

August 14, 2026

Michael P. Michener
Deputy Associate Director, Visitor and Resource Protection
National Park Service
1849 C Street NW
Washington, DC 20240

Subject: Comments on National Park Service Director's Order #41: Wilderness Stewardship (91 Fed. Reg. 35,998 (June 15, 2026))

Dear Mr. Michener:

This letter is submitted on behalf of the undersigned organizations and our many members and supporters.

INTRODUCTION

As stated in Federal Register Notice # NPS-2026-0100-0001,¹ the National Park Service (NPS) seeks public comment on its Level 2 Wilderness Stewardship Policy, which is found in Director's Order #41 (DO41): Wilderness Stewardship. This DO provides policy direction to NPS staff regarding the identification, planning, stewardship, and administration of wilderness managed by the NPS. There were no specific proposals put forth upon which to comment.

The wilderness-quality lands managed by the NPS conserve some of the nation's most critical natural, cultural, and scenic resources, and are widely used and loved by millions of visitors to units of the national park system. Park visitors highly value the wild, undeveloped landscapes at Cumberland Island and other national park units in large part *because* they remain undeveloped

As described in the 2014 Foundation Document² for Cumberland Island National Seashore (CUIS), Cumberland Island is the largest and southernmost of Georgia's barrier islands. The island is 17.5 miles long, ranging from approximately a 0.5 mile to 3 miles wide, and totals 36,415 acres of which 16,850 are marsh, mud flats, and tidal creeks. More than half of the acreage at CUIS was designated by Congress as either wilderness (9,886 acres) or potential wilderness (10,500 acres) in 1982. As advocates for the proper management and preservation of Cumberland Island in accordance with its 1972 enabling legislation (P.L.

¹ National Park Service Level 2 Wilderness Stewardship Policy Review, Director's Order #41, 91 Fed. Reg. 35,998 (June 15, 2026), <https://www.regulations.gov/document/NPS-2026-0100-0001>.

² Nat'l Park Serv., U.S. Dep't of the Interior, Foundation Document: Cumberland Island National Seashore (Feb. 2014), <https://npshistory.com/publications/foundation-documents/cuis-fd-2014.pdf>.

92-536)³ and subsequent 1982 wilderness legislation,⁴ we offer the following comments about DO41 for your consideration.

COMMENTS

In general, DO41 has many components that provide a balanced framework for the NPS to manage wilderness-quality lands in compliance with existing federal laws, specifically the 1964 Wilderness Act⁵ and the 1916 NPS Organic Act, as amended.⁶ While the current version of DO41 was approved in 2013, it was informed by public review and comment and built upon decades of policy development under both Republican and Democratic administrations to help the NPS fulfill its statutory responsibilities for managing wilderness; to provide consistency for management of lands across widely divergent landscapes; and to support informed decision-making.

Furthermore, DO41 is largely consistent with NPS Level 1 Wilderness Stewardship guidance provided in Chapter 6⁷ of NPS Management Policies 2006. As a result, the DO and related Management Policies provides appropriate, effective service-wide guidance for the management and protection of all categories of “wilderness.” The current policy has many components that exist to ensure that wilderness character and values are appropriately identified, protected, and managed alongside other national park uses, as federal laws require. But, the policy could always be improved. Wilderness lands in the National Park System epitomize both the conservation of park resources and values, as well as providing for the enjoyment of the same by both current and future generations, as mandated in the NPS Organic Act.⁸

As presented, the current review of existing policy is general in nature; and no revisions have been proposed by NPS or the Department of the Interior (DOI). As a result, our comments are also general in nature. We cannot offer more specific comments on DO41 because NPS has not proposed any specific changes. Meaningful public participation occurs when the agency provides the public with the specific proposal(s) that it is considering and asks for public input on that proposal. With three agencies under DOI all seeking public comment on vague proposals at the same time, it seems likely that the

³ Cumberland Island National Seashore Act, Pub. L. No. 92-536, 86 Stat. 1066 (1972), <https://www.congress.gov/bills/92nd-congress/senate-bill/2411/text>.

⁴ Pub. L. No. 97-250, § 2, 96 Stat. 709, 709–10 (1982), https://www.wildcumberland.org/wp-content/uploads/2020/06/CI_WildernessAct-1982.pdf

⁵ Wilderness Act of 1964, Pub. L. No. 88-577, 78 Stat. 890 (codified as amended at 16 U.S.C. §§ 1131–1136), https://www.nps.gov/subjects/wilderness/upload/W-Act_508.pdf.

⁶ National Park Service Organic Act, ch. 408, 39 Stat. 535 (1916), <https://www.govinfo.gov/content/pkg/COMPS-1725/pdf/COMPS-1725.pdf>.

⁷ Nat'l Park Serv., U.S. Dep't of the Interior, Management Policies 2006, ch. 6, Wilderness Preservation and Management (2006).

⁸ National Park Service Organic Act, *supra* note 6.

administration may have more specific change(s) in policies in mind. However, the current review process has not informed the public of any possible revisions.

If, after reviewing public comments, the NPS or DOI propose to make any substantive changes in NPS wilderness stewardship guidance, we urge the administration to reengage the public about such proposed changes. In brief, we request that NPS provide another public comment opportunity on any proposed revisions to DO41.

We look forward to further engaging on this issue if/when NPS develops any proposed policy changes.

Sincerely,

Birds Georgia
Center for Biological Diversity
Center for a Sustainable Coast
Coalition to Protect America's National Parks
Defenders of Wildlife
National Parks Conservation Association
Sierra Club
Southern Environmental Law Center
Wild Cumberland
Wilderness Watch

cc: Melissa Trenchik, Superintendent, CUIS, NPS, melissa_trenchik@nps.gov
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