



THE STATE
of **ALASKA**
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Department of Natural Resources
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August 14, 2026

Bureau of Land Management
Attention: Management of Wilderness Study Areas
Division of National Conservation Lands
1849 C St. NW, Room 5646
Washington, DC 20240

Submitted online at [regulations.gov](https://www.regulations.gov)

Re: Policy Review: BLM Manual 6330, Management of BLM Wilderness Study Areas

The State of Alaska (State) reviewed the Bureau of Land Management (BLM) Manual 6330-*Management of Wilderness Study Areas* for any necessary updates, clarifications, or suggested revisions. The manual provides policy and guidance for BLM staff in managing Wilderness Study Areas (WSAs), to maintain their suitability until Congress makes a final determination. BLM must ensure that the guidance in Manual 6330 accurately reflects statutory mandates and legal exceptions unique to Alaska under the Alaska National Interest Lands Conservation Act (ANILCA).

The comments below incorporate input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

ANILCA Context

Title VII of ANILCA designated areas of wilderness within the National Park system, the National Wildlife Refuge system, and the National Forest system, amounting to the largest expansion of the national preservation system in history. Additionally, ANILCA established study areas for Wild and Scenic River designations, a WSA in Chugach National Forest, and the Central Arctic Management Area (CAMA) on BLM-managed lands. Beyond that, Section 1326 of ANILCA established that “no further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a [CSU] ... shall be conducted unless authorized by this Act or further Act of Congress. Taken in their entirety, Titles VII and XIII of ANILCA establish a clear Congressional intent that the wilderness areas added to the National Wilderness Preservation System (NWPS) through ANILCA were sufficient, and that no further additions were necessary in the State of Alaska.

Agency policies and manuals which direct agency staff to identify lands with wilderness characteristics and lands suitable for wilderness designation that may be recommended to Congress as additions to the NWPS are inappropriate in Alaska. Despite claims from DOI agencies that these practices are required by guiding statutes such as Section 603 of the Federal Land Policy and Management Act (FLPMA), they are in fact contrary to the intent of ANILCA, a superseding law of compromise that enacted the largest expansion of the national preservation

system in history while also recognizing that no further additions were necessary to the system of Conservation System Units (CSUs) established through ANILCA.

Regarding WSAs on BLM-managed lands, ANILCA designated the CAMA WSA, making it a CSU subject to specific statutory provisions. Unlike WSA management in the lower 48 states, WSAs in Alaska operate under distinct ANILCA provisions regarding access, subsistence, motorized/mechanized transport, and state wildlife management.

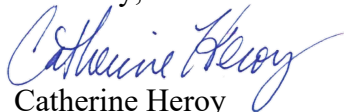
Summary of Recommendations

BLM should add context to Manual 6330 that describes the special exceptions to the Wilderness Act of 1964 that are provided by ANILCA. In Attachment A, we provide specific revisions and additions that are needed to ensure Manual 6330 accurately reflects ANILCA provisions. These revisions include but are not limited to adding references to ANILCA in the manual's authorities and referencing a range of allowed uses in Wilderness and WSAs under ANILCA throughout the manual.

Closing

Thank you for the opportunity to review and comment on BLM Manual 6330, *Management of Wilderness Study Areas*. Through the recommended changes, the State hopes that BLM can include the context necessary to manage lands in accordance with the unique provisions of ANILCA. Doing so will benefit the people, lands, and managing agencies of Alaska. Please contact me at (907)269-0880 or by email at catherine.heroy@alaska.gov to coordinate any follow up discussions.

Sincerely,



Catherine Heroy
Federal Program Manager

Attachment A: Section-Specific Comments

Unlike WSA management in the lower 48 states, WSAs in Alaska operate under distinct ANILCA provisions regarding access, subsistence, motorized/mechanized transport, and state wildlife management. We provide the following section-specific revisions and additions:

Section Specific Comments:

Section 1.3 Authority

- **Comment:** Add ANILCA to the list of authorities. ANILCA designated the CAMA WSA, which is part of the Wilderness Preservation System and is a CSU as defined under ANILCA.
- **Justification:** Unique ANILCA exceptions apply to WSAs in Alaska, including Title XI (transportation, utility systems, and access provisions), Title VIII (subsistence), Title XIII (cabins and temporary structures, and more), and exceptions for motorized equipment. These provisions modify standard non-impairment general wilderness management rules applied in the lower 48 states.

Section 1.5 References

- **Comment:** Add the Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. 3101 et seq.) to the reference list.

Section 1.6 Policy – Subsection B. General Policy 5. New Discretionary Uses

- **Comment:** Revise to note ANILCA exceptions.
- **Justification:** Discretionary use limits must recognize that wilderness designation, including WSA, in Alaska allows for specific statutory exceptions for traditional and subsistence activities. ANILCA authorizes the use of snowmachines, motorboats, airplanes, bicycles, and off-highway vehicles (OHVs) for subsistence and traditional access.

Section 1.6 General Policy- Subsection C. The Non-Impairment Standard

- **Comment:** Add clarifications regarding aircraft access and surface disturbance in Alaska.
- **Justification:** Off-airstrip aircraft landings in Alaska utilizing tundra tires do not create new surface disturbances that would impair the suitability of the WSA for preservation as wilderness. Furthermore, the requirement to document landing strips prior to 1976 does not apply in Alaska. Airplane landings are generally allowed under ANILCA Section 1110(a) unless closed via the formal rulemaking and public hearing process under 43 CFR 36.

Section 1.6 Policy- Subsection D. Policies for Specific Activities. 4: Lands Actions (Disposals, Use Authorizations, Rights-of-Way, Access, and Withdrawals)

- **Comment:** Insert specific reference to ANILCA Title XI.

- **Justification:** ANILCA Title XI establishes the legal framework in Alaska regarding rights-of-way, transportation and utility systems, and guaranteed access, including temporary, to inholdings and across WSAs.

Section 1.6 Policy- Subsection D. Policies for Specific Activities. 6: Recreation

- **Comment:** Incorporate references to ANILCA Section 1110(a) (allowing snowmachines, motorboats, airplanes, and non-motorized surface transportation for traditional activities) and ANILCA Section 811 (ensuring reasonable access to subsistence resources for rural residents via motorized transportation).
- **Solitude vs. Primitive Recreation:** Section 6 Recreation must properly reflect statutory wording: Wilderness possesses outstanding opportunities for "*solitude or a primitive and unconfined type of recreation*", not simply "solitude." The BLM must not create privileged recreational opportunities at the expense of general public access. High-volume primitive recreation does not impair an area's wilderness suitability or constrain Congress's ability to designate it.
- **Recommended Edits for Section 6 Recreation:**
 - **Strike the following text under 6a:** ~~The BLM will monitor the magnitude of all recreational activities in WSAs to ensure that such use will not impair the area's wilderness suitability. If monitoring indicates impairment is occurring the BLM will, as appropriate and subject to applicable law, take action to eliminate the impairing activity (e.g., adjust the time, location, or quantity of use, or prohibit that use in the impacted area). For example, an area may become more frequently used for camping, thereby causing broad physical impacts to soils or vegetation, or an area may become popular for mountain biking, and the resulting increase in use results in a loss of solitude. In either case, the BLM must take some action to address the impairment of wilderness characteristics.~~

~~Care must be taken not to concentrate use by promoting a recreational activity that is normally allowable but at high use levels would cause impairment or create a conflict that may constrain Congress' ability to designate the area as wilderness.~~
 - **b. Motorized/Mechanical Transport:** Add reference to ANILCA Section 1110(a). In Alaska WSAs, motorized and mechanized transport for traditional and subsistence activities are open until closed following the public notice and hearing procedures in 43 CFR 36.
 - **c. Trails:** Reference ANILCA Section 1110(a). Bicycles and horseback riding are open by default in Alaska WSAs and require 43 CFR 36 regulatory procedures for closure.

- **d. Boating:** Reference ANILCA Section 1110(a). Motorboat use is open until closed in Alaska following 43 CFR 36 regulatory procedures for closure.

Section 1.6 Policy- Subsection D. Policies for Specific Activities, Item 8: Vegetation, c. Collection and Removal

- **Comment:** Amend this section to explicitly state that vegetation collection rules are modified in Alaska by ANILCA Title VIII.
- **Justification:** Subsistence collection of renewable resources is statutorily authorized under ANILCA. Closures affecting the collection of renewable plant and animal resources for subsistence purposes fall under the purview of the Federal Subsistence Board (See 43 CFR 51).

Section 1.6 Policy- Subsection D. Policies for Specific Activities, Item 11. Wildlife, a. Coordination Between the BLM and State Agencies.

- **Comment:** Revise to respect state management authority over fish and wildlife as outlined in 43 CFR 24.3 and the 1983 Master Memorandum of Understanding (MMOU) between the Alaska Department of Fish and Game (ADF&G) and the BLM, as revised below.
- **Recommended Edits to 11.a, Coordination between the BLM and state agencies:**
 “Congress directed the Secretary, through the BLM, to manage WSAs "in a manner so as not to impair the suitability of such areas for preservation as wilderness." State wildlife management activities and research do not impair the suitability of areas as wilderness. However, effective management of WSAs requires close coordination and communication between the BLM and State wildlife management agencies. “In general the States possess broad trustee and police powers over fish and wildlife within their borders, including fish and wildlife found on Federal lands within a State.” (43 CFR 24.3). Management actions taken to support wildlife management, ~~whether~~ proposed by the ~~State or the~~ BLM, must conform to the non- impairment mandate, as detailed in 1.6.C of this manual. ...” and

“States regulate where and when the activities of hunting, fishing, and trapping take place in WSAs. Hunting, fishing, and trapping are normally unaffected by WSA designation. The BLM is responsible for managing the habitat upon which these fish and wildlife are dependent. In WSAs, the BLM has an additional responsibility to assure that management techniques and tools do not cause impairment to wilderness characteristics ~~and that fish and wildlife management activities emphasize the continuation of natural processes to the greatest extent possible.~~”

Section 1.6 Policy- Subsection D. Policies for Specific Activities, Item 11. Wildlife, b. General.

- **Comment:** Clarify the division of responsibilities: States manage fish and wildlife species, while the BLM manages the habitat.
- **Recommended Edits to 11.b:**
 b. General. ~~Wildlife and their~~ Habitats in WSAs are managed to ensure:

- natural distribution, number, and interaction of native plant species
- natural processes will be allowed to occur under the applicable land use plan unless degrading to other wilderness characteristics
- ~~wildlife species maintain a natural balance with their habitat and with each other.~~

If healthy, viable, self-sustaining populations of native plant species presently exist within the WSA, then a natural distribution, number, and interaction has already been achieved, and it is generally not appropriate to artificially manipulate natural processes to increase the population of a native plant species.