

DIRECTOR'S ORDER #41: WILDERNESS STEWARDSHIP

Approved: _____
Director

Effective Date: _____

Duration: This order will remain in effect until updated or rescinded

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

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1. Background and Purpose

The purpose of this Director's Order is to provide accountability, consistency, and continuity in the National Park Service wilderness stewardship program, and to guide Service-wide efforts in meeting the letter and spirit of the [Wilderness Act](#) (16 USC 1131-1136). This Order clarifies, where necessary, specific provisions of *Management Policies 2006* and establishes specific instructions and requirements concerning the stewardship of all National Park Service wilderness.

This Order should be applied to stewardship actions carried out within the framework of park general management plans, wilderness stewardship plans, natural and cultural resources plans, fire management plans, and other operational plans. It is important to note that these generic NPS wilderness policies may in some instances be superseded by statutory provisions that apply to individual wilderness areas, by rights reserved by former landowners and, in Alaska, by applicable provisions of the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).

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 a subset of any of proposed, recommended, or designated categories.

2. Authority

Authority to issue this Order is contained in the National Park Service Organic Act (16 USC 1 through 4), and delegations of authority contained in Part 245 of the Department of the Interior Manual. 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. The Associate Director will—

- oversee the NPS Wilderness Program and develop necessary standards and procedures;
- coordinate with the Associate Director of Natural Resources and Science and the Associate Director for Cultural Resources to enhance wilderness stewardship across disciplines throughout the NPS;
- issue, review, and revise as appropriate, Reference Manual #41 (RM-41), which will provide more detailed procedural guidance on administering the Wilderness Program; and
- represent the NPS on the interagency Wilderness Policy Council.

3.2 Wilderness Leadership Council. The Wilderness Leadership Council will—

- advise the Director and National Leadership Council on all matters pertaining to NPS 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 NPS wilderness stewardship.

3.3 Chief, Wilderness Stewardship. The Chief will—

- provide goals and direction to the wilderness program as approved by the Associate Director;
- assist the Director with national policy review and responses to congressional inquiries;
- maintain the Service-wide 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 regarding wilderness stewardship;
- work closely with the NPS Wilderness Leadership Council;
- serve as the NPS representative on the interagency wilderness steering committee; and

- oversee the Arthur Carhart National Wilderness Training Center and the Aldo Leopold Wilderness Research Institute.

3.4 Wilderness Training Manager. The Associate Director will designate a wilderness training manager to—

- serve as the National Park Service representative to the Carhart Center;
- 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. Regional directors will—

- 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 a wilderness character baseline is established for all wilderness parks; and
- ensure that all superintendents and deputy superintendents of parks with wilderness resources receive National Wilderness Stewardship training, hosted by the Carhart Center, within two years of assuming their duties.

3.6 Regional Wilderness Coordinators. Regional Wilderness Coordinators will—

- promote consistency in wilderness stewardship, provide policy interpretation in their region;
- facilitate training and awareness to staff throughout the region; and
- provide communication between the multiple levels and disciplines of wilderness program management.

3.7 Superintendents. Superintendents will—

- track the status of their parks' designation processes;
- protect wilderness character by adhering to the Wilderness Act and NPS guidance documents;
- establish an interdisciplinary approach to wilderness stewardship;
- participate in interagency wilderness stewardship coordination;
- monitor plans and operations to ensure compliance with the Wilderness Act and ensure that their regional director is made aware of park staffing requirements to meet their wilderness-related responsibilities;
- designate a park wilderness coordinator with a percentage of time dedicated to wilderness stewardship appropriate to the size and complexity of the park; and
- ensure that all park staff has necessary training and skills to be effective wilderness stewards.

3.8 Park Wilderness Coordinators. Park wilderness coordinators are the central points of contact for park wilderness stewardship issues. They will—

- coordinate eligibility assessments and wilderness studies;
- establish wilderness character baseline and monitoring trends;
- develop and maintain wilderness stewardship plans;
- complete GPRA/PMDS annual reporting requirements;

- participate in interagency wilderness stewardship coordination;
- provide advice on wilderness issues to park staffs;
- incorporate wilderness education into park programs;
- ensure their park applies the “minimum requirements” concept through proper analysis, including documenting and tracking all decisions;
- assess wilderness impacts in NEPA compliance documents; and
- evaluate proposals for scientific activities in wilderness.

4. Training Requirements

Park superintendents and deputy superintendents are required to attend the Carhart Center's National Wilderness Stewardship Training course within two years of coming to any park with wilderness resources, and ensure that park personnel have appropriate types and levels of wilderness training to be effective wilderness stewards. (Other position-specific training requirements are listed in section 3, above, and further details on the wilderness training program are identified in RM-41.)

5. Identification and Designation of the Wilderness Resource

Park superintendents must take the necessary steps to identify and designate wilderness resources in their parks and afford them maximum protection during the process, as detailed in *Management Policies 2006*, Chapter 6, “Wilderness Preservation and Management.” Identification and designation of the wilderness resource is a multi-step process, as outlined below and in section 6.2 of [Management Policies 2006](#). The first two steps (i.e., an eligibility assessment and a formal wilderness study) may be combined into one if the work can be completed in a timely manner.

5.1 Wilderness Eligibility Assessment

All national park system lands, including new units or additions to existing units since 1964, must undergo a wilderness eligibility assessment. The eligibility assessment is an internal park review that identifies those lands that are eligible for further study and possible inclusion in the National Wilderness Preservation System. It consists of a memorandum from the regional director to the Director. Lands that were originally assessed as ineligible because of nonconforming uses must be reevaluated if those uses have ceased or been removed.

The assessment should be completed no later than one year after NPS acquisition or from the cessation of the nonconforming use. Public involvement at this step consists of NPS “notification of its intentions to conduct the assessment and publication of the Director's determination, either as ‘eligible’ or as ‘ineligible’ for further wilderness study.” (See *Management Policies 2006* section 6.2.1.3.)

To be eligible, NPS lands must, at a minimum, meet the criteria identified by the Wilderness Act and summarized in *Management Policies 2006*, section 6.2.1.1. Additional criteria to be considered for wilderness eligibility are listed in *Management Policies 2006* section 6.2.1.2. Further guidance and definitions can be found in [Title 43, Part 19 of the Code of Federal Regulations](#).

Lands that are determined to be eligible for further wilderness study will be managed as wilderness per the wilderness preservation provisions in *Management Policies 2006* chapter 6, until a final determination is made that the lands will become designated wilderness or released. 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 nonwilderness areas of the national park system.

5.2 Wilderness Studies and Proposed Wilderness

Wilderness studies are formal studies with public involvement to develop a recommendation to Congress regarding wilderness designation. Notification and coordination with the WASO Wilderness Stewardship Division should occur early in this planning process. Chapter 6 of *Management Policies 2006* contains substantial guidance on the wilderness study process, but there are several points that should be emphasized:

- In the course of a study, the NPS will involve the public, share alternatives, and assess the effects of wilderness designation.
- An environmental impact statement (EIS) is required for any recommendations for designation as wilderness.
- The initial determination of eligibility may be revised based on this study and public involvement.
- Wilderness designation proposals will be reviewed by the Director for determination as to which lands will be forwarded to the Secretary of the Interior (through the Assistant Secretary's office) as proposed wilderness.
- Superintendents must track and know the status of their wilderness designation proposals.

Lands that are identified as "proposed wilderness" will be managed as if they were wilderness, in accordance with the provisions of *Management Policies 2006*, chapter 6. Lands that were identified by the assessment as eligible but not forwarded as "proposed wilderness" by the Director to the Secretary will be managed to preserve their wilderness resources and values. Although these lands do not have to be managed as if they were wilderness, no actions may be taken that would preclude their eligibility for designation as wilderness by Congress. In other words, no actions may be taken that would degrade an area's wilderness character and resources such that the area would no longer meet the primary eligibility criteria identified by the Wilderness Act (for example, new structures or new roads). The concept of "minimum requirements" does not need to be applied to the administration of these lands that were not proposed for designation.

5.3 Recommended Wilderness

The NPS Wilderness Stewardship Division and appropriate park superintendent will track the status of the recommendation as it progresses through the offices of the Assistant Secretary and Secretary. Lands that are identified as "recommended wilderness" will be managed as wilderness in accordance with the wilderness preservation provisions of *Management Policies 2006* chapter 6. Lands proposed by the Director but not forwarded as "recommended wilderness" by the Secretary to the President will be managed to preserve their wilderness resources and values, per *Management Policies 2006*.

5.4 Designated Wilderness

When 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" and/or "designated potential" wilderness. Lands designated as wilderness by Congress will be managed to preserve their wilderness character and value according to 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 Designated Potential Wilderness

Designated potential wilderness lands are Federal lands that Congress intends to become fully designated wilderness upon the elimination of a nonconforming use prohibited by the Wilderness Act. Prohibited uses could include a road, or a structure/installation. Congress may also designate non-federally owned tracts, so if and when they are acquired the area can be included as designated wilderness. Designated potential wilderness lands will be managed as if they were designated wilderness, to the extent the non-conforming uses or conditions allow.

The National Park Service will seek to remove from designated potential wilderness the temporary, nonconforming conditions that preclude wilderness designation. Once the non-conforming use has been terminated, the superintendent must ensure that potential wilderness lands are converted to fully designated wilderness. For procedures on how to do this refer to *Procedure for Converting Potential Wilderness to Designated Wilderness* in RM-41.

5.6 Wilderness Boundaries

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 setbacks for roadways should be 100 feet from centerline. Exceptions to these standards may need to be made on a case by case basis to accommodate environmental protection and safety considerations. Any deviation from the standard should be documented on the map and in the legal description.

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. Future generations will be able to experience national park wilderness, and other areas within the National Wilderness Preservation System, only if all NPS employees understand this goal, work together, and engage other wilderness management agencies and partners, to accomplish it.

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 Wilderness Stewardship Division, Wilderness Policy Council, Wilderness Steering Committee, and Carhart Center. 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 Native American tribes; 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 the adjacent wilderness units to achieve as much consistency as possible in the application of wilderness regulations or 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 NPS *Management Policies*. Where appropriate, National Park Service wilderness education programs should explain reasons for differences among neighboring agencies wilderness stewardship practices.

6.2 Wilderness Character

The Wilderness Act, specifically 16 USC 1133(b), directs that "each agency administering any area designated as wilderness shall be responsible for preserving [its] wilderness character." Accordingly, each wilderness park will establish a baseline for wilderness character. Once established, monitoring for trends in wilderness character should be completed at a minimum of every five years. Establishing a park's wilderness character baseline, and monitoring the wilderness character to understand the status and trend, can be done independent of having a wilderness stewardship plan. The baseline and monitoring program may be incorporated into a wilderness stewardship plan or used to help inform the creation of a wilderness stewardship plan.

Wilderness character can be measured against four tangible qualities that the NPS will utilize in wilderness planning, stewardship, and monitoring. While there are many intangible aspects of wilderness character that are important, these four qualities are practical and measureable and rooted in the Wilderness Act.

- Untrammeled - Wilderness is essentially unhindered and free from modern human control or manipulation. Actions authorized or unauthorized by the federal land manager that manipulate the biophysical environment are indicators used to identify effects to the untrammeled quality.
- Natural - Ecosystems are substantially free from the effects of modern civilization. Plant and animal species and communities, physical resources and biophysical processes are indicators used to identify effects to the natural quality.
- Undeveloped - Wilderness retains its primeval character and influence, and is without permanent improvements or modern human habitation. Non-recreational structures, installations, and developments, inholdings, use of motor vehicles, motorized equipment, or mechanical transport, loss of statutorily protected cultural resources are indicators used to identify effects to the Undeveloped quality.
- Opportunity for Solitude or Primitive and Unconfined Recreation - Remoteness from sights and sounds of people inside the wilderness, remoteness from occupied and modified areas outside the wilderness, facilities that decrease self-reliant recreation, management restrictions on visitor behavior are indicators used to identify effects to the Solitude or Primitive and Unconfined quality.

See RM-41 for additional guidance on trends that can be assessed and tracked for monitoring these qualities and other unique qualities that may be present and identified with respect to an individual wilderness. *Keeping it Wild: An Interagency Strategy to Monitor Trends in Wilderness Character Across the National Wilderness Preservation System*, offers a detailed guide for a monitoring framework on the four qualities, and a method for assessing trends.

6.3 Wilderness Planning

Development of a Wilderness Stewardship Plan (a.k.a. wilderness management plan) will be a priority and initiated, or reviewed and updated, as soon as practicable when Congress designates an area as wilderness. Wilderness parks with lands in other categories (e.g. recommended, proposed, study) should

develop wilderness stewardship plans to guide the stewardship and protection of wilderness resources and character until such time that Congress acts on the designation.

The goals and objectives of the wilderness stewardship plan will be effectively coordinated with other park management documents (e.g. General Management Plan, Strategic Plan, Annual Performance Plan, and other operational plans such as the Air Tour Management Plan, Commercial Services Plan, Fire Management Plan, and Natural and Cultural Resources Management Plan). The Associate Director will include in RM-41 standards for the content and structure of Wilderness Stewardship Plans.

6.4 Minimum Requirements

Superintendents of parks with wilderness must have a documented process for applying the [minimum requirements concept](#). The concept must be applied to all administrative activities that could potentially affect the wilderness character, including activities that are not specifically prohibited by section 4(c) of the Wilderness Act (16 USC 1133 (c)). Parks in Alaska must consult RM-41 to ensure that their minimum requirements process is consistent with the provisions of ANILCA.

The minimum requirements process cannot be used to allow permanent roads or commercial enterprise within wilderness unless authorized by specific legislation. Superintendents may approve any of the other activities or uses that are listed in section 4(c) of the Wilderness Act (16 USC 1133 (c)) as "prohibited," provided that they are deemed necessary to meet the minimum requirements for the administration of the area as wilderness, and the methods are determined to be the minimum activity for the project. The use of motorized equipment and the establishment of management facilities are specifically prohibited when other reasonable alternatives are available. Minimum requirements must be addressed in any EA or EIS prepared for work projects proposing the use of any section 4(c) prohibited use.

The Associate Director will ensure that additional information, guidance and detail on the minimum requirements concept is included in RM-41.

6.5 Scientific Activities

The Wilderness Act intended the conduct of legitimate scientific activities in wilderness. The scientific value of wilderness derives from its undisturbed conditions. These areas can provide a baseline for study of air, water, natural soundscapes, and night skies. Wilderness research can help provide a scientific and scholarly basis for wilderness planning, operations, management, education, and interpretive activities.

Scientific activities will be encouraged in wilderness, provided that the benefits of what may be learned outweigh the negative impacts on other wilderness values. Managers need to be aware of and guard against cumulative impact effects on the wilderness resource and character 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 National Park Service wilderness should demonstrate a positive benefit to wilderness or wilderness purposes, and must include a minimum requirements analysis of the project's methodologies. Monitoring systems must be implemented to ensure that the wilderness resource is not degraded.

Superintendents must use a systematic process to assess proposed scientific activities as a part of the park review and compliance process. They should also develop and maintain a comprehensive database to track all scientific activities within the wilderness and their cumulative impact to wilderness character.

6.6 Climate Change

Climate disruption 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 response.

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, support appropriate wilderness-compatible scientific research, and create and update relevant climate change communication.

6.7 Fire Management

In many NPS wilderness areas, fires resulting from natural ignitions are a natural process that contributes to the function of ecosystems and to wilderness character, provided the fire regime has not been adversely impacted by historic fire suppression efforts. As a result of past and present suppression practices within wilderness and the continued suppression of natural ignitions on lands adjacent to wilderness, fire may not always be adequately functioning as a natural change agent, or be allowed to burn freely without constraints or limitations. In those cases, augmenting natural ignitions with prescribed fire within wilderness may be necessary to restore or maintain ecological function. To guide these efforts, each park with burnable vegetation must have a Fire Management Plan (FMP) that defines the objectives, management requirements, and potential strategies and tactics for safely managing fire in order to meet overall land management and wilderness objectives.

Wilderness character must be adequately protected during all fire management actions, beginning with the development of the FMP and continuing through the management of individual events. A minimum requirements analysis must be completed as part of the development of the park's FMP and companion environmental compliance document. It must address the necessity of certain fire management actions for both planned and unplanned ignitions in wilderness, and specify at a programmatic level the minimum activities (methods or tools) that are generally permitted. Minimum requirements analyses should also be completed to address specific activities (methods or tools) for individual planned ignitions, as well as for actions that may be needed to restore, stabilize, or rehabilitate an area following fire. For the long term management of unplanned ignitions, an incident specific minimum requirements analysis should be completed. It should periodically be reviewed throughout the incident to ensure that minimum activities (methods or tools) are being used to protect wilderness character.

The application of Minimum Impact Suppression Techniques (MIST) is required for all fires in wilderness. The use of [Wilderness Fire Resource Advisors](#) should be incorporated into all wildfire management actions and Burned Area Emergency Stabilization and Response (BAER) activities. Resource advisors must be knowledgeable about wilderness values, objectives, and policies.

A delegation of authority from the park superintendent to incoming Incident Commanders will include appropriate emphasis on the protection of wilderness resources and character and on the minimum requirements concept. Incoming fire management teams must be adequately briefed in the concepts of wilderness stewardship, and held accountable for preservation of wilderness character, and must be made aware of specific protections and constraints contained in the park's Wilderness and Fire Management Plans. Individuals with this knowledge should be identified by the park and made available to the Incident Commander and his/her immediate command and general staff

Parks lacking an approved FMP must suppress all unplanned ignitions in a method that is commensurate with values to be protected and with consideration for the principles of risk management, and may not

implement prescribed fire or other fuels projects. While parks lacking an approved FMP may not use resource objectives as a primary consideration when selecting a suppression strategy for an unplanned ignition, the impacts of suppression alternatives on wilderness character must be considered when response decisions and plans are made. (Also see section 6.3.9 of *Management Policies 2006*, and Director's Order #18: Wildland Fire Management.)

6.8 Abandoned Mine Lands

Abandoned mine lands, adits, and shafts will be evaluated for closure or restoration using the minimum requirements analysis, which includes consideration of public safety and other pertinent laws and regulations and restoration of wilderness character.

6.9 Cultural Resources

Wilderness may contain scientific, educational, and historical properties that are also cultural resources. There has been extensive prior human use in most areas now designated as wilderness, resulting in archeological sites, historic structures, cultural landscapes and associated features, objects, and traditional cultural properties 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 section 6.3.8 of *NPS Management Policies 2006*.)

National Park Service 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 on access and use of the minimum requirements concept.

Cultural resource specialists must fully participate in the development of a park's wilderness management plan. In keeping with the Secretary of the Interior's Standards for managing cultural resources, a variety of management actions may be taken, including preservation of a site or property, protection from vandalism, professional level documentation, and removal after appropriate steps have been taken to comply with section 106 of the National Historic Preservation Act and other requirements. Parties interested in the historic preservation issue(s) must be consulted, including but not limited to, Native American tribes, State Historic Preservation Officers and, if necessary, the Advisory Council on Historic Preservation.

For Native American groups, wilderness can be a homeland or a place of profound tribal history or traditional use. Various laws and Executive orders reflect our Nation's respect for the strongly held tribal relationships to places in wilderness. Within wilderness, a number of Native American tribes may continue religious ceremonies and other practices as provided for in the American Indian Religious Freedom Act. Managers must develop long-term, constructive relationships with traditionally associated tribes to assist in culturally sensitive wilderness management. Wilderness may also include areas where treaty responsibilities and provisions apply. (Also see sections 1.11 and 8.5 of *NPS Management Policies 2006*.)

6.10 Interpretation and Education

The Comprehensive Interpretive Plan for parks with any classification of wilderness (e.g. designated, recommended, proposed, etc.) 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, educational 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. NPS staff who work in wilderness should attend LNT workshops and training.

6.11 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 National Park Service 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 educational or interpretive purpose; or (c) is linked to an historical figure, activity, incident, or resources 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.

7. Wilderness Use Management

7.1 Persons with Disabilities

While the Americans with Disabilities Act (ADA) Title V Section 508c 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 Service is committed to providing opportunities for appropriate enjoyment. Any facilities built or altered must meet current accessibility guidelines and be assessed in a minimum requirements analysis.

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 National Park Service will allow service animals within wilderness when their use is required. Department of Justice regulations 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 is allowed only with specific written permission from the park superintendent. Documentation must be provided that the animal is legitimately in training to be a service animal.

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 RM-41 and section 6.4.10 of NPS *Management Policies 2006*.)

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. Climbing is in many cases 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 or impairment to wilderness resources or character, or interfere significantly with the experience of other park visitors. The criteria under which a superintendent will make closure or restriction determination are listed in 36 CFR 1.5.

If significant climbing activities occur in wilderness, a climbing management plan must be prepared or be included as part of the park's wilderness stewardship plan or another activity level plan. Plans will be developed with the aid of public involvement and collaboration and will include public review and comment.

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 adverse impact on wilderness resources and character will always be the preferred choice.

- "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).
- The use of motorized equipment (e.g. power drills) is prohibited (36 CFR 2.12). Practices such as gluing or chipping holds, and damaging or removing vegetation on or at the base of climbing routes are prohibited (36 CFR 2.1).
- Climbers are encouraged to adopt Leave No Trace principals and practices, to include packing out human waste when on or in the vicinity of climbing routes.
- Proposals for the placement of fixed anchors or fixed equipment for the purpose of facilitating future rescue operations should be evaluated through minimum requirements analysis.
- Fixed anchors or fixed equipment may be appropriate, but 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 of existing fixed anchors or fixed equipment.
 - Authorization may be required for the removal of existing fixed anchors or fixed equipment.

The requirements for authorization, and the process to be followed, will be effected through an approved climbing management plan.

- Management strategies to control, and in some cases reduce, proliferation of fixed anchors in wilderness must be developed and articulated in a park climbing management plan.
- The establishment of bolt-intensive face climbs, such as "sport climbs," is considered incompatible with wilderness preservation and management due to the concentration of human activity which they support, and the types and level of impacts associated with the development of such routes.

Wilderness climbing education and impact monitoring will be important components in climbing management programs.

7.3 Commercial Services

Parks must determine whether, and to what extent, commercial services are necessary in a park's wilderness. This could be addressed within a General Management Plan, Wilderness Stewardship Plan or Commercial Services Plan. Authority to allow commercial services is found in section 4(d)(5) of the Wilderness Act. However, when considering this question, park managers must also evaluate—

- individual park wilderness enabling legislation; or
- existing private rights.

A commercial service—including a commercial recreational service, such as a guide service—allowed under any of these authorities is not subject to the Wilderness Act's "prohibition of certain uses." However, it must adhere to the minimum requirements concept in all aspects of its operation.

The only structures or facilities that will be allowed in wilderness in support of commercial services are temporary shelters, such as tents, which will be removed from the wilderness after each trip unless exceptions are clearly identified in the park's Wilderness Stewardship Plan and commercial services permit stipulations. Supply caches are not allowed at any time within the wilderness unless specifically authorized within a park's wilderness enabling legislation or in ANILCA.

Commercial filming permits, as identified in and required by 36 CFR 5.5, 43 CFR part 5, section 8.6.6 of *Management Policies 2006*, and Director's Order #53, will not be approved in wilderness unless determined to be necessary and proper for providing educational information about wilderness uses, resources, or values, or necessary for other wilderness purposes.

An appropriate ratio between commercial and private wilderness use allocations, including number of groups/people, location, and timing is to be addressed within the park wilderness stewardship plan or commercial services plan and associated environmental compliance documents. The public must be afforded an opportunity to provide input to these planning documents. (Also see section 6.4.4 of NPS *Management Policies 2006*.)

8. Further Guidance

Additional resources available for guidance are:

- [Management Policies 2006, Chapter 6](#)
- Reference Manual #41
- [NPS Wilderness Stewardship Division \(internal NPS web site\)](#)
- <http://www.wilderness.nps.gov/>
- <http://www.wilderness.net/>

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