

# MINIMUM REQUIREMENTS ANALYSIS

## Resource Brief

National Park Service  
U.S. Department of the Interior

Wilderness Stewardship Division



### Background

The National Park Service (NPS) is responsible for implementing mandates of the 1964 Wilderness Act, as interpreted through NPS wilderness policy.

To help preserve wilderness character and promote sound wilderness stewardship, NPS wilderness managers and partners are responsible for implementing the “minimum requirements analysis” (MRA) process, first introduced in the [Wilderness Act](#), Section 4(c):

*Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.*

### Minimum Requirements in NPS Policy

The MRA process is referenced and explained in several sections of Management Policies 2006 and Director’s Order 41 (see reverse for the two-step MRA process).

From [NPS Management Policies 2006](#), Chapter 6 - Section 6.3.5:

*All management decisions affecting wilderness must be consistent with the minimum requirement concept. This concept is a documented process used to determine if administrative actions, projects, or programs undertaken by the Service or its agents and affecting wilderness character, resources, or the visitor experience are necessary, and if so how to minimize impacts. The minimum requirement concept will be applied as a two-step process that determines:*

1. *Whether the proposed management action is appropriate or necessary for administration of the area as wilderness and does not cause a significant impact to wilderness resources and character, in accordance with the Wilderness Act; and*



Buffalo National River Wilderness (NPS/Mike Johnson), Zion Wilderness (NPS photo), Hain Wilderness - Pinnacles NP (NPS/Gavin Emmons)

2. *The techniques and types of equipment needed to ensure that impacts on wilderness resources and character are minimized.*

From [NPS Director’s Order 41](#), Section 6.4:

*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... 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.*

### Contacts

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Visit the [NPS Wilderness Stewardship Program Sharepoint Site](#) for more information about MRAs [Viewable by DOI employees only]

## Step 1: Determine if administrative action is necessary.

**Issue Statement:** Describe the circumstances that may require action. This is not a proposed action, tool, or solution.

**Address options outside of wilderness** – Can action be taken outside of wilderness to properly resolve the issue?

**Examine criteria for determining necessity** – Is action necessary to meet any of the criteria below?

- Valid Existing Rights or Special Provisions of Wilderness Legislation – Is action necessary to satisfy valid existing rights or a special provision in wilderness legislation (the Wilderness Act of 1964 or subsequent wilderness laws) that requires action?
- Does another federal law, by itself or as implemented/interpreted through EO, court order, etc., require action?
- Wilderness Character – Based on the Issue Statement, are any of the qualities of wilderness character degraded, impaired, or threatened to a degree that is necessary to analyze potential action?

### Step 1 Determination: Is administrative action necessary in wilderness?

*If action is necessary, proceed to Step 2 to determine the minimum activity which least impacts the wilderness resource and wilderness character.*

## Step 2: Determine the minimum activity.

**Other Direction:** Is there “special provisions” language in legislation (or other Congressional direction) that explicitly allows consideration of a use otherwise prohibited by Section 4(c), AND/OR the issue is addressed or prescribed in agency policy, management plans, or legal directive??

**Uncontrollable Timing Requirements:** Are there any considerations that would dictate timing of the action?

**Workflow Components:** Break the action down into discrete components or phases to be analyzed in each alternative.

**Description of Alternatives:** For each feasible and reasonable alternative, describe what methods and techniques will be used, when and where the action will take place, and what mitigation measures are necessary. Alternatives considered should include the following:

- Use of any suggested prohibited equipment or facilities.
- None of the Section 4(c) prohibited uses.
- If appropriate, a mix of prohibited and non-prohibited uses.

**Component Methods:** Identify how each of the components of the action would be performed under this alternative.

**Wilderness Character:** For each alternative, describe the effect of each component activity on the qualities of wilderness character (including cumulative impacts) and what mitigation measures will be taken:

- Untrammeled
- Undeveloped
- Natural
- Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation
- Other Features of Value

**Alternatives Considered but Dismissed:** What alternatives were considered but not analyzed?

### Step 2 Determination: What is the minimum activity?

- Identify the Selected Alternative.
- Explain rationale for selection, including a comparison of the selected alternative with other alternatives.
- Describe mitigation measures as well as monitoring and reporting requirements.
- Indicate approved prohibited uses, including quantity, timing, frequency, or duration as applicable.

**Approvals and Environmental Compliance:** Follow agency compliance pathways and approvals as per applicable laws (NEPA, NHPA, etc.).