United States Department of the Interior
NATIONAL PARK SERVICE
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DIRECTOR'S ORDER #41: WILDERNESS STEWARDSHIP

Approved: Jonathan B. Jarvis
Director

Effective Date: May 13, 2013

Duration: This Order will remain in effect until updated or rescinded

This Director's Order (DO #41) supplements *Management Policies 2006*, Chapter 6, Wilderness Preservation and Management. Together with Reference Manual 41 (RM 41), this Order supersedes and replaces any conflicting guidance issued previously.

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1. Purpose of this Order

The purpose of this Director's Order is to provide accountability, consistency, and continuity in the National Park Service (NPS) wilderness stewardship program, and to guide servicewide efforts in meeting the requirements of the Wilderness Act (16 U.S.C. 1131-1136). This Order clarifies, where necessary, specific provisions of *Management Policies 2006* and establishes specific instructions and requirements.

This Order should be applied to wilderness stewardship actions carried out within the framework of park general management plans, wilderness stewardship plans, natural resource plans, cultural resource plans, fire management plans, and other activity-level plans.

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The NPS will apply the guidance contained in this Order to all of its wilderness stewardship activities. For the purpose of applying this guidance, unless specifically noted, the term "wilderness" includes the categories of eligible, proposed, recommended, and designated. Potential wilderness may be identified within the proposed, recommended or designated categories.

It is important to note that these policies may in some instances be superseded by statutory provisions that apply to individual wilderness areas, by rights reserved by former landowners and, in Alaska, by applicable provisions of the Alaska National Interest Lands Conservation Act (ANILCA).

2. Authority

Authority to issue this Order is contained in the NPS Organic Act (16 U.S.C. 1-4), and delegations of authority contained in the Department of the Interior Manual, Part 245. This Order is intended only to improve the internal management of the NPS, and is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or employees, or any other person.

3. Roles and Responsibilities

3.1 Associate Director, Visitor and Resource Protection

- oversee the NPS wilderness stewardship program and develop necessary standards and procedures;
- coordinate with the Associate Directors for Natural Resource Stewardship and Science; Park Planning, Facilities, and Lands; Cultural Resources, Partnerships and Science; and Interpretation and Education to enhance wilderness stewardship across disciplines throughout the NPS;
- issue, review, and revise as appropriate, RM 41, which will provide more detailed procedural guidance on administering the wilderness stewardship program; and
- represent the NPS on the Interagency Wilderness Policy Council.

3.2 Wilderness Leadership Council

- advise the Associate Director for Visitor and Resource Protection on all matters pertaining to wilderness and lead the agency in addressing critical wilderness stewardship issues; and
- assist the Wilderness Stewardship Division in developing and implementing programs and projects that improve the accountability, consistency, and continuity of wilderness stewardship.

3.3 Chief, Wilderness Stewardship Division

- provide goals and direction to the wilderness stewardship program as approved by the Associate Director;
- assist the Director with national policy review and responses to congressional inquiries;
- maintain the servicewide wilderness database for wilderness status, acreage, wilderness character, stewardship planning, training, and other pertinent information;
- develop an annual wilderness report;

- facilitate communication throughout all levels and disciplines of the NPS;
- maintain communication with the Wilderness Leadership Council, sharing information on national issues, challenges, and opportunities;
- serve as the NPS representative on the Interagency Wilderness Steering Committee; and
- oversee NPS involvement with the Arthur Carhart National Wilderness Training Center (ACNWTC) and the Aldo Leopold Wilderness Research Institute (ALWRI).

3.4 Wilderness Training Manager

- serve as the NPS representative to the ACNWTC;
- develop and maintain a strategic plan for wilderness training;
- develop, conduct, and track wilderness stewardship training, and track accomplishments; and
- provide information and advice on wilderness stewardship issues to park, regional, and program area staffs.

3.5 Regional Directors

- strive to ensure that wilderness coordination needs within their regions are met, and that parks with wilderness resources are adequately staffed to meet their wilderness-related responsibilities;
- see that eligibility determinations and studies are complete for parks within their region and on any new roadless areas as soon as practicable after these areas are acquired;
- transmit wilderness eligibility determinations to the Director for final approval;
- ensure that all wilderness parks establish a wilderness character baseline, and that wilderness character is integrated into park planning, management, and monitoring;
- ensure that all superintendents and deputy superintendents of parks with wilderness receive ACNWTC Wilderness Stewardship Training within two years of assuming their duties; and
- ensure that superintendents manage wilderness according to the Wilderness Act and appropriate NPS policy documents.

3.6 Regional Wilderness Coordinators

- promote consistency in wilderness stewardship, provide policy interpretation in their region;
- facilitate wilderness training to staff throughout the region;
- provide communication between the multiple levels and disciplines of the wilderness stewardship program; and
- provide information and advice on wilderness stewardship issues to park, regional, and program area staffs.

3.7 Superintendents

- protect wilderness character by adhering to the Wilderness Act and NPS guidance documents;
- establish an interdisciplinary approach to wilderness stewardship;
- designate a park wilderness coordinator with a percentage of time dedicated to wilderness stewardship appropriate to the size and complexity of the wilderness park;

- ensure that park staff has necessary training and skills to be effective wilderness stewards;
- complete eligibility assessments and wilderness studies;
- complete and maintain Wilderness Stewardship Plans[1];
- monitor plans and operations to ensure compliance with the Wilderness Act;
- ensure wilderness character baseline is established and trends monitored;
- ensure that a minimum requirements process is applied for all actions that could potentially affect wilderness character;
- ensure wilderness character impacts are addressed in National Environmental Policy Act (NEPA) compliance documents;
- ensure proposals for scientific activities in wilderness are evaluated and monitored by park wilderness coordinators;
- incorporate wilderness education into park programs;
- participate in interagency wilderness stewardship coordination; and
- attend ACNWTC Wilderness Stewardship Training within two years of assuming their duties.

3.8 Park Wilderness Coordinators

- work with superintendent to facilitate the integration of wilderness character into park planning, management/operations, and monitoring;
- provide advice on wilderness issues to park staffs;
- coordinate eligibility assessments and wilderness studies;
- develop and maintain Wilderness Stewardship Plans;
- establish wilderness character baseline and monitor trends;
- coordinate and assist in minimum requirements analysis, including the documentation and tracking of all decisions;
- assess wilderness effects in NEPA and National Historic Preservation Act (NHPA) compliance documents, and participate in other planning efforts which involve wilderness resources;
- evaluate proposals for scientific activities in wilderness and monitor effects on wilderness character;
- incorporate wilderness education into park programs; and
- participate in local interagency wilderness stewardship coordination.

4. Training Requirements

Park superintendents and deputy superintendents are required to attend ACNWTC Wilderness Stewardship Training within two years of coming to any park with wilderness. Superintendents and deputy superintendents must ensure that park personnel have the appropriate wilderness training and skills to be effective wilderness stewards. Associate directors and regional directors should encourage senior staff from visitor and resource protection, planning, facilities management, natural resource stewardship and science, cultural resources management, and

[1] Within *Management Policies 2006*, the "wilderness stewardship plan" is referred to as the "wilderness management plan." The meaning is the same for both.

interpretation and education, as well as select staff from regional directorates, program areas, and service centers to attend wilderness stewardship training.

5. Identification and Designation of the Wilderness Resource

Parks must make a documented determination of whether lands will be considered eligible for inclusion in the National Wilderness Preservation System. This documented determination should be undertaken using an interdisciplinary approach. The first requirement is an agency's evaluation of lands to determine eligibility based on the statutory definition of wilderness, and outlined as primary criteria in *Management Policies 2006*, Section 6.2.1.1. For eligible lands, the second requirement is a wilderness study, with public involvement, followed by an agency proposal, Secretarial recommendation, and the President's suitability recommendation to Congress.

5.1 Wilderness Eligibility Assessments

Parks with lands possessing wilderness characteristics must complete eligibility assessments to identify lands for possible inclusion in the National Wilderness Preservation System. The eligibility assessment is a general evaluation of park lands as a preliminary step to the wilderness study. In preparing an assessment, the park will consider existing park information, such as general management plans, foundation documents, development plans, natural resource plans, and cultural resource plans. This internal process includes two public notifications. The first notification documents an intention to conduct the eligibility assessment. The second notification provides notice of the Director's approval of the findings and determination of eligibility or ineligibility in the park's assessment.

Lands that are determined to be eligible for wilderness will be managed to preserve their wilderness character. Lands that are determined to be ineligible will be managed in accordance with the NPS Organic Act and all other laws, executive orders, regulations, and policies applicable to non-wilderness areas of the national park system.

Some parks, faced with the need to complete an initial eligibility assessment, may decide to include this step within a wilderness study. The assessment would be completed as an initial step in the study process. The findings in the assessment would then be subject to the more comprehensive evaluation required for the wilderness study, including the requirement for public review and comment.

Lands initially determined to be eligible in the eligibility assessment will be further evaluated in the wilderness study to determine whether they should be proposed by the NPS for designation as wilderness.

5.2 Wilderness Studies and Proposed Wilderness

Formal wilderness studies are used to inform decisions on areas contemplated for wilderness designation. These studies include field work, the identification of alternatives, review under the National Historic Preservation Act (16 U.S.C. 470f), analysis of impacts, public involvement and comment. As a result, the land identifications made in the eligibility assessment may be changed, and may result in more or less land advancing in the wilderness designation process.

The initial determination of eligibility is used as a starting point for the wilderness study. A completed wilderness study may result in revised eligibility determinations. The next step entails the NPS using the results of the wilderness study to submit a proposal for wilderness

designation from the Director to the Secretary of the Interior (Secretary). Throughout the study process, eligible lands continue to be managed to preserve their eligibility for designation by protecting their wilderness character.

Wilderness studies involve a much more intensive review than an eligibility assessment, as demonstrated by the preparation of an environmental impact statement and Record of Decision (ROD). The authority to sign the ROD on a wilderness study is delegated to the NPS Regional Director, and notice of the ROD is published in the Federal Register. The ROD identifies lands to be forwarded to the Director for a wilderness designation proposal. If any historic properties are included in the proposal, the ROD will identify the historic properties and will provide an assessment of effects of the proposed designation, per 36 CFR Part 800. The wilderness study serves as the basis for the Director to propose wilderness designation to the Secretary.

The Secretary (through the Assistant Secretary for Fish and Wildlife and Parks) then reviews the bureau's proposal, and makes his/her determination of suitability and nonsuitability. The Secretary's suitability determination forms the basis for a recommendation to the President. It is possible that the Secretary's determination will change the proposal put forward by the Director.

Lands originally considered as eligible, and proposed by the Director for wilderness designation, become proposed wilderness and are managed as if they were wilderness. Lands considered eligible, but not proposed, are managed to preserve their eligibility for designation by protecting their wilderness character. Lands determined ineligible through the wilderness study will be managed according to the NPS Organic Act and all other laws, executive orders, regulations, and policies applicable to non-wilderness areas of the national park system.

Wilderness proposals resulting from a formal wilderness study will be reviewed and approved by the Director before being forwarded to the Secretary (through the Assistant Secretary's office).

Notification and coordination with the WASO Wilderness Stewardship Division should occur early in this wilderness study process.

5.3 Recommended Wilderness

Once a wilderness study is completed and a proposal is transmitted from the Director, it becomes the Secretary's responsibility under the Wilderness Act to make a recommendation to the President as to suitability or nonsuitability for designation as wilderness. Lands that the Secretary recommends as suitable for designation as wilderness will be managed as if they were wilderness. Lands that have been proposed by the Director, but not recommended by the Secretary, will be managed to preserve their wilderness character.

5.4 Designated Wilderness

Once the President sends the recommendation to both houses of Congress for formal consideration, Congress may enact legislation to include the area in the National Wilderness Preservation System as designated or potential wilderness. Lands designated as wilderness by Congress will be managed as wilderness in accordance with the Wilderness Act and NPS policy. Lands released by Congress from further consideration will be managed in accordance with the NPS Organic Act and all other laws, executive orders, regulations, and policies applicable to non-wilderness areas of the national park system.

5.5 Potential Wilderness

When Congress provides for the designation of potential wilderness lands it also provides the process for the lands to become designated wilderness upon the elimination of the pre-existing nonconforming uses. Pre-existing nonconforming uses might include reserved use and occupancy interests, a road, a structure, or an installation. The National Park Service will seek to remove nonconforming uses that preclude wilderness designation. This process normally provides for the potential wilderness to become designated wilderness upon the elimination of the nonconforming use and the Secretary publishing a Notice in the Federal Register that these lands now meet the qualifications of designation. In limited situations, Congress may also designate in wilderness legislation non-federally owned lands, generally inholdings, as potential wilderness pending Federal acquisition.

5.6 Wilderness Boundaries

Final boundaries of designated wilderness have the full force and effect of Federal law and may be modified only through the legislative process. Wilderness boundaries should be established so they are easily identifiable on the ground. Unless otherwise defined by Congress when the area is designated, the standard boundary setbacks from roads, paved and unpaved, should be 100 feet on land from either side of the centerline. Exceptions to these standards may be proposed on a case-by-case basis to accommodate environmental protection or safety considerations. Any deviation from the standard should be documented on the map and in the legal description that is filed with Congress.

For lands that are designated wilderness, legal descriptions and maps must be filed with Congress, the Wilderness Stewardship Division in WASO (2 copies), the appropriate regional office (2 copies), and at the park. The Associate Director will include in RM 41 further instructions and standards for mapping and otherwise documenting eligible, proposed, recommended, and designated wilderness.

6. Wilderness Stewardship

The goal of wilderness stewardship is to keep these areas as natural and wild as possible in the face of competing purposes and impacts brought on by activities that take place elsewhere in the park and beyond park boundaries. NPS employees should understand this goal, work together and engage other agencies and partners to provide for an enduring resource of wilderness.

6.1 Consistency

Interagency cooperation and coordination is desirable to minimize administrative differences and visitor confusion and to ensure that wilderness resources receive maximum protection. At the national level this will be accomplished through the work of the NPS Wilderness Stewardship Division, Interagency Wilderness Policy Council, Interagency Wilderness Steering Committee, NPS Wilderness Leadership Council, ACNWTC, and ALWRI. Regional staff with wilderness responsibilities should be engaged with their counterparts from the other wilderness management agencies and other appropriate government organizations. Superintendents will ensure that wilderness stewardship within their parks is coordinated with surrounding Federal, State, and local land managers; federally recognized Indian Tribes, Alaska Natives, and Native Hawaiian Organizations; and with other public and private organizations, as appropriate.

In areas where NPS wilderness adjoins wilderness administered by another land management agency, the superintendent must coordinate with land managers of adjacent wilderness units to achieve consistency on regulations, requirements, and management techniques. While the goal is to mitigate problems resulting from the differing agency missions and stewardship, the NPS will not adopt any practice that weakens or compromises the preservation of wilderness within the parks or the parks' fundamental purposes as described in enabling legislation and *Management Policies 2006*. Where appropriate, NPS wilderness stewardship and education programs should explain reasons for differences among neighboring agencies' wilderness stewardship practices.

6.2 Wilderness Character

The Wilderness Act (16 U.S.C. 1133(b)) directs that "each agency administering any area designated as wilderness shall be responsible for preserving [its] wilderness character." Wilderness character is the combination of biophysical, experiential, and symbolic ideals that distinguishes wilderness from other lands. The five qualities of wilderness character are (1) untrammeled, (2) undeveloped, (3) natural, (4) offers outstanding opportunities for solitude or primitive and unconfined recreation, and (5) other features of scientific, educational, scenic, or historical value. Accordingly, each wilderness park will integrate the concept of wilderness character into park planning, management, and monitoring in order to preserve the enduring benefits and values of wilderness for future generations.

Whenever a park planning process that has the potential to affect wilderness character occurs, the park should determine how wilderness character can be both integrated into the planning effort and presented in the planning document. As a foundation, wilderness parks should develop a wilderness character narrative which describes what is unique and special about a specific wilderness, organized by each of the qualities of wilderness character.

Day-to-day management decisions and actions made within a park can significantly affect or be influenced by wilderness character. Wilderness character should be considered in the management and operations conducted by all divisions/work units (e.g., natural and cultural resources management, facilities management, interpretation and education, resource and visitor protection, environmental compliance, and commercial services).

Wilderness parks will conduct a wilderness character assessment, which includes identifying what should be measured, establishing baseline data, and conducting ongoing monitoring of trends. Each measure should be relevant to tracking change in an attribute or element of the park's wilderness character, or relevant to tracking a threat to this attribute. Once a baseline is established, tracking change and reporting on the trend in wilderness character should generally occur every five years.

Specifics on integrating wilderness character into park planning, management, and monitoring can be found in the *NPS Wilderness Character User Guide,* a component of RM 41.

6.3 Wilderness Planning

For every designated wilderness, a Wilderness Stewardship Plan will guide management actions to preserve wilderness character. Parks should notify the WASO Wilderness Stewardship Division Chief and work with their Regional Wilderness Coordinator during the Wilderness Stewardship Planning process. Parks with lands determined to be eligible, proposed, or recommended should also develop plans to preserve wilderness character. Wilderness

Stewardship Plans should be completed within two years of designation, subject to funding. Preservation of wilderness character will be incorporated into appropriate sections of park planning and management documents. Also see *Management Policies 2006*, Section 6.3.4.2.

6.4 Minimum Requirements

Parks must complete a "minimum requirements analysis" (MRA) in order to document the determination of whether a proposed action (project), which involves a prohibited use, is necessary to meet minimum requirements for the administration of the area for the purpose of wilderness. The Wilderness Act in Section 4 (c) identifies the prohibitions (codified at 16 U.S.C. 1133(c)) and Section 2 describes the purpose of wilderness (codified at 16 U.S.C. 1131).

Parks must first determine if the action (project) is necessary for the administration of the wilderness area, to realize the purpose of wilderness. Once the action (project) is determined necessary, parks must next determine the activity (method or tool) to accomplish the action (project) with the least negative impact to wilderness. This MRA should be undertaken using an interdisciplinary approach that includes the project lead, wilderness manager, resource specialists, and superintendent.

NPS Management Policies provide that a MRA must also be applied to all other administrative actions (projects) within wilderness that could potentially affect wilderness character. Also, whenever an environmental assessment or environmental impact statement is prepared for work projects within wilderness, a MRA should be included as part of the document.

Under no circumstances may a MRA be used to allow permanent roads or commercial enterprise within wilderness. The use of motorized equipment and the establishment of management facilities are specifically prohibited when other reasonable alternatives are available.

For newly designated wilderness, parks will prepare a MRA, along with an NHPA Section 106 Determination, to evaluate the retention or removal of administrative facilities, structures, and installations.

Parks in Alaska must consult RM 41 to ensure that their minimum requirement analysis process is consistent with the provisions of ANILCA.

The Associate Director will ensure that additional information, guidance, and detail on applying the MRA are included in RM 41.

6.5 Scientific Activities

The scientific value of wilderness is derived from the preservation of wilderness character. These areas can provide a baseline for study of natural and cultural resources and other related values such as soundscapes and night skies. Wilderness research can help provide a scientific and scholarly basis for wilderness planning, operations, management, interpretive, and education activities.

Scientific activities will be encouraged in wilderness, provided that the benefits of what may be learned outweigh the negative impacts to wilderness character. Managers need to be aware of, and guard against, cumulative effects from simultaneously occurring projects. It is important for scientists to understand that the conduct of their research should be in accord with wilderness preservation principles. Applications for research and other scientific work in wilderness should demonstrate a positive benefit to wilderness or wilderness purposes, and must include a MRA of

the project's methods. Monitoring systems must be implemented to ensure wilderness character is preserved.

Superintendents must use a documented process to determine appropriateness of proposed scientific activities. They should also develop and maintain a comprehensive database to track all scientific activities within the wilderness and their cumulative impact to wilderness character. This database should include an annual certification of continuing need for data collection. The park is responsible for ensuring the removal of scientific equipment by investigators at the end of the authorized research period.

6.6 Climate Change

Climate change will have long-range effects on all aspects of ecosystem function. Wilderness managers and superintendents should collaborate across program areas to develop flexible, sustainable strategies that uphold wilderness values and integrate with park, regional, and national level responses. These strategies must account for any effects on wilderness character from actions taken or not taken.

Superintendents and wilderness staff should fully participate and be leaders in efforts to increase landscape connectivity, improve ecosystem resilience through the reduction of the influence and negative impact of humans on the ecosystem, engage in interagency management collaboration, consider appropriate scientific research, and create relevant climate change communication products.

6.7 Fire Management

Firefighter and public safety are the first priorities in every fire management activity. However, wilderness character must be fully considered during all fire management actions beginning with the development of the Fire Management Plan (FMP) and continuing through the management of individual wildfires and implementation of fuel treatments and post-fire actions. A FMP is required for each park with burnable vegetation. It defines objectives, management requirements, ecological considerations, and potential strategies and tactics for safely managing fire in order to meet overall land management and wilderness objectives. The FMP considers values that require protection from fire (e.g., structures, cultural resources, and other values) as well as those that may benefit from fire within and outside of wilderness.

In many NPS wilderness areas, fires resulting from natural ignitions are considered a natural process that contributes to ecosystem function and is necessary to maintain wilderness in an unimpaired condition. As a result of many factors including past fire management practices within wilderness and the need to control wildfires on adjacent lands, fire may not be adequately functioning as a natural change agent. In those cases, augmenting natural ignitions with prescribed fire or other fuel treatments within wilderness may be necessary to restore or maintain ecological function if that is a goal identified in the park's Wilderness Stewardship Plan or FMP.

To ensure adequate consideration of wilderness resources, a programmatic MRA must be completed as part of the development of the park's FMP and companion environmental compliance document. The programmatic MRA must address management strategies for wildfires and fuel treatments in wilderness. The programmatic statement will establish the need for potential fire management actions in wilderness and will provide guidance for implementing initial wildfire responses. The analysis should specify the minimum activities (strategies, methods, and tools) that are generally permitted for managing wildfires, implementing fuels

treatments, and conducting post-fire activities. For management of long-duration wildfires, an incident specific minimum requirements analysis should be considered to evaluate the methods and tools being applied to manage the event. The analysis should be periodically reviewed throughout the incident to ensure that appropriate strategies, methods, and tools are being used to protect wilderness character.

A MRA must also be developed as part of a Burned Area Emergency Response (BAER) plan for actions in wilderness that are proposed to restore, stabilize, or rehabilitate an area following a wildfire.

Project plans for fuels treatments in wilderness must address the minimum requirement. Project plans should refer to the programmatic MRA developed for the FMP that establishes the necessity for such treatments. If the proposed treatment is confirmed to be within the framework of the programmatic MRA, the project plan is not required to revisit that decision. However, each project plan must contain an analysis of the minimum methods and techniques necessary to accomplish the specific action with the least negative impact to wilderness character.

The application of Minimum Impact Strategies and Tactics (MIST) is required for all fires in wilderness. Qualified wildland fire Resource Advisors should be utilized throughout wildfire incidents, and post-fire activities including emergency stabilization and BAER. Resource advisors must be knowledgeable about wilderness values, objectives, and policies.

A delegation of authority from the park superintendent to an Incident Commander will include appropriate emphasis on the protection of wilderness resources and character, and the minimum requirements concept. Fire management resources must be adequately briefed on the concepts of wilderness stewardship and held accountable for preservation of wilderness character. They must be made aware of specific protections and constraints contained in the park's Wilderness Stewardship Plan and FMP.

Parks lacking an approved FMP must suppress all wildfires in a method that is commensurate with values to be protected and with consideration for the principles of risk management. While parks lacking an approved FMP may not use resource objectives as a primary consideration when selecting a suppression strategy for a wildfire, the impacts of suppression alternatives on wilderness character and other resource values must be considered when response strategies are developed and decisions are approved. Parks lacking an approved FMP may not implement prescribed fire projects. Also see *Management Policies 2006*, Section 6.3.9 and Director's Order #18: Wildland Fire Management.

6.8 Abandoned Mine Lands

Abandoned mine lands, adits, shafts and wells will be evaluated for closure or restoration using the MRA, which includes consideration of public safety, natural and cultural resources, and wilderness character.

6.9 Non-native Invasive Species

Non-native invasive plant and animal species must not be brought into wilderness. Parks should be managed with the goal of early detection and rapid response in areas adjacent to wilderness to prevent the spread into wilderness. Parks should have information and programs to inform the visiting and non-visiting public about the impacts of non-native invasive plants and animals and how to prevent their introduction and spread. Regulations (e.g., requiring certified weed-free

hay, grain and hay cubes for stock) may need to be put in place within a park's compendium in order to prevent the introduction and spread of non-native invasive species.

Parks should use Integrated Pest Management (IPM) to guide invasive species planning and implementation and develop management plans using IPM that may require NEPA and minimum requirements compliance. Elements include prevention, inventory, prioritization, treatment, monitoring, research, education, and outreach. An inventory and assessment of non-native invasive species should be conducted before any treatment actions are proposed. The objective of treatment within wilderness should be the eradication of the invasive species. If eradication is not feasible, the objective of treatment should be to contain the invasion, preventing spreading.

The management of non-native invasive species can result in both positive and negative impacts to wilderness character. A MRA will be conducted on proposed actions to inventory, monitor, control or eradicate non-native invasive species. The MRA will be the basis for managers to determine if the proposed action is necessary and will identify the management activity which has the least negative impact on wilderness. Also see *Management Policies 2006,* Section 4.4.1.

6.10 Natural Sounds and Night Skies

Opportunities to hear the sounds of nature and view the night sky are important components of wilderness character. Experiencing natural soundscapes and viewing night skies unmarred by human-caused noise and light is critical to the primeval character of wilderness, giving the visitor a sense of remoteness and solitude. Wilderness provides us with moments of quiet reflection to experience the natural rhythms of sound in the wild and inspires us to contemplate the mysteries of a star-filled sky, experiences that are rapidly disappearing in the modern world. Anthropogenic noise and light travel long distances. In many wilderness areas, the only perceptible human influence on the landscape is the noise and light from human activity, often occurring many miles away. Effective management of wilderness should involve careful attention to these important resources. Also see *Management Policies 2006,* Section 4.9.

6.11 Air Quality

Managers must protect air quality related values (AQRVs) in wilderness. Managers should define AQRVs for each wilderness, select sensitive indicators, collect baseline data, establish a long-term monitoring program to track changes, and establish the acceptable level of protection needed to protect AQRVs. Proposals for the use of temporary instrumentation to monitor AQRVs will be evaluated using a MRA. Managers should rely on instrumentation outside of the wilderness to the extent possible.

Managers must ensure that agency actions conform to the air pollution regulations and do not contribute to long-term negative impacts to wilderness air quality. Managers will be responsible for reducing the impacts of smoke from wildland fires in wilderness, while understanding and promoting the need to re-introduce the natural role of fire into wilderness ecosystems. As community leaders in environmental stewardship, managers are committed to using sustainable practices in parks that will reduce air pollution, such as the use of alternative energy sources (e.g., solar power, wind energy, and alternative fuels). Interpretation of these and other sustainable practices in parks will help educate visitors on ways they can reduce their contribution to air pollution.

The NPS has no direct permitting or enforcement authority over air pollution sources. Managers will work with Federal and State regulatory agencies to identify air pollution effects and develop protection strategies. Managers should be involved in local and State air quality planning and permitting processes. Managers should review proposed emission source projects with the potential to impact wilderness and make recommendations to mitigate the impacts of these sources.

6.12 Cultural Resources

Wilderness may contain features of scientific, educational, scenic, and historical values that are also cultural resources. There has been prior human use in all areas now designated as wilderness, resulting in archeological sites, historic structures, cultural landscapes, and associated features, objects, and traditional cultural properties located in many wilderness areas that contribute to our appreciation of wilderness. It is important to recognize that all laws intended to preserve our cultural heritage are applicable in wilderness and must be applied in concert with the Wilderness Act. Also see *Management Policies 2006*, Section 6.3.8.

NPS managers must maintain an affirmative cultural resource management program in wilderness, but these sites must additionally be treated in a manner that preserves other wilderness resources and character. Measures to protect and inventory cultural resources in wilderness must comply with the Wilderness Act provisions for minimum requirements analysis.

Cultural resource specialists must fully participate in the development of a park's Wilderness Stewardship Plan. Wilderness stewardship specialists must fully participate in the development of a park's cultural stewardship plan when cultural resources are present in wilderness. In keeping with the Secretary of the Interior's Standards for managing cultural resources, a variety of management actions may be taken, including restoration or stabilization of a site or property, or professional level documentation and removal after appropriate steps have been taken to comply with the National Historic Preservation Act (16 U.S.C. 470f). Parties interested in the historic preservation issue(s) must be consulted, including but not limited to, appropriate tribal government officials, including Tribal Historic Preservation Officers, Alaska Natives, and Native Hawaiian Organizations, State Historic Preservation Officers and, if necessary, the Advisory Council on Historic Preservation.

6.13 Native Americans and Consultation

For Native Americans, wilderness can be a homeland or a place of profound tribal history or traditional use. Managers must engage in government-to-government consultation with associated federally recognized Indian Tribes to assist in culturally sensitive wilderness stewardship. Uses of wilderness in a park may be subject to a treaty right by a formerly occupying tribe to engage in certain activities. Various laws and executive orders reflect our nation's respect for the strongly held tribal relationships to places in wilderness. Additionally, Executive Order 13175 and the Department of the Interior Policy on Consultation with Indian Tribes require that the National Park Service conduct government-to-government consultations with federally recognized Indian Tribes when undertaking any Federal action that may have a direct impact on tribes or tribal lands. Federal actions include policy, guidance, and/or operational activity that affect tribal cultural practices, lands, resources, or access to traditional areas of cultural or religious importance on federally managed lands. Tribes may have concerns about natural and cultural resources that may not necessarily be addressed during the Section 106 process. Also see *Management Policies 2006*, Sections 1.11 and 8.5.

6.14 Interpretation and Education

The Comprehensive Interpretive Plan for parks with proposed, recommended, or designated wilderness should include and address the primary park interpretive themes that reflect the wilderness. Wilderness significance statements and interpretive themes can be found in the NPS Wilderness Education and Partnership Plan, developed by the Wilderness Leadership Council. Wilderness character, resources and stewardship should be included in the park's interpretation, education, and outreach programming and should be included as an integral component of the park's long-range interpretive plan and annual implementation plan.

Staff education is an integral part of wilderness stewardship. Therefore, wilderness awareness training will be incorporated into all appropriate training programs for park staff, including seasonal staff, cooperating association employees, concessions employees, and volunteers.

Leave No Trace (LNT) principles and practices will be applied to all forms of recreation management within wilderness. LNT principles should be incorporated into interpretive activities and products such as hikes, talks, brochures, maps, and websites. All commercial guides leading trips into wilderness should attend LNT workshops and be required to incorporate LNT into their trips. Park staff who work in wilderness should attend LNT workshops and training. Also see *Management Policies 2006,* Sections 6.4.2 and 7.1.

6.15 Naming of Geographic Features

The U.S. Board on Geographic Names governs the naming of geographic features and has the authority to approve or disapprove any request to name a feature within wilderness. As stated in the Board's Principles, Policies, and Procedures, the Board will not approve proposed names unless an overriding need exists, such as for purposes of safety, education, or area administration. To maintain the untrammeled character of wilderness, the NPS will not propose to the Board, or support proposals by others, to apply new names to geographic features within any category of wilderness. A rare exception to this policy may be considered on a case-by-case basis when a proposed name: (a) has a direct influence on the safety of persons within the area; (b) serves a useful wilderness interpretive or educational purpose; or (c) is linked to an historical figure, activity, incident, or resource having a direct association with the geographic feature; and (d) meets all other NPS and Board policies applicable to geographic naming. The NPS Office of Policy coordinates with the Board and should be consulted on naming issues relating to wilderness. Also see *Management Policies 2006,* Section 9.6.3.

7. Wilderness Use Management

7.1 Persons with Disabilities

While section 507(c) of the Americans with Disabilities Act (ADA) (42 U.S.C. 12207(c)) allows for the use of wheelchairs in wilderness, it also states that "no agency is required to provide any form of special treatment or accommodation, or to construct any facility or modify any condition of lands within a wilderness area in order to facilitate such use." Nevertheless, the NPS is committed to providing opportunities for appropriate enjoyment of wilderness by persons with disabilities.

Wheelchairs (whether manually operated or power-driven) are allowed in wilderness if they meet the definition in the ADA: "...a device designed solely for use by a mobility-impaired person for

locomotion, that is suitable for use in an indoor pedestrian area." The device must also be a person's primary mode of locomotion.

The NPS will allow service animals within wilderness when their use is required. Department of Justice (DOJ) regulations (28 CFR Part 36), implementing the ADA define a service animal as any dog that is individually trained to do work or perform tasks for a person with a disability. Other species of animals are not service animals for the purpose of this definition. The training of service animals in wilderness may be allowed if it does not negatively impact wilderness character and only in areas specifically designated for pets by the park superintendent.

The Wilderness Access Decision Tool publication provides further guidance in assisting managers in making appropriate, objective, and consistent decisions regarding the use of wilderness by persons with disabilities. Managers should ensure that decisions concerning wilderness use do not inadvertently discriminate against persons with disabilities. Also see *Management Policies 2006,* Section 6.4.10 and RM 41.

7.2 Climbing

For the purpose of this Order, climbing is defined to include rock climbing, snow and ice climbing, mountaineering, canyoneering, and caving, where climbing equipment, such as ropes and fixed or removable anchors, is generally used to support an ascent or descent. The NPS recognizes that climbing is a legitimate and appropriate use of wilderness. However, any climbing use or related activity must be restricted or prohibited when its occurrence, continuation, or expansion would result in unacceptable impacts to wilderness resources or character, or interfere significantly with the experience of other park visitors.

If climbing activities occur in wilderness, climbing management strategies will be included as part of the park's Wilderness Stewardship Plan, or other activity-level plan. Wilderness parks with climbing use will exchange information on best practices, work together on servicewide implementation, and communicate with stakeholders and wilderness users. Wilderness climbing education and impact monitoring will be important components in climbing management programs. It is recognized that the use of removable anchors may reduce, but does not in every case completely eliminate, the need for fixed anchors. The occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act. However, climbing practices with the least negative impact on wilderness resources and character will always be the preferred choice.

The establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management due to the concentration of human activity which they support, and the types and levels of impacts associated with such routes. Climbing management strategies will address ways to control, and in some cases reduce, the number of fixed anchors to protect the park's wilderness resources or to preserve the "untrammeled," "undeveloped," and "outstanding opportunities for solitude" qualities of the park's wilderness character.

Fixed anchors or fixed equipment should be rare in wilderness. Authorization will be required for the placement of new fixed anchors or fixed equipment. Authorization may be required for the replacement or removal of existing fixed anchors or fixed equipment. The authorization process to be followed will be established at the park level and will be based on a consideration of resource issues (including the wilderness resource) and recreation opportunities. Authorization may be issued programmatically within the Wilderness Stewardship Plan or other

activity-level plan, or specifically on a case-by-case basis, such as through a permit system. Prior to the completion of the park's Wilderness Stewardship Plan or other activity-level plan, the park superintendent may approve new fixed anchors or fixed equipment on a case-by-case basis.

If unacceptable impacts are occurring in wilderness as a result of climbing, the park superintendent may deem it necessary to restrict or prohibit the placement of fixed anchors. Proposals for the placement of fixed anchors or fixed equipment for the administrative purpose of facilitating future rescue operations must be evaluated through a MRA.

"Clean climbing" techniques should be the norm in wilderness. This involves the use of temporary equipment and anchors that can be placed and removed without altering the environment (e.g. slings, cams, nuts, chocks, and stoppers). Practices such as gluing or chipping holds, and damaging or removing vegetation on or at the base of climbing routes, are prohibited by NPS regulations (36 CFR 2.1). The use of motorized equipment (e.g. power drills) is prohibited by the Wilderness Act and NPS regulations (36 CFR 2.12). Climbers are encouraged to adopt Leave No Trace principles and practices for all climbing activities, including packing out all trash and human waste.

7.3 Commercial Services

Parks must make a documented determination of the types and amount of commercial services necessary to realize wilderness purposes (recreational, scenic, scientific, educational, conservation and historical) in a given area at a given time. This documented determination process should be undertaken using an interdisciplinary approach that includes the wilderness manager, commercial services staff, and other resource specialists. There are two specific legal requirements for allowing commercial services from the Wilderness Act (16 U.S.C. 1133(d)(5)). The first requirement of the Wilderness Act is a determination that a certain activity is necessary in wilderness. For activities that are necessary to realize the wilderness purposes, the second requirement is an evaluation of the minimum amount of commercial service that is necessary to achieve these purposes.

Wilderness areas at, or near, visitor use capacity may not be able to accommodate any commercial services either at all or during peak capacity periods. Commercial services, similar to all other activities, may only be allowed in wilderness if wilderness character is preserved. Commercial services may be limited to preserve opportunities for primitive recreation or other aspects of wilderness character. Specific consideration should also be given to the potential short-term and long-term impacts of commercial service activities. The use of motor vehicles, motorized equipment, or mechanized transport is not allowed in wilderness for commercial services.

Commercial filming is considered a commercial service for purposes of the Wilderness Act. Parks must apply the same two legal requirements for commercial services to any commercial filming request in wilderness. For example, is it necessary, why does the commercial filming need to take place in park wilderness? If necessary, what wilderness purposes (recreational, scenic, scientific, educational, conservation and historical) will be realized from this use? In most cases, park managers should work with the applicant to find locations outside of wilderness that can accommodate this use. If wilderness locations are justified, then the activities should minimize impacts to other visitors' enjoyment of wilderness and only use the minimum amount of the wilderness needed for the activity for the shortest possible period of time.

Commercial still photography activities that include the use of models, sets, or props, or promote a product or service are prohibited in wilderness.

Commercial air tours are inconsistent with preservation of wilderness character. Existing air tours over a proposed wilderness area will not preclude consideration for wilderness designation. Ways to prevent or minimize negative impacts to wilderness character should be addressed in Wilderness Stewardship and Air Tour Management Plans. Parks should also work with air tour operators and the FAA to further prevent or minimize negative impacts to wilderness character.

8. Further Guidance

Additional resources available for guidance are:

- Wilderness Act (16 U.S.C. 1131-1136)
- Title 43, Part 19 of the Code of Federal Regulations
- NPS *Management Policies 2006*, Chapter 6
- Reference Manual 41: Wilderness Stewardship
- Director's Order #18: Wildland Fire Management
- Director's Order #53: Special Park Uses
- NPS Wilderness Stewardship Division (internal NPS web site)
- http://wilderness.nps.gov/
- http://www.wilderness.net/

----End of Director's Order----