



THE STATE
of **ALASKA**
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Department of Natural Resources
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U.S. Fish and Wildlife Service
Public Comments Processing
Attn: Docket No. FWS-HQ-NWRS-2026-2575
Policy and Regulations Branch
5275 Leesburg Pike, MS: PRB (JAO/3W)
Falls Church, VA 22041-3803

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

Re: Wilderness Administration and Resource Stewardship; Request for Information,
Docket No. FWS-HQ-NWRS-2026-2575

The State of Alaska (State) reviewed the United States Fish and Wildlife Service's (USFWS) federal register notice 91 FR 35993, dated June 15, 2026, seeking public comment on potential improvements to the USFWS policies associated with the Part 610 *Wilderness Stewardship Manual*. The Wilderness Stewardship manual provides policy direction for the review, planning, stewardship, and administration of wilderness areas managed by USFWS. The comments below incorporate input from the Departments of Natural Resources (DNR), Fish and Game (ADF&G).

The State supports the USFWS' retention and update of an Alaska-specific guidance document regarding the agency's management of Alaska's Refuges that focuses on the unique provisions that the Alaska National Interest Lands Conservation Act (ANILCA) established for federal land management in Alaska. Our comments focus primarily on 610 FW 5 – *Special Provisions for Alaska Wilderness*, with related comments on 610 FW 1 - *General Overview of Wilderness Stewardship Policy* and 610 FW 2 - *Wilderness Administration and Resource Stewardship*. The State supports the language in 610 FW 4, Section 4.2, "Wilderness reviews are not required for refuges in Alaska."

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. Section 1317 of ANILCA went even further by ordering the Secretary of the Interior to conduct a review of all lands within the National Park System and National Wildlife Refuge System in Alaska for their "suitability or nonsuitability for preservation as wilderness." Section 1317 also established a clear timeline for any potential additions to the National Wilderness Preservation System (NWPS), requiring that the Secretary of the Interior forward the results of these studies to the President within five years, and that the President make an official recommendation to Congress within seven years from the date that ANILCA was enacted (December 2, 1980). 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 NWPS through this Act were sufficient, and that no further additions were necessary in the State of Alaska.

Despite the clear Congressional intent demonstrated in these statutes, the NPS, BLM, and USFWS have continued to apply wilderness land management principles to “eligible” lands through agency orders and the planning process. In their current form, these manuals and directives have created a situation in which DOI lands in Alaska that are considered “eligible” for wilderness designation are managed indefinitely as de facto wilderness while Congressional recommendations languish, a practice that fails to acknowledge ANILCA as the superseding statute and results in real impacts to access, economic development, and subsistence practices in Alaska; all activities that ANILCA sought to protect.

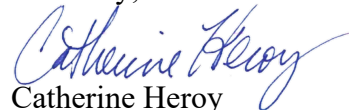
Summary of Recommendations

In Attachment A, we provide specific revisions and additions that are needed to ensure the USFWS Wilderness Stewardship Manual accurately reflects ANILCA provisions and language from the Wilderness Act. These recommendations include but are not limited to an addition to the USFWS Service Manual Part 610, Section 1.4 to include a statement clarifying that in Alaska, ANILCA supersedes the policy priorities established by the listed statutes in the context of wilderness management. Additional subsections that lack Alaska-specific context should include references to ANILCA as appropriate and should refer back to 610 FW 5 for special provisions for wilderness management in Alaska. The State also asserts that Minimum Requirements Analyses are not required for administrative activities and that ADF&G management activities are considered refuge management activity.

Closing

Thank you for the opportunity to suggest improvements to the USFWS manual on Wilderness Stewardship. The inclusion of Alaska-specific guidance can provide the context necessary for the USFWS to manage lands in accordance with the 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

USFWS should add context and clarifications to Service Manual Part 610 to describe the special exceptions to the Wilderness Act of 1964 that are provided by ANILCA. We provide the following section-specific revisions and additions to Part 610 of the Service Manual.

Section 5.4 How do the special provisions of ANILCA affect the need for a minimum requirement analysis (MRA) for proposed refuge management activities and facilities in Alaska wilderness?

We request this section clearly identify that Refuge Administrative activities are exempt from the need for a MRA and that ADF&G management activities are considered refuge management activity. MRAs are not required unless there is a use proposed that is prohibited by the Wilderness Act Section 4(c). Requiring them for all uses is burdensome and unnecessary.

Section 5.12 Does the Service allow the use of motorized equipment in Alaska wilderness areas?

This section needs to include reference to ANILCA Section 1316 which allows the use of motorized equipment in relation to the take of fish and wildlife.

Section 5.13 What provisions apply to commercial enterprises and services in Alaska wilderness areas?

This Section should be re-written, as shown below, to prioritize the applicable ANILCA Sections rather than the Wilderness Act Section 4(d).

~~A. Except as described in section 4(d)(6) of the Wilderness Act, commercial enterprises are prohibited in wilderness (see 610 FW 2.12). However, Sections 304(d) and 707 of ANILCA in conjunction with section 4(c) of the Wilderness Act authorize the exercise of valid commercial fishing rights in Alaska refuge system wilderness.~~

(2) Under section 1316(a) and 304(d), we allow, subject to reasonable regulation, temporary campsites, tent platforms, shelters, and other temporary facilities and equipment (including the use of motorized vehicles) and aircraft landings (also see section 4(d) of the Wilderness Act) directly related to the exercise of valid commercial fishing rights (see section 5.15 for guidance on temporary facilities and equipment related to the taking of fish and wildlife).

Section 5.14 What special provisions apply to management of structures and installations in Alaska wilderness areas?

We request that specific structures and installations allowed under ANILCA be exempted from the MRA requirement. In practice, the MRA has been used to weaken, compromise, or restrict uses specifically guaranteed in ANILCA's special provisions that allow actions prohibited in designated wilderness areas outside of Alaska, emphasizing Lower-48-style conservation over culturally and legally required use in Alaska.

Please revise as shown below:

~~Section 4(e) of the Wilderness Act generally prohibits structures and installations in wilderness areas. ANILCA, however, contains~~ specifically allows direction about the authorization and management ~~of the types of structures and installations described in the~~

following sections. ~~We conduct and document an MRA as a part of the authorization process for the facilities described below and include it in the WSP. (See section 5.15 for guidance on temporary facilities and equipment related to the taking of fish and wildlife.)~~

Section 5.16 What special provisions apply to management of fish populations on Alaska wilderness areas?

We request that the management of fish populations, as allowed under ANILCA, be exempted from the MRA requirement. In practice, the MRA has been used to weaken, compromise, or restrict uses specifically guaranteed in ANILCA's special provisions that allow actions prohibited in designated wilderness areas outside of Alaska, emphasizing Lower-48-style conservation over culturally and legally required use in Alaska.

Please revise as shown below:

In accordance with section 304(e) of ANILCA and subject to reasonable regulations, ~~an~~ **MRA**, and in accord with sound fisheries management principles, we may permit scientifically acceptable means of maintaining, enhancing, and rehabilitating fish stocks where compatible with refuge purposes, including Wilderness Act purposes. Any new facilities associated with these activities should be temporary whenever feasible.

Section 5.17 Does the Service conduct wilderness reviews of refuge lands in Alaska?

We request the following revisions to this Section. We disagree that section 304(g) requires USFWS to identify new wilderness values on refuges in Alaska. Section 304(g) simply states that USFWS describe such values in the Comprehensive Conservation Plan. These values should already be identified. Section 1317 established timelines of seven years from the date of passage of ANILCA to complete the identification of wilderness areas. That time has expired. In Section 101(D) of ANILCA, Congress clearly stated "no more" regarding additional wilderness in Alaska.

We have completed wilderness reviews for refuges in Alaska in accordance with section 1317 of ANILCA. Additional wilderness reviews as described in the refuge planning policy (602 FW 1 and 3) are not required for refuges in Alaska. ~~During preparation of CCPs for refuges in Alaska, we follow the provisions of section 304(g) of ANILCA, which requires us to identify and describe the special values of the refuge, including wilderness values. Subsequently, the CCP must designate areas within the refuge according to their respective resources and values and specify the programs for maintaining those values. However, ANILCA does not require that we incorporate formal recommendations for wilderness designation in CCPs and CCP revisions.~~

610 FW 1 – General Overview of Wilderness Stewardship Policy

We recognize 610 FW 5 outlines provisions for managing designated wilderness in Alaska. Because roughly 90% of USFWS's designated wilderness is in Alaska, where ANILCA establishes numerous exceptions to standard Wilderness Act management, 610 FW 1 should explicitly reference ANILCA. As written, the policy implies that most USFWS-designated wilderness is managed without consideration of ANILCA, which is inaccurate. For accuracy, we suggest the following edits to Sections 1.1 and 1.4.

1.1 What is the purpose of Part 610 and this chapter?

Please revise as shown below:

A. Part 610 provides an overview and foundation for implementing the Wilderness Act, ANILCA, and the National Wildlife Refuge System Administration Act of 1966, as amended (Administration Act).

1.4 What are the priorities in implementing this policy?

As currently written, the USFWS wilderness guidance improperly minimizes ANILCA's impact on designated wilderness management. We suggest the following revisions:

We will consider ~~three~~ four main priorities in the following order when administering refuge wilderness areas: The Administration Act, the Endangered Species Act, ANILCA, and the Wilderness Act. We initially determine what needs to be accomplished to meet refuge purposes, then ensure that these activities comply with the Endangered Species Act and then ensure that these activities comply with ANILCA and the Wilderness Act.

I. Generally Prohibited Use.

Except in Alaska, where ANILCA provides numerous exceptions, Section 4(c) of the Wilderness Act generally prohibits temporary roads, motor vehicles, motorized equipment, motorboats, mechanical transport, landing of aircraft, structures, and installations.

Section 1.5 What terms do you need to know to understand Part 610?

Please use the common dictionary definition of solitude:

BB. Solitude. Solitude" refers to the state or situation of being alone, often by choice, and can carry both peaceful and reflective meanings. Wilderness solitude is a state of mind, a mental freedom that emerges from settings where visitors experience nature essentially free of the reminders of society, its inventions, and conventions. Privacy and isolation are important components, but solitude also is enhanced by the absence of distractions, such as large groups, mechanization, unnatural noise and light, unnecessary managerial presence (such as signs), and other modern artifacts.

Please delete the following definition, as it is not found in the Wilderness Act:

~~**KK. Wildness.** The state of being free from human control and untrammelled.~~

Section 1.13 What is wilderness character?

The Wilderness Act does not explicitly say "protect night skies;" its language on preserving natural, primeval environments, and related agency guidance, has been interpreted as encompassing protection of natural darkness. Wilderness managers may minimize artificial light in designated wilderness to maintain wilderness character. Management of sources of light, sound, and air quality impacts that originate outside of Wilderness is beyond the scope of the Wilderness Act provisions. As a result, please modify the following items in Section 1.13 subsection **B** as shown.

(3) Maintaining watersheds ~~and airshed~~ in a healthy condition;

(4) ~~Maintaining natural night skies and soundscapes;~~

- Please delete 1.13 subsections C and D, as these paragraphs are more philosophical, values-oriented, and reflective, rather than procedural or operational as needed for a guidance document. Guidance documents should provide clear requirements, processes, and expectations.

~~C. The character of wilderness refocuses our perception of, relationship to, and use and enjoyment of nature. It requires changing our view of a landscape from the utilitarian, commodity orientation that often dominates our relationship with nature to respect for and deference to other life forms and natural processes. It requires us to recognize that we are embedded in these natural processes. Wilderness character imposes upon us an obligation to leave to future generations what remains of the world we did not make and do not control. Wilderness represents a symbol of respect for the natural conditions and wildness that civilization has displaced.~~

~~D. We influence wilderness character with every decision about refuge management activities and refuge uses, including public use and enjoyment of wilderness. Maintaining wilderness character requires an attitude of humility and restraint. In wilderness, we do not adjust nature to suit people, but adjust human use and influences so as not to alter natural processes. We strengthen wilderness character with every decision to forego actions that have physical impact or would detract from the idea of wilderness as a place set apart, a place where human uses, convenience, and expediency do not dominate. We preserve wilderness character by our compliance with wilderness legislation and regulation, but also by imposing limits on ourselves.~~

1.14 What are the principles for administering wilderness?

Revise Section E as follows, as “inspiration” is not identified as a requisite of wilderness in the Wilderness Act:

E. Provide opportunities for primitive recreation, giving priority to compatible wildlife-dependent activities that are enhanced by a wilderness setting. Provide physical, social, and administrative settings that are conducive to experiencing opportunities for solitude, adventure, challenge, inspiration, and other aspects of wilderness character that the American people can use and enjoy.

610 FW 2 – Wilderness Administration and Stewardship

Section 2.5 May the Service allow structures and installations in wilderness?

In the first sentence of this section, please revise as follows:

Except in Alaska, Section 4(c) of the Wilderness Act generally prohibits structures and installations in wilderness areas. After designation, we will make an inventory and condition assessment of all existing structures and installations.

Section 2.6 May the Service allow roads and trails in wilderness?

Please revise as follows:

Except in Alaska, Section 4(c) of the Wilderness Act prohibits permanent roads in wilderness. We will inventory and evaluate all roads, vehicle routes, and trails in existence at the time of wilderness.

Section 2.7 May the Service allow use of motorized vehicles, motorized equipment, and mechanical transport in wilderness?

Please revise as follows:

Except in Alaska, tThe Wilderness Act generally prohibits the use of motorized vehicles, motorized equipment (including motorized portable tools), and mechanical transport in wilderness.

Section 2.8 May the Service manage aircraft use in and over wilderness?

Please revise as follows:

A. Except in Alaska, the Wilderness Act generally prohibits landing aircraft in refuge wilderness.

B. Except in Alaska, the Wilderness Act also generally prohibits landing aircraft in wilderness for refuge management activities (see 610 FW 1.16) unless:

Section 2.9 How does wilderness designation affect existing private rights?

Please revise as follows:

Except in Alaska, Section 4(c) of the Wilderness Act prohibits commercial enterprises and permanent roads, except as provided by the Act and “subject to existing private rights.”

Section 2.14 May the Service authorize mineral exploration and development activities in wilderness areas?

Please revise as shown below:

We authorize, under Part 612 of the Service Manual, mineral exploration and development activities in wilderness areas, recommended wilderness, and proposed wilderness under limited circumstances, as described below. Sections 4(d)(2) and (3) of the Wilderness Act address prospecting, mineral locations, mineral patents, and mineral leasing within national forest wilderness areas. These provisions do not apply to refuge wilderness areas. In Alaska, ANILCA prevails.

Section 2.16 How does the Service conserve wildlife and habitat in wilderness?

Please revise to include reference to ANILCA, as 90 percent of all USFWS designated wilderness is in Alaska. We propose the following revisions:

A. We conserve fish, wildlife, and plant resources and their habitats (including water resources) in wilderness in a manner consistent with the Administration Act and refuge purpose(s), including Wilderness Act purposes. In Alaska, conservation of fish, wildlife, and plant resources also occurs in a manner consistent with ANILCA.

B. (2) In such cases, we encourage the restoration and maintenance of biological integrity and wilderness character. In Alaska, we seek to ensure the continuation of healthy populations and recognize that that local rural residents engaged in subsistence uses may be a natural part of that ecosystem.

(3)(b) The minimum requirement for administering the area as wilderness and necessary to accomplish the purposes of the refuge, including Wilderness Act purposes. In addition, such decisions and actions must:

(i) Maintain or restore the biological integrity (in Alaska “healthy populations”), diversity, or environmental health of the wilderness area; or

Section 2.20 May the Service control predation in wilderness?

Please revise as follows:

Predation is an essential and integral process in the wilderness ecosystem. We will initiate actions intended to alter natural predator/prey relationships only when compelling evidence exists that the proposed action will correct or alleviate identified impacts on native fish, wildlife, plants, or their habitats and would be in compliance with section 2.16. In Alaska, we seek to ensure the continuation of healthy populations and recognize that local rural residents engaged in subsistence uses may be a natural part of that ecosystem. In cooperation with state fish and wildlife managers, we will direct control at the individual animal(s) causing the problem using the method least likely to adversely impact nontarget species and wilderness visitors. We will not manage predation solely to protect livestock, wilderness visitors, or other users.

Section 2.23 May the Service use prescribed fire in wilderness?

This section should identify that prescribed fire can be used in Alaskan wilderness areas when necessary to ensure the continuation of subsistence uses by rural Alaskan residents. Please revise to add such reference:

A. We may use prescribed fire within a wilderness area only where fire is a natural part of the ecosystem, and only if prescribed fire is the minimum requirement for administering the area as wilderness and is necessary to accomplish the purposes of the refuge, including Wilderness Act purposes. In addition, such decisions and actions must:

- (1) Maintain or restore the biological integrity, diversity, or environmental health of the wilderness area; ~~or~~
- (2) Ensure the continuation of subsistence uses by rural Alaskan residents; or
- (3) Be necessary for the recovery of threatened or endangered species.

Section 2.26 How does the Service protect natural night skies and natural soundscapes in wilderness?

Please strike this section as the protection of night skies and natural soundscapes is not identified in the Wilderness Act. Management of sources of light, sound, and air quality impacts that originate outside of Wilderness is beyond the scope of the Wilderness Act provisions.

Section 2.27 How does the Service conduct research in wilderness?

C.(3). In Alaska, where State research activities are a traditional use that predates Alaskan wilderness areas, an MRA will not be required.