>Theodore Roosevelt NP</strong></td>
<td>28,335 acres</td>
<td>P.L. 95-625</td>
<td>29,920 acres</td>
<td>Nothing</td>
<td>Enacted as recommended in May 1978 revision</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Revised Recommendation</td>
<td>29,920</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6/13/74</td>
<td>NPS</td>
<td>CA</td>
<td><strong>Yosemite NP</strong></td>
<td>646,821 acres</td>
<td>P.L. 98-425</td>
<td>681,150 acres</td>
<td>Nothing</td>
<td>Enacted more acres than recommended</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td></td>
<td><strong>Zion NP</strong></td>
<td>129,660 acres</td>
<td>P.L. 111-11</td>
<td>124,406</td>
<td>Enacted fewer acres than recommended</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Revised Recommendation</td>
<td>130,984 acres</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>DATE Recommendation Sent to Hill</th>
<th>AGENCY</th>
<th>STATE</th>
<th>DOI/PRESIDENTIAL RECOMMENDATION</th>
<th>DESIGNATED by Public Law # on Date, Number of Acres</th>
<th>PENDING</th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td>NPS</td>
<td>AK</td>
<td>Aniakchak NM and NPR - No proposal or recommendation transmitted</td>
<td>None</td>
<td>602,779 acres are qualified</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td>Bering Land Bridge NPR - No proposal or recommendation transmitted</td>
<td>None</td>
<td>2,690,179 acres are qualified</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td>Cape Krusenstern NM – No</td>
<td>None</td>
<td>633,587 acres are qualified</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>State</td>
<td>Description</td>
<td>Proposal Date</td>
<td>Acres Recommended</td>
<td>Acres Qualified</td>
</tr>
<tr>
<td>------</td>
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<td>-------</td>
<td>-------------</td>
<td>---------------</td>
<td>------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>?</td>
<td>NPS</td>
<td>AK</td>
<td>Denali NP and NPr</td>
<td>P.L. 96-487 12/2/80</td>
<td>1,900,000 acres in ANILCA. NPS recalculated as 2,124,783 acres</td>
<td>3,726,343 acres qualified</td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td>Gates of the Arctic NP and NPr</td>
<td>P.L. 96-487 12/2/80</td>
<td>7,052,000 acres in ANILCA. NPS recalculated as 7,167,192 acres</td>
<td>1,052,561 acres qualified</td>
</tr>
<tr>
<td>?</td>
<td>NPS</td>
<td>AK</td>
<td>Glacier Bay NP and NPres</td>
<td>P.L. 96-487 12/2/80</td>
<td>2,770,000 acres in ANILCA. NPS recalculated as 2,664,876 acres</td>
<td>62,790 acres qualified</td>
</tr>
<tr>
<td>6/13/74</td>
<td>NPS</td>
<td>AK</td>
<td>Katmai NP and NPr</td>
<td>P.L. 96-487 12/2/80</td>
<td>3,473,000 acres in ANILCA. NPS recalculated as 3,384,358 acres</td>
<td>643,448 acres qualified</td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td>Kenai Fjords NP</td>
<td>None</td>
<td>668,165 acres qualified</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td><strong>Kobuk Valley NP</strong> – No proposal or recommendation transmitted</td>
<td>P.L. 96-487 12/2/80 190,000 acres in ANILCA. NPS recalculated as 174,545</td>
<td>1,494,500 acres qualified</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td><strong>Lake Clark NP and NPr</strong> – No proposal or recommendation transmitted</td>
<td>P.L. 96-487 12/2/80 2,470,000 acres in ANILCA NPS recalculated as 2,619,550</td>
<td>1,240,820 acres qualified</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td><strong>Noatak NPr</strong> – No proposal or recommendation transmitted</td>
<td>P.L. 96-487 12/2/80 5,800,000 acres in ANILCA. NPS recalculated as 5,765,427 acres</td>
<td>757,175 acres qualified</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td><strong>Wrangell-St. Elias NP and NPr</strong> – No proposal or recommendation transmitted</td>
<td>P.L. 96-487 12/2/80 8,700,000 acres in ANILCA</td>
<td>3,174,000 acres qualified</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>NPS</td>
<td>AK</td>
<td><strong>Yukon-Charley Rivers NPr</strong> – No proposal or recommendation transmitted</td>
<td>None</td>
<td>2,220,576 acres qualified</td>
<td></td>
</tr>
</tbody>
</table>
### 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.

<table>
<thead>
<tr>
<th>DATE Recommendation Sent to Hill</th>
<th>AGENCY</th>
<th>STATE</th>
<th>DOI/PRESIDENTIAL RECOMMENDATION</th>
<th>DESIGNATED PUBLIC LAW # DATE</th>
<th>PENDING</th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>UT</td>
<td>Arches NP</td>
<td>None</td>
<td>70,008 acres</td>
<td>Map No. 138-20,014-A January 1978 (Superseded an earlier recommendation of Map No. 138-20,014 October 1974)</td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>TX</td>
<td>Big Bend NP</td>
<td>None</td>
<td>583,000 acres</td>
<td>Map No. 155-20,004-D January 1978 (Superseded an earlier recommenda</td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>State</td>
<td>Park/Unit</td>
<td>Size Recommended</td>
<td>Size Recommended Details</td>
<td></td>
</tr>
<tr>
<td>------</td>
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<td></td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>UT</td>
<td>Bryce Canyon NP</td>
<td>20,810 acres</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(20,810/0)</td>
<td>20,810 acres</td>
<td>Map No. 129-20004-C January 1977 (Superseded an earlier recommendation of Map No. 155-20004-C January 1973)</td>
</tr>
<tr>
<td>5/23/77</td>
<td>NPS</td>
<td>UT</td>
<td>Canyonlands NP</td>
<td>278,420 acres</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(260,150/18,270)</td>
<td>278,420 acres</td>
<td>Map No. 164-20,015-A October 1974</td>
</tr>
<tr>
<td>5/23/77</td>
<td>NPS</td>
<td>UT</td>
<td>Capitol Reef NP</td>
<td>183,865 acres</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(179,815/4,050)</td>
<td>183,865 acres</td>
<td>Map No. 158-20016 October 1974</td>
</tr>
<tr>
<td>1/12/76</td>
<td>NPS</td>
<td>UT</td>
<td>Cedar Breaks NM</td>
<td>4,830 acres</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(4,830/0)</td>
<td>4,830 acres</td>
<td>Map No. 154-20,000 May 1973</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Reaffirmed earlier recommendation</td>
<td></td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>CO</td>
<td>Colorado NM</td>
<td>14,779 acres</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(13,842/937)</td>
<td>14,779 acres</td>
<td>Map No. 119-20,006-C January 1978 (Superseded an earlier recommendation of Map No. 119-20,005 March 1971)</td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>OR</td>
<td>Crater Lake NP</td>
<td>None</td>
<td>127,058</td>
<td>Map No.</td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>ID</td>
<td>Area Description</td>
<td>Acres</td>
<td>Reference Note</td>
<td></td>
</tr>
<tr>
<td>--------</td>
<td>--------</td>
<td>-------</td>
<td>-----------------------------------------------------------------------------------</td>
<td>-------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>10/13/91</td>
<td>NPS</td>
<td>ID</td>
<td><strong>Craters of the Moon NM and Pres</strong>&lt;br&gt;President recommended Congress designate BLM wilderness in Great Rift Wilderness Study Area (WSA) of 396,696 acres (346,800)</td>
<td>346,800</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>KY-VA-TN</td>
<td><strong>Cumberland Gap NHP</strong> 14,091 acres recommended (12,191/1,900)</td>
<td>None</td>
<td>Map No. 380-20,026-C January 1978 (Superseded an earlier recommendation of Map No. 380-40,001-A August 1972)</td>
<td></td>
</tr>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>CO-UT</td>
<td><strong>Dinosaur NM</strong> 210,727 acres recommended (205,672/5,055)</td>
<td>None</td>
<td>Map No. 122-20,009-B January 1978 (Superseded an earlier recommendation of Map No. 122-20,009-B August 1972)</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>State</td>
<td>Location</td>
<td>Acres</td>
<td>Recommendation</td>
<td>Map No.</td>
</tr>
<tr>
<td>------------</td>
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</tr>
<tr>
<td>4/18/02</td>
<td>NPS</td>
<td>NM</td>
<td>El Malpais NM</td>
<td>97,428</td>
<td>None</td>
<td>Map No. 103/20020B</td>
</tr>
<tr>
<td>6/13/74</td>
<td>NPS</td>
<td>MT</td>
<td>Glacier NP</td>
<td>930,910</td>
<td>None</td>
<td>Map No. 117-20,010-A</td>
</tr>
<tr>
<td>5/11/78</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12/4/74</td>
<td>NPS</td>
<td>NC-TN</td>
<td>Great Smoky Mtns. NP</td>
<td>390,900</td>
<td>None</td>
<td>Map No. 133-20,003A</td>
</tr>
<tr>
<td>5/11/78</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Delay in enactment until dispute over a road in park (North Shore Road) is resolved.

<table>
<thead>
<tr>
<th>Date</th>
<th>Agency</th>
<th>State</th>
<th>Park Name</th>
<th>Acres</th>
<th>Recommendation Details</th>
<th>Map No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/11/78</td>
<td>NPS</td>
<td>MT-WY</td>
<td>Yellowstone NP</td>
<td>2,032,721 acres</td>
<td>None</td>
<td>Map No. 101-20,005-A January 1978 (Superseded an earlier recommendation of Map No. 101-20004-A July 1972)</td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>DATE Recommendation Sent to Hill</th>
<th>AGENCY</th>
<th>STATE</th>
<th>DOI/PRESIDENTIAL PROPOSAL</th>
<th>DESIGNATED</th>
<th>ROADLESS ACRES</th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposal not sent to DOI, Pres. or Hill</td>
<td>NPS</td>
<td>MT-WY</td>
<td>Bighorn Canyon NRA 8,108 acres proposed (Roadless area “A” only) Map No. 817-20037 March 1981</td>
<td>None</td>
<td>NPS study found 41,871 acres of roadless lands in 6 separate areas (Areas “A through F”)</td>
<td>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.</td>
</tr>
<tr>
<td>Proposal not sent to DOI, Pres. or Hill</td>
<td>NPS</td>
<td>NC</td>
<td>Cape Lookout NS 2,990 acres proposed 2 acres proposed potential Total 2,992 acres (Shackleford Banks only) Map No. 623-20,050D</td>
<td>None</td>
<td>19,990 roadless area acres; land and water.</td>
<td>Park established March 1966. Park is 28,243 acres. Land acres only 8,741 acres. NPS study disqualified</td>
</tr>
<tr>
<td>Date</td>
<td>Type</td>
<td>State</td>
<td>Details</td>
<td></td>
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</tr>
</tbody>
</table>
| July 1985  | Proposal      | Glen Canyon NRA | 588,855 acres proposed
48,955 proposed potential
Total 637,810 acres
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 |</p>
<table>
<thead>
<tr>
<th>Proposal not sent to Pres. or Hill</th>
<th>NPS</th>
<th>AZ</th>
<th><strong>Grand Canyon NP</strong></th>
<th>None</th>
<th>1,139,077 roadless acres</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>980,088 acres proposed</td>
<td></td>
<td>The Colorado River corridor of 240 free-flowing miles proposed as potential wilderness in 1980 and 1993 proposal due to</td>
</tr>
<tr>
<td>Date</td>
<td>Event</td>
<td>Map No.</td>
<td>Acreage</td>
<td></td>
<td></td>
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<tr>
<td>----------</td>
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<td>---------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11/6/2002</td>
<td>NPS prepares revised map with 184,439 acres proposed by Secretary of Interior to President 9/10/74</td>
<td>602-2000G</td>
<td>184,439 acres</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1/1975</td>
<td>Act of Grand Canyon - 1,139,077 acres.</td>
<td></td>
<td>1,139,077 acres</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12/4/74</td>
<td>Message from Gerald Ford to Speaker requests deferment of any congressional action, due to pending national need for electric power.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1/1978</td>
<td>Proposal not sent to Hill.</td>
<td></td>
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<tr>
<td>1/1978</td>
<td>Proposal not sent to Hill.</td>
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<tr>
<td>1/1978</td>
<td>Proposal not sent to Hill.</td>
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<tr>
<td>1/1978</td>
<td>Proposal not sent to Hill.</td>
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</tr>
<tr>
<td>1/1978</td>
<td>Proposal not sent to Hill.</td>
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</tr>
</tbody>
</table>

Potential for a total of 1,139,077 acres.
<table>
<thead>
<tr>
<th>Not sent to Hill</th>
<th>NPS</th>
<th>MN</th>
<th>Voyageurs NP</th>
<th>None</th>
<th>127,436 acres</th>
<th>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</th>
</tr>
</thead>
<tbody>
<tr>
<td>1991/92</td>
<td></td>
<td></td>
<td>amount of wilderness or potential wilderness due to the partial designation of 11/2002.</td>
<td></td>
<td></td>
<td>NPS ordered to produce a wilderness recommendation for submittal to the President by July 14, 1992</td>
</tr>
<tr>
<td>Not sent to Hill</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Year</td>
<td>Action</td>
<td></td>
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</tr>
<tr>
<td>1992.</td>
<td>President never sent recommendation to Congress.</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>DATE Recommendation Sent to Hill</th>
<th>AGENCY</th>
<th>STATE</th>
<th>DOI/PRESIDENTIAL RECOMMENDATION</th>
<th>DESIGNATED PUBLIC LAW #</th>
<th>PENDING</th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not sent to Hill</td>
<td>NPS</td>
<td>FL</td>
<td>Big Cypress NPres</td>
<td>None</td>
<td>Almost entire area roadless. NPS Map No. unknown.</td>
<td>Park established in 1974; approximately 570,000 acres.</td>
</tr>
<tr>
<td>10/11/74</td>
<td></td>
<td></td>
<td>NPS 1979 study finds no lands suitable as wilderness.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>P.L. 93-440 established park and required a report to the President on wilderness suitability or nonsuitability by October 11, 1979.</td>
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<tr>
<td>8/79</td>
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<tr>
<td>1990</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>NPS study finds no suitable acres due to nonfederal oil and gas rights, ORV use and inholdings. NPS pledged to restudy</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Date</td>
<td>Event</td>
<td>Location</td>
<td>Findings / Comments</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>4/29/88</td>
<td>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.</td>
<td></td>
<td>1990 GMP concluded that 1979 finding still valid for original Preserve.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6/2002</td>
<td>Park Superintendent sends a suitability assessment to Regional Director</td>
<td></td>
<td>Regional Director Hooks declined to send to Director, on June 25, 2002; leaving statutory requirement of 4/88 unmet.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2006</td>
<td>NPS Draft GMP for Big Cypress Addition</td>
<td></td>
<td>Now under formal study.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12/2011</td>
<td>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.</td>
<td></td>
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</tr>
</tbody>
</table>

Not sent to Hill  | NPS  | TX | **Big Thicket NPres.** | NPS Study found lands within 5 units to Park established 1974, expanded 1996; approximatel

<p>| 238,000 acres found suitable in old Preserve; 128,600 in Addition. | Regional Director Hooks declined to send to Director, on June 25, 2002; leaving statutory requirement of 4/88 unmet. | Now under formal study. |</p>
<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/11/74</td>
<td>P.L. 93-439</td>
<td>Established park and required a report to the President on wilderness suitability or nonsuitability by October 11, 1979.</td>
</tr>
<tr>
<td>12/80</td>
<td></td>
<td>Wilderness objective areas (Beaumont, Lance Rosier, Big Sandy Crk, Beech Crk, Neches-Jack Gore)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Maps: 175-20059C, 20061C, 20084C, 20067B, 20069B.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No record that NPS/DOI report was sent to the President.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wilderness Study states that wilderness objective areas “are to be restudied in the future for possible wilderness designation.”</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NEVER RESTUDIED</td>
</tr>
<tr>
<td>Not sent</td>
<td>NPS</td>
<td>Biscyane NP: NPS finds no lands suitable as wilderness.</td>
</tr>
<tr>
<td>6/28/80</td>
<td>FL</td>
<td>P.L. 96-287: enlarged and renamed a “national park.”</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Required a recommendation of NPS study of 5/83 found only several small keys as “possibly eligible.” Arsenier Keys, keys.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Park established 1968, approximately 172,000 acres, only 4,600 acres of land.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Congress intended that wilderness review should also</td>
</tr>
<tr>
<td>Date</td>
<td>Event Description</td>
<td>Location</td>
</tr>
<tr>
<td>----------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
</tr>
<tr>
<td>7/19/83</td>
<td>suitability or nonsuitability be submitted to President and Congress by Sept 30, 1983.</td>
<td>south of Caesar Creek, Elliot Key, Sands Key. Acreage unknown. Map No. 169-20,026A Dec 1982</td>
</tr>
<tr>
<td></td>
<td>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.</td>
<td>consider aquatic and submerged resources. (Dec 7, 1979 – House Report)</td>
</tr>
<tr>
<td></td>
<td>No record that the NPS recommendation (signed by Director on July 19, 1983) ever sent to President or Congress.</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>Location</td>
</tr>
<tr>
<td>------------</td>
<td>--------</td>
<td>----------</td>
</tr>
<tr>
<td>1/3/75</td>
<td>NPS</td>
<td>FL</td>
</tr>
<tr>
<td>1/3/75</td>
<td>NPS</td>
<td>NM</td>
</tr>
<tr>
<td>8/28/71</td>
<td>NPS</td>
<td>NM</td>
</tr>
<tr>
<td>Year</td>
<td>Authority</td>
<td>State</td>
</tr>
<tr>
<td>-------</td>
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</tr>
<tr>
<td>2004</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12/4/74</td>
<td>NPS</td>
<td>KY</td>
</tr>
<tr>
<td>2011</td>
<td>wilderness and “report back to Congress at a later date.” NEVER DONE.</td>
<td></td>
</tr>
<tr>
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<tr>
<td></td>
<td>NPS designates 6.5 miles of single track trail in Roadless Unit “B” as open to bicycles (Sal Hallow Loop). No special regulation adopted to allow bicycle use in violation of NPS rules at 36 CFR 4.30(b).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>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 Hallow Loop</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>State</td>
</tr>
<tr>
<td>------------</td>
<td>--------</td>
<td>-------</td>
</tr>
<tr>
<td>5/27/09</td>
<td>NPS</td>
<td>WVA</td>
</tr>
<tr>
<td>9/21/72</td>
<td>NPS</td>
<td>TX</td>
</tr>
<tr>
<td>Date</td>
<td>Agency</td>
<td>Location</td>
</tr>
<tr>
<td>----------</td>
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<td>----------</td>
</tr>
<tr>
<td>20,002, June 1972</td>
<td>NPS</td>
<td></td>
</tr>
<tr>
<td>9/21/72</td>
<td>NPS</td>
<td>NM</td>
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</tbody>
</table>
TABLE NO. 6
PARKS DETERMINED TO HAVE WILDERNESS SUITABLE/ELIGIBLE LANDS IN AN NPS FORMAL PLANNING PROCESS - AWAITING ACTION

<table>
<thead>
<tr>
<th>DATE Recommendation Sent to Hill</th>
<th>AGENCY</th>
<th>STATE</th>
<th>NPS DETERMINATIONS</th>
<th>DESIGNATED Public Law # Date</th>
<th>PENDING</th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Not Sent to Hill</td>
<td>NPS</td>
<td>MA</td>
<td><strong>Cape Cod NS</strong></td>
<td>None</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**Big Bend NP**
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.

**Cape Cod NS**
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
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.

<table>
<thead>
<tr>
<th>Not Sent to Hill</th>
<th>NPS</th>
<th>GA</th>
<th><strong>Fort Pulaski NM</strong></th>
<th>None</th>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NPS</td>
<td>CO</td>
<td><strong>Great Sand Dunes NP and Pr</strong></td>
<td>None</td>
<td>Monument established in 1911; Congress</td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>Location</th>
<th>Agency</th>
<th>State</th>
<th>Park</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guadalupe Mountains NP</td>
<td>NPS</td>
<td>TX</td>
<td>None</td>
<td>Park established in 1966, with a significant expansion in 1988. Wilderness designated in 1978.</td>
</tr>
<tr>
<td>Hawaii Volcanoes NP</td>
<td>NPS</td>
<td>HA</td>
<td>None</td>
<td>NPS assessment 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</td>
</tr>
<tr>
<td>Location</td>
<td>Park</td>
<td>State</td>
<td>Data</td>
<td>Notes</td>
</tr>
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<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Lassen Volcanic NP</td>
<td>NPS</td>
<td>CA</td>
<td>None</td>
<td>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/R OD, followed no detectable process</td>
</tr>
<tr>
<td>X</td>
<td>NPS</td>
<td>MO</td>
<td>Draft GMP/Wilderness Study closed for comment February 2014. Wilderness Study found 3,434 acres as eligible</td>
<td>Park established in 1964</td>
</tr>
<tr>
<td>Not Sent to Hill</td>
<td>NPS</td>
<td>AZ</td>
<td>Saguaro NP</td>
<td>NPS assessme</td>
</tr>
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<td></td>
<td></td>
</tr>
<tr>
<td>Reportedt o be in Nixon message to Hill. of 2/8/72</td>
<td>NPS</td>
<td>AZ</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wupatki NM</td>
<td>NPS finds no lands suitable as wilderness</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not Sent to Hill 3/29/13</td>
<td>NPS</td>
<td>AZ</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NPS finds 34,194 acres out of 35,423 as eligible for wilderness</td>
<td>NPS study finds 18,500 roadless acres NPS Map # 322/2000 0-A Dated November 1969</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NPS recommendation finds that grazing on the lands disqualifies them. (Grazing ended in 1988).</td>
<td>Park established 1924; several expansions by proclamation or statute; now over 35,000 acres.</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
First, and only park thus far, to reverse a previous finding of no suitable acres!
POSTCRIPT 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 NPres, 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:

- 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