Comparing the Process of National Park Redesignation Over Time: *Case Studies of Carlsbad Caverns and White Sands National Park*

by

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Abstract

This paper compares the process and outcomes from the reclassification of Carlsbad Caverns and White Sands from national monuments to national parks. Carlsbad was initially established as a national monument in 1923 and then redesignated as a national park in 1930. White Sands, however, was created as a national monument in 1933, but did not obtain national park status until 2019. This article reconstructs the sequence of events and decisions that led to the creation and redesignation of these two National Park Service (NPS) units, paying close attention to the significant difference in time separating their establishment as national monuments and eventual redesignation to national parks. To accomplish this, historical data relevant to these NPS units was analyzed from the University of New Mexico and New Mexico State University archives, including congressional and gubernatorial records, newspaper accounts, and personal correspondences. Budget and visitation statistics for the parks are also included, where relevant, to highlight the tangible impacts of redesignation.

Keywords: Carlsbad Caverns, national monument, national park, National Park Service, White Sands

Introduction

On December 20, 2019, Congress passed, and President Donald Trump signed into law, the National Defense Authorization Act for Fiscal Year 2020. Included in that Act was text which redesignated White Sands National Monument as White Sands National Park (WSNP) (S.1790 - 116th Congress (2019-2020): National Defense

Authorization Act for Fiscal Year 2020, 2019). With its passage, White Sands became the second national park established in New Mexico. The first, Carlsbad Caverns National Park (CCNP), established in 1930, was also redesignated from a national monument. Although both units followed the same path to national parkhood, Carlsbad spent just seven years as a national monument, while White Sands retained this status for 86 years.

This paper uses archival sources from collections at the University of New Mexico and New Mexico State University libraries to answer the following questions: *How has the process of redesignating a national monument to a national park varied over time?* and *What factors led to Carlsbad Caverns being redesignated as a national park seven years after establishment as a national monument, but 86 years for White Sands?*

These questions will be addressed through an initial analysis of National Park Service (NPS) history that explores, among other things, the different criteria and mechanisms used to create national parks over time. That analysis will be used to build a framework to examine the redesignations of Carlsbad and White Sands. The history of each area will then be told, and the framework will be applied to understand why the areas received park status on different timelines. Finally, some broad conclusions about the methods of park redesignation will be included.

Data and methods

The primary sources for this paper were sourced from National Geographic Society Archive and Library, and the New Mexico State University and University of New Mexico libraries. Archival methods were used to analyze these documents (Harris,

2001). The National Geographic sources were originally analyzed by the author in the summer of 2020. The University of New Mexico documents were obtained by Dr. Buckley, from the Richard Dillon and Joseph Montoya collections. The Tom and Bula Charles Papers were also used from New Mexico State University, with access to these documents obtained by the author.

Early national park history

Created in 1872, Yellowstone National Park is considered the first "national park" in the United States. Congress had previously protected a tract of land in the Sierra Nevada Mountains, now Yosemite National Park, as a state park, leaving the state of California to manage it from 1866-1890. They could not follow this model with Yellowstone, however, because it was located in the territories of Idaho, Montana, and Wyoming, so there was no state government to take responsibility for the land. Accordingly, Congress gave the land federal park status which opened the door to the creation of several new parks, including Mackinac in 1875 (decommissioned in 1895), Yosemite and Sequoia in 1890, and Mount Rainier in 1899 (Muir, 1901; Runte, 2010).

In addition to protecting national parks, in 1906, Congress passed the Antiquities Act, which granted the President executive powers to designate sites of historic or scientific interest as "national monuments" (Dilsaver, 1994). As monuments and parks were established, there was debate over who should administer the areas -- whether they should be protected by the U.S. Forest Service, housed in the Department of Agriculture after 1905, or if they should be managed by the Department of Interior. Complicating this issue was that some areas, like Yellowstone, were being protected by the U.S. Army,

under the War Department (Runte, 2010). To remedy this issue, Congress passed the Organic Act in 1916, which established the NPS (Runte, 2010; Shankland, 1951). At this point, administration of parks passed to the NPS, but management of monuments remained divided among different agencies.

The inaugural NPS Director, Stephen Mather, had a successful business background, and brought this financial expertise to the directorship (Shankland, 1951). Mather believed parks needed to be promoted and visited, and worked closely with concessionaires, such as railroad companies to secure their commercial success. Railroads provided early park visitors convenient access to the parks, as well as expensive and exclusive accommodations (Blodgett, 2007; Byrand and Wyckoff, forthcoming; Wilson, 2020).

Expansion of the park service

Mather served in NPS leadership until shortly before his death in 1930, and then leadership of the Service passed to Horace Albright, director from 1929-1933. Albright's lasting impact on the NPS was expanding the diversity of areas the Park Service protected. Places such as Gettysburg had been previously managed by the War Department, but in 1933, Albright convinced President Franklin D. Roosevelt to transfer management of battlefields, and all national monuments, to the NPS. Prior to these transfers, the NPS only managed areas that met the minimum threshold for "monumentalism," like Yellowstone, Yosemite, and Grand Canyon. These areas were all valued for scenic qualities that produced breathtaking views, and features such as tall waterfalls, vast gorges, and great mountain ranges. The acquisition of areas with qualities

other than monumental views solidified the NPS as the nation's custodian for sites of cultural, historic, and scenic value (Brinkley, 2016; Runte, 2010).

The growth in types of parks coincided with a significant increase in visitation to parks. In the postwar period, Americans had more funds and leisure time to devote towards recreation and park visits rose. The increase started in the 1930s but continued after the end of World War II. In 1930, NPS sites attracted a total of 3,038,935 visitors. This grew to 16,410,148 in 1940 and almost doubled to 32,706,172 by 1950 (National Park Service, 2023). To accommodate the growing number of visitors, NPS Director Conrad Wirth (1951-1964) introduced a program called "Mission 66," which increased road construction, improved car access to national parks, and ensured every park had a visitor center (Carr, 2007).

As the infrastructure of parks expanded, the specific designations of NPS-managed lands grew more diverse. In addition to national parks and national monuments, the NPS now managed national historical parks, seashores, and preserves (Dilsaver, 2004; Dilsaver & Wyckoff, 2009; Watt, 2017). The expansion of designations coincided with changes in what landscapes the NPS protected. When deciding whether to push for inclusion of an area in the NPS portfolio, Mather and Albright built a checklist that considered the feasibility, suitability, and national significance of a potential new unit. For a park to be feasible, land acquisition must be easy and local support must be high; the suitability test considered whether the park was different from other areas already protected, and accessible to the public (Dilsaver & Wyckoff, 2009). Monumental scenery was originally the criteria for "national significance," but over time, areas with different qualities earned NPS protections. Everglades National Park and Mojave

National Preserve are examples of NPS units protecting swamp and desert ecosystems that use a broader application of the term national significance (Dilsaver & Wyckoff, 2009; Runte, 2010; Sellars, 1997).

Present day park dynamics

As the scope of the NPS mission has grown, so too have the challenges faced by the agency. Current scientific challenges to park management include how to manage growing visitation and combat climate change in parks (Dilsaver, 1992; Machlis and Jarvis, 2018; Machlis and Soukup, 2021). Parks also face the challenge of telling accurate stories of their environmental and social histories (Algeo, 2004; Young, 2006). Additionally, the pressures on already existing public lands have increased as natural resources are discovered on or around parklands (Williams, 2016). Due to these pressures and lack of available land, new national parks are often exclusively established from public lands, instead of from land pulled into the public domain for the purpose of creating a park.

Historically, many national parks were originally established as monuments and then redesignated as parks. The differences between “parks” and “monuments” have been widely speculated but the only procedural difference is in their establishment mechanism (Rothman, 1989). National parks must be established through an Act of Congress, whereas monuments are established by Presidential Proclamation, as outlined by the Antiquities Act. The Redwood Act of 1978 specified that titles are the only difference between designations, and all areas are equal in the eyes of the NPS (Dilsaver, 1994).

Although this is the official NPS policy, it is not always the case. Parks often have higher visitation and better funding than their monument counterparts (Rothman, 1989).

Carlsbad Caverns and White Sands were both originally founded as monuments and then redesignated to national park status. Early literature about Carlsbad detailed its physical and ecological features (Bailey, 1925; Lee, 1924, 1925) but did not tell the story of its redesignation to park status seven years after obtaining monument status. Redesignated in 2019, White Sands only recently received park status. Although a study about the specifics of its monument status has been completed (Schneider-Hector, 1995), the difference between its timeline and that of Carlsbad has not been analyzed. Additionally, beyond the specifics of the redesignations of Carlsbad and White Sands, this paper aims to conduct a broader analysis of how the monument-to-park pathway has changed over time.

Monument establishment

Carlsbad Caverns (see Fig. 1) was established in 1923 as a national monument and redesignated in 1930 as a national park, when Congress passed and President Herbert Hoover signed the act designating the park into law. The park is 46,766 acres and protects 120 known caves, including the "Big Room," an 8.2 acre cave chamber that is the largest of its kind in North America (National Park Service, 2019). In 1930, the year it was designated a park, Carlsbad welcomed 90,104 visitors. Over time, CCNP's visitation grew and ultimately peaked in 1976 at 876,500 visitors. Since that time, visitation has declined, with park officials recording just 390,932 visits in 2022 (National Park Service, n.d.a). White Sands, which gained monument status in 1933 and park status in 2019, is

more than triple the size of CCNP at 145,762 acres. WSNP is currently the most visited NPS unit in New Mexico and had 705,127 visitors in 2022 (White Sands NP, n.d.g).

Carlsbad Caverns was first documented by Jim White but the NPS has been very firm that White was just an explorer, and not the discoverer of the cave. In a letter from William Everhart, Assistant Director of the NPS, to Joseph Montoya, U.S. Senator from New Mexico (1964-1977), Everhart writes that "Although Jim White is popularly thought of as the discoverer of Carlsbad Caverns, no one knows who in fact did make the discovery. It was probably an Indian, as evidenced by Indian markings in the cave from a tribe which inhabited it 1,000-2,000 years ago" (Everhart, 1968). The NPS has resisted multiple campaigns to erect a statue of White on CCNP premises and has challenged language in literature that has credited White as the cave discoverer.

Figure 1: Photo taken by author in the Big Room of Carlsbad Caverns National Park, December 8, 2022

White first came across the cave in 1898, when he was working as a cowboy, and saw what he thought was a fire and went to investigate. The alleged fire turned out to be a mass departure of bats from the cave. White went on to explore the cave and many of the chambers and galleries still bear the names he gave them, including Big Room and King's Palace, two of the most accessible parts of the cave (Thomas, 2016). White's commercial promotion of the cave contributed to its popularity and attracted national attention, and on October 25, 1923, President Calvin Coolidge used the Antiquities Act to declare Carlsbad Caverns a national monument. Coolidge's declaration describes the features of the cave, such as chambers that "contain stalactites, stalagmites, and other formations in such unusual number, size, beauty of form, and variety of figure as to make this a cavern equal, if not superior, in both scientific and popular interest to the better known caves" (National Park Service, 2017a). As the first cave federally protected in New Mexico, CCNM was an unique site and enjoyed significant support from local, state, and federal government representatives.

Located 181 miles away from CCNM, the gypsum dunes of White Sands National Monument (WSNM) (see Fig. 2) have been inhabited or explored by humans for over 20,000 years (National Park Service, 2022a). In the past 200 years, the dunes have been valued for use in producing plaster of Paris. In addition to acknowledging the industrial potential of the dunes, early New Mexico residents also recognized their recreational potential (Charles, 1952). One of the most prominent advocates for their dual industrial and recreational possibilities was Tom Charles, the Secretary for the Alamogordo Chamber of Commerce.

Charles, as well as other individuals in the Alamogordo area, believed that federal protection for a section of the dunes would allow for these recreational and industrial interests to exist simultaneously. To secure protection for an area, an NPS official must first inspect it to assess its quality and determine whether it is fit for inclusion in the park system. The purpose of this inspection is to provide a critical evaluation of the area's national significance. Of the three criteria for creating park sites -- national significance, feasibility, and suitability -- national significance is the most important (Dilsaver & Wyckoff, 2009). At the time Charles was petitioning for White Sands to receive an evaluation, land inspections were completed by career Park Service men, who, "staffed field investigation teams to reduce subjectivity in decision making as much as possible" (Dilsaver & Wyckoff, 2009, p. 8).

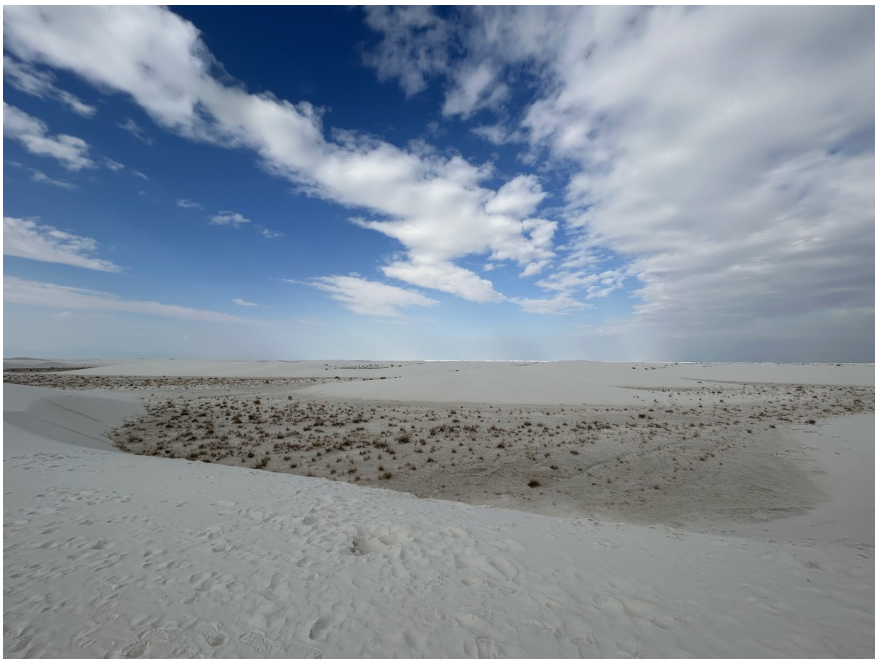

Figure 2: Photo by author at White Sands National Park, taken December 7, 2022

Yet, in order for the White Sands inspection to be conducted, the area had to be on the radar of the NPS. After CCNM was created, Charles began promoting the idea of

WSNM to individuals connected to Carlsbad. He believed they could use their connections with NPS and federal government officials to secure park status for White Sands. Charles frequently communicated with Victor Minter, the Carlsbad Chamber of Commerce Secretary, as well as New Mexico politicians, such as Dennis Chávez, who served in both the U.S. House of Representatives (1931-1935) and U.S. Senate (1935-1962).

In 1931, Charles leveraged his connections with other Chambers of Commerce, appealing in particular to Chamber managers from El Paso and Las Cruces to write to New Mexico Senators and Thomas Boles, the CCNP Superintendent, urging them to ask for an inspection of the White Sands area (Charles, 1931). Eventually, NPS Associate Director Arthur Demaray responded to a request for inspection from J. S. B. Woolfood, the President of the Roswell Chamber of Commerce. Demaray's response, sent on July 9, 1931, indicated that the NPS "expected to have a report on the proposed Great White Sands National Monument long before this time, but due to lack of experienced men qualified for making investigations of this character we have not been able to accomplish this desire" (Demaray, 1931). Following these petitions, the inspection of White Sands took place in November 1931, conducted by Roger Toll, the Superintendent of Yellowstone National Park.

The inspection of White Sands left Toll assured of its national significance, but he raised concern about the commercial value of the gypsum dunes. This challenged the feasibility of the area, because if industrial interests opposed the park's creation, they could complicate the process of land acquisition if they bought the dunes and also decrease local support for the park. Charles attempted to quell these concerns in a

follow-up letter to Toll on November 30, 1931, writing, “there is a great commercial value out there in the Sands and our Chamber has persistantly promised those who believe that there is, that we will not go north of the north line of Township 17 S” (Charles, 1931). Charles specifically outlined the boundaries of the proposed monument to exclude valuable deposits and thus allow for commercial interests to continue to access the dunes.

Another concern about the proposed WSNM was ease of public access to the dunes (Schneider-Hector, 1995). At the time of the inspection, no road to the dunes existed, diminishing the suitability of the park due to the emphasis on public accessibility for proposed park sites (Dilsaver & Wyckoff, 2005). At the same time the park inspection was being completed, the state highway between Alamogordo and Las Cruces was being surveyed. Charles saw a connection between the two events and urged Governor Arthur Seligman and State Highway Engineer W. R. Eccles to revise the survey to consider including the proposed WSNM location along the route between the two locations. Charles convinced the state officials to reroute the highway and was persistent about ending work on the originally surveyed route, bringing this concern up with both officials (Charles, 1932).

With the questions of public and industrial access to the dunes addressing concerns about park feasibility and accessibility, the NPS began preparing a proposal establishing WSNM for approval by President Herbert Hoover. WSNM was created on January 18, 1933, and its enabling legislation states the area is to be “within a national monument for the preservation on the white sands and additional features of scenic, scientific, and educational interest” (National Park Service, 2022b). The Park Service

appointed Tom Charles the first custodian of the monument, with a starting salary of $1 per year (Charles & Charles, 1950, p. 10). Despite both CCNM and WSNM being established within a decade of each other, the processes dictating their establishment differed greatly.

Early history

Shortly after the establishment of CCNM, the National Geographic Society (NGS) proposed an expedition to the area. The NGS submitted the proposal to the NPS in 1923 (National Geographic Society, 1923). The expedition was led by Willis T. Lee, a geologist formerly employed by the U.S. Geological Survey, who was tasked with exploring the cave for the mutual benefit of the NPS and NGS. Lee eventually produced two articles for *National Geographic Magazine*, titled "A Visit to Carlsbad Cavern: Recent Explorations of a Limestone Cave in the Guadalupe Mountains of New Mexico Reveal a Natural Wonder of the First Magnitude," published in January 1924 and "New Discoveries in Carlsbad Caverns: Vast Subterranean Chambers with Spectacular Decorations Are Explored, Surveyed, and Photographed," published in September 1925.

The expedition is an early example of the coordination and cooperation between the NPS and NGS. The two organization heads, Mather and NGS President Gilbert Grosvenor, had a deep personal relationship that enabled their collaboration. Together, they advocated for increased conservation and exploration of unique landscapes, securing protections for areas like groves of redwoods, tracts of land in Sequoia National Park, and Katmai National Monument (Grosvenor & Mather, 1918-1927). The Carlsbad expedition began in March 1924, from which point on, Grosvenor and Lee communicated frequently

about progress and Grosvenor handled appropriations and equipment requests. Lee was tasked with both exploring the cave as well as researching its ecology and sent many specimens to the Smithsonian Institution, took a large number of photographs of the cave, and gave talks about his expedition, spreading the information about CCNM's qualities to audiences far beyond New Mexico (Grosvenor & Lee, 1924-1925). Lee's expedition was staffed in part by Jim White, who became a park ranger and guided the group, and his children, Elizabeth and Dana Lee. Elizabeth would go on to be the first female cavern guide, and was called the "female equivalent to Jim White" (Hoff, 2004, p. 4).

During the expedition, one of the challenges Lee confronted was the vast number of tourists in the cave (Lee, April 1924). The NPS only recorded 1,280 visits in 1924, but that number grew to 76,822 recorded visits by 1929 (National Park Service, n.d.a). Increased visitation was due to increased accessibility and promotion of the park by local and state officials. In 1925, a staircase was built into the cave entrance, which allowed the unit to accommodate more visitors as they no longer had to be lowered by bucket to enter the cave system (National Park Service, 2019) (see Fig. 3). Park promotion was led by Victor Minter, of the Carlsbad Chamber of Commerce, who frequently invited Governor Richard Dillon (1927-1931) and his guests to the cave. Dillon was a strong advocate of increased tourism at the cave and helped coordinate visits with other governmental officials.

One notable visit coordinated between Minter and Dillon brought Texas Governor Dan Moody to CCNM, with the goal of emphasizing to him the importance of improving highways between western Texas and the New Mexico state line, which provided the main southern connection to CCNM (Minter, 1928). In addition to extending a specific

invitation to Moody, Dillon frequently leveraged other scheduled events to generate interest in CCNM. In 1929, governors from seven southwestern states were convening, and Dillon planned to invite them all to CCNM. With this invitation, he believed he could "be able to get the whole State of New Mexico interested in the Carlsbad Cavern and make it one big day while the Governors are here" (Dillon, 1929).

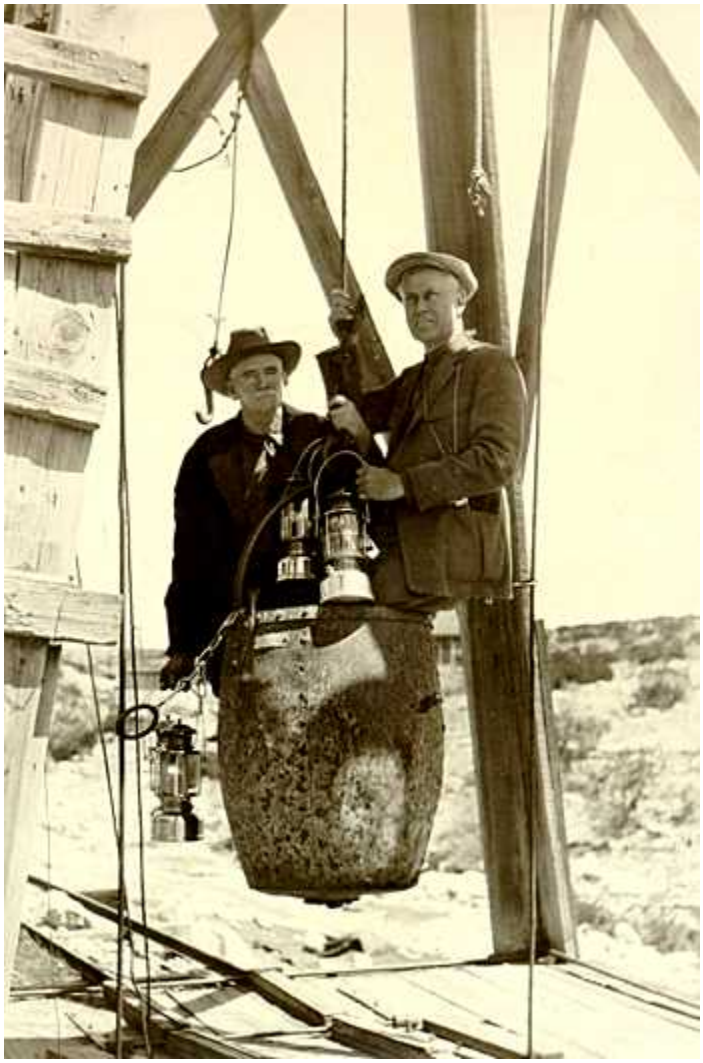

Figure 3: Photo of Willis T. Lee, left, and Stephen Mather, right, about to be lowered into Carlsbad Caverns in 1924

Credit: Obtained from https://npgallery.nps.gov/AssetDetail/5e804c932abe40ef99c078bdf02e0e2f

Explorations continued after the creation of the national monument. In 1930, Frank Nicholson reached out to Minter with plans for touring the cave, hosting a radio broadcast from the base of the cave, and eventually publishing a book about his

expedition, in what came to be known as the *New York Times*-Carlsbad Expedition. Albright disapproved of the publicity of the expedition, worrying that it had a "tendency toward sensationalism which might discourage, rather than encourage, travel to the cavern" (Boles, ca. 1930). The expedition ultimately mapped an additional ten miles of the cave, and Nicholson published *The Exploration of Carlsbad Caverns* in 1930 (Carlsbad Caverns National Park, 1940).

At the same time the Nicholson expedition was running, the impact of CCNM's promotion had reached Washington, D.C. On February 14, 1930, Representative Albert Simms telegraphed Minter stating that conditions were "favorable to establish Carlsbad Caverns National Park," and that he was introducing a bill to change its status which would create "substantial resultant advantages in many ways and no disadvantages" (Simms, 1930). These advantages may have included increased national recognition and more federal funding for park staffing and infrastructure. Three months later, on May 14, 1930, Congress established Carlsbad Caverns National Park (CCNP) (National Park Service, 2017b). In the years following its redesignation, CCNP visitation grew substantially, with the park receiving 400,000 visitors in 1947 (National Park Service, n.d.a). To accommodate the influx of visitors, construction of elevator shafts began in 1931, with two eleven-passenger elevators opened for operation in January 1932 (National Park Service, 2019).

Compared to Carlsbad, WSNM had less promotion from state officials, but with Charles as the custodian, visitation continued to grow as the unit built partnerships with other organizations, like the NGS and railroads. NGS President Grosvenor visited WSNM to conduct research on an article, titled "The White Sands of Alamogordo: A Dry

Ocean of Granular Gypsum Billows Under Desert Winds in a New National Playground," written by Carl P. Russell, which was published in *National Geographic Magazine* in August 1935. During his visit, Grosvenor purportedly told Charles "This is one of the Natural Wonders of the World. I place it on par with Carlsbad Caverns and the Grand Canyon" (Charles & Charles, 1950, p. 16). A few years after publication of this article, in 1938, the Rock Island and Pacific Railway Company displayed photos of the monument in their Chicago ticket office, which was "seen by thousands of people daily" (Wootton, 1938) (see Fig. 4). At the time Charles stepped down as custodian in 1939, visitation was at an all-time high, with 110,805 people visiting the unit in 1938, compared to just 12,000 in 1933. It would not be until 1948 that visitation topped 100,000 visitors again (National Park Service, n.d.g).

Figure 4: Photo of Rock Island and Pacific Railway Company White Sands National Monument Display

Credit: Tom and Bula Charles family papers. (Ms 0018, Box 8, Folder 5), New Mexico State University Library, Archives and Special Collections Department.

As custodian, Charles placed significant emphasis on ensuring that everyone connected with the White Sands region had the opportunity to recreate at the dunes at least once a year. To accomplish this, he introduced "Play Day," a popular event when locals and "Old Timers" were encouraged to visit the dunes. Play Day featured a variety

of attractions, including a track tournament, ball games, and a picnic. It ran until 1959, at which point the date could not be finalized and the event was not picked up again (Charles, 1940-1958; Lovell, 1959).

What does it mean to be a national park?

Historically, it has been difficult for NPS managers to define the differences between national monuments and parks. The only technical difference is in the establishment mechanism, where the process to create a national park is more stringent because the support of both houses of Congress is required, unlike with a national monument, which only needs the support of the President. The difference in the features of the areas is less clear. According to the Antiquities Act, passed in 1906, national monuments protect "historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest" (Dilsaver, 1994, p. 29). National parks do not have similar guidance about what they should protect, beyond "suitable" tracts of land that meet thresholds for national significance and feasibility.

To provide context on the differences between monuments and parks, some have turned to the writings of Mather to see if he articulated a clear difference between the designations. In his biography of the first director, Shankland suggests that Mather felt that monuments were "Less overpowering and much more miscellaneous, and they emphasize historical or scientific values rather than scenic" (Shankland 1951, 50). An early manager of national monuments, Frank Pinkley, maintained that "a national monument's outstanding characteristics were its educational benefits and inspirational values for the public; therefore, a national monument did not have to possess recreational

worth" (Schneider-Hector 1995, 56). This is a more concise definition, but it fails to explain why areas would be originally protected as national monuments and then redesignated to parks if they were truly "less overpowering" or did not possess "recreational worth." Some areas, like Mesa Verde and Grand Canyon, were established as national monuments as an expedient way to protect threatened resources or prevent commercial development, yet quickly became national parks when Congressional support was secured (Runte, 2010).

Further complicating this issue is the fact that throughout the history of the NPS, not only have areas been redesignated from monuments to parks, but some have been redesignated from parks to other classifications. One example of this is Platt National Park, which became the seventh national park in 1902, and was redesignated as Chickasaw National Recreation Area in 1976 (Rudd, n.d.). Unlike the reclassification of Platt, not all proposed redesignations are successful. In 1971-72, the National Parks Advisory Board reviewed a proposal that would change CCNP's status from a national park, combine it with national forest land and Guadalupe Mountains National Park, and reclassify the entire area as a National Recreation Area (Park Group To Decide Future Of Caverns, 1972). If the Board chose to move forward with this proposal, its recommendations would go to the Secretary of the Interior and would require Congressional approval (Montoya, 1972). The proposal was never enacted, and Carlsbad and Guadalupe both retain their status as national parks today.

Despite the NPS stating that parks and monuments are equal, there are clear social differences between the two designations. Areas designated as monuments are less visited, and often receive less funding than their park counterparts. In the first two years

after establishing WSNP, the NPS budget allocations for the area increased by $652,000 after being cut in the previous three years (National Park Service, n.d.b; National Park Service, n.d.c; National Park Service, n.d.d; National Park Service, n.d.e; National Park Service, n.d.f).

Changing park creation mechanisms

In the early days of the NPS, potential park land was often part of the public domain and creating a park was a matter of setting this land aside, not acquiring it. Over time, as populations have grown, land uses have multiplied and one of the main challenges of establishing a new park location is land acquisition as there are generally residential and commercial interests that already own that land (Dilsaver, 2004). To this point, it is rare for new large parks to be created. Instead, new national parks are generally areas that have already been protected under a different designation (i.e., national monument, national preserve, etc.). Although this method has been used throughout NPS history, it has increased in prominence to become the primary way parks are established. The last national park that was established by means other than redesignation was Redwood, which was created in 1968.

As the land acquisition method has changed, so too has the legislative creation mechanism. In the early NPS era, parks were established through individual bills and championed throughout Congress. Mather and Albright had a reputation for putting photos of potential park areas on the desks of Congressmen, which helped them visualize the areas they had not seen before and often led to the successful creation of new parks.

More recently, however, these parks are not established through individual bills. Instead, they are included in larger bills.

New creation methods in action: White Sands becomes a park

A significant change to the White Sands area came in 1945, when the federal government established the establishment of White Sands Proving Ground. Later renamed the White Sands Missile Range (WSMR), the 2.2 million acre property encompasses the remainder of the dunefield not protected by the NPS (NASA, n.d.). Historically, the missile range has been used for a variety of purposes, including the detonation site of the first atomic bomb and test sites for NASA rockets (NASA, n.d.; National Park Service, 2022c).

The establishment of WSMR did not deter visitors from visiting the dunes. Visitation topped 300,000 in 1957, 500,000 in 1965, and then hovered in the 400-600,000 range through the 2000s. In 2019, White Sands received 608,785 visitors and then 782,469 people in 2021 (National Park Service, n.d.g). Despite this growth, there were not any Congressional proposals to redesignate the area until recently, when its national significance grew.

WSNM's significance grew in 2018, when a set of fossilized footprints were discovered at the monument, an event that changed the understanding of when humans first arrived in North America. The fossilized footprints were estimated to be between 21,000-23,000 years old, whereas humans were previously thought to have entered North America 13,500-16,000 years ago (National Park Service, 2022a). The feasibility and suitability of the White Sands unit had been long established, so in order to be

redesignated as a park, WSNM's national significance needed to grow. With this discovery, White Sands satisfied all the NPS criteria for national park status.

Shortly after the discovery, in 2018, U.S. Senator Martin Heinrich (D-NM) (2013-present) introduced a bill that would establish White Sands as a national park, the first such proposal to Congress (S.2797 - 115th Congress (2017-2018): White Sands National Park Establishment Act, 2018). This bill contained language about both WSNM and WSMR, including transfers of land from one area to another, and was referred to the Senate Committee on Armed Services, but never made it out of the Committee. Senator Heinrich introduced the same bill in the 116th Congress on March 26, 2019, and it was once again stalled in the Committee on Armed Services (S.871 - 116th Congress (2019-2020): White Sands National Park Establishment Act).

Although the bills exclusively outlining the redesignation of White Sands failed, the text of the bills Senator Heinrich introduced was included in the National Defense Authorization Act for Fiscal Year 2020. This act officially redesignated the monument to a park. The National Defense Authorization Act is passed annually, sets the budget for, and funds the Department of Defense, and section 2851 (of 7631) was the clause that officially changed WSNM to WSNP. This means that, unlike earlier park bills, Congressional representatives were not exclusively voting on whether to redesignate a park area. It is possible that many representatives were not even aware of the change to WSNM.

Conclusion

CCNM became a park when awareness of its national significance was increased. Creation of the national monument established its feasibility and with the addition of roads in the Texas area increasing access to the caverns, its suitability for park status was strengthened. Throughout its time as a monument, Carlsbad's national significance had been elevated through the combination of promotion by New Mexico government officials and publicized explorations. These factors combined to create the political climate suitable for redesignating the monument as a park. WSNM followed the same path; its feasibility had been determined during its time as a monument and its suitability increased with the construction of roads. Yet, where Carlsbad's national significance grew from early promotional efforts, White Sands did not have the same publicity. Instead, its national significance increased from the discovery of fossilized footprints that rewrote the timeline of human arrival to North America. In the year after this discovery and elevated national significance, White Sands quietly gained park status as part of the National Defense Authorization Act for Fiscal Year 2020.

The mechanisms for national park establishment have varied over time as definitions of national significance, land acquisition methods, and Congressional voting patterns have changed. Even with these changes, however, the criteria for park establishment have remained constant. As outlined by Dilsaver and Wyckoff (2009), feasibility, suitability, and national significance remain the driving factors behind national park establishment, as shown by the case studies of Carlsbad Caverns and White Sands.

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