



Larch Occasional Paper #8

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"Small" Wilderness: No Big Deal¹

by Andy Kerr²

Abstract

There are concerns about the appropriateness of advocating that Congress designate roadless areas less than 5,000 acres in size as units of the National Wilderness Preservation System. These concerns are, generally: (1) these small areas don't provide opportunities for outstanding "solitude" or "primitive recreation" required for Wilderness designation; and/or (2) small areas are not manageable by the responsible agency. One out of every 15 Wilderness areas designated by Congress is a freestanding Wilderness of less than 5,000 acres in size. Congress has also designated other contiguous, multi-unit Wilderness areas of which at least one of the units is less than 5,000 acres in size. Opportunities for solitude and primitive recreation are not necessarily proportional to Wilderness size. Federal land management agencies are managing small and irregular-shaped Wilderness areas without incident across the country. Congress is the ultimate arbiter of whether or not to designate a smaller roadless area as Wilderness.

"Or of Sufficient Size as to Make Practicable...."

In uncharacteristically elegant prose, in the Wilderness Act of 1964 Congress first defined Wilderness in general and then more specifically:

A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears

¹ Portions of this paper (including photographs) were adapted from: Kerr, Andy. 2004. OREGON WILD: ENDANGERED FOREST WILDERNESS. Oregon Natural Resources Council [now Oregon Wild] (distributed by Timber Press). Portland OR.

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to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) **has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition**; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value (emphases added).³



Figure 1. *The Crabtree Valley Unit of the proposed Santiam Wilderness contains old-growth Douglas-fir and western red cedar in the vicinity of 1,000 years of age. The unit is 1,726 acres in size, or equivalent to the area of Portland, Oregon bounded by the Willamette River, East Burnside Street, SE 33rd Avenue and SE Powell Boulevard. David Stone Wildland Photography.*

The statutory 5,000-acre figure is a guideline, not a bottom line. In fact, approximately one out of every 15 areas designated Wilderness by Congress is a freestanding (excluding islands) area that is less than 5,000 acres in size. Congress has also designated other contiguous, multi-unit Wilderness areas of which at least one of the units is less than 5,000 acres in size.

5,000 Acres, More or Less

Wilderness expert and author Michael Frome wrote in his book, *Battle for Wilderness*:

(Henry David) Thoreau foresaw man's need to reach out from the clatter of the mechanical age for a touch of the natural. He proposed that each community sustain a primitive forest of 500 or 1,000

*acres. "Let us keep the New World new," he proposed, "and preserve the advantages of living in the country."*⁴

The great conservationist, Aldo Leopold, similarly noted

*In short all available wild areas, large or small, are likely to have value as norms for land science. Recreation is not their only, or even their principal, utility.*⁵

In the final analysis, a Wilderness area is of sufficient size if Congress designates it. In 2000, the Democratic House Members in the 2000 Oregon Congressional delegation wrote to President Clinton

*It is vitally important to protect the values of roadless areas 1,000 acres and larger from all activities that will harm their wild character.*⁶

³ The Wilderness Act, 16 U.S.C. § 1131(c).

⁴ Frome, Michael. 1974. *BATTLE FOR WILDERNESS*. Praeger Publishers. New York, NY: 18 (emphasis in original).

⁵ Leopold, Aldo. 1970. *A SAND COUNTY ALMANAC: WITH ESSAYS ON CONSERVATION FROM ROUND RIVER*. Ballantine Books. New York, NY: 276.

⁶ Blumenauer, Earl, Peter DeFazio, Darlene Hooley, and David Wu (all Members of Congress from Oregon). Letter to President Clinton (October 2000).

Much of Oregon’s remaining unprotected forest wilderness is between 1,000 and 4,999 acres in size (Table 1). Almost 1.5 million of the nearly 5 million acres of forested roadless lands in the state exist in parcels less than 5,000 acres.⁷ Even some roadless areas less than 1,000 acres in size qualify for inclusion in the National Wilderness Preservation System.

Table 1. Federal Forest Roadless Areas in Oregon

Size (acres)	Number of Areas	Total Acreage
1000-4,999	749	1,449,000
5,000+	152	3,306,000
TOTAL	901	4,755,000

Source: Erik Fernandez, Oregon Wild



Map 1. The Otis Pike Wilderness Area is 1,380 acres, which is only part of the Fire Island National Seashore, which is only part of Fire Island, a coastal barrier island off of Long Island, New York. The small strip of private land at Belleport Beach results in two Wilderness Units. National Park Service

In defining Wilderness for legislative purposes, Congress said that—in general—an area must have “at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition.”⁸ Since enacting the Wilderness Act in 1964, Congress has designated many “small” (<5,000 acres) Wilderness areas. In Oregon, these include not only offshore islands like the 17-acre Three Arch Rocks Wilderness in Tillamook County, but also areas like the 4,800-acre Menagerie Wilderness in Linn County and the 2,780-acre Lower White River Wilderness in Wasco County.

Ecological Importance of Small Roadless Areas

Wilderness values can be generally categorized as anthropocentric (aesthetic and recreational) or biocentric (nature at her best). This distinction should be taken into account when considering an area’s size and suitability for Wilderness designation. Aldo Leopold, a co-founder of The Wilderness Society, once defined a wilderness area as one sufficiently large enough for a two-

⁷ Fernandez, Erik, Wilderness Coordinator Oregon Wild, pers. comm. (April 4, 2011).

⁸ The Wilderness Act, 16 U.S.C. § 1131(c).

week animal pack trip. In today's America, where more is known about horsepower than horses, there are very few large wilderness areas left that meet Leopold's criteria.

Bob Marshall, a great American forester and another co-founder of The Wilderness Society, also recognized the scientific values of small roadless areas:

*The minimum area necessary for the maintenance of primeval conditions varies with forest type, climate and topography. In general the Forest Service believes that for scientific purposes 1,000 acres is about the smallest area desirable, in special cases where so much as 1,000 acres of virgin forest cannot be found the largest available area will have to be sufficient.*⁹

Small Wilderness areas also help perpetuate larger natural systems essential for fish and wildlife habitat, stream flow, and clean drinking water. These are but some of the many modern scientific reasons to protect small roadless and wild areas. In a letter to President Clinton urging the protection of roadless areas, 136 scientists stated:

*There is a growing consensus among academic and agency scientists that existing roadless areas—irrespective of size—contribute substantially to maintaining biodiversity and ecological integrity on the national forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society, American Ornithologists' Union, Ecological Society of America, Society for Conservation Biology, and The Wildlife Society, recommended a prohibition on the construction of new roads and logging within existing (1) roadless regions larger than 1,000 acres, and (2) roadless regions smaller than 1,000 acres that are biologically significant.... Other scientists have also recommended protection of all roadless areas greater than 1,000 acres, at least until landscapes degraded by past management have recovered.... As you have acknowledged, a national policy prohibiting road building and other forms of development in roadless areas represents a major step towards balancing sustainable forest management with conserving environmental values on federal lands. In our view, a scientifically based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and those smaller areas that have special ecological significance because of their contributions to regional landscapes.*¹⁰

Solitude Not Required

Marshall acknowledged the limits of small areas for human recreation:

A tract of 1,000 acres, while well adapted for research is too small for satisfactory recreation. The person with a yearning for the beauties of the primeval wants to do more than just stroll into a virgin stand of timber and squat. He desires to be able to walk around in it for a considerable period, losing

⁹ Marshall, Robert. 1933. THE PEOPLE'S FORESTS. Harrison Smith and Robert Haas. New York, NY: 176-177.

¹⁰ Letter to President Clinton signed by 136 scientists (Nov. 14, 1997).

*himself for a while in its timeless beauty, forgetting that there is such a thing as a machine-aged world. This is extremely difficult to do in 1,000 or even 5,000 acres.*¹¹

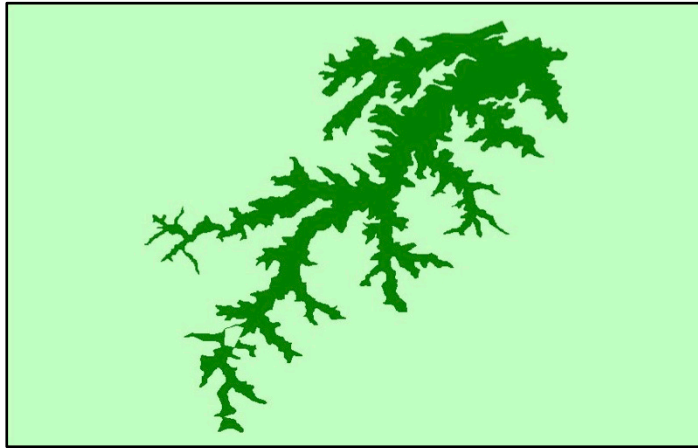
Admittedly, the recreational value of wilderness generally decreases in areas less than 5,000 acres (approximately eight square miles). One can hike through a 1,000-acre roadless area in an afternoon and miss having a “wilderness” experience, as one may never be too far from roads, development, clearcuts and other signs of human existence. There are exceptions, however — areas where the topography and grandeur of nature conspire to create a sense of solitude and wonder in spite of being small.

Notably, the Wilderness Act of 1964 does not *require* areas to offer opportunities for solitude. In fact, it only mentions the word “solitude” once, where it requires a Wilderness to have: “outstanding opportunities for solitude *or* a primitive and unconfined type of recreation” (emphasis added).¹² Solitude is a wilderness value, not a Wilderness requirement.

Marshall expressed his views on minimum Wilderness size in the 1930s when there were much more wildlands than today. Congress defined Wilderness in principle in 1964 and periodically (as recently as 2009) defines Wilderness in practice. Such practice has included numerous areas less than 5,000 acres in size.

Managing Small Wilderness

Whenever Congress asks the Forest Service or Bureau of Land Management (BLM) whether an area (of any size) it is considering for Wilderness designation is manageable as Wilderness, the agencies almost always reply that all or part of the area is not. The Forest Service and BLM do not generally support Wilderness designation, which they view as a limitation on agency discretion to manage the affected lands (which is true). However, Congress routinely ignores such agency protestations and establishes Wilderness anyway, after which the agencies proceed to professionally manage it as Wilderness (see Map 1) despite their previous views.



Map 2. Beaver Creek Wilderness (4,753 acres) on the Daniel Boone National Forest in Kentucky. The mere shape of a Wilderness Area on a map can be deceptive as to its wilderness qualities. “The wilderness is almost totally enclosed by towering sandstone cliffs,” according to wilderness.net. Oregon Wild

¹¹ Marshall, Robert. 1933. THE PEOPLE’S FORESTS. Harrison Smith and Robert Haas. New York, NY: 176-177.

¹² The Wilderness Act, 16 U.S.C. § 1131(c).

Table 2. Freestanding (Excluding Islands) Wilderness Areas Less than 5,000 Acres in Size

<i>Wilderness Area</i>	<i>Agency</i>	<i>State</i>	<i>Acreage</i>	<i>Year Est.</i>
Agassiz Wilderness	FWS	MN	4,000	1976
Baboquivari Peak Wilderness	BLM	AZ	2,040	1990
Bald River Gorge Wilderness	FS	TN	3,721	1984
Bay Creek Wilderness	FS	IL	2,866	1990
Beaver Creek Wilderness	FS	KY	4,753	1975
Big Lake Wilderness	FWS	AR	2,144	1976
Big Slough Wilderness	FS	TX	3,455	1984
Billies Bay Wilderness	FS	FL	3,092	1984
Bristol Cliffs Wilderness	FS	VT	3,738	1975
Brush Mountain East Wilderness	FS	VA	3,743	2009
Brush Mountain Wilderness	FS	VA	4,794	2009
Burden Falls Wilderness	FS	IL	3,671	1990
Chase Lake Wilderness	FWS	ND	4,155	1975
Clear Springs Wilderness	FS	IL	4,730	1990
Crab Orchard Wilderness	FWS	IL	4,050	1976
Fort Niobrara Wilderness	FWS	NE	4,635	1976
Garden of the Gods Wilderness	FS	IL	3,990	1990
Gee Creek Wilderness	FS	TN	2,493	1975
Great Swamp National Wildlife Refuge Wilderness	FWS	NJ	3,660	1968
Hell Hole Bay Wilderness	FS	SC	2,125	1980
Horseshoe Bay Wilderness	FS	MI	3,790	1987
Jumbo Springs Wilderness	BLM	NV	4,631	2002
Lacassine Wilderness	FWS	LA	3,346	1976
Leaf Wilderness	FS	MS	994	1984
Little Dry Run Wilderness	FS	VA	2,858	1984
Little Frog Mountain Wilderness	FS	TN	4,666	1986
Little Lake Creek Wilderness	FS	TX	3,855	1984
Little Lake George Wilderness	FS	FL	2,833	1984
Lower White River Wilderness	BLM/FS	OR	2,870	2009
Menagerie Wilderness	FS	OR	4,800	1984
Moosehorn (Baring Unit) Wilderness	FWS	ME	4,680	1975
Moosehorn Wilderness	FWS	ME	2,712	1970
Nordhouse Dunes Wilderness	FS	MI	3,450	1987
Otis Pike Fire Island High Dune Wilderness	NPS	NY	1,380	1980
Panther Den Wilderness/Crab Orchard Wildernesses	FS/FWS	IL	4,824	1990/1976
Peters Mountain Wilderness	FS	VA	4,531	1984
Pond Pine Wilderness	FS	NC	1,685	1984
Porcupine Lake Wilderness	FS	WI	4,292	1984
Raccoon Branch Wilderness	FS	VA	4,223	2009
Rock River Canyon Wilderness	FS	MI	4,640	1987
Rockpile Mountain Wilderness	FS	MO	4,089	1980
Stone Mountain Wilderness	FS	VA	3,270	2009
Tamarac Wilderness	FWS	MN	2,180	1976
Three Ridges Wilderness	FS	VA	4,608	2000
Unaka Mountain Wilderness	FS	TN	4,496	1986
Wambaw Creek Wilderness	FS	SC	1,825	1980
Wambaw Swamp Wilderness	FS	SC	4,815	1980
West Sister Island Wilderness	FWS	OH	77	1975

Abbreviations: Bureau of Land Management, Fish and Wildlife Service, Forest Service, National Park Service

Source: www.wilderness.net

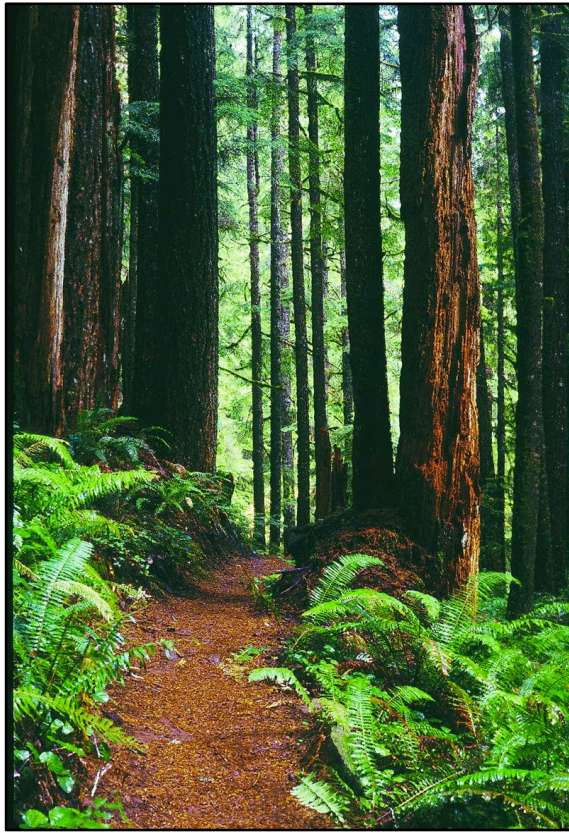


Figure 2. *While only 4,350 acres in size the North Fork Smith River roadless area on the Siuslaw National Forest is worthy for designation as Wilderness.* David Stone Wildland Photography

Occasionally the Forest Service has independently determined, without Congressional prompting, that small roadless areas are manageable as Wilderness. For example, the agency determined that two areas on the Fremont-Winema National Forest in Klamath County, Oregon—the 821-acre Bad Lands and the 511-acre Devils Garden Inventoried Roadless Areas—are manageable as Wilderness due to their topography (there was also a particularly enlightened Forest Supervisor at the time when it was first inventoried!). The Forest Service has also once recommended that Congress designate the 2,370-acre Umpqua Spit Wilderness in the Oregon Dunes National Recreation Area managed by the Siuslaw National Forest in Douglas County, Oregon. Unfortunately, examples of agency initiative are rare.

Congressional Precedent

Of the 757 Wilderness areas designated by Congress since 1964, 49 (6.3 percent or approximately one out of every fifteen) are freestanding (excluding islands; see Map 2) Wilderness areas of 4,999 acres or less in size (Table 2). While most of the areas in Table 1 are in the eastern United States, four are in the West.

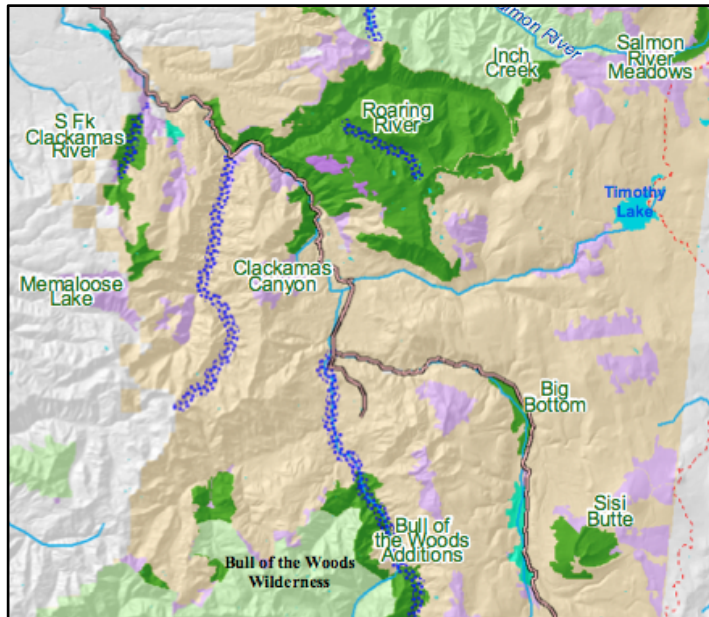
Besides the Menagerie Wilderness (4,800 acres) and Lower White River Wilderness (2,870 acres) in Oregon, there is also Jumbo Springs (4,631), Nevada; and Baboquivari Peak (2,040 acres), Arizona.

The Cases of the Clackamas Wilderness and the Bonnie Butte Unit of the Badger Creek Wilderness

Not all “small” congressionally designated Wilderness Areas are individually established Wilderness areas.

The United States Congress designated the Clackamas Wilderness in 2009 and it now has a total of 9,470 acres. All of this wilderness is located in Oregon and is managed by the Forest Service.... **The Clackamas Wilderness consists of five widely separated tracts of roadless land, scattered left and right of the Clackamas River for 50 miles. These pieces include Big Bottom [1,263 acres], Clackamas Canyon [1,247 acres], Memaloose Lake [1,131 acres], Sisi Butte [3,243 acres] and South Fork Clackamas [2,579 acres].** With the largest trees in northwest Oregon, the Clackamas Wilderness protects clean drinking water for many Oregonians. A well-known hike in the Clackamas Wilderness is the trail to

Memaloose Lake. It climbs through an old-growth forest 1.4 miles to the lake, and then continues a mile up to a viewpoint atop South Fork Mountain. The word memaloose means “dead” in Chinook Jargon, the old Indian trade language of the Northwest. Now the lake's old-growth forest is a rare wilderness island in a sea of logged lands [emphasis added as were the acreages in brackets]¹³



Map 3. Though a total of 9,470 acres in size, the Clackamas Wilderness on the Mount Hood National Forest in Oregon consists of four disjunct units, all of which are less than 5,000 acres in size. Oregon Wild

The Bonnie Butte Unit of the Badger Creek Wilderness, also on the Mount Hood National Forest in Oregon, is another relevant example. Congress designated the original Badger Creek Wilderness of ~25,000 acres in 1984. Twenty-five years later, Congress added 1,135 acres to the (now) core wilderness unit and also designated a disjunct unit of the Badger Creek Wilderness in the form of the 3,004-acre Bonnie Butte Unit.

Neither of these are cases where Congress in fact designated freestanding Wilderness units of less than 5,000 acres in size and they are not included in the aforementioned “one in fifteen.” These two examples are personally known to the author who suspects there are other cases of freestanding Wilderness units in other

states, but the information is not readily searchable using the wilderness.net database.¹⁴

Conclusion

Some who would disqualify small roadless areas from consideration for Wilderness designation may, nonetheless, say they still favor their protection from roading, logging and mining. They prefer that Congress protect such areas using an “alternative” designation.

There is no comparable Congressional alternative to Wilderness designation. Although they have important purposes, alternative landscape designations often have loopholes that allow logging (the Forest Service has proposed clearcuts in the Columbia River Gorge National Scenic Area¹⁵). In other cases, Congress has designated alternative special management areas that are as

¹³ wilderness.net (viewed Apr. 2, 2011). Detailed Internet address is unavailable as it is quite long and variable depending on how the webpage was accessed. Search for “Clackamas Wilderness” on the website.

¹⁴ The author is aware of one other example where Congress has designated multi-unit Wilderness areas that have at least one unit that is less than 5,000 acres in size (e.g., the 13,331-acre Upland Island Wilderness in Texas has a unit [none of the units are actual “islands” as in surrounded by water] that is 1,578 acres in size).

¹⁵ 16 U.S.C. §§ 544 et seq.

restrictive as Wilderness in so far as it relates to logging, but is more permissive for other harmful land uses, such as mining and roading. If one wants an area to be *Wilderness*, designate it as “Wilderness”.



Figure 3. *Old-growth Douglas-fir in the Valley of the Giants Unit of the proposed Coast Range Wilderness on Oregon. While this unit is very small in size, the combination of seeing very large trees after a very long drive through the clearcut hell of private industrial timberlands project a Wilderness mystique.* David Stone, Wildland Photography

In addition, alternative special areas are established on a case-by-case basis. There is no “system” such as the National Wilderness Protection System in to which new areas can easily be placed. Congress must debate and compromise for each alternative designation which land uses are to be allowed or prohibited. With Wilderness designation, the proscribed activities are known. The debate and compromise centers on whether and how much of a given area should be protected as Wilderness.

If there were an alternative to Wilderness designation, the protections would either be weaker or the same as Wilderness. If protections were weaker, it would mean less than full protection and likely become the de facto political choice for designation for areas of any size for politicians that tend to gravitate towards the option with the least resistance. If protections were the same, there would be no need for the alternative designation except to call small wilderness areas something other than Wilderness.

Acknowledgements

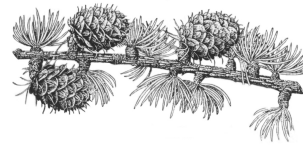
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Forest Wilderness (2004, Timber Press).

Additional Resources

- Kerr, Andy. 2004. OREGON WILD: ENDANGERED FOREST WILDERNESS. Timber Press. Portland, OR.
- Scott, Douglas W. 2004. THE ENDURING WILDERNESS: PROTECTING OUR NATURAL HERITAGE THROUGH THE WILDERNESS ACT. Fulcrum Publishing. Golden, CO.
- wilderness.net was created in 1996 through a collaborative partnership between the Wilderness Institute at the University of Montana College for Forestry and Conservation, the Arthur Carhart National Wilderness Training Center and the Aldo Leopold Wilderness Research Institute.

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