

An Evaluation of the National Park Service's Wilderness Program on the 40th Anniversary of the Wilderness Act

THE YEAR 2004 MARKS THE ANNIVERSARY FOR TWO SIGNIFICANT EVENTS in the environmental history of the United States. Two hundred years ago, the Lewis and Clark Corps of Discovery expedition began its exploration of the western territory acquired by the Louisiana Purchase. Forty years ago, Public Law 88-577, the Wilderness Act, was signed into law by President Johnson. These two events serve as historic markers on how quickly the “endless” expanse of the American wilderness disappeared.

In fact, the Lewis and Clark expedition was already encountering the vanguard of traders, trappers, and settlers moving into the West even before its return to St. Louis in 1806. In less than one hundred years, most of the lands traversed by the Corps were occupied by European settlers and ranchers, and the vast herds of wildlife that fed and clothed Native Americans, and the Lewis and Clark expedition itself, were almost gone. By the late 1800s, many Americans were expressing alarm about how rapidly the resources within the wilderness, as well as the wilderness itself, were vanishing. This alarm translated into a Golden Era of wilderness advocacy by the likes of Henry David Thoreau, George Perkins Marsh, John Muir, Sigurd Olson, Bob Marshall, Gifford Pinchot, and Aldo Leopold, among others. After years of effort by people such as Howard Zahniser and David Brower, this advocacy was translated into law with the passage of the Wilderness Act on September 3, 1964—in spite of the

objections of the National Park Service (NPS) in being included under its authority.

While the Park Service objected to several administrative aspects of early drafts of the Wilderness Act, its primary objection, formally expressed at several congressional hearings, was the contention that NPS lands were “already wilderness” and, therefore, did not need to be included under any “additional, burdensome regulations” (Sellars 1997). But after years of observing NPS’s propensity to provide visitor facilities and developments throughout the National Park System, sometimes through the coercion of local politicians but often through its own initiatives, the environmental community and Congress disagreed with the Park Service that it was doing an adequate job of preserving undisturbed areas within national parks. Congress specifically, and pointedly, included the Park Service within the Wilderness Act as one of the three federal agencies responsi-

ble for administering the National Wilderness Preservation System. (Subsequent legislation added the Bureau of Land Management as a wilderness management agency.)

Implicit in being identified within the Wilderness Act was the requirement for NPS to preserve wilderness lands in keeping with the supplemental definitions, standards, and prohibitions of uses described within the act itself. The basic requirement for managing wilderness lands differently from other NPS lands has never been fully accepted, or implemented, by the agency.

Since that inauspicious start 40 years ago, and in spite of the fact that it administers the nation's (and the world's) largest inventory of wilderness, the Park Service has actually accomplished relatively little in implementing either the letter, or the spirit, of the 1964 Wilderness

Act. While the NPS directorate has constantly claimed a commitment to wilderness, and often states that it is doing a good job in managing wilderness, there is very little evidence available to demonstrate that the agency has made more than token efforts to distinguish wilderness (including areas identified as "designated," "proposed," "potential," "recommended," and "study areas") from other NPS backcountry areas and provide wilderness with the supplemental protection required by the act and its own management policies.

This is not to say that, in the years since the Wilderness Act was passed, the agency has not generated considerable paperwork, formed several special task forces and committees, held countless meetings, attended dozens of public forums, created workbooks, proposed budgets, written white papers, sent numerous people to training, and developed policies and directives addressing the issue of wilderness management. While these products provide an image that the Park Service is actually "managing" wilderness, the reality is that



Figure 1. Camp at Pingo Lake, Gates of the Arctic National Park and Preserve, Alaska. (photo courtesy of National Park Service)

the agency would find it difficult to provide any real evidence that the basic requirements of the Wilderness Act are actually being applied in the day-to-day and long-term management of wilderness areas within national parks. Generally, the current NPS wilderness program reflects the historic reluctance the NPS directorate has had towards the Wilderness Act (Sellars 1997) and calls into question the agency's commitment and capacity to preserve wilderness.

After four decades, the public should

reasonably expect that a resource stewardship agency such as the National Park Service would be able to easily demonstrate (prove) that it has made at least minimal efforts toward providing the supplemental management standards for wilderness that would differentiate it from other backcountry resources. In fact, NPS would be hard pressed to offer proof that it has actually taken administrative steps to protect wilderness within the National Park System beyond the original ten-year initiative it started in the mid-1960s to develop the presidential recommendations (required by the Wilderness Act) that resulted in the current inventory of “designated” and “recommended” wilderness. That effort ended in the 1970s and, even then, did not include a complete inventory of all the natural area parks in existence at the time the Wilderness Act was passed. Since that time, the NPS wilderness program has basically consisted of ignoring the requirements of wilderness, a reluctance in enforcing established policies, and, in some cases, an open hostility by upper-level managers towards wilderness.



Figure 2. Big Bend National Park, Texas. (photo courtesy of National Park Service)

While it is recognized that some slow progress has been made within the Park Service, and several park managers and many more lower-echelon staff deserve high marks for their wilderness program efforts, NPS’s overall wilderness program over the past several decades has been driven only by the periodic energy of a few interested individuals rather than being accepted as a vested, permanent responsibility of the agency. While the NPS leadership may present an inventory of paper and electronic products referencing the word “wilderness” as a testimony to the agency’s commitment to wilderness, the instructions of the Wilderness Act itself, and the Park Service’s own wilderness policies, currently exist as voluntary guidelines that a park manager may, or may not, choose to apply.

The impact of the Park Service’s less-than-enthusiastic attitude towards wilderness reflects itself in the day-to-day management of wilderness both at the park level and on a national scale. Forty years after the Wilderness Act, most NPS wilderness parks do not have even a simple wilderness management plan (which have been required by NPS management policies since 1988). Such plans should at least identify where the park wilderness is located and who within the park staff is responsible and accountable for wilderness, and include statements as to how these resources are to be managed and preserved. While not having an adequate wilderness planning document is problematic in its entirety, management of wilderness resources is directly affected by the lack of one particular requirement of these plans: the element that addresses section

4(c) of the Wilderness Act, entitled “Prohibitions of Certain Uses,” i.e., the “minimum requirement” provision of the law. The appropriate application of minimum requirement is considered by many to be the heart of the Wilderness Act, and continues to represent one of the greatest sources of contention within the NPS wilderness program through the agency’s misuse of motorized equipment, aircraft, structures, and installations.

Since most national parks have neither wilderness management plans nor suitable minimum requirement procedures to assess whether or not projects, and the tools or techniques needed to complete them, are actually needed “for the purposes of this Act,” park managers continue to do essentially whatever they want or need to do within wilderness regardless of potential violations of the Wilderness Act and NPS policies. Historically, the Park Service has deferred to whatever methods and equipment are easiest, quickest, and cheapest to use. Invariably this has meant the routine use of motorized equipment and helicopters within wilderness. Decisions to use prohibited equipment are usually made without an adequate consideration of alternatives, including environmental compliance documentation and public involvement. This situation has meant that NPS, when compared with the other wilderness agencies, has a reputation for generally “allowing” the use of motorized equipment, helicopters, and developments within wilderness when other, less-intrusive, methods are available.

On a national level, the Park Service’s inability, or unwillingness, to implement an effective wilderness management program has generated growing criticism, and lawsuits, from the national environmental organizations. Sadly, the historic reluctance of NPS to implement an effective wilder-

ness program within individual parks has been a contributing factor in current legislative efforts to de-authorize designated wilderness at Cumberland Island National Seashore and remove the Colorado River corridor from the wilderness proposal for Grand Canyon National Park (Ingram 2003).

What does the NPS need to do to implement a more effective wilderness program? While there will always be reasonable discussion about exactly what is needed for an adequate wilderness program, at a minimum the Park Service should strive to have the following actions implemented prior to the celebration of the Wilderness Act’s 50th anniversary in 2014:

- Parks should have at least a basic wilderness management plan that distinguishes wilderness resources from other backcountry resources, establishes who is responsible for the management of wilderness within the park organization, establishes how minimum requirement will be determined for all activities affecting wilderness, and provides an opportunity for the public to become involved in the wilderness planning process.
- Parks should be responsible and accountable for full documentation of, and providing for appropriate public involvement in, decisions on all activities involving any of the section 4(c) prohibitions.
- Persons selected for positions having wilderness responsibilities should have a basic understanding of the ramifications of the Wilderness Act on the NPS Organic Act and other appropriate laws. Knowledge of wilderness issues should be included in the selection criteria for all positions having specific responsibilities for the management and

preservation of wilderness.

- If they haven't done so already, all managers having direct responsibilities for wilderness should complete an Arthur Carhart National Wilderness Training Center course for line officers within a year of being selected for the position.
- NPS should complete the required inventory of lands considered suitable for inclusion within the National Wilderness Preservation System, including wilderness suitability studies, and forward the required recommendation as to suitability or non-suitability to the president.

While all of these suggestions have been recommended before in one form or another, the prospects of implementing them in order to significantly improve the Park Service's wilderness program will depend upon the NPS directorate being willing to hold itself, and the parks, more accountable for wilderness than it has for the past four decades. This will involve the adoption of a system which ensures that the wilderness parks and the directorate are staffed by individuals who support the concepts of the Wilderness Act and are aware of their responsibilities in seeing that the requirements of wilderness are effectively applied in all appropriate NPS operations and programs. The capacity of the agency to actually make these improvements remains a

question.

The state of the NPS wilderness program is certainly not just the result of the current administration. Past administrations advocating a strong commitment to wilderness have been equally unsuccessful in their efforts to improve wilderness preservation within the Park Service. In 1997, Director Roger Kennedy issued a memorandum to regional directors and wilderness park superintendents entitled "Strengthening the NPS Wilderness Accountability System." Director Robert Stanton re-issued a similar memo in 1998. These memos instructed NPS staff to ensure that wilderness was included in (1) annual performance plans for wilderness park superintendents, (2) the position



Figure 3. Two coastal barrier islands in the Mississippi portion of Gulf Islands National Seashore are designated wilderness areas. (photo courtesy of National Park Service)

descriptions for critical management positions, (3) the knowledge, skills, and abilities (KSAs) statements for pertinent job announcements, and (4) the each park's Government Performance and Results Act (GPR) strategy plans.

A report summarizing the relative lack of response to the directors' accountability memorandums was submitted to the Washington Office's associate director for operations in the fall of 1998. Because of resistance from individuals in the Washington Office, this report was never forwarded to the director and the elements of the original initiative were essentially abandoned. In short, the effort to ensure that NPS wilderness resources are being managed by individuals knowledgeable about their responsibilities under the Wilderness Act, or even to implement standards for monitoring this issue, has never been implemented.

While the National Wilderness Steering Committee has generated a significant inventory of documents and projects (Henry and Ulvi 2003) designed to improve the NPS wilderness program, there appears to be little evidence to indicate that the NPS directorate is going to use this material to overcome its historic reluctance to implement, and enforce, a truly effective wilderness program within the agency. The steering committee itself is limited in its assertiveness for wilderness, ironically, by virtue of its being sanctioned and administered by the NPS directorate. The Washington Office associate director for visitor and resource protection maintains an oversight authority for the group, regardless of who happens to be chairperson. Thus, the steering committee has remained silent on significant issues, such as the unexpected termination of the Grand Canyon National Park wilderness planning process by the park superintendent.

Similarly, in 2002 the steering committee "approved" (without real debate or review) a Washington Office-generated wilderness directive that would have pro-

vided an "authority" for individual park superintendents to usurp Congress in determining what is, or is not, wilderness by allowing them to make individual decisions as to what lands needed to be formally studied for wilderness suitability, thus avoiding the required formal study process and subsequent recommendation to the president. This directive was withdrawn only after 21 environmental groups protested to the secretary of the interior about the precedent established by the directive and the lack of public involvement in its issuance.

In summary, after 40 years the National Park Service has made relatively little progress in implementing the requirements of the Wilderness Act. While some progress and the efforts of individual managers need to be recognized, the agency's overall wilderness program falls far short of what should be expected from a resource stewardship agency as prestigious as the U.S. National Park Service. This situation appears to reflect the historic reluctance the NPS directorate has had in accepting the restrictions imposed by wilderness and the objection the agency has had in being included under the authority of the Wilderness Act.

Without better leadership, it is unlikely that the National Park Service wilderness program will lift itself out of the state of lethargy in which it has existed since the passage of the Wilderness Act in 1964, and will probably never achieve the level of professionalism envisioned by Regional Director Roger Contor when he wrote: "Wilderness within a national park should be championed as the very best of the very best remnants of America's original landscape" (Contor 1992).

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