

Public Employees For Environmental Responsibility * The Wilderness Society * Wilderness Watch

Mr. Lee Baiza
Superintendent
Petrified Forest National Park
PO Box 2217
Petrified Forest, AZ 86028

April 27, 2005

Dear Superintendent Baeza:

Public Employees For Environmental Responsibility (PEER), The Wilderness Society (TWS) and Wilderness Watch are pleased that Congress expanded Petrified Forest National Park. On December 3, 2004, Public Law 108-403 added 125,000 acres to the Park. This is one of the most significant additions to the national park system since 1994.

The addition of significant new lands to Petrified Forest will help ensure the long-term preservation of the Park. The addition also imposes obligations upon the National Park Service (NPS). NPS Management Policies (2001) require that “[A]ll lands administered by the National Park Service, including new units or additions to existing units since 1964 will be evaluated for their suitability for inclusion within the national wilderness preservation system.” Management Policies 6.2.1. For an example of a wilderness suitability assessment, you may wish to contact Guadalupe Mountains National Park, Texas, which prepared such a document in December 2002.

The obligation to prepare a wilderness suitability assessment is binding upon the NPS. See The Wilderness Society v. Norton, No. 03-0064 (D.D.C. Jan.10, 2005). The Management Policies require that “the assessment must be completed within one year after...the acquisition of the new lands.” We recognize, however, that the majority of the addition lands in this case are State of Arizona lands and it may be several years before the NPS acquires them under Section 4 of the Expansion Act.

We request that the NPS please review the new lands to determine any roadless areas that may be suitable for wilderness. “Roadless” areas means lands as defined at 43 CFR 19.2(e). Rough dirt tracks, passable by four-wheel-drive vehicles (not simply by “four wheeled”), or all terrain vehicles are “roadless” under Departmental Wilderness Regulations. We note that authorization for continued grazing on the added lands (section 5(5) of the Petrified National Park Expansion Act) does not disqualify lands from wilderness suitability, either under the Wilderness Act or NPS Management Policies. (See Management Policies 6.2.1.2.).

Wilderness is nothing new to Petrified Forest National Park. On October 23, 1970 Congress designated wilderness in the park, becoming the first NPS wilderness along with Lava Beds National Monument. We hope that the NPS will continue its stewardship role over the wilderness and other resources of the Park. Please contact us if we can be of assistance.

Cordially,

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