



THE STATE

Of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

July 30, 2026

National Wildlife Refuge System, U.S. Fish & Wildlife Service
Attn: Cynthia Martinez
5275 Leesburg Pike
Falls Church, VA 22041-3803

Submitted electronically to: <https://www.regulations.gov>

Comment Letter – U.S. Fish & Wildlife Service Request for Information on Part 610 – Wilderness
Administration and Resource Stewardship
Docket No. FWS-HQ-NWRS-2026-2575

Dear Ms. Martinez:

The Citizens' Advisory Commission on Federal Areas (CACFA) appreciates the opportunity to comment on potential improvements to Part 610 of the U.S. Fish and Wildlife Service Manual, which guides Wilderness Administration and Resource Stewardship across the National Wildlife Refuge System.

CACFA's statutory responsibility is to identify and reduce potential negative impacts on Alaska and its citizens resulting from federal actions on Alaska's more than 200 million acres of federal land. CACFA evaluates the consistency of federal action management, planning, development, and additions to federal management areas—with congressional intent and applicable law.

CACFA particularly acknowledges and supports the inclusion of Chapter 610 FW 5, Special Provisions for Alaska Wilderness, which appropriately recognizes that ANILCA's statutory directives govern wilderness management in Alaska and prevail where they conflict with general Wilderness Act provisions.

CACFA also appreciates the Service's continued acknowledgement of the "no more" clause found within ANILCA (e.g., §1326 and related provisions), which Congress included to ensure that Alaska would not be subjected to additional wilderness reviews, wild and scenic river suitability studies, or administrative land withdrawals without explicit Congressional authorization. This statutory boundary is essential to prevent policy drift and protect the balance of conservation and access negotiated in the Alaska National Interest Lands Conservation Act. CACFA has consistently emphasized the importance of this clause, as documented in prior Commission memos describing Congress's intent that "no more simply means what it says."

Given that Part 610 is a national-level policy document, CACFA recommends that any future refinements continue to clearly distinguish between permissible wilderness review activities and those that could inadvertently resemble additional wilderness study efforts—particularly in Alaska, where ANILCA establishes strict limits to prevent such outcomes.

To strengthen Alaska-specific applicability and ensure statutory compliance, CACFA recommends that USFWS directly reference the multi-agency authored *Alaska Supplement to the Minimum Requirements Decision Guide (MRDG)* (2016) [Microsoft Word - 06-06-20 Alaska Supplement MRDG FINAL.doc](#) within Part 610. This supplement serves as an essential tool for managers operating within Alaska's distinct legal framework by:

- Identifying Alaska-specific statutory allowances under ANILCA, including motorized access, structures, traditional activities, and Title XI access provisions.
- Directing managers to evaluate ANILCA-protected access, subsistence activities, authorized motorized uses, and traditional transportation before relying on national Wilderness Act standards.
- Providing a practical, quick-reference guide illustrating that the Minimum Requirements Analysis (MRA) process must be tailored for Alaska and should not default solely to national Wilderness Act prohibitions, which do not fully apply in Alaska's conservation system units.

Formal inclusion of the Alaska Supplement would ensure that wilderness stewardship determinations appropriately reflect the legal allowances Congress established for Alaska, reduce inconsistency across refuge units, and reinforce proper application of ANILCA provisions.

CACFA respectfully requests that USFWS continue to strengthen explicit recognition of ANILCA's controlling authority—including its important “no more” clause—and ensure that wilderness stewardship in Alaska remains fully aligned with Congressional intent. Incorporating the multi-agency Alaska Supplement to the MRDG into Part 610 would meaningfully reinforce that Minimum Requirement analyses in Alaska must evaluate ANILCA-protected access, subsistence activities, and authorized motorized uses before applying national Wilderness Act standards. By embedding this Alaska-specific guidance within Part 610, the Service can enhance statutory compliance, improve management consistency across Alaska refuges, and uphold the unique framework Congress established for conservation system units in Alaska.

We appreciate the Service's continued attention to Alaska's unique statutory landscape and stand ready to support further refinement of Part 610.

Sincerely,



Kim Griffith

Executive Director

Citizens' Advisory Commission on Federal Areas (CACFA)