



THE STATE

Of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

August 4, 2026

Carla Bock

Department of Interior

Assistant Director National Conservation Lands and Community Partnerships U.S.

Bureau of Land Management

1849 C St. NW, Room 5646

Washington, DC 20240

Submitted electronically to:

<https://www.regulations.gov>

Subject: Policy Review: BLM Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process

Dear Director Bock,

As Executive Director of the Citizens' Advisory Commission on Federal Areas (CACFA), I submit these comments regarding the Bureau of Land Management's review of BLM Manual 6320 – Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process. CACFA's statutory mission is to monitor, evaluate, and respond to federal land-management decisions that affect Alaskans, ensuring that federal actions comply with the Alaska National Interest Lands Conservation Act (ANILCA) and accurately reflect the realities of access, subsistence, and resource use in our state.

We appreciate BLM's willingness to update Manual 6320. However, CACFA must express a significant concern: the manual currently omits the controlling language of ANILCA Section 1320, which governs how wilderness identification and wilderness-related review processes must operate uniquely in Alaska.

To underscore the importance of this statutory provision, we quote Section 1320 as enacted:

"Notwithstanding any other provision of law, section 603 of the Federal Land Policy and Management Act of 1976 shall not apply to any lands in Alaska. However, in carrying out his duties under section 201 and section 202 of such Act and other applicable laws, the Secretary may identify areas in Alaska which he determines are suitable as wilderness and may, from time to time, make recommendations to the Congress for inclusion of any such areas in the National Wilderness Preservation System, pursuant to the provisions of the Wilderness Act. In the absence of congressional action relating to any such recommendation of the Secretary the Bureau of Land Management shall manage all such areas which are within its jurisdiction in accordance with the applicable land use plans and applicable provisions of law."

This language is unambiguous. Congress established a distinct statutory framework for Alaska, recognizing that the traditional wilderness review process under FLPMA §603 does not apply here. In Alaska, identifying lands suitable for wilderness does not create interim wilderness study area status and does not authorize temporary restrictive management. If Congress does not act on a recommendation, BLM must manage such lands only under existing land use plans and applicable law, not under WSA-like or pseudo-wilderness protocols.

Despite this clear directive, Manual 6320—while listing ANILCA among its authorities—does not incorporate Section 1320’s operative requirements. Without explicit inclusion of this provision, the manual risks:

- encouraging misapplication of Lower-48 wilderness-characteristics procedures in Alaska;
- creating administrative pressure toward de facto wilderness study area-type management on lands Congress specifically exempted from FLPMA §603;
- generating conflict with ANILCA’s guarantees of access, subsistence, and federal-state coordination; and
- undermining congressional intent that Alaska’s conservation designations already represent an appropriate and carefully considered balance.

CACFA has repeatedly observed that omissions of Alaska-specific ANILCA provisions contribute to planning inconsistencies, public confusion, and avoidable conflict between federal agencies, the State of Alaska, and rural communities.

Accordingly, CACFA respectfully requests that BLM revise Manual 6320 to explicitly incorporate ANILCA Section 1320 by:

1. Stating clearly that **FLPMA §603 does not apply to lands in Alaska.**
2. Affirming that **wilderness-characteristics identification in Alaska does not impose interim restrictions resembling wilderness study areas.**
3. Directing that, **absent congressional action**, identified areas must be managed **solely under existing BLM land use plans and applicable law**, consistent with ANILCA.
4. Clarifying that **Alaska-specific access and subsistence provisions** continue to apply when evaluating and managing lands with wilderness characteristics.

Incorporating this language is essential to ensure that Manual 6320 accurately reflects governing law, upholds congressional intent, and avoids unintended impacts on Alaska’s communities, subsistence practices, transportation corridors, and state-managed resources.

Further recommendation would be to incorporate Alaska specific language for Manual

6320 similar to the “BLM-Utah Additional Guidance for Manual 6320”. Or similar to language in BLM Manual 6330 that states, this policy does not apply to Alaska.

CACFA appreciates the opportunity to provide this input and encourages BLM to integrate Section 1320 directly into the revised Manual 6320. We look forward to continued collaboration with BLM as it updates its land-use planning guidance for Alaska.

Sincerely,


Kim Griffith

Executive Director

Citizens' Advisory Commission on Federal Areas (CACFA)