



Date: August 14, 2026

U.S. Department of the Interior, Director (630)
Bureau of Land Management
1849 C St. NW, Room 5646
Washington, DC 20240
Attention: Management of Wilderness Study Areas

Via submission on Regulations.gov: <https://www.regulations.gov/document/BLM-2026-0069-0001>

RE: **Policy Review: BLM Manual 6330, Management of BLM Wilderness Study Areas**
Document ID: BLM-2026-0069-0001

Dear DOI & BLM Policy Review Teams,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the [Policy Review: BLM Manual 6330, Management of BLM Wilderness Study Areas](#). These comments are submitted on behalf of UPLA, its members, affiliated clubs, and volunteers who regularly recreate within the 244.4 million acres of BLM-administered public lands in the USA. This letter of comment shall not supersede the rights of other UPLA agents, representatives, or members from submitting their own comments; the Bureau of Land Management (BLM) should consider and appropriately respond to all comments received for this policy review.

UPLA is a non-profit organization representing over 5,800 members, in addition to speaking out for 69 OHV clubs and organizations. We advocate for responsible outdoor recreation, active stewardship of public lands, and encourage members to exercise a strong conservation ethic including “leave no trace” principles. We champion scrupulous use of public lands for the benefit of the general public and all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with public land managers, all recreationists, and other public land stakeholders. Our members participate in outdoor recreation of all forms to enjoy federally and state managed lands throughout Utah, including BLM and US Forest Service managed public lands. UPLA members visit public lands to participate in motorized and human-powered activity such as off-roading, camping, hiking, canyoneering, horseback riding, sightseeing, photography, wildlife and nature study, observing cultural resources, and other similar pursuits on a frequent and regular basis throughout every season of the year. UPLA members and supporters have concrete, definite, and immediate plans to continue such activities in BLM managed public lands throughout the future.



I, Rose Winn, am an avid outdoor recreation enthusiast and anthropologist; hiking, backpacking, camping, rock climbing, off-roading, fishing, forage of wild herbs and plants for medicinal uses, and exploration of cultural and archeological sites and artifacts on public lands are among my core areas of activity and interest. I serve as the Natural Resources Consultant for Utah Public Lands Alliance (UPLA), a non-profit organization dedicated to keeping offroad trails open for all recreation users. While my profession allows me to advocate to protect public access to public lands for all stakeholders and multiple-uses, I also work as a volunteer on conservation, mitigation, and restoration projects on public lands.

As a joint writer of this comment letter, Loren Campbell is a Jeep and UTV enthusiast from Virgin, Utah. Loren serves as the President of Utah Public Lands Alliance (UPLA). We share a strong interest in maximizing opportunities for offroad motorized recreation. Loren works full time as a volunteer advocate to protect access for all users, but also organizes and works as a volunteer on projects on public lands. UPLA, Loren, and I are also members of BlueRibbon Coalition. These comments are submitted on behalf of both me and Loren Campbell, as well as our members and followers from within and outside of Utah.

Please note our support and agreement with the comments submitted by BlueRibbon Coalition.



TABLE OF CONTENTS

Topic	Page
Executive Summary	4
FLPMA, Congressional Intent, and the Temporary Nature Of Wilderness Study Areas	5
Recommendation to Release All Remaining WSAs to Multiple-Use Management	9
Wilderness and Wilderness Study Area Statistics: United States and Utah	12
Multiple Use, Sustained Yield, and Maximum Public Benefit	14
Economic Consequences of Long-Term WSA Management	19
Recreation, Public Access, and Rural Communities	22
Active Stewardship versus Passive Preservation	27
Wildfire, Fuel Loading, and Landscape Resilience	31
Resource Management, Infrastructure, and Public Safety	36
Section-by-Section Recommended Updates to Manual 6330	46
Additional Recommended Revisions	63
Summary of Recommendations	71
Closing	73
References	75



EXECUTIVE SUMMARY

Utah Public Lands Alliance (UPLA) appreciates the opportunity to provide comments regarding the Bureau of Land Management's review and proposed revision of Manual 6330 – Management of BLM Wilderness Study Areas. UPLA strongly supports revision of the Manual and urges BLM to use this opportunity to restore Wilderness Study Area (WSA) policy to its original statutory purpose under the Federal Land Policy and Management Act (FLPMA): preserving Congress's opportunity to determine whether qualifying lands should become designated Wilderness while maintaining the broader congressional mandate that public lands be managed for multiple use, sustained yield, and maximum public benefit.

The most significant deficiency in the current Manual is not merely the language of individual provisions, but the institutional reality that temporary WSA designations have remained in place for 30 to 50 years after completion of the Section 603 wilderness review. Today, approximately 11.6 million acres remain in WSA status nationwide, including approximately 2.8 million acres in Utah, despite Congress having designated more than 112 million acres of permanent Wilderness nationwide, including more than 1.8 million acres in Utah. Temporary study status has therefore evolved into a de facto permanent management regime that increasingly functions as administrative Wilderness without congressional authorization.

UPLA recommends that BLM expressly recognize that this outcome is inconsistent with both the purpose of Section 603 and FLPMA's broader multiple-use mandate. The Bureau should make **final disposition of the remaining WSA estate an explicit agency objective**, recommending congressional release of unresolved Section 603 WSAs while actively reconsidering administratively designated Section 202 WSAs through the land-use planning process where continued designation is no longer warranted.

This comment letter also recommends comprehensive revisions throughout Manual 6330 to ensure that non-impairment is implemented according to its statutory meaning rather than expanded into an increasingly restrictive policy favoring passive preservation over responsible public-land stewardship. The revised Manual should preserve lawful public access, maintain existing transportation routes and infrastructure, protect valid existing rights, facilitate active vegetation and fuels management, improve wildfire resilience, strengthen public safety authority, support rural economies dependent upon public lands, protect cultural and historical resources, and employ mitigation before closure or prohibition wherever compatible with preservation of wilderness suitability.



UPLA further recommends that BLM improve transparency and accountability by requiring contemporary scientific data, accurate geospatial mapping, periodic WSA review, network-level transportation analysis, regular reporting to Congress, and evidence-based findings before restricting public use. WSA management should remain adaptive, science-driven, and grounded in measurable resource conditions rather than assumptions or administrative preference.

Ultimately, this review presents BLM with an opportunity to restore balance to WSA policy. Public lands can simultaneously conserve outstanding natural resources while supporting recreation, grazing, infrastructure, wildlife management, watershed protection, cultural resources, wildfire resilience, and the many other public benefits Congress directed BLM to sustain under FLPMA. After decades of unresolved study status, it is time for Manual 6330 to once again reflect that balanced multiple-use mission and to facilitate final resolution of the remaining Wilderness Study Areas rather than perpetuating their indefinite administration as de facto Wilderness.

FLPMA, CONGRESSIONAL INTENT, AND THE TEMPORARY NATURE OF WILDERNESS STUDY AREAS

UPLA urges the Bureau of Land Management to begin its review of Manual 6330 with the foundational legal distinction between a **Wilderness Area** and a **Wilderness Study Area (WSA)**. Congress alone designates Wilderness. A WSA, by contrast, is an interim land-management classification created to preserve Congress's ability to make that ultimate decision. A WSA was never intended to constitute Wilderness by administrative attrition, nor should decades of congressional inaction transform a temporary review status into a functionally permanent restrictive land-use designation.

The Federal Land Policy and Management Act of 1976 (FLPMA) established a specific, time-bounded wilderness-review process. Section 603(a) directed the Secretary of the Interior, **within fifteen years after October 21, 1976**, to review qualifying roadless public lands possessing wilderness characteristics and to report recommendations concerning their suitability or nonsuitability for Wilderness designation (43 U.S.C. § 1782(a)). Congress therefore imposed an affirmative timetable upon the administrative review itself. The BLM conducted its principal wilderness inventory from 1978 through 1980, subsequently studied identified WSAs, and completed the reporting process to Congress by 1993. The BLM's own Manual 6330 recognizes this three-stage structure of inventory, study, and reporting and acknowledges that recommendations concerning the suitability or nonsuitability of individual WSAs were ultimately transmitted to Congress. (BLM, 2012).



Equally important, the BLM's own historical characterization of its WSA policy demonstrates that the extraordinary management regime applicable to these lands was understood to be temporary. Manual 6330 explains that prior iterations were expressly called the **"Interim Management Policy"** because the policy was expected to remain in effect only for a limited period and was designed for the short-term stewardship of WSAs pending their ultimate disposition. The Manual further recognizes that, for Section 603 WSAs, wilderness review ends when Congress either designates the lands as Wilderness or releases them for other purposes. (BLM, 2012).

That history matters. The phrase "until Congress has determined otherwise" in Section 603(c) does not create an expiration date by operation of law, and UPLA does not suggest that BLM may simply disregard that statutory language for Section 603 WSAs. Section 603(c) presently requires BLM to manage those lands so as not to impair their suitability for Wilderness until Congress acts (43 U.S.C. § 1782©). But the absence of an automatic sunset does not convert the underlying congressional design into an affirmative policy preference for perpetual WSA management. Congress established a wilderness **study and recommendation process**, not an independent administrative mechanism for creating permanent wilderness-equivalent designations.

That distinction has become increasingly consequential as the supposedly interim period has extended from years to generations. The original wilderness-review process is now approximately half a century removed from FLPMA's enactment, while the statutory deadline for completing the principal wilderness-review recommendations passed decades ago. In Utah, the remaining WSA estate likewise reflects decisions made decades in the past rather than a contemporary congressional determination that these lands should be permanently governed under wilderness-style restrictions.

BLM's June 2026 notice itself recognizes the unresolved character of this arrangement. The agency describes Manual 6330 as policy for maintaining WSA suitability for potential congressional Wilderness designation **"until Congress makes a final determination."** The notice further distinguishes Section 603 and congressional WSAs from certain later Section 202 WSAs, whose designation may be changed through the BLM land-use planning process. (BLM, 2026). This distinction must guide the present revision.

FLPMA's broader structure reinforces the need to avoid converting non-impairment into an administratively enlarged form of permanent preservation. **Congress declared that public lands generally are to be managed under the principles of multiple use and sustained yield unless otherwise specified by law** (43 U.S.C. § 1701(a)(7)). Congress separately defined "multiple



use" as management of public lands and their resource values in the combination that will best meet the present and future needs of the American people, taking account of renewable and nonrenewable resources including recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historical values (43 U.S.C. § 1702(c)). Section 302 likewise directs the Secretary to manage the public lands under principles of multiple use and sustained yield, subject to applicable land-use plans and specific statutory exceptions (43 U.S.C. § 1732(a)).

Wilderness preservation therefore exists within FLPMA's statutory architecture, but it does not displace that architecture except where Congress has directed otherwise. Section 603(c)'s non-impairment requirement is such a specific direction for lands actually under wilderness review, but it must be interpreted according to its text and purpose rather than expanded administratively into restrictions resembling designated Wilderness. Manual 6330 itself recognizes that distinction, stating that management under the non-impairment standard does **not** mean WSAs are to be managed as though Congress had already designated them as Wilderness and acknowledging that activities, including motorized vehicle use on qualifying primitive routes, remain permissible in WSAs even though prohibited in designated Wilderness (BLM, 2012).

This distinction should become a central principle of the revised Manual. The existing policy too frequently treats preservation of a future congressional option as though it were an independent objective to progressively enhance wilderness character over time. Particularly problematic is the concept reflected in Manual 6330 that where wilderness characteristics have improved since the statutory baseline, BLM should preserve the *better current condition* and prohibit a return to otherwise lawful baseline uses. The 2024 language reviewed in the supporting comments, for example, states that where primitive routes have been closed and rehabilitated, BLM will not permit them to be re-established because the current condition contains superior wilderness characteristics.

UPLA recommends deleting that policy. Section 603(c) directs BLM **not to impair the suitability** of an area under review. It does not direct the agency to continually improve its wilderness characteristics, progressively ratchet permissible uses downward, or convert administrative restrictions accumulated during the review period into a new and increasingly restrictive baseline. Such an interpretation creates a one-way regulatory mechanism: uses can disappear, routes can be closed and reclaimed, human influences can be removed, and wilderness character can consequently increase, after which the agency treats the improved condition as legally protected against restoration of historically lawful uses. Over several decades, that process can transform a WSA into something materially more restrictive than the landscape Congress was originally asked to evaluate.



The problem becomes especially acute where administrative actions themselves generate the allegedly improved wilderness character. Temporary closures, route rehabilitation, discontinued maintenance, reduced recreation, removal of facilities, or other management decisions can progressively erase evidence of historic human use. If each resulting improvement in solitude or apparent naturalness becomes a new regulatory floor, BLM effectively acquires the ability to manufacture increasingly restrictive wilderness-management conditions without congressional designation. That outcome conflicts with the distinction Congress maintained between **studying lands for possible Wilderness designation** and actually **designating Wilderness by statute**.

The same principle should govern post-1993 Section 202 WSAs. Unlike Section 603 WSAs submitted to Congress, BLM expressly acknowledges that certain Section 202 WSAs identified after completion of the Wilderness Study Reports were not forwarded to Congress and that their status may be changed through the land-use planning process (BLM, 2026). These lands present the clearest opportunity for immediate administrative reform. Where no congressional wilderness decision remains pending, indefinite maintenance of an administrative WSA designation is particularly difficult to reconcile with contemporary land-use planning and FLPMA's multiple-use framework.

The magnitude of the issue is substantial. As of January 2026, BLM reports **491 WSAs encompassing 11,132,890 acres nationwide**. Against approximately 245 million acres administered by BLM, WSAs alone represent approximately **4.54 percent of all BLM surface lands**. Utah contains **77 WSAs encompassing 2,795,574 acres**, meaning approximately **12.26 percent of the 22.8 million acres administered by BLM in Utah** remain subject to WSA status. By comparison, BLM currently administers 263 designated Wilderness Areas totaling 10,185,931 acres nationwide, including 35 Wilderness Areas totaling 914,079 BLM acres in Utah. Thus, in Utah, approximately three times as much BLM acreage remains in the ostensibly temporary WSA category as has actually been designated by Congress as BLM Wilderness. (BLM, 2026). BLM confirms that it administers approximately 22.8 million acres in Utah. That disparity deserves serious policy attention. Wilderness reflects an affirmative congressional judgment. WSA status reflects an unresolved question. Those categories should not become functionally interchangeable merely because an unresolved question has remained unresolved for decades.

UPLA therefore recommends that revised Manual 6330 explicitly recognize three principles:

1. WSA management is interim management pending final disposition;
2. The non-impairment mandate preserves congressional options but does not authorize BLM to administratively create or incrementally manufacture de facto Wilderness;



3. Where BLM possesses land-use-planning authority to remove an administrative WSA designation, the agency should now, immediately, actively evaluate whether continued WSA status remains justified rather than treating preservation of that designation as the presumptive or permanent outcome.

RECOMMENDATION TO RELEASE ALL REMAINING WSAs TO MULTIPLE-USE MANAGEMENT

UPLA recommends a national policy objective of **resolving and releasing the remaining WSA estate and returning those lands to FLPMA multiple-use management**, while respecting the distinct legal mechanisms applicable to different classes of WSAs.

For Section 603 WSAs and legislative WSAs whose disposition requires congressional action, BLM should prepare and transmit to the Secretary of the Interior and Congress an updated national inventory accompanied by formal recommendations for release. Where Congress has already received a BLM recommendation of nonsuitability for Wilderness, BLM should expressly renew and prioritize that recommendation. Where earlier recommendations are obsolete, incomplete, or no longer reflective of current conditions, the Department should provide Congress with updated information necessary to make the decision that Section 603 contemplated decades ago.

For post-1993 Section 202 WSAs that were never submitted to Congress and whose status may be modified through land-use planning, BLM should initiate the appropriate planning processes to **remove WSA status and return those lands to management under the full multiple-use and sustained-yield framework of FLPMA**, subject to all other applicable laws and resource protections. BLM's 2026 Federal Register notice expressly acknowledges that the status of this category may be changed through the land-use planning process.

UPLA emphasizes that **release from WSA status is not disposal, privatization, development authorization, or abandonment of environmental stewardship**. Released lands remain public lands managed by BLM. Their management remains governed by FLPMA, applicable resource management plans, NEPA where applicable, the Endangered Species Act, National Historic Preservation Act, Clean Water Act, Clean Air Act, federal mineral laws, grazing statutes, travel-management decisions, cultural-resource protections, and the prohibition against unnecessary or undue degradation (among a litany of additional conservation and resource protection statutes). Release merely removes the extraordinary wilderness-review overlay and allows the agency once again to weigh the complete range of public-land values through the planning framework Congress enacted for that purpose.



This distinction was also central to prior congressional proposals addressing unresolved wilderness-review lands. The background material concerning the Wilderness and Roadless Area Release Act of 2011 correctly emphasized that release of lands found unsuitable for Wilderness would not transfer federal ownership; rather, BLM would remain the land manager and future decisions would proceed through ordinary land-use planning and applicable environmental review. That remains an important distinction for the present policy review.

Release would therefore restore **management discretion**, not predetermine management outcomes. Some released lands may appropriately emphasize habitat conservation, primitive recreation, scenic values, watershed protection, or cultural-resource preservation. Others may support motorized and mechanized recreation, grazing, mineral development, renewable-energy infrastructure, rights-of-way, utility corridors, fuels treatment, vegetation management, watershed restoration, wildlife improvements, or combinations of these uses. FLPMA requires precisely this type of context-specific balancing rather than the subordination of every other resource value to preservation of potential future Wilderness.

That balancing has tangible public consequences. Wilderness-style restrictions can limit transportation and utility corridors, mechanized recreation, mineral development, infrastructure, and other productive uses. The empirical study by Steed, Yonk, and Simmons (2011), using longitudinal county-level data while controlling for federal land ownership and other socioeconomic factors, found statistically significant negative relationships between the presence of federally designated Wilderness and household income, payroll, and county tax receipts. The authors appropriately cautioned that individual Wilderness areas may generate positive effects and that economic consequences vary by location, but concluded that economic costs are often borne disproportionately by local communities. Those findings do not establish that every WSA causes equivalent economic effects, but they demonstrate why indefinite application of wilderness-style restrictions should not be treated as economically neutral.

Recreation access is similarly consequential. BLM lands support motorized recreation, hunting, camping, mountain biking, horseback riding, rock climbing, boating, dispersed recreation, sightseeing, and innumerable other public uses. Yet Manual 6330 currently allows the agency to restrict otherwise permissible recreation when increasing use itself affects solitude, naturalness, or other wilderness characteristics. It also prohibits new motorized routes, restricts maintenance and improvement of primitive routes, provides for closure and restoration where route conditions depart from historical baselines, and prevents qualifying motorized primitive routes from becoming ordinary transportation assets absent congressional release. These provisions demonstrate that WSA status has practical consequences extending well beyond a cartographic



label. The supporting review correctly identifies the counterproductive possibility that prohibiting maintenance of an existing primitive route can itself encourage bypass routes where erosion, rockfall, flooding, or other hazards render the historic alignment temporarily unusable.

The same constraints affect active stewardship. Manual 6330 permits fire suppression, prescribed burning, fuels treatment, vegetation manipulation, watershed rehabilitation, invasive-species control, and other management actions under specified circumstances, but ordinarily subjects such actions to the overarching non-impairment standard or its exceptions. The existing Manual recognizes that historical fire suppression can produce fuel accumulation and unnaturally severe wildfire and that non-native annual grasses can fundamentally alter fire regimes. Those acknowledgments are important. A revised policy should go further by ensuring that WSA status does not unnecessarily delay or constrain scientifically justified actions needed to protect ecosystem resilience, watersheds, wildlife habitat, cultural resources, neighboring communities, and adjacent public and private lands.

Multiple use is not the absence of conservation. Properly understood, it is the statutory framework through which conservation, recreation, commodity production, watershed protection, wildlife management, cultural-resource stewardship, infrastructure, access, and other public values are balanced over time. BLM itself continues to describe its core FLPMA mission as the careful balancing of **multiple use and sustained yield**. Active stewardship, including fuels reduction, invasive-species treatment, route maintenance, erosion control, habitat improvement, grazing management, wildfire response, and restoration, can protect natural resources more effectively than rigid preservation where contemporary ecological conditions demand intervention.

Nearly fifty years after FLPMA's enactment, the Nation should no longer accept unresolved WSA status as an end in itself. Congress established a process intended to produce decisions. Where Congress must act, BLM and the Department of the Interior should provide Congress with current information and affirmative recommendations necessary to complete that process. Where BLM itself possesses authority to change a Section 202 designation through land-use planning, it should exercise that authority. In the meantime, Manual 6330 should be revised to prevent non-impairment policy from exceeding the restrictions actually required by statute or progressively converting WSAs into administratively created Wilderness.

UPLA therefore recommends that BLM adopt an express policy objective to resolve the remaining WSA inventory; recommend congressional release of remaining Section 603 and legislative WSAs to ordinary public-land management; administratively remove eligible post-1993 Section 202 WSA designations through lawful land-use planning; and, following



release, manage those lands under FLPMA's multiple-use and sustained-yield mandate for the maximum long-term benefit and enjoyment of the American public.

WILDERNESS AND WILDERNESS STUDY AREA STATISTICS: UNITED STATES AND UTAH

The scale of the remaining WSA estate is essential context for the present review of Manual 6330. WSAs do not exist in isolation from Congress's substantial use of its authority to designate permanent Wilderness. Rather, they comprise an additional layer of highly restrictive interim management imposed upon millions of acres that remain outside the National Wilderness Preservation System decades after completion of the original FLPMA wilderness-review process.

At the national level, the **National Wilderness Preservation System presently contains 806 designated Wilderness Areas comprising more than 111.8 million acres** administered collectively by the Bureau of Land Management, U.S. Forest Service, National Park Service, and U.S. Fish and Wildlife Service. The system began with 54 areas encompassing approximately 9.1 million acres upon enactment of the Wilderness Act on September 3, 1964, and Congress has expanded it repeatedly since that time (Wilderness Connect, 2026).

Within BLM-administered lands specifically, the January 2026 national inventory identifies **263 designated Wilderness Areas encompassing 10,185,931 BLM acres**. BLM simultaneously administers **491 Wilderness Study Areas encompassing 11,132,890 acres**. Thus, BLM presently manages **more acreage as temporary WSAs than it manages as congressionally designated Wilderness**. Using BLM's most recent published national surface-land inventory of approximately **244.4 million acres**, congressionally designated BLM Wilderness comprises approximately **4.17%** of BLM surface lands, while WSAs comprise approximately **4.56%**. Combined, approximately **21.32 million acres, or 8.72% of BLM's surface estate**, are presently subject either to permanent Wilderness designation or the special non-impairment regime applicable to WSAs (BLM, 2025, 2026).

The imbalance is substantially greater in Utah. BLM administers approximately **22.8 million acres of public land in Utah**, representing roughly 42 percent of the State. Of that acreage, **35 congressionally designated BLM Wilderness Areas encompass 914,079 acres**, approximately **4.01%** of Utah's BLM surface estate. In comparison, **77 WSAs encompass 2,795,574 BLM acres**, approximately **12.26%** of Utah's BLM lands. Consequently, approximately **3.71 million BLM acres in Utah, or 16.27% of the entire BLM surface estate in the State**, are presently subject either to permanent Wilderness designation or WSA management (BLM, 2026).



The Utah comparison is particularly instructive. **WSA acreage in Utah is more than three times the acreage that Congress has affirmatively designated as BLM Wilderness.** Put differently, for every acre of Utah BLM land that Congress has affirmatively placed into permanent Wilderness, approximately three additional acres remain governed by an interim wilderness-study regime awaiting final disposition.

These statistics should not be interpreted as an argument that Wilderness has no legitimate place within the federally managed public-land system. Congress has exercised its Wilderness Act authority extensively and has permanently protected an enormous and geographically diverse national system. The relevant point for Manual 6330 is narrower and more consequential: **lands Congress has affirmatively designated as Wilderness and lands merely retained for possible future Wilderness designation are legally distinct categories, yet the acreage retained under the latter status remains enormous.**

The chronology reinforces that concern. The Wilderness Act dates to 1964. FLPMA was enacted in 1976 and required completion of BLM's Section 603 wilderness-review process within fifteen years, with reports ultimately transmitted to Congress by 1993. BLM's own Manual recounts that the original inventory occurred from 1978 through 1980, followed by study and recommendations regarding suitability or nonsuitability for designation. The remaining Section 603 WSAs therefore reflect a wilderness-review process principally undertaken between the late 1970s and early 1990s, not a recently initiated evaluation. BLM's current Manual continues to manage those lands under non-impairment until Congress acts, while the 2024 revision separately authorizes continuing administrative Section 202 WSA designations unless BLM changes those designations through subsequent land-use planning (BLM, 2024).

For Utah in particular, the persistence of almost 2.8 million acres under WSA restrictions should therefore be understood not merely as a conservation statistic, but as an unresolved land-management decision of exceptional scale. Approximately one acre out of every eight administered by BLM in Utah remains a WSA. This proportion has material implications for transportation networks, recreation access, grazing infrastructure, mineral and energy resources, rights-of-way, vegetation treatment, wildfire mitigation, wildlife management, water development, restoration, and the ability of field managers to respond adaptively to changing landscape conditions.

The present Manual review provides an appropriate opportunity for BLM to acknowledge this scale explicitly. Manual 6330 should contain current national and state-level WSA statistics and should require periodic reporting to Congress and the public identifying:



1. The acreage remaining under WSA status; the date and legal origin of each WSA;
2. The original BLM suitability recommendation where applicable;
3. Whether Congress has acted upon that recommendation;
4. and, for administratively designated Section 202 WSAs, whether continued WSA management remains justified under the current resource management plan.

A designation intended to preserve an option pending final decision should not become administratively invisible merely because the decision has remained unresolved for decades.

UPLA further recommends that BLM distinguish clearly in all future WSA reporting between **Section 603 WSAs, legislative WSAs, pre-1993 Section 202 WSAs submitted to Congress, and post-1993 Section 202 WSAs subject to administrative reconsideration**. The 2024 Manual recognizes meaningful legal differences among these categories, yet aggregating all of them under a single national WSA statistic can obscure which lands remain subject to congressional disposition and which lands BLM itself possesses authority to return to ordinary multiple-use management.

These figures ultimately demonstrate why the status quo deserves more than routine continuation. Congress has already permanently designated substantial Wilderness nationwide and in Utah. The additional retention of more than 11.1 million BLM acres nationally, including nearly 2.8 million acres in Utah, under an ostensibly interim WSA regime should prompt BLM and Congress to complete the unfinished disposition process rather than normalize indefinite administrative suspension between Wilderness and ordinary multiple-use public land.

MULTIPLE USE, SUSTAINED YIELD, AND MAXIMUM PUBLIC BENEFIT

The revision of Manual 6330 must also be anchored firmly in the governing policy Congress established for public lands in FLPMA: **multiple use and sustained yield**. Wilderness preservation is a legitimate component of federal land management, and Section 603 imposes a specific non-impairment obligation upon qualifying lands while they remain under wilderness review. But that obligation exists within, rather than wholly outside, FLPMA's broader statutory framework. It should therefore be implemented no more restrictively than Congress required and should not become an administrative mechanism for displacing the broader resource-management purposes Congress directed BLM to serve.

FLPMA's declaration of policy is explicit. Congress directed that the public lands generally be managed "on the basis of multiple use and sustained yield unless otherwise specified by law." (43 U.S.C. § 1701(a)(7)). Congress simultaneously directed BLM to protect scientific, scenic, historical, ecological, environmental, air, water, and archaeological values; to preserve certain



lands in their natural condition **where appropriate**; to provide habitat for fish, wildlife, and domestic animals; and to provide opportunities for outdoor recreation and human occupancy and use (43 U.S.C. § 1701(a)(8)). These directives are complementary, not mutually exclusive. FLPMA does not establish resource production as the sole purpose of public lands, but neither does it establish preservation as their presumptive use.

Section 302 converts that policy into an affirmative management command: "[t]he Secretary shall manage the public lands under principles of multiple use and sustained yield," subject to land-use plans and to tracts dedicated to specific purposes by other provisions of law (43 U.S.C. § 1732(a)). Section 202 similarly requires BLM, when developing and revising land-use plans, to "use and observe the principles of multiple use and sustained yield" and to employ a systematic interdisciplinary approach integrating physical, biological, economic, and other sciences (43 U.S.C. § 1712(c)).

Congress supplied a deliberately broad definition of **multiple use**. FLPMA requires management of public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. The statutory concept encompasses recreation, range, timber, minerals, watershed, wildlife and fish, natural scenic values, scientific and historical values, and other resources. Critically, Congress instructed that multiple use does not necessarily require every resource to be developed or utilized on every acre, nor does it require selection of the use generating the greatest dollar return (43 U.S.C. § 1702(c)). The statutory objective is balanced, coordinated management of public resources over space and time, not categorical preference for any single use.

Likewise, **sustained yield** means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the renewable resources of public lands consistent with multiple use (43 U.S.C. § 1702(h)). The inclusion of sustained yield is significant because Congress contemplated public lands as landscapes capable of continually producing ecological, recreational, social, and economic benefits. Conservation within this framework means stewardship that maintains resource productivity and function over time, not simply the exclusion of human use.

The phrase **maximum public benefit** describes the practical objective embedded within these statutory commands. It does not mean maximizing extractive development, maximizing recreation, or maximizing preservation. It means managing the public estate so that its diverse renewable and nonrenewable resources collectively serve the greatest reasonable range of present and future public needs while maintaining long-term resource health. That includes protecting watersheds and wildlife habitat, preserving cultural and scenic resources, maintaining



access and recreation opportunities, supporting grazing and mineral development where appropriate, accommodating transportation and utility needs, reducing wildfire risk, restoring degraded ecosystems, and protecting the continuing productivity of the land.

This balanced conception is particularly important when revising Manual 6330. Section 603(c) indisputably creates an exception to ordinary management discretion while qualifying lands remain under congressional wilderness review: BLM must manage those lands "so as not to impair" their suitability for preservation as Wilderness. But the statutory command is **non-impairment**, not maximization of wilderness character. The distinction is fundamental.

- A policy that prevents an action because it would actually impair a WSA's suitability for congressional designation implements Section 603.
- A policy that incrementally eliminates otherwise permissible uses merely because eliminating those uses produces *better* wilderness characteristics risks exceeding that mandate.
- Likewise, a policy that treats every management question as though wilderness preservation is the dominant resource objective rather than the preservation of congressional decision-space transforms a temporary statutory exception into a permanent departure from FLPMA's clearly articulated management framework.

Manual 6330 itself illustrates the tension. The existing policy subjects rights-of-way, route maintenance, recreation, vegetation treatment, fuel management, wildlife improvements, mineral activities, grazing infrastructure, and other uses to a specialized non-impairment analysis. The Manual further applies Class I visual-resource objectives to WSAs, restricts new motorized and mechanical transportation routes, limits maintenance of existing primitive routes, restricts new rights-of-way, and constrains numerous active-management practices. These restrictions may be legally appropriate when necessary to satisfy Section 603(c). They should not, however, be expanded by policy beyond what preservation of wilderness **suitability** actually requires.

The distinction is particularly important for **Section 202 WSAs**. BLM's November 2024 policy states that the agency may designate lands possessing wilderness characteristics as Section 202 WSAs through land-use planning and subject them to Manual 6330's non-impairment regime, while retaining discretion to remove that designation in a later planning process. BLM simultaneously acknowledges that its wilderness-characteristics policy provides other options, including management that prioritizes wilderness characteristics while permitting compatible multiple uses, management that minimizes impacts while emphasizing other multiple uses, or management emphasizing other multiple uses without specific protection of wilderness characteristics. That acknowledgment is important because it confirms that **WSA designation is not the only lawful means of conserving wilderness characteristics**. Where landscape



conditions warrant protection of scenic, ecological, wildlife, watershed, cultural, or primitive-recreation values, BLM retains an extensive suite of planning authorities capable of protecting those resources without necessarily subjecting the landscape to the full non-impairment regime of Manual 6330. Section 202 WSAs should therefore not become the default method of conserving undeveloped public lands.

UPLA recommends that the revised Manual expressly require BLM to consider whether continued Section 202 WSA status remains the **least restrictive management mechanism reasonably necessary** to achieve identified resource objectives. Where those objectives can be achieved through ordinary RMP prescriptions, recreation management, habitat protections, seasonal limitations, route-specific mitigation, visual-resource classifications, ACECs where statutory criteria are independently satisfied, or other tailored management measures, BLM should favor those tools over indefinite application of a wilderness-style non-impairment regime.

The same principle should influence implementation of Section 603 WSAs, even where only Congress can release the designation. Nothing in UPLA's position suggests that BLM should violate Section 603(c) while Congress has not acted. Rather, the revised Manual should distinguish carefully between an activity that **actually impairs wilderness suitability** and one that simply makes the landscape marginally less pristine than a condition produced by decades of progressively restrictive management. Where a lawful use, maintenance activity, restoration treatment, grazing improvement, recreation activity, or other action can occur without impairing the characteristics necessary for Congress to retain the option of Wilderness designation, the Manual should not prohibit that action merely because prohibition would produce a more wilderness-like landscape.

This principle is consistent with BLM's own acknowledgment in Manual 6330 that WSA management does not mean managing the lands as though Congress had already designated them as Wilderness. That distinction should be operational, not rhetorical. A WSA can retain its suitability for possible Wilderness designation while accommodating uses Congress specifically preserved, valid existing rights, existing recreation, appropriate active stewardship, emergency access, wildlife management, grazing, and other activities compatible with the statutory standard. Multiple use also requires **active stewardship when landscape health demands intervention.** FLPMA's multiple-use mandate cannot sensibly be reduced to a choice between commodity production and preservation. Modern public-land management requires fuels reduction, invasive-species control, watershed stabilization, erosion repair, vegetation treatment, habitat restoration, water development where appropriate, maintenance of access needed for management and emergency response, and adaptive responses to changing ecological conditions. Manual 6330 already acknowledges that wildfire exclusion can contribute to fuel accumulation and



unnaturally severe fire, that invasive annual grasses can alter fire regimes, and that intervention may sometimes be necessary to restore ecological function. The revised Manual should ensure that such stewardship is facilitated rather than presumptively subordinated to passive-management preferences.

The public also derives substantial noncommodity benefit from access itself. Public lands cannot fully provide recreation, hunting, fishing, camping, wildlife viewing, historical interpretation, dispersed recreation, motorized touring, or access for older and mobility-limited citizens where access infrastructure is unnecessarily eliminated or allowed to deteriorate. Multiple-use management requires BLM to consider these benefits alongside ecological and wilderness values, not after them. The statutory phrase "present and future needs of the American people" necessarily encompasses people who experience public lands through different means and possess different physical abilities, recreational interests, occupations, cultural traditions, and economic relationships with the federal estate.

UPLA therefore recommends that revised Manual 6330 adopt an explicit rule of construction: **where more than one management approach will satisfy the applicable statutory non-impairment requirement, BLM should select the approach that best preserves the broadest compatible range of multiple-use benefits, public access, active stewardship opportunities, and long-term resource productivity.** Non-impairment should function as the statutory boundary Congress established, not as an invitation to select the most restrictive management option available.

This approach gives full effect to both components of FLPMA. It honors Congress's instruction to preserve the Wilderness option for qualifying WSAs pending final disposition, while simultaneously respecting Congress's broader command that BLM lands be managed for multiple use and sustained yield. It also recognizes the practical reality that protection and use are not opposites. Properly maintained routes can concentrate recreation and reduce dispersed disturbance. Grazing infrastructure can improve livestock distribution and watershed condition. Fuel treatments can protect habitat and cultural resources from catastrophic fire. Wildlife developments can sustain species where historic water sources have been altered. Active restoration can repair landscapes more effectively than passive recovery. Appropriate rights-of-way can serve communities while avoiding sensitive resources.

The revised Manual should therefore implement non-impairment narrowly and faithfully, preserve rather than extinguish compatible existing uses, facilitate active resource stewardship, and ensure that every discretionary decision affecting WSAs remains cognizant of FLPMA's overarching objective: management of the public estate to provide



enduring ecological, recreational, social, and economic benefit to present and future generations.

ECONOMIC CONSEQUENCES OF LONG-TERM WSA MANAGEMENT

Long-term WSA management imposes economic consequences that should be recognized expressly in any revision of Manual 6330. UPLA does not contend that every WSA produces an identical economic effect, nor that economic considerations override Section 603(c)'s statutory non-impairment requirement while applicable. The relevant point is that maintaining millions of acres for decades under a restrictive interim management regime carries real opportunity costs, particularly in rural western communities where public lands constitute a substantial share of the surrounding land base and where local economies remain closely connected to recreation, grazing, energy and mineral development, rights-of-way, utility infrastructure, tourism, and other lawful uses of federally managed public lands.

Those costs arise first from the breadth of restrictions attached to WSA status. Manual 6330 limits new rights-of-way, new motorized and mechanized routes, route improvement and maintenance, certain recreation uses, new mineral activity, infrastructure, vegetation manipulation, and other surface-disturbing uses unless they satisfy the non-impairment standard or an exception. It also directs BLM to manage WSAs under restrictive visual-resource objectives and subjects projects both within and adjacent to WSAs to additional review and mitigation considerations. The cumulative consequence is that WSA status can foreclose or substantially constrain economic opportunities even though Congress has never made the affirmative policy judgment required to designate those lands as Wilderness.

The economic literature supplied for this comment provides relevant evidence concerning the consequences of wilderness-style restrictions. Steed, Yonk, and Simmons (2011) conducted a longitudinal analysis of counties throughout the United States, controlling for multiple forms of federal public land management and other socioeconomic variables. They found a statistically significant negative association between the presence of federally designated Wilderness and county economic indicators, including average household income, total payroll, and county tax receipts. Their estimates associated Wilderness counties with approximately \$1,446 lower average household income, \$37,500 lower total payroll, and \$92,910 lower county tax receipts relative to non-Wilderness counties under the model employed.

UPLA recognizes the limits of that study and does not overstate its conclusions. The authors themselves acknowledged that particular Wilderness areas can produce positive economic effects and that outcomes vary geographically and by the type of protected land involved. Other



research has likewise found that protected public lands can attract residents, businesses, tourism, and amenity-based economic activity in some western communities. That evidence counsels against simplistic claims that preservation either invariably harms or invariably benefits rural economies. The appropriate conclusion is instead that **land-management designations change the mix of economic opportunities available to surrounding communities, and their costs and benefits are geographically uneven**. A temporary designation therefore should not be treated as economically consequence-free merely because its effects are dispersed or difficult to quantify.

The distinction between permanent Wilderness and long-term WSA management makes that concern more serious. Congress may reasonably decide that the ecological, scenic, cultural, or recreational values of a particular landscape justify the opportunity costs associated with permanent Wilderness designation. That is a legislative policy determination. But when WSA status persists for several decades without final congressional disposition, comparable restrictions may continue indefinitely without the corresponding affirmative congressional judgment that those costs are warranted.

The BLM's own economic reporting demonstrates the enormous breadth of economic activity supported by multiple-use public lands. In fiscal year 2024, activities authorized on BLM-managed public lands generated approximately **\$245.4 billion in total economic output and supported approximately 884,000 jobs nationwide**. BLM's economic accounting encompasses recreation, energy, minerals, grazing, timber, agency expenditures, and related activities, illustrating that the public estate functions as a diversified economic resource rather than as a single-use landscape (BLM, 2025).

Recreation alone is economically substantial. BLM reports that its lands received nearly **81 million recreation-related visits in 2024**. For 2023, recreation on BLM lands generated more than **\$4.7 billion in visitor spending within 50 miles of BLM-managed areas**, supported approximately **\$1.6 billion in labor income**, and contributed approximately **\$11.7 billion in total national economic output** (BLM, 2025). BLM separately reported that recreation on its lands supported approximately **76,000 jobs** in fiscal year 2023.

These figures matter to WSA policy because recreation spending is frequently concentrated in rural gateway communities. Fuel stations, restaurants, hotels, campgrounds, repair shops, outfitters, sporting-goods businesses, grocery stores, guide services, and other locally owned enterprises depend upon visitors being able to reach and use surrounding public lands. USDA research similarly concludes that recreation and tourism development can increase rural employment, wages, and income and can reduce poverty, while recognizing that effects vary



among communities and that recreation-based development can also create pressures such as higher housing costs (Reeder & Brown, 2005).

A USDA rural-development report concluded that limiting public access through road, campground, RV-parking, and trail closures can directly affect recreation-dependent rural economies because visitors purchase food, lodging, fuel, and other services in nearby communities. That proposition is consistent with broader Forest Service research finding that federally managed public land recreation generates substantial spending in local economies surrounding recreation resources (White et al., 2016).

WSA management can also impose economic costs outside recreation. Manual 6330 restricts rights-of-way, new leasing and mineral development, surface-disturbing activities, infrastructure, and other uses that may be important to local and regional economies. Those constraints can affect utility corridors, water infrastructure, communications facilities, energy development, mineral resources, livestock operations, and access to private or state inholdings. In Utah, where approximately 12% of BLM-managed acreage remains in WSA status, the cumulative opportunity cost of such restrictions cannot reasonably be presumed immaterial.

These costs are not necessarily measured solely by foregone extraction revenue. A right-of-way that cannot be efficiently located may increase the cost of electrical transmission, broadband, water delivery, transportation, or emergency access. Prohibition or delay of route maintenance may raise future reconstruction costs. Restrictions on fuels treatment can increase the expense and complexity of wildfire suppression and post-fire rehabilitation. Constraints upon grazing improvements can prevent distribution changes that would otherwise improve both livestock management and rangeland condition. Restrictions on recreation infrastructure can redirect visitation away from particular communities. Each represents an economic consequence of public land-management policy even where no commodity is removed from the land.

The temporal dimension is therefore critical. A short-term restriction imposed while Congress evaluates a landscape has a materially different economic character from the same restriction maintained for thirty, forty, or fifty years. Long duration transforms temporary opportunity costs into cumulative intergenerational losses. Businesses make location decisions, infrastructure corridors are established elsewhere, communities adapt to reduced access, traditional uses disappear, roads deteriorate, and prospective investment moves to locations where regulatory uncertainty is lower. Once those changes occur, merely releasing the WSA decades later cannot necessarily restore the opportunities that were foregone during the interim.



Accordingly, **UPLA recommends that revised Manual 6330 expressly acknowledge economic and social effects as legitimate considerations in WSA administration to the extent consistent with the governing statute.** For decisions involving discretionary implementation of the non-impairment standard, BLM should identify alternatives that satisfy the statutory requirement while minimizing unnecessary economic displacement. Where multiple management approaches would equally preserve wilderness suitability, the agency should favor the alternative that retains greater compatible public use, community benefit, infrastructure functionality, and resource-management flexibility.

For administratively designated Section 202 WSAs, economic consequences warrant even greater consideration because BLM retains authority to reconsider the designation through land-use planning. Continued WSA status should therefore be supported by a contemporary record that evaluates not merely wilderness characteristics, but also the social and economic consequences of maintaining the restrictive designation against available alternatives for protecting identified resources through ordinary multiple-use planning.

Most importantly, BLM should not confuse release from WSA status with loss of conservation. Removal of a WSA overlay does not eliminate NEPA, FLPMA's prohibition against unnecessary or undue degradation, cultural-resource protections, the Endangered Species Act, Clean Water Act requirements, grazing regulations, travel-management decisions, or other environmental safeguards. It restores the ability to weigh competing public benefits under the full multiple-use framework.

UPLA therefore recommends that BLM recognize the cumulative economic opportunity costs created by decades-long WSA management, avoid restrictions beyond those actually necessary to comply with applicable non-impairment requirements, evaluate contemporary socioeconomic effects when reconsidering Section 202 WSAs, and expedite final disposition of lands whose interim status continues to constrain rural communities without a corresponding congressional decision that permanent Wilderness protection is warranted.

RECREATION, PUBLIC ACCESS, AND RURAL COMMUNITIES

Public access is not incidental to the purpose of public lands. Recreation, hunting, fishing, sightseeing, camping, motorized touring, horseback riding, mountain biking, rockhounding, wildlife viewing, photography, family outings, and other forms of outdoor use are among the principal ways Americans obtain tangible benefit from the federally managed public lands estate. WSA policy should therefore protect genuine wilderness suitability where required by law



without unnecessarily converting an interim study designation into a progressively restrictive public-access regime.

Manual 6330 recognizes that many recreational activities remain lawful within WSAs, but its practical restrictions are substantial. The Manual provides that recreational use may be curtailed where increased activity affects soils, vegetation, solitude, or other wilderness characteristics. It restricts new motorized and mechanized routes, limits maintenance and improvement of existing primitive routes, authorizes route closure and restoration when route impacts exceed historical conditions, constrains camping infrastructure, and subjects special recreation permits to the non-impairment standard. The 2024 revisions further state that even increased use of an existing mountain-bike route can become problematic where the resulting public expectation of continued use could constrain future Wilderness designation.

That approach illustrates a central concern with long-term WSA management: **the public's successful enjoyment of public land can itself become the rationale for restricting that enjoyment.** A route may remain lawful at one level of use yet become vulnerable to closure as visitation increases. A primitive recreation corridor can be maintained only within narrow historic-condition constraints. A recreational activity that becomes locally popular may be curtailed because its popularity affects solitude. In this manner, growing public demand for access can progressively narrow the recreation opportunities available on lands that Congress has never designated as Wilderness.

UPLA recommends that the revised Manual reject any presumption that increased lawful recreation is inherently inconsistent with WSA management. Section 603(c) protects suitability for possible Wilderness designation; it does not direct BLM to maximize solitude at the expense of every historically established recreational use. Restrictions should require documented, site-specific evidence that the activity is actually impairing a wilderness characteristic material to the area's suitability, and BLM should first employ targeted mitigation before closure or prohibition.

For motorized recreation, this principle is especially important. Existing primitive routes often provide the only practical means by which large segments of the public can experience remote BLM landscapes. They support four-wheel-drive recreation, motorcycle and ATV use, dispersed camping, hunting, photography, rockhounding, sightseeing, access to historic and cultural sites, and ordinary family travel. These routes are also frequently shared by grazing permittees, wildlife managers, search-and-rescue personnel, fire crews, law enforcement, and other authorized users.



The 2012 Manual recognizes that motorized use can remain lawful on qualifying primitive routes within WSAs, but simultaneously prohibits improvements or maintenance that fail the non-impairment standard and permits closure where erosion or increased use alters a route beyond its historic physical condition. This identifies an important practical consequence: failure to maintain an existing route after washouts, rockfalls, erosion, or watercourse migration can induce users to create parallel bypasses, thereby increasing disturbance rather than reducing it.

This is particularly relevant in Utah's arid and semi-arid landscapes, where flash floods, seasonal runoff, rockfall, erosion, and channel migration routinely alter primitive transportation routes. A static 1976 physical-condition benchmark cannot always be translated literally onto a dynamic landscape. Preservation of an existing route's **function and corridor** may require minor relocation, drainage repair, stabilization, or reconstruction following natural events. Prohibiting reasonable maintenance because the exact historic tread has changed can produce greater soil disturbance, resource damage, safety risk, and enforcement problems than maintaining a sustainable route within substantially the same transportation corridor.

UPLA therefore recommends that Manual 6330 expressly permit routine maintenance, hazard correction, drainage work, and minor realignment of existing lawful routes where necessary to preserve their historic function, protect public safety, or reduce resource damage, provided such work does not materially impair the WSA's overall suitability for potential Wilderness designation. The same principle should apply where rivers, washes, landslides, or other natural processes physically displace the route from its documented alignment.

Public access also bears directly upon rural economic resilience. BLM's nearly 81 million annual recreation visits translate into billions of dollars of spending and tens of thousands of jobs, much of it in communities located near public lands. USDA research recognizes outdoor recreation and tourism as important economic-development tools in rural areas, while Forest Service scholarship similarly identifies gateway communities as beneficiaries of visitation associated with public lands. For many rural Utah communities, public-land recreation is not an abstract amenity. It supports motels, restaurants, fuel stations, convenience stores, campgrounds, outfitters, guides, repair businesses, equipment dealers, and seasonal employment. Motorized recreation can be particularly important because vehicle-based visitors often travel greater distances through interconnected landscapes, purchase significant quantities of fuel, transport equipment, camp for multiple days, and patronize businesses across several communities. Restricting route connectivity can therefore affect not merely the mileage directly closed, but the functionality of larger recreation networks and the communities linked to them.



Access also has an equity dimension. A trail-only conception of public-land recreation disproportionately favors visitors who possess the physical ability, time, equipment, and circumstances necessary to travel significant distances on foot or horseback. Existing motorized routes allow older Americans, families with young children, people with mobility limitations, and visitors who cannot undertake strenuous human-powered backcountry travel to experience remote landscapes. Manual 6330 appropriately recognizes that qualifying wheelchairs and other mobility devices are not prohibited, but formal accessibility devices do not substitute for maintaining the ordinary vehicular access upon which many members of the public rely to reach dispersed recreation opportunities. The underlying 2012 Manual's glossary itself distinguishes motorized transport while expressly recognizing qualifying mobility devices.

This does not mean every road must remain open or that resource damage should be ignored. BLM possesses ample authority to impose seasonal closures, vehicle-class limitations, route-specific mitigation, speed restrictions, drainage improvements, hardened crossings, signing, education, law enforcement, rerouting, permit conditions, and restoration measures where evidence demonstrates a resource problem. **Closure should be a remedy of necessity, not administrative convenience.** Where a documented impact can be corrected while retaining access, FLPMA's multiple-use objectives are better served by mitigation than exclusion.

The same reasoning applies to nonmotorized recreation. Mountain biking, horseback riding, climbing, camping, boating, hunting, fishing, geocaching, and other uses should not become vulnerable merely because they become popular. Recreation management should focus on measurable physical and resource impacts rather than attempting to suppress use simply to prevent creation of an "expectation of continued use." The public's expectation that lawful recreational opportunities on public lands will remain available absent a demonstrated management need for restriction is not itself an impairment of a natural resource.

Special Recreation Permits deserve similar treatment. Commercial outfitters, organized clubs, competitive events, guided hunting and fishing, group recreation, and educational programs frequently produce local economic activity while also providing organized mechanisms through which BLM can impose stewardship requirements, participant education, route limitations, sanitation standards, restoration obligations, and other mitigation. The revised Manual should not disfavor organized recreation where the same underlying activity is otherwise compatible with the statutory non-impairment standard.

UPLA further recommends that BLM evaluate network-level access effects, not merely the footprint of individual closures. Closing a short connector route can sever access to extensive surrounding networks, eliminate loop opportunities, concentrate use onto remaining corridors,



isolate legal routes, or render destinations practically inaccessible. Where route closure is considered, BLM should disclose the miles and acreage functionally affected, changes in connectivity, impacts to emergency and administrative access, displacement onto adjacent routes, and socioeconomic effects upon communities dependent upon recreation visitation. This is particularly important because access has cumulative value. A dispersed network of primitive routes allows users to spread across large landscapes, reducing congestion and offering a diversity of recreation experiences. Repeated closure of individual routes can gradually convert a connected system into isolated fragments even though no single decision appears substantial when viewed alone. WSA administration should therefore consider the cumulative loss of recreational functionality resulting from multiple restrictions over time.

Finally, recreationists should be treated as stewardship partners rather than presumptive sources of impairment. Volunteer clubs and recreation organizations routinely participate in trail maintenance, trash removal, signing, restoration, visitor education, monitoring, wildfire prevention, and resource-protection projects. The supporting background material specifically identifies organized OHV volunteer patrols, education programs, and user-funded stewardship initiatives as examples of recreation communities contributing labor and resources to public-land management. Such partnerships can extend limited agency capacity while promoting compliance and conservation.

UPLA therefore recommends that revised Manual 6330 establish a clear recreation-management hierarchy: retain lawful access wherever compatible with the statutory non-impairment requirement; address documented impacts first through maintenance, education, enforcement, rerouting, seasonal controls, permit conditions, or other targeted mitigation; evaluate network-level and socioeconomic consequences before restricting access; allow reasonable maintenance and adaptation of existing routes to natural landscape change; and employ closure only where BLM demonstrates that less restrictive measures cannot adequately prevent actual impairment.

This approach protects both sides of the public-land trust. It preserves Congress's ability to decide the ultimate status of qualifying WSAs while ensuring that decades of unresolved wilderness review do not unnecessarily deprive rural communities and the American public of recreation, access, economic activity, and stewardship opportunities on lands that remain, fundamentally, public lands.



ACTIVE STEWARDSHIP VERSUS PASSIVE PRESERVATION

Effective conservation of public lands requires more than preventing visible human disturbance. Landscapes are dynamic ecological systems affected by wildfire, drought, invasive species, insects and disease, altered hydrology, vegetation succession, historical fire suppression, changing climate conditions, expanding wildland-urban interfaces, recreation, grazing, and numerous other interacting forces. A management policy that prioritizes preservation of an apparent wilderness condition while unnecessarily constraining scientifically justified intervention can therefore protect a *visual condition* while allowing ecological condition, watershed function, habitat quality, or landscape resilience to deteriorate.

This distinction is particularly important for Wilderness Study Areas because the statutory purpose of WSA management is not to recreate a pre-human landscape or maximize every possible wilderness characteristic. Section 603(c) requires BLM to avoid impairment of an area's **suitability for preservation as wilderness** while Congress considers its ultimate disposition. Manual 6330 should implement that mandate without elevating passive preservation into a categorical preference over ecological stewardship. The existing Manual already recognizes this principle in important respects. Its fire provisions acknowledge that historical fire suppression may contribute to fuel accumulation capable of producing unnaturally severe fires and that invasion by non-native annual grasses can produce unnatural fire regimes. The Manual also recognizes prescribed fire, mechanical or chemical fuel treatment, vegetation restoration, watershed rehabilitation, invasive-species control, wildlife management, and post-fire stabilization as potentially appropriate management actions. The vegetation provisions likewise recognize that landscapes containing WSAs can depart from characteristic ecological composition, structure, and density, with resulting consequences for habitat quality, soil stability, and watershed function.

Those acknowledgments should become a stronger organizing principle of the revised Manual. BLM's current agency-wide restoration policy demonstrates why. The Bureau has concluded that **more than 80 million acres of BLM-managed public lands require fuel-reduction treatments to lessen the risk of catastrophic wildfire**, and that approximately 38 percent of BLM lands in the lower 48 states occur within the wildland-urban interface. BLM also reports that it administers 72 percent of Department of the Interior lands classified as having high or very high wildfire risk (BLM, 2024). These conditions cannot be reconciled with a management philosophy under which human intervention is presumed undesirable merely because it produces temporary disturbance. BLM's mission itself is to sustain the **health, diversity, and productivity** of public lands for the use and enjoyment of present and future generations (BLM,



2026). Health, diversity, and productivity are ecological and functional objectives. They are not necessarily achieved by maximizing the absence of visible human influence.

Modern wildfire science likewise demonstrates that ecological integrity sometimes requires intervention. Forest Service research has found that historical fire exclusion in many dry western forests contributed to accumulation of live and dead fuels and changes in forest structure. Recent modeling further indicates that systematic fire suppression can increase the severity of subsequent wildfire by preferentially removing lower-intensity fires from landscapes, thereby contributing to altered fire regimes. (Graham et al., 2004; Kreider et al., 2024).

The problem differs in arid rangelands, but the lesson is similar. In sagebrush ecosystems characteristic of much of Utah and the Great Basin, invasive annual grasses can create continuous fine-fuel beds that greatly increase wildfire susceptibility. BLM reports that cheatgrass-invaded areas are approximately twice as likely to burn as areas not similarly invaded (BLM, 2024). USGS research similarly identifies the interaction among invasive annual grasses, wildfire, and declining sagebrush as a major landscape-management challenge and recognizes vegetation treatment as an important tool for disrupting the annual-grass/fire cycle.

In such settings, passive management may not constitute conservation. Allowing invasive annual grasses to expand unchecked can increase fuel continuity. Allowing inappropriate woody encroachment into some sagebrush communities can alter fuel structure and increase the potential for severe wildfire. Permitting erosion following disturbance can degrade watersheds and cultural sites. Delaying reseeding after wildfire can allow invasive plants to capture disturbed sites. Preventing maintenance of erosion-control structures or access routes can complicate both restoration and fire response. The ecologically responsible management decision must depend upon site conditions, best available science, and clearly defined resource objectives. **UPLA therefore recommends that Manual 6330 expressly distinguish non-impairment from non-management.**

The proper inquiry should not be whether an action involves machinery, temporary surface disturbance, vegetation manipulation, or another visible human intervention. The relevant inquiry should be whether the action, after appropriate mitigation and restoration, would materially impair the characteristics that make the area suitable for possible Wilderness designation. An action that temporarily disturbs several acres but prevents thousands of acres of habitat conversion, catastrophic soil loss, invasive-species expansion, or destructive wildfire may preserve wilderness suitability more effectively than administrative inaction.



This principle is especially important because the present Manual sometimes places multiple procedural hurdles before active treatment. Fuel treatments used in place of wildland fire may require more extensive NEPA analysis, must satisfy the non-impairment standard or an exception, must demonstrate specified circumstances, must employ the least-impacting method, and may be disfavored where objectives could instead be pursued outside the WSA. The 2024 language continues to define fuel treatment narrowly in relation to restoring natural wildfire and suggests that treatment decisions should remain responsive to highly variable local conditions. UPLA agrees strongly with the latter principle. **Ecological conditions should drive treatment decisions at the field-office and landscape level.** A national manual cannot reasonably prescribe identical treatment priorities for high-elevation conifer forests, pinyon-juniper woodlands, mountain shrub communities, sagebrush steppe, salt desert shrublands, riparian corridors, and Mojave or Colorado Plateau desert ecosystems. Fire regimes, invasive-species risks, soil resilience, precipitation, historical disturbance, wildlife values, and treatment responses differ dramatically among these systems.

The scientific literature reinforces the need for such specificity. A 2024 synthesis of sagebrush fuel-treatment research concluded that vegetation responses depend substantially upon ecological site characteristics, resilience to wildfire and treatment, and resistance to invasive annual grasses. (Chambers et al., 2024). Some treatments can produce unintended consequences. For example, research in pinyon-juniper and shrub systems has shown that vegetation removal can increase herbaceous fine fuels under certain circumstances, potentially increasing modeled rates of fire spread years after treatment. Active management therefore does not mean indiscriminate vegetation removal. It means **science-based adaptive management**, including the willingness to treat where treatment is beneficial and the willingness not to treat where intervention would create greater ecological risk.

The revised Manual should consequently replace any implicit presumption favoring passive management with a presumption favoring the management alternative most likely to sustain ecological function while satisfying the statutory non-impairment standard.

Such an approach is entirely compatible with wilderness values. Restoring native plant communities, preventing invasive annual-grass conversion, protecting archaeological sites from erosion and wildfire, maintaining watershed function, restoring natural fire regimes, reducing unnatural fuel accumulation, conserving wildlife habitat, and protecting natural hydrological processes can all preserve or enhance characteristics relevant to wilderness suitability. The artificial distinction between "management" and "preservation" obscures the fact that active stewardship is frequently undertaken precisely to conserve natural systems.



Manual 6330 should also recognize the importance of **preventive management**. Existing policy often frames intervention in terms of responding to an emergency, restoring an existing impact, or correcting an already documented ecological departure. That framework can force managers to wait until deterioration becomes pronounced enough to qualify for an exception.

A more rational stewardship model would permit intervention where credible scientific information demonstrates a substantial risk of ecological degradation if no action is taken. Preventive invasive-species treatment is usually less disturbing than restoring an annual-grass monoculture after wildfire. Maintaining a drainage crossing is generally less invasive than reconstructing an eroded route and adjacent watershed after failure. Treating hazardous fuels under controlled conditions can be substantially less damaging than emergency suppression and post-fire rehabilitation following an extreme wildfire.

The revised Manual should therefore authorize preventive stewardship when BLM demonstrates through site-specific analysis that: the action addresses a reasonably foreseeable threat to ecological integrity, public safety, watershed condition, habitat, cultural resources, or wilderness suitability; the proposed treatment is supported by the best available science; reasonably practicable mitigation will minimize unnecessary disturbance; and the treatment will not materially impair the WSA's suitability for possible congressional Wilderness designation.

UPLA also recommends eliminating policy that artificially elevates the **current condition** of a WSA above its statutory baseline merely because management actions have increased apparent wilderness characteristics. As discussed previously, the 2024 Manual states that where wilderness characteristics improve, BLM will protect the improved condition rather than permit regression to the historical baseline. Applied to ecological management, such a policy can create perverse incentives. An area altered by fire suppression, invasive species, hydrological modification, or vegetation succession may appear more "natural" simply because roads, structures, treatments, or human uses have disappeared, even while ecological resilience has declined. Natural appearance and ecological health are not synonymous. **Manual 6330 should therefore direct managers to evaluate ecological condition, process, resilience, and risk, rather than relying primarily on an increasingly restrictive visual conception of naturalness.** Where active management can improve ecosystem function without destroying the basic qualities supporting wilderness suitability, it should remain available.

Finally, active stewardship should include collaboration. State wildlife agencies, counties, grazing permittees, conservation organizations, recreation groups, local fire authorities, Tribes, adjacent landowners, and other stakeholders often possess substantial site-specific knowledge and management capacity. BLM should facilitate cooperative restoration, monitoring, fuels



reduction, invasive-species treatment, route stabilization, and other stewardship within WSAs where such activities comply with applicable law.

UPLA therefore recommends that revised Manual 6330 expressly establish that non-impairment does not mean non-management; eliminate any presumption that passive preservation is inherently preferable to active stewardship; authorize preventive treatment where supported by credible science; provide field managers sufficient discretion to select treatments suited to local ecological conditions; evaluate ecological function and resilience rather than apparent naturalness alone; and permit the full range of restoration, fuels, invasive-species, watershed, wildlife, and landscape-management tools where they can be implemented without materially impairing wilderness suitability.

WILDFIRE, FUEL LOADING, AND LANDSCAPE RESILIENCE

Wildfire policy warrants particular attention in this revision because the ecological and public-safety context in which Manual 6330 operates has changed substantially since BLM's original wilderness inventories were conducted in the late 1970s and early 1980s. Contemporary western landscapes face interacting pressures from drought, altered vegetation communities, invasive annual grasses, historical fire exclusion, increased development near public lands, and changing fire-weather conditions. USGS reports that fuel conditions and fire regimes in western forests and deserts have been altered by historical land management, biological invasions, and recent climatic and extreme-weather conditions.

UPLA cautions against attributing catastrophic wildfire to any single factor. The scientific record does not support a simplistic assertion that WSA or Wilderness designation itself causes severe wildfire. Fire severity and extent are influenced by vegetation type, fuel structure, weather, drought, topography, ignition, historical land management, invasive species, prior wildfire, and other variables. Likewise, some naturally functioning landscapes appropriately experience wildfire with little or no human intervention.

That scientific nuance, however, strengthens rather than weakens the case for reforming Manual 6330. Because wildfire drivers differ among landscapes, BLM requires **more management flexibility**, not less.

The Manual itself recognizes that past fire suppression can create fuel buildup capable of contributing to unnaturally severe wildfire and that non-native annual grasses can produce unnatural fire spread. Yet it simultaneously subjects prescribed fire, mechanical fuels treatment, chemical treatment, and many restoration actions to restrictive non-impairment procedures. The



result can be an institutional tension in which the agency acknowledges the ecological need for intervention but places special procedural barriers before the tools necessary to perform it. Contemporary research strongly supports retaining those tools.

A comprehensive 2024 Forest Service meta-analysis of western U.S. fuel-treatment studies found **overwhelming evidence** that mechanical thinning followed by prescribed burning, mechanical thinning followed by pile burning, and prescribed burning alone significantly reduce subsequent wildfire severity. Across the studies analyzed, these treatments were associated with approximately **62% to 72% lower wildfire severity relative to untreated areas** (Davis et al., 2024).

Earlier empirical research reached comparable conclusions. Prichard et al. found strong evidence that thinning combined with prescribed fire reduced wildfire severity in dry western forests, while thinning without treatment of surface fuels was substantially less effective. (Prichard et al., 2010). Subsequent landscape-scale work found that strategically placed treatments can reduce localized fire spread and severity even under severe fire weather, although effectiveness varies with weather, treatment age, placement, and vegetation.

Recent Forest Service research likewise found that fuel treatments reduced wildfire severity across the forest types and weather conditions examined, with effectiveness diminishing as treatments aged. This last point is especially important for Manual 6330. Fuels management is not ordinarily a one-time action. Vegetation regrows, dead material accumulates, and treatment effectiveness declines. A policy that allows an initial treatment but makes subsequent maintenance increasingly difficult can eventually defeat the purpose of the original investment.

BLM itself has embraced this principle within the National Conservation Lands system. In 2025, the Bureau reported that it was on track to conduct approximately **740,000 acres of fuels treatments within National Conservation Lands units between 2022 and 2027**, expressly recognizing that preventive fuel management can reduce the spread of severe wildfire, protect neighboring property, conserve firefighting resources, and protect firefighter lives. (BLM, 2025). That initiative includes landscapes subject to conservation designations, demonstrating that active fuels management and conservation objectives need not be mutually exclusive. The same BLM report provides a particularly relevant WSA example. The agency described portions of Montana's approximately 10,000-acre Wales Creek WSA as presenting serious fuel concerns because dense conifers, downed lodgepole pine, and other dry material had produced hazardous conditions. BLM managers were developing treatments while simultaneously protecting wildlife and wilderness values. The example illustrates precisely the management model UPLA



recommends: conservation status informs treatment design but does not become a rationale for avoiding treatment altogether.

In Utah and elsewhere across the Great Basin and Colorado Plateau, the wildfire problem frequently involves rangeland rather than dense forest. Here, invasive annual grasses warrant particular emphasis. Cheatgrass dries earlier than many native perennial plants and can form continuous fine-fuel beds across areas that historically contained more discontinuous fuels. BLM states that cheatgrass-invaded landscapes are approximately twice as likely to burn. Once fire removes sagebrush and perennial vegetation, annual grasses can recolonize rapidly, increasing the probability of recurring fire and further limiting recovery of native shrub communities. This annual-grass/fire feedback can fundamentally alter habitat. USGS reports that wildfire-driven sagebrush loss is outpacing natural recovery in portions of North American shrublands, with consequential effects on sagebrush-dependent wildlife. BLM and USGS therefore employ herbicide treatment, native seeding, fuel breaks, targeted vegetation management, and other tools intended to disrupt the annual-grass/fire cycle and improve post-fire resilience.

A Manual that unduly restricts those interventions in order to avoid temporary evidence of human activity can produce a paradoxical outcome: the agency may preserve apparent naturalness immediately before wildfire only to lose the native ecological community whose naturalness it intended to protect.

Catastrophic or uncharacteristically severe wildfire can also affect resources far beyond vegetation. High-severity fire can damage archaeological and historic resources, increase erosion, destabilize slopes, degrade water quality, alter stream temperature, damage wildlife habitat, facilitate invasive species, close recreation areas, eliminate forage, destroy infrastructure, and expose communities and firefighters to substantial risk. USGS wildfire research accordingly includes post-fire flooding, debris-flow risk, watershed impacts, water-resource effects, wildlife response, and invasive-species dynamics, reflecting the broad consequences of modern wildfire. For WSA policy, the relevant management question should therefore be **which action best preserves the whole resource system**, rather than which action produces the least immediate physical evidence of management.

A limited mechanical treatment may temporarily reduce apparent naturalness while protecting a watershed, archaeological site, sagebrush community, adjacent town, or wildlife population from a reasonably foreseeable high-consequence fire. A fuel break may create a visible linear feature but provide firefighters a location from which to contain an invasive-grass-driven rangeland fire. Prescribed fire may temporarily blacken vegetation but restore a lower-severity fire regime. Native reseeding following wildfire may require motorized equipment but prevent long-term



conversion to invasive annual grassland. These are not inherently anti-conservation activities. In appropriate settings they *are* conservation.

evidence demonstrates that treatment effectiveness is ecosystem-specific and that poorly designed interventions can create adverse effects. Sagebrush research, for example, shows that responses to pinyon-juniper removal, prescribed fire, mowing, herbicide, and other treatments depend upon site resilience, invasive-species resistance, soil and climatic conditions, treatment method, and existing vegetation state. (Chambers et al., 2024). Extreme fire weather can also overwhelm some treatment effects. The appropriate reform is therefore removal of policy barriers that prevent managers from selecting the treatment supported by the best available site-specific science.

Manual 6330 should accordingly establish several principles for wildfire management.

- First, **human life, firefighter safety, community protection, and prevention of wildfire spread onto adjacent lands must take priority over preservation of short-term wilderness appearance.** The existing emergency exception appropriately recognizes wildfire as a circumstance in which impairing actions can be necessary, but BLM should avoid forcing managers to wait until conditions become emergencies before implementing foreseeable risk-reduction measures.
- Second, **fuel treatment should be expressly recognized as preventive stewardship** rather than an extraordinary exception. Where credible wildfire-risk assessment demonstrates that treatment is reasonably necessary to protect ecological integrity, public safety, cultural resources, watersheds, habitat, infrastructure, or adjacent lands, the Manual should permit treatment subject to appropriate site-specific analysis and mitigation.
- Third, **maintenance treatments must be authorized.** Because treatment effectiveness declines as vegetation and surface fuels recover, the Manual should allow prescribed fire, thinning, targeted grazing where appropriate, invasive-species treatment, and other recurring maintenance when necessary to preserve previously established desired conditions. Requiring managers to repeatedly demonstrate an extraordinary justification for routine maintenance unnecessarily increases cost and allows fuels to return to hazardous levels.
- Fourth, **treatment methods should be selected according to ecosystem rather than ideology.** Mechanical treatment may be appropriate in one location and counterproductive in another. Prescribed fire may be the best tool in a fire-adapted forest while presenting unacceptable invasive-grass risks in a low-resilience sagebrush community. Strategic grazing may reduce fine fuels in some settings. Herbicide followed



by native seeding may be necessary elsewhere. The Manual should establish performance objectives, not prescribe one universal treatment hierarchy.

- Fifth, **wildfire-management access should be preserved.** Existing roads and primitive routes can provide critical access for initial attack, fuel treatment, emergency response, post-fire stabilization, monitoring, and rehabilitation. Allowing such routes to deteriorate solely to improve wilderness characteristics can increase response times and make later emergency disturbance substantially greater than routine maintenance would have been. Where an existing route serves a documented fire-management or stewardship function, reasonable maintenance should be permissible so long as the route does not materially impair wilderness suitability.
- Sixth, **post-fire rehabilitation should be rapid and adaptive.** Following severe wildfire, there may be short windows in which erosion treatment, invasive-species control, reseeding, infrastructure stabilization, archaeological-site protection, and route repair are most effective. Manual 6330 should not impose procedural delay that causes BLM to miss those biological or hydrological windows. Emergency stabilization and restoration authorities should be interpreted broadly enough to allow timely science-based response.

Finally, the present Manual review provides an opportunity to improve the empirical record concerning wildfire within WSAs. Through our research on WSAs to support our policy recommendations for revision of Manual 6330, we were unable to identify a current BLM-published national statistic quantifying the total acreage of existing WSAs burned by wildfire since 2000 (or since any relatively recent point in time). Given that BLM maintains both WSA geospatial boundaries and federal wildfire-perimeter datasets, this information should be readily capable of calculation and available to the public. BLM should disclose, nationally and by state, **the acreage and percentage of each WSA burned since 2000; repeat-burn acreage; burn severity where available; vegetation conversion following fire; invasive-species expansion; treatments conducted before and after fire; and whether WSA management restrictions materially affected treatment or suppression options.**

Such analysis is important because policy should be based upon measurable outcomes. If passive management has produced resilient ecological conditions in particular WSAs, that evidence should inform continued management. If other WSAs have experienced repeated fire, invasive conversion, severe erosion, or preventable loss of habitat because needed treatments could not be implemented efficiently, that evidence should likewise inform reform. Neither outcome should be assumed in advance. The ultimate purpose of resilience management is not to prevent every wildfire. Fire is a necessary ecological process in many western ecosystems. The objective is to



prevent altered fuel conditions, invasive species, or administrative barriers from converting ecologically beneficial fire into repeated or uncharacteristically destructive disturbance.

UPLA therefore recommends that BLM revise Manual 6330 to affirmatively facilitate science-based wildfire prevention and landscape resilience; recognize fuels treatment and maintenance as legitimate preventive stewardship; expand field-level flexibility to employ prescribed fire, mechanical treatment, invasive-species control, targeted grazing where appropriate, native reseeding, fuel breaks, and other proven tools; preserve management access needed for prevention and suppression; expedite post-fire restoration; and establish a national WSA wildfire database capable of measuring burned acreage, treatment history, ecological outcomes, and the consequences of WSA-specific management constraints.

Preservation of wilderness suitability should never require the Bureau to watch preventable ecological degradation occur from the sidelines. The most faithful implementation of FLPMA is one that protects Congress's wilderness option while giving professional land managers the tools necessary to ensure that, when Congress ultimately makes that decision, there remains a healthy, functioning, resilient landscape worth conserving.

RESOURCE MANAGEMENT, INFRASTRUCTURE, AND PUBLIC SAFETY

WSA management must preserve Congress's ability to make a final wilderness determination without disabling BLM's equally important responsibilities to manage natural resources, maintain necessary infrastructure, honor valid existing rights, protect neighboring lands, and safeguard human life and property. Manual 6330 should therefore distinguish clearly between activities that would materially impair wilderness suitability and activities necessary to sustain the safe, functional, and environmentally responsible management of the public estate.

This distinction is especially important because WSAs are not designated Wilderness. The 2024 Manual itself recognizes that management under the non-impairment standard does not mean that BLM must manage WSAs as though Congress had already designated them as Wilderness. Existing primitive-route motorized use, grazing, mining and mineral leasing within applicable statutory parameters, valid existing rights, emergency response, public-safety actions, and other activities can remain lawful even where comparable activities might be restricted in designated Wilderness. The revised Manual should make this distinction operational throughout its treatment of infrastructure and resource management rather than acknowledging it in principle while adopting policies that progressively eliminate the uses necessary to manage these lands.

Infrastructure Is Often a Stewardship Necessity, Not an Incompatible Development



Infrastructure on BLM lands serves functions extending far beyond commercial development. Existing roads and primitive routes provide access for wildfire response, search and rescue, law enforcement, grazing administration, wildlife management, watershed restoration, invasive-species treatment, cultural-resource monitoring, emergency evacuation, utility maintenance, and recreation. Stock-water facilities can distribute livestock away from sensitive riparian areas. Fences may protect cultural sites, springs, restoration areas, or sensitive habitat. Culverts and drainage structures can prevent erosion. Communication facilities can support emergency response. Water systems, transmission facilities, pipelines, and rights-of-way can serve rural communities and private or state inholdings.

FLPMA expressly contemplates BLM management of public-land use, occupancy, and development through easements, permits, leases, licenses, rights-of-way, and other instruments, while simultaneously requiring management under multiple use and sustained yield and prevention of unnecessary or undue degradation (43 U.S.C. § 1732(a)-(b)). A WSA-specific non-impairment requirement may constrain this authority in particular circumstances, but Manual 6330 should not presume that infrastructure is inherently inconsistent with responsible conservation.

The current Manual contains provisions that warrant refinement in this respect. We have identified language allowing the BLM to remove structures and facilities that impair wilderness characteristics; later in this letter we specify where we recommend deletion or substantial revision of that language because historically significant structures and facilities may themselves possess cultural value and require maintenance to prevent deterioration. A structure's mere visibility or evidence of human influence should not determine whether it warrants removal. Historic mining features, cabins, livestock improvements, corrals, water developments, roads, airstrips, communication remnants, archaeological features, and other cultural resources can embody precisely the historic values FLPMA and the National Historic Preservation Act require BLM to consider. An administrative objective of increasing apparent wilderness character should not become an independent basis for destroying resources that may contribute to the historical record.

The revised Manual should consequently require **affirmative cultural-resource review before removal, abandonment, rehabilitation, or deliberate deterioration of existing structures or facilities**. Where a feature is eligible for or listed in the National Register of Historic Places, contributes to a historic landscape, supports a valid existing use, provides public-safety or resource-management value, or can reasonably be maintained without materially impairing wilderness suitability, preservation should remain available. Removal should be based upon an



identified resource-management justification rather than a generalized preference for erasing evidence of historical human use.

This approach is consistent with the Manual's own recognition that public-safety remediation of some human-created hazards may implicate the National Historic Preservation Act. If an abandoned mine or other structure can simultaneously constitute both a safety hazard and a cultural resource, the appropriate response is balanced treatment, such as protective gating, stabilization, documentation, selective access, or another site-specific measure, rather than a categorical assumption that either preservation or removal must prevail.

Valid Existing Rights Must Be Practically Exercisable

Manual 6330 correctly acknowledges that valid existing rights remain protected. The 2024 policy identifies mineral claims, mineral leases, rights-of-way, and R.S. 2477 claims as examples and recognizes that rights generally transfer with the underlying interest when lawfully conveyed. It further instructs BLM to work with right holders so that non-impairment criteria are satisfied to the extent possible **without unreasonably interfering with exercise of the right**.

That last qualification should receive considerably greater emphasis in the revised Manual.

A right that exists legally but cannot reasonably be accessed, maintained, repaired, or exercised is not meaningfully protected. Recognition of a preexisting right should therefore encompass the reasonable incidental activities necessary to keep that right functional, consistent with its scope and applicable law. For an existing right-of-way, this may include grading, drainage repair, culvert replacement, removal of rockfall, erosion repair, vegetation clearing, and limited realignment necessitated by natural events. For a water facility, it may include maintenance of pipelines, troughs, diversion structures, or access necessary for repair. For mineral rights, it may encompass the logical and reasonably foreseeable progression of operations where authorized by law.

The existing Manual recognizes some of this principle. It permits renewal of existing rights-of-way still serving their authorized purpose and allows necessary routine maintenance to preserve a facility in safe and reliable condition, including improvements required because of natural hazards. This language should be retained and strengthened.

UPLA recommends that the revised Manual establish that **ordinary maintenance, repair, reconstruction following natural damage, and reasonable modernization necessary for safety or continued function do not constitute prohibited new development merely because**



the resulting facility is not physically identical to its condition in 1976. Technology, engineering standards, public-safety requirements, hydrology, and landscape conditions change. BLM should focus upon whether the underlying authorized use remains substantially the same and whether maintenance can be performed without materially impairing wilderness suitability. A rigid historical-condition standard can itself create unnecessary environmental degradation. A road built decades ago may require contemporary drainage structures to prevent gullyng. A culvert may need to be larger because hydrological conditions have changed. A utility line may require replacement components that no longer resemble original technology. A livestock facility may need redesigned water distribution to protect riparian resources. Requiring physical replication of obsolete infrastructure when a modest modernization would produce fewer environmental impacts is inconsistent with rational resource management.

Rights-of-Way and Access to Inholdings Require a More Practical Standard

The treatment of rights-of-way and inholdings is another area where Manual 6330 is in need of revision.

The 2024 policy permits authorization of an existing access route to nonfederal land surrounded by a WSA, but generally prohibits upgrading the route beyond its historical condition and contemplates limits on traffic where necessary to avoid impairment. Where no route exists, BLM may authorize access subject to the non-impairment standard or an applicable exception. The Manual also suggests limited-duration or seasonal rights-of-way and consideration of acquisition of the inholding as an alternative to access.

These provisions should not operate to make lawful private, state, or local-government property functionally unusable.

Reasonable access is typically inseparable from the beneficial use of an inholding. Where an existing access corridor crosses a WSA, BLM should generally preserve that corridor and allow the level of maintenance reasonably necessary for safe and practical access unless the agency demonstrates that a particular improvement would materially impair wilderness suitability. The fact that a road may need gravel, drainage improvements, stabilization, minor widening at hazardous locations, or realignment around a landslide should not alone convert ordinary access into prohibited development.

The revised Manual should also eliminate any implication that federal acquisition of an inholding is a preferred substitute for providing lawful access. Voluntary acquisition can be an appropriate land-management tool where both the landowner and BLM determine that it serves



their interests. It should not become leverage through which restrictive WSA management makes private property increasingly difficult to use until sale to the federal government becomes the only practical alternative.

Particular care is necessary in Utah and other western states where checkerboard ownership, state trust lands, historic patents, grazing allotments, mining interests, water rights, and county transportation networks frequently intersect federally managed public lands. WSA policy should accommodate those realities rather than treating surrounding public lands as though they formed an isolated federal preserve.

Existing Roads and Primitive Routes Should Be Maintained for Resource Management and Safety

Transportation infrastructure deserves special treatment because roads and primitive routes are among the most useful tools available for management of remote public lands.

As discussed elsewhere in this comment, the 2024 Manual prohibits new recreational motorized routes and restricts maintenance or improvement of existing primitive routes where the action fails the non-impairment standard. It further allows closure where erosion, increased use, or bypassing causes a route to exceed its historic impact. The Manual also directs that motorized or mechanized primitive routes generally not become transportation-system assets unless Congress releases the WSA or another specified condition applies. That policy should be revised to recognize the **resource-management value of existing routes independently of recreational motorized use.**

BLM's travel-management program itself recognizes transportation planning as a component of integrated public-land management (BLM, 2012). In a remote landscape, an existing primitive route may provide the fastest means of reaching a wildfire ignition, injured visitor, damaged livestock facility, illegal dumping site, invasive-plant infestation, archaeological resource, or restoration project. Maintaining such a corridor can reduce the need for cross-country travel and concentrate administrative disturbance onto an established footprint. The choice is therefore not always between "road" and "no disturbance." It may instead be between a maintained route and repeated off-route travel by emergency vehicles, equipment, permittees, or agency staff.

The revised Manual should permit maintenance of existing roads and primitive routes where they serve a demonstrated **administrative, emergency, public-safety, resource-management, access, or recreation function**, provided that maintenance is designed to minimize unnecessary expansion of the route footprint. Work should include drainage maintenance, erosion repair,



vegetation clearing, removal of fallen rock or trees, stabilization, repair following floods, and minor rerouting where the original alignment is rendered unusable by natural processes.

This is particularly important given the shortcomings of historic WSA mapping. Original designation maps may not precisely identify cherry-stemmed roads or other boundary features, while rivers, floods, landslides, and rockfalls can physically change routes over decades. The Virgin River example discussed later in this comment letter illustrates how dynamic hydrology can make a rigid historical alignment impractical. The revised Manual should establish a procedure for correcting mapping inaccuracies and accommodating minor route displacement caused by natural events without treating every adjustment as a new intrusion into the WSA.

Public Safety Authority Must Extend Beyond Human-Caused Hazards

One of the most important revisions should concern the Manual's treatment of public safety. The 2024 Manual authorizes otherwise impairing actions to address public-safety concerns but states that such actions are limited to **human-caused hazards**, such as abandoned mine openings, and specifically indicates that altering naturally occurring hazards, including landslides or watercourse changes, is not permissible under the public-safety exception.

UPLA recommends deletion of that limitation.

From the perspective of an injured visitor, stranded family, search-and-rescue team, firefighter, county road crew, permittee, or adjacent property owner, the origin of a hazard is immaterial. A rockfall blocking the only practical evacuation route can be just as dangerous as a collapsed mine structure. A flood-damaged crossing can threaten life regardless of whether the original road was human-created. A landslide can isolate visitors or emergency responders. Hazardous trees can threaten established campsites or access corridors. Severe erosion can make an otherwise lawful route unsafe.

A public-safety exception that distinguishes principally between natural and anthropogenic causation is poorly aligned with the objective it purports to serve.

Manual 6330 should instead ask whether a credible hazard exists and whether the proposed action is reasonably necessary and proportionate to the risk. Where a naturally occurring event renders an existing lawful facility or route hazardous, BLM should have authority to stabilize, repair, relocate, or otherwise mitigate that condition. Wilderness suitability can still inform the method chosen, but it should not prevent the agency from taking reasonable preventive measures simply because the initiating event was natural.



FLPMA itself reflects the importance of health and safety in public-land administration. Section 302 gives the Secretary authority to regulate public-land use and allows immediate temporary suspension of an authorization where necessary to protect health, safety, or the environment (43 U.S.C. § 1732(c)). While this provision does not independently displace Section 603(c), it illustrates that Congress did not envision BLM management as indifferent to foreseeable hazards.

UPLA therefore recommends that the revised public-safety exception encompass **human-caused and naturally occurring hazards alike**, subject to reasonable mitigation and a least-impacting practicable approach where several equally effective safety solutions exist.

Emergency Response Must Prioritize Life and Property

Manual 6330 appropriately recognizes emergencies as an exception to non-impairment and identifies wildfire, flood, pursuit of criminal suspects, search and rescue, recovery of deceased persons, and other urgent circumstances in which actions necessary to prevent loss of life or property may occur even if wilderness suitability is temporarily impaired. UPLA supports retention of this provision, but recommends strengthening it in several respects. The Manual should state unequivocally that **protection of human life takes precedence over preservation of wilderness characteristics during an emergency**. Incident commanders, law-enforcement officers, firefighters, emergency medical personnel, and search-and-rescue teams should not face ambiguity over whether helicopters, motor vehicles, mechanized equipment, temporary landing zones, bulldozers, chainsaws, route clearing, or other tools may be used where reasonably necessary to protect life.

The phrase "least impairing" should not be interpreted to require responders to choose a materially slower, less reliable, or more dangerous method merely because it produces less visible disturbance. The appropriate standard is the **least impairing practicable alternative consistent with timely and effective emergency response**. Safety personnel should retain reasonable operational discretion based upon conditions encountered in the field.

This distinction should apply before as well as during emergencies. Maintaining an existing emergency-access route, identifying helicopter landing areas, correcting known hazards, maintaining communication infrastructure, and implementing fuels treatment can prevent incidents from becoming emergencies or improve response when they occur. Manual 6330 should not create a policy under which BLM possesses broad authority after lives are endangered but insufficient authority to take modest preventive actions beforehand.



Abandoned Mines and Legacy Hazards Require Flexible Remediation

Abandoned mine lands are a particularly relevant element within Manual 6330 that requires greater scrutiny. BLM administers a large inventory of abandoned mine features across western public lands, and the agency identifies remediation of hazardous abandoned mine lands as an ongoing public-safety responsibility. Many such features are located in landscapes possessing historical mining significance and may simultaneously provide wildlife habitat, particularly for bats. Manual 6330 should permit a full range of site-specific remedies, including bat-compatible gates, fencing, backfilling, stabilization, drainage control, warning systems, partial closure, or other engineering solutions. The objective should be to resolve the hazard while preserving cultural and ecological values where practicable. The policy should not create a false choice between leaving a dangerous feature untouched and completely obliterating it to improve apparent wilderness character.

The same principle applies to orphaned wells, unstable structures, contaminated sites, hazardous debris, unsafe dams or diversions, and other legacy infrastructure. Federal conservation responsibility includes correcting historical environmental liabilities where correction is necessary to protect people and natural resources.

Infrastructure Necessary for Modern Public Needs Should Receive Genuine Consideration

The long duration of WSA status also creates a problem that could not reasonably have been anticipated when many WSAs were inventoried: infrastructure needs have changed dramatically over the last four to five decades. Communities now face demands for wildfire resilience, electrical transmission, renewable and conventional energy infrastructure, broadband, water conveyance, telecommunications, emergency communications, transportation improvements, and other facilities that may not have existed in their current form when the wilderness inventory was completed. BLM administers public lands through a statutory system that expressly recognizes rights-of-way and other authorized uses.

For Section 603 WSAs, UPLA recognizes that Section 603(c) constrains BLM's ability to authorize infrastructure that would actually impair wilderness suitability before Congress acts. The appropriate solution is not administrative disregard of that statute. It is **accelerated congressional disposition of WSAs where the interim designation conflicts materially with compelling contemporary public needs.**



For Section 202 WSAs subject to BLM reconsideration through land-use planning, however, the agency possesses greater flexibility. Where an administratively created WSA blocks an important transportation, water, energy, communication, public-safety, or restoration corridor, BLM should examine whether continued WSA status remains justified when weighed against the present and future needs of the American people.

Manual 6330 should therefore require early coordination between the wilderness program and BLM programs responsible for rights-of-way, minerals, grazing, wildfire, recreation, wildlife, abandoned mine lands, engineering, and transportation. WSA management should not occur in an administrative silo.

Mitigation Should Precede Prohibition

Across all categories of infrastructure and resource management, UPLA recommends adoption of a consistent **mitigation-first hierarchy**. Where an otherwise lawful action presents a potential conflict with wilderness suitability, BLM should first determine whether the impact can be avoided or reduced through:

- use of an existing disturbed corridor;
- modification of facility location or design;
- seasonal construction restrictions;
- temporary rather than permanent installations;
- use of low-profile or visually compatible infrastructure;
- reclamation following construction;
- limited route width;
- erosion-control measures;
- timing limitations;
- restoration of temporary disturbance; or
- other site-specific best management practices.

Only where BLM demonstrates that reasonable mitigation cannot prevent material impairment should the agency deny an otherwise lawful use solely under Manual 6330. This approach is consistent with existing portions of the Manual, which contemplate modified terms and conditions for rights-of-way and mitigation of impacts associated with projects near WSAs. But the principle should be applied uniformly rather than selectively.



Recommended Revision

UPLA recommends that Manual 6330 establish a clear overarching standard for infrastructure, resource management, and public safety:

BLM should preserve the continued functional use, reasonable maintenance, and safe operation of existing lawful infrastructure and access; honor valid existing rights in a manner that allows those rights to be practically exercised; authorize preventive and emergency actions necessary to protect life, property, natural and cultural resources, and neighboring lands; accommodate reasonable adaptation to natural landscape change; preserve management access needed for stewardship and emergency response; and employ site-specific mitigation before prohibition.

The Manual should further:

1. require cultural-resource evaluation before removing or intentionally allowing deterioration of historic structures and facilities;
2. authorize routine maintenance and reasonable modernization of existing infrastructure where the underlying use remains substantially unchanged;
3. permit maintenance and minor realignment of existing roads and primitive routes following floods, landslides, erosion, rockfall, or other natural events;
4. broaden the public-safety exception to include naturally occurring as well as human-caused hazards;
5. clarify that emergency responders may use motorized and mechanized equipment reasonably necessary to protect life and property;
6. protect reasonable access to nonfederal inholdings and valid existing rights;
7. reject acquisition of private or state property as a preferred substitute for providing lawful access;
8. prioritize mitigation and engineering solutions over denial of compatible infrastructure;
9. coordinate WSA management with wildfire, transportation, grazing, wildlife, engineering, recreation, mineral, and rights-of-way programs; and
10. identify WSAs where unresolved status materially interferes with essential contemporary infrastructure and recommend congressional or administrative disposition, as legally appropriate.

WSA status should preserve a congressional option. It should not render public lands unsafe, strand lawful property interests, prevent responsible maintenance, erase historical resources, or force BLM managers to choose ecological and operational inefficiency merely to preserve an increasingly artificial appearance of nonuse.



The revised Manual should therefore treat functional infrastructure, resource stewardship, and public safety as integral components of responsible WSA management, not as presumptive threats to it. Where these objectives can coexist with preservation of wilderness suitability, BLM has both the authority and the responsibility to ensure that they do.

SECTION-BY-SECTION RECOMMENDED UPDATES TO MANUAL 6330

UPLA recommends substantial revision of Manual 6330 to ensure that its operative provisions remain faithful to the limited statutory purpose of Wilderness Study Area management: preservation of Congress's ability to determine whether qualifying lands should ultimately become designated Wilderness. The Manual should not convert that interim obligation into a progressively restrictive management regime that administratively approximates Wilderness, enlarges the statutory non-impairment standard, or unnecessarily displaces FLPMA's underlying multiple-use framework.

The revisions adopted in October 2024 are particularly consequential because they restored BLM policy allowing new Section 202 WSAs to be created through land-use planning and subjected those administratively designated lands to Manual 6330's non-impairment standard. BLM simultaneously acknowledges that Section 202 WSAs differ fundamentally from Section 603 WSAs because their designation may be modified or removed through a subsequent planning process (BLM, 2024). The revised Manual should preserve this distinction throughout its substantive provisions rather than applying identical restrictions without regard to the different statutory origins and legal status of the affected lands.

A. Manual 6330 § 1.1 – Purpose and Scope

UPLA recommends revising Section 1.1 to state expressly that WSA management is **interim or administratively reversible management, depending upon the legal origin of the WSA**, and is not equivalent to management of congressionally designated Wilderness.

Section 603 WSAs are governed by FLPMA's statutory non-impairment requirement pending congressional disposition. Post-review Section 202 WSAs, by contrast, arise from BLM's discretionary land-use-planning authority and may be modified or eliminated through subsequent planning. BLM's October 2024 Information Bulletin expressly recognizes that distinction and confirms that the original Section 603 wilderness-review process concluded in 1991 (BLM, 2024).



The Manual should consequently identify separately:

1. Section 603 WSAs awaiting congressional disposition;
2. legislative WSAs created by Congress;
3. earlier Section 202 WSAs transmitted to Congress where applicable; and
4. Section 202 WSAs whose designation remains within BLM's planning discretion.

This distinction is essential because a Manual implementing a statutory congressional-review obligation should not imply that every administratively designated Section 202 WSA possesses the same permanence or legal constraints as a Section 603 WSA.

UPLA further recommends adding an affirmative policy statement that BLM will periodically review administratively reversible Section 202 WSAs and determine whether continued WSA status remains warranted under contemporary land-use conditions. BLM itself states that Section 202 designation is only one among several permissible management approaches for lands with wilderness characteristics, including alternatives that protect some wilderness characteristics while retaining compatible multiple uses (BLM, 2024). WSA designation therefore should not become the default or presumptively permanent management outcome.

B. Manual 6330 § 1.4 – Responsibilities and Coordination

UPLA supports intergovernmental and public coordination but recommends revising Section 1.4 so that BLM's consultation obligations reflect the full spectrum of interests affected by WSA management.

Existing policy has historically instructed managers to maintain liaison with federal agencies, Tribal governments, state and local governments, nonprofit organizations, friends' groups, and members of the public concerned with wilderness preservation. BLM has described this liaison responsibility in prior implementation guidance. The revised Manual should broaden the formulation beyond entities principally "concerned with wilderness preservation." WSA decisions also affect counties, state agencies, grazing permittees, recreation organizations, outfitters and guides, water-right holders, mineral claimants, right-of-way holders, adjacent landowners, state trust-land managers, emergency responders, conservation districts, search-and-rescue organizations, utilities, and communities economically dependent upon public-land access.

UPLA recommends substituting neutral language requiring coordination with **affected federal, Tribal, state, and local governments; cooperating agencies; authorized users; recreation**



and conservation organizations; right holders; adjacent landowners; and other affected members of the public.

No nongovernmental organization should receive privileged policy access based solely upon its advocacy for wilderness designation. Management of public lands requires impartial administration of competing lawful interests.

C. Manual 6330 § 1.6.A – General Management and the Removal of Existing Structures or Facilities

The Manual should eliminate any presumption favoring removal of existing structures or facilities merely because their presence diminishes apparent wilderness character. Existing human features may possess significant historical, cultural, administrative, recreational, grazing, wildlife, water-management, transportation, or public-safety value. Historic cabins, corrals, mining features, roads, airstrips, water developments, fences, archaeological features, communication remnants, and similar facilities can themselves constitute resources protected under FLPMA and the National Historic Preservation Act.

UPLA recommends that Section 1.6.A require BLM, before removing or intentionally allowing deterioration of an existing structure or facility, to determine whether:

- the feature possesses historic or cultural significance;
- it supports a valid existing right or lawful continuing use;
- it performs a resource-management, access, recreation, or public-safety function;
- maintenance can occur without materially impairing wilderness suitability; and
- less destructive alternatives are available.

Where a historic structure can be stabilized or restored without materially impairing the WSA's suitability for potential Wilderness designation, the Manual should authorize preservation rather than encourage erasure of the historical record merely to increase apparent naturalness.

D. Manual 6330 § 1.6.B – WSA Boundaries

UPLA recommends substantial improvement to the Manual's treatment of WSA boundaries. Many WSA boundaries originated from inventories and mapping conducted decades before modern high-resolution GIS, LiDAR, GPS, and digital cadastral systems. Boundary roads and cherry-stemmed routes may consequently be depicted imprecisely. Natural processes also modify the physical landscape: streams migrate, floods alter channels, landslides displace roads, rockfall blocks corridors, and erosion changes route locations.



The revised Manual should expressly distinguish between changing the legal boundary of a WSA and correcting the mapped representation of the existing boundary or accommodating natural displacement of a boundary-related feature.

BLM should establish an administrative process to:

- reconcile historic wilderness-inventory maps with contemporary cadastral and geospatial information;
- document boundary roads and cherry-stemmed corridors accurately;
- correct demonstrable mapping errors;
- recognize reasonable deviations in roads caused by flood, erosion, landslide, rockfall, or other natural processes; and
- preserve the functional status of routes historically excluded from WSA acreage even where their precise tread has shifted modestly.

A road should not effectively become absorbed into a WSA merely because natural processes forced traffic several yards from an alignment depicted approximately on a decades-old map.

E. Manual 6330 § 1.6.B – New Discretionary Uses

UPLA recommends deleting or substantially revising language suggesting that an otherwise physically non-impairing recreational use may be prohibited merely because its popularity could create a public expectation of continued use inconsistent with possible future Wilderness designation. This policy expands non-impairment beyond protection of wilderness suitability and into regulation of public expectations.

Whether the public enjoys an existing mountain-bike route, motorized route, camping location, climbing area, or other lawful recreation opportunity does not itself alter the area's size, naturalness, roadlessness, or physical wilderness characteristics. Congress remains fully capable of designating Wilderness subject to whatever provisions it chooses regardless of whether an existing use has become popular. The appropriate inquiry should be whether the activity produces **actual, material effects upon the physical or experiential characteristics relevant to wilderness suitability**, not whether the activity might become politically or socially difficult to discontinue later.

BLM should therefore delete policy instructing managers to suppress otherwise permissible use before it generates an expectation of continuity. It is legally, administratively, and morally



impermissible for a federal public land management agency to reduce lawful public use simply to prevent the public from developing an attachment to public lands.

F. Manual 6330 § 1.6.B – "Maintain Improved Conditions"

UPLA strongly recommends deleting the policy that makes the **current condition or the historical baseline, whichever possesses greater wilderness characteristics**, the benchmark for future non-impairment determinations. This provision creates a regulatory ratchet unsupported by the text of Section 603(c). FLPMA requires BLM to manage qualifying lands so as not to impair their suitability for preservation as Wilderness. It does not command BLM to continually improve wilderness characteristics or to convert improvements resulting from administrative restrictions into an increasingly restrictive legal baseline.

Under the existing approach, a route can be closed and rehabilitated, reducing evidence of human use. The resulting increase in apparent naturalness then becomes the new minimum condition, preventing restoration of the formerly lawful route even where its previous existence did not render the area unsuitable for wilderness review. Over decades, repeated application of this principle allows agency management itself to progressively manufacture greater wilderness character.

That policy risks transforming non-impairment into administrative wilderness creation.

UPLA recommends replacing it with language providing that management must preserve the characteristics necessary to maintain the area's **suitability** for potential congressional designation, while allowing otherwise lawful uses that do not materially impair that suitability. Restoration undertaken for genuine ecological reasons may certainly improve wilderness characteristics, but such improvement should not automatically create a new legal floor that permanently extinguishes previously compatible use.

G. Manual 6330 § 1.6.C.1 – Definition of the Non-Impairment Standard

The definition of non-impairment is the substantive core of Manual 6330 and should be revised with particular care. The Manual presently operationalizes non-impairment largely through requirements that a use be temporary and avoid significant new surface disturbance. That framework can be useful, but the operative definitions should not be so expansive that trivial or readily reversible disturbance becomes synonymous with impairment.



The revised Manual should establish **material impairment of wilderness suitability** as the governing threshold.

Not every footprint, tire track, vegetation disturbance, temporary installation, maintenance action, or localized soil disturbance affects whether Congress retains a meaningful option to designate the broader landscape as Wilderness. The Wilderness Act itself recognizes that wilderness landscapes may contain historical human influences, and FLPMA expressly permits continuation of certain established uses in WSAs. The statutory inquiry therefore cannot reasonably be reduced to whether any new evidence of human activity exists.

UPLA recommends defining impairment as a reasonably foreseeable effect of sufficient magnitude, duration, geographic extent, or permanence that it would materially diminish one or more wilderness characteristics to the point that the area's suitability for preservation as Wilderness is meaningfully compromised.

Likewise, "temporary" should not be defined so narrowly that repeated or recurring stewardship activities become permanent by semantic construction. Prescribed fire, invasive-species treatment, route maintenance, vegetation monitoring, grazing administration, wildlife management, restoration, and similar activities may need to recur indefinitely because ecological systems require continuing stewardship. Recurrence does not transform an activity into a permanent facility.

BLM should revise the definition of "temporary" so that an activity is not deemed impairing merely because it is recurring, seasonal, repeated, or expected to continue over time. The proper inquiry should be whether the activity or facility causes material impairment to the area's suitability for Wilderness designation. A recurring use that does not create significant new surface disturbance, permanent development, or other material impairment should not be prohibited solely because it occurs repeatedly or because users may reasonably expect the activity to continue.

We also recommend that BLM delete the statement that a "chronic, repeated short-term use" automatically fails the definition of temporary. Frequency alone does not determine whether wilderness suitability is impaired. The Manual should focus on the actual physical and experiential effects of the use, rather than its duration, repetition, popularity, or the expectations of those engaged in it.

These recommendations create greater consistency with the goal of ensuring that material impairment should be the trigger for restriction, not an administrative presumption based on



repetition or duration. This clarification in Manual 6330 is particularly important to incorporate to ensure balanced management of recurring recreational activities, organized events, seasonal access, outfitter and guide operations, maintenance activities, and other lawful uses that may occur repeatedly without materially impairing wilderness suitability.

H. Manual 6330 § 1.6.C.2 – Exceptions to Non-Impairment

UPLA supports retention of explicit exceptions to the non-impairment standard but recommends that they be interpreted according to their functional purposes rather than constrained by unnecessary secondary restrictions.

Emergencies

The emergency exception should be retained and strengthened. Firefighters, law-enforcement officers, emergency medical responders, and search-and-rescue personnel must be authorized to use motor vehicles, aircraft, mechanized equipment, temporary access, chainsaws, earth-moving equipment, and other tools reasonably necessary to protect life and property.

The requirement to minimize impairment should apply only insofar as doing so remains **practicable without compromising the timeliness, safety, or effectiveness of the emergency response.**

Public Safety

The current limitation of public-safety actions principally to human-caused hazards should be removed.

Public safety depends upon the magnitude of the hazard, not its origin. Landslides, flood-damaged crossings, rockfall, unstable slopes, hazardous trees, changed watercourses, and naturally occurring erosion can pose risks equivalent to abandoned mines or human-created structures.

BLM should be authorized to correct either natural or human-caused hazards where reasonably necessary to protect visitors, authorized users, emergency responders, neighboring property, or infrastructure.

Restoration Following Violations and Emergencies

UPLA supports restoration following unauthorized disturbance but recommends deleting any requirement that restoration necessarily produce a condition **better than** that existing before the disturbance.



The purpose of remediation should be to correct the impact, stabilize resources, and restore appropriate ecological function. Requiring enhancement beyond the pre-impact condition can convert enforcement restoration into an unrelated landscape-improvement program and contribute to the same regulatory ratchet discussed above.

Valid Existing Rights

UPLA supports recognition of valid existing rights but recommends stronger language ensuring those rights remain practically exercisable.

BLM should expressly recognize reasonable maintenance, repair, replacement, access, and logical progression necessary to exercise a valid right, subject to its lawful scope. The Manual already acknowledges mineral claims, leases, rights-of-way, and R.S. 2477 claims as potential valid existing rights and recognizes that non-impairment should not unreasonably interfere with their exercise.

That principle should control. A valid right that cannot reasonably be accessed or maintained is not meaningfully protected.

Legacied Uses

UPLA recommends retaining recognition of lawful uses existing when FLPMA was enacted, but the Manual should avoid construing the phrase "same manner and degree" with unnecessary rigidity.

Technological improvement should not automatically constitute prohibited expansion where modern equipment produces the same underlying use with equal or less resource impact. Replacement of obsolete equipment, improved erosion controls, safer livestock facilities, modern water systems, and similar changes should be evaluated according to **functional use and environmental footprint**, not technological identity with equipment used in 1976.

Actions Protecting or Enhancing Wilderness Characteristics

This exception should remain available, but it must not become an avenue for circumventing the ordinary non-impairment standard by authorizing otherwise impairing activities merely because agency personnel prefer a more pristine future condition.

Actions under this provision should address a documented resource-management need and should protect ecological function or an identified wilderness characteristic, rather than simply increase administrative restrictions.



Other Legal Requirements

UPLA supports the provision recognizing that BLM must comply with other statutes even where doing so requires actions that would otherwise conflict with non-impairment. Manual 6330 cannot subordinate independent congressional mandates concerning endangered species, cultural resources, public safety, water, wildfire response, rights-of-way, or other federal obligations merely because the lands possess WSA status.

I. Manual 6330 § 1.6.D – Cultural and Historic Resources

Cultural-resource management should be revised to recognize that evidence of human history is not inherently inconsistent with WSA status. Archaeological sites, historic roads, cabins, mining landscapes, livestock improvements, Indigenous cultural resources, and other historic features may form part of the landscape Congress originally evaluated. Removal or deterioration of such resources simply to increase perceived naturalness can conflict with the National Historic Preservation Act and with FLPMA's express recognition of historical and archaeological values.

UPLA recommends that Manual 6330 affirmatively authorize documentation, stabilization, protective treatment, maintenance, and where appropriate restoration of significant cultural resources, including reasonable use of mechanized equipment when it minimizes overall disturbance or is necessary to prevent loss of the resource.

J. Manual 6330 § 1.6.D – Fire Management and Fuel Treatment

UPLA supports substantial revision of the fire and fuels provisions consistent with the preceding sections of this comment. Fuel treatment should not be framed principally as an extraordinary intervention tolerated only for the eventual purpose of allowing "natural" wildfire to return. Treatment may legitimately be undertaken to protect communities, firefighters, watersheds, wildlife habitat, cultural resources, neighboring lands, infrastructure, or ecological resilience.

Field managers should possess sufficient discretion to select prescribed fire, mechanical treatment, targeted grazing where ecologically appropriate, invasive-species treatment, native revegetation, fuel breaks, or other science-supported methods according to local ecological conditions.

The Manual should further recognize **maintenance treatment**. Fuels treatments lose effectiveness as vegetation regrows and fuels reaccumulate. A policy that authorizes initial



treatment but erects new barriers to periodic maintenance undermines both fiscal efficiency and wildfire resilience.

The appropriate standard is whether the treatment is supported by credible site-specific analysis and can be implemented without materially impairing the area's overall suitability for Wilderness consideration.

K. Manual 6330 § 1.6.D – Lands Actions and Rights-of-Way

UPLA recommends revising the rights-of-way provisions to distinguish meaningful wilderness impairment from reasonable maintenance and continued use of established infrastructure. Existing rights-of-way should remain renewable where their authorized purpose continues, and routine maintenance necessary to preserve safe and reliable operation should be expressly allowed. This includes erosion repair, grading within the established footprint, drainage maintenance, culvert replacement, stabilization, vegetation clearing, repair following natural hazards, and minor adjustments necessary to satisfy modern safety standards.

The Manual should not require exact physical replication of infrastructure that may be several decades old when modest modernization would reduce environmental impact or improve public safety.

For new rights-of-way, Section 603 constraints must of course be respected where applicable. But where several routes or designs would satisfy the non-impairment requirement, BLM should select the alternative providing the greatest compatible multiple-use and public benefit rather than automatically preferring avoidance of the WSA regardless of other resource consequences. BLM policy recognizes that WSA status creates specialized constraints for rights-of-way and that many large infrastructure projects cannot satisfy Section 603 non-impairment. This reinforces the need to complete congressional disposition of long-pending WSAs rather than using Manual 6330 to perpetually resolve infrastructure conflicts through prohibition.

L. Manual 6330 § 1.6.D – Access to Nonfederal Inholdings

The Manual should guarantee reasonable practical access to state, private, Tribal, county, and other nonfederal inholdings where access rights exist or where federal law otherwise requires access. Where an existing route provides access, BLM should permit maintenance sufficient to keep that route safe and usable. Restrictions limiting a route to its literal 1976 physical condition are inappropriate where flooding, erosion, landslide, modern vehicle dimensions, changed safety standards, or ordinary deterioration require reasonable improvement.



UPLA further recommends deleting any implication that federal **acquisition of an inholding** is a preferred alternative to providing otherwise reasonable access.

Voluntary land acquisition is an appropriate tool where both parties favor it. It should not become a mechanism through which federal land-management restrictions diminish the usability of private or state property until acquisition becomes the only practical option.

M. Manual 6330 § 1.6.D – Minerals

Mineral provisions should continue to recognize valid existing rights and the logical pace and progression of operations authorized under applicable federal law.

UPLA recommends that the revised Manual distinguish between genuinely new surface occupancy and reasonable evolution of an established lawful mineral use. Modern safety requirements, environmental controls, equipment replacement, reclamation technology, and operational methods may change over decades. Such changes should be evaluated by their actual physical effects rather than presumed impairing merely because they differ technologically from historical practice.

Where mineral activity cannot lawfully proceed because Congress has retained a Section 603 WSA in unresolved status, BLM should identify the conflict in its periodic reports to Congress so that indefinite administrative limbo does not substitute for final legislative disposition.

N. Manual 6330 § 1.6.D – Grazing and Range Improvements

FLPMA expressly protects continuation of grazing within Section 603 WSAs subject to the statute's terms. The Manual should therefore ensure that livestock management remains operationally viable rather than recognizing grazing in theory while constraining the infrastructure necessary to conduct it responsibly.

Water developments, pipelines, fences, corrals, vegetation treatments, access routes, and other range improvements may be essential to distribute livestock, protect riparian resources, improve utilization patterns, maintain animal welfare, or meet land-health objectives.

The revised Manual should allow maintenance, replacement, relocation, and environmentally beneficial modernization of existing facilities where such actions preserve substantially the same underlying grazing use and do not materially impair wilderness suitability.



Where a modest improvement can reduce impacts to soils, riparian areas, wildlife habitat, or water quality, WSA policy should not create a perverse incentive to preserve an inferior historical system merely because it leaves less evidence of modern management.

O. Manual 6330 § 1.6.D – Recreation, General

UPLA recommends revising the recreation provisions so that **lawful recreation is presumed compatible unless BLM demonstrates actual impairment**. The Manual presently allows hiking, horseback riding, camping, hunting, fishing, trapping, motorized travel on qualifying routes, and other recreational uses, but permits restrictions when use levels affect wilderness characteristics. BLM has historically emphasized the legal distinction between designated Wilderness, where preservation of wilderness character is the management mandate, and WSAs, where the mandate is non-impairment of suitability. That distinction must govern recreation policy.

Increased popularity alone should not constitute impairment. Where recreation creates localized soil damage, vegetation loss, sanitation problems, congestion, or cultural-resource impacts, BLM should address the measurable impact through targeted management rather than suppressing public use simply because visitation has increased.

The Manual should establish a mitigation hierarchy favoring education, maintenance, signing, hardening, seasonal restrictions, capacity management, rerouting, enforcement, or site restoration before closure.

P. Manual 6330 § 1.6.D – Motorized and Mechanized Transportation

UPLA recommends substantial revision of the motorized and mechanized transportation provisions. Existing qualifying primitive routes should remain available unless BLM demonstrates that continued use materially impairs wilderness suitability and that reasonable mitigation cannot correct the impact. Route use should not be restricted merely because traffic has increased relative to 1976.

BLM should delete the prohibition against assigning names or numbers to existing motorized or mechanized primitive routes within WSAs. Existing routes should be permitted to be signed, numbered, mapped, and identified in digital and printed navigation products where reasonably necessary for public safety, navigation, emergency response, resource protection, administration, or enforcement. Identification of an existing route does not constitute creation of a new route or



transportation system and, standing alone, does not impair the area's suitability for Wilderness designation. Appropriate route identification may instead reduce resource impacts by helping users remain on established routes and avoid unauthorized cross-country travel.

The Manual should also eliminate any rule treating modest physical evolution of a primitive route as automatic impairment. A two-track route may lose center vegetation without becoming a fundamentally different transportation feature. A route may widen temporarily around rockfall, erosion, standing water, or another hazard. Increased tire impressions do not necessarily alter whether the surrounding landscape remains suitable for congressional Wilderness consideration. Where physical deterioration creates bypassing, BLM should ordinarily **repair the cause rather than close the route**. Failure to maintain an eroded or damaged route can generate parallel tracks and broader disturbance, defeating the very conservation objective the restriction seeks to advance.

The revised Manual should therefore authorize reasonable maintenance of qualifying primitive routes, including drainage work, erosion repair, obstacle removal, surface stabilization, and minor realignment necessitated by natural processes.

Q. Manual 6330 and Manual 1626 – Transportation Asset Classification

UPLA recommends revising the policy preventing motorized primitive routes in WSAs from being treated as ordinary transportation assets merely because Congress has not yet released the WSA. The current framework can create an administrative fiction in which a route exists, is legally used, serves recreation and management purposes, and requires maintenance, yet is denied normal transportation-system recognition because of an unresolved congressional decision.

Transportation inventory should reflect **what physically exists and what functions are being served**. Classification as an agency asset does not itself determine whether Congress may later designate an area as Wilderness. If eventual Wilderness designation requires closure of a route, Congress retains that authority.

BLM should therefore permit qualifying WSA routes to be inventoried, mapped, numbered where useful for navigation and public safety, maintained, and managed as transportation assets without treating such administrative recognition as wilderness impairment.

The present prohibition against assigning names or numbers where doing so could appear to create a "de facto route system" is particularly counterproductive. Route identification facilitates



law enforcement, visitor navigation, emergency dispatch, maintenance reporting, responsible recreation, and prevention of off-route travel. An unnamed route still exists physically; withholding a route number does not make the landscape more natural.

R. Manual 6330 § 1.6.D – Trails

The Manual should apply comparable sustainability principles to motorized routes and nonmotorized trails. Existing provisions recognize that increasing hiking or horseback use can justify construction, relocation, drainage, or stabilization of a trail where doing so prevents braiding, erosion, cultural-resource impacts, or public-safety problems. That principle is sound.

It should not, however, be restricted according to transportation mode. If relocating a hiking trail around an eroding slope protects resources, relocating a primitive motorized route around the same slope can provide the identical conservation benefit.

UPLA recommends adopting a **mode-neutral sustainability standard**: where maintenance, drainage improvement, or limited relocation of an existing route or trail would reduce total disturbance, protect resources, improve safety, and retain substantially the same transportation function, the Manual should permit the work irrespective of whether users travel by foot, horse, bicycle, motorcycle, or four-wheel-drive vehicle.

S. Manual 6330 § 1.6.D – Special Recreation Permits

Special Recreation Permits should be evaluated according to the physical effects of the proposed activity, not according to generalized assumptions about organized or commercial recreation. Guided trips, outfitting, organized trail rides, competitive or noncompetitive motorized events on established routes, educational outings, hunting and fishing guides, and other permitted activities can provide substantial rural economic benefit while giving BLM greater control over participant conduct than occurs with dispersed individual use.

Permit conditions can establish designated routes, participant limits, seasonal restrictions, sanitation requirements, resource-protection measures, restoration obligations, monitoring, and enforcement mechanisms.

The revised Manual should therefore expressly state that an SRP is not impairing merely because the activity is organized, recurring, commercial, or popular. The relevant inquiry remains whether the authorized use, under appropriate permit conditions, materially impairs wilderness suitability.



T. Manual 6330 § 1.7 – Evaluation of Proposed Actions

UPLA recommends revising the evaluation provisions to require a transparent, evidence-based determination of actual impairment. Every decision restricting or denying a proposed use under Manual 6330 should identify:

1. the specific wilderness characteristic allegedly affected;
2. the condition and importance of that characteristic;
3. the magnitude, geographic extent, and duration of the anticipated impact;
4. the factual basis demonstrating that the impact would materially affect wilderness suitability;
5. reasonable mitigation measures considered;
6. why less restrictive mitigation would be insufficient; and
7. whether the affected WSA is a Section 603, legislative, or administratively reversible Section 202 WSA.

A conclusory statement that an activity "impairs wilderness characteristics" is insufficient. Because WSA restrictions affect public access, private investment, authorized uses, infrastructure, and local economies, the administrative record should demonstrate a rational connection between the evidence and the restriction imposed.

U. Manual 6330 § 1.7 – Projects Adjacent to WSAs

UPLA recommends substantial revision of language concerning actions **outside** WSA boundaries. NEPA appropriately requires consideration of reasonably foreseeable environmental effects where applicable. But WSA designation should not create an informal protective buffer beyond the legal boundary Congress or BLM established.

BLM has historically recognized that management mandates differ between designated Wilderness and WSAs. Manual 6330 should therefore avoid applying WSA non-impairment standards extraterritorially to adjacent multiple-use lands.

Where a project proposed outside a WSA could produce a legally relevant effect within it, BLM may analyze that effect under NEPA and applicable law. Any mitigation imposed, however, should be:

- supported by a demonstrable impact;
- proportionate to that impact;
- authorized by applicable law;



- consistent with the governing land-use plan; and
- limited to what is reasonably necessary to address the effect.

The mere visibility or audibility of lawful activity occurring outside a WSA should not automatically be treated as impairment. Nor should Manual 6330 be used to create de facto setback zones, viewshed buffers, noise buffers, or development exclusions on adjacent lands absent independent legal authority.

This point is especially important for energy, mineral, utility, transportation, grazing, and recreation projects located on public lands that Congress never placed under wilderness review. WSA boundaries must mean something.

V. Manual-Wide Recommendation – Replace "Least Impairing" with a More Balanced Practicability Standard

Throughout Manual 6330, BLM frequently directs managers to choose the "least impairing" activity. UPLA recommends clarifying that this phrase means the **least impairing practicable alternative that effectively accomplishes the authorized purpose**, not simply the option producing the fewest visible effects upon wilderness characteristics.

An alternative that costs several times more, creates greater impacts to another resource, substantially compromises public safety, fails to achieve a project's purpose, or transfers disturbance onto adjacent multiple-use lands should not automatically prevail merely because it marginally reduces wilderness effects.

FLPMA requires integrated management of multiple resource values. The Manual should therefore recognize tradeoffs among soil, water, wildlife, cultural resources, access, safety, infrastructure, economic feasibility, recreation, and wilderness suitability.

W. Manual-Wide Recommendation – Establish Mitigation Before Closure or Denial

A consistent mitigation hierarchy should apply throughout Manual 6330. Before BLM closes a route, terminates a recreation opportunity, denies maintenance, rejects a right-of-way, or prohibits another otherwise lawful use on non-impairment grounds, the agency should determine whether the identified effect can reasonably be resolved through site design, relocation, timing restrictions, route maintenance, capacity limits, seasonal restrictions, restoration, permit conditions, education, enforcement, engineering controls, or another targeted measure.



Closure or denial should be reserved for circumstances in which BLM demonstrates that **reasonable mitigation cannot preserve wilderness suitability.**

This approach does not weaken Section 603(c). It implements it precisely while minimizing unnecessary displacement of the public-land uses FLPMA otherwise requires BLM to consider.

X. Manual-Wide Recommendation – Do Not Administer WSAs as De Facto Wilderness

Finally, UPLA recommends that this principle appear prominently and repeatedly throughout the revised Manual:

A Wilderness Study Area is not congressionally designated Wilderness, and management to preserve wilderness suitability does not authorize BLM to administer the area as though Congress had already designated it Wilderness.

BLM itself has historically recognized this distinction, explaining that the administrative mandate for designated Wilderness is preservation of wilderness character whereas the mandate for WSAs is non-impairment of suitability for possible designation. The Bureau's current public materials likewise explain that WSA management preserves suitability while Congress determines whether to add or end consideration of an area.

That distinction should control every revision to Manual 6330.

Section 603 WSAs should be managed no more restrictively than Congress actually required while BLM affirmatively assists Congress in completing their disposition. Section 202 WSAs should remain subject to genuine reconsideration through the land-use-planning process.

Existing lawful uses should be preserved wherever compatible with wilderness suitability. Active stewardship should be facilitated rather than discouraged. Public safety and valid existing rights should receive practical, not merely nominal, protection. Restrictions should respond to demonstrated impairment rather than hypothetical future conflicts, administrative preference, or a generalized objective of maximizing wilderness character.

UPLA therefore recommends that BLM revise Manual 6330 from a policy centered upon progressively preserving or enhancing wilderness characteristics to one centered upon the precise statutory task before the agency: maintaining the option of congressional Wilderness designation without unnecessarily sacrificing multiple use, public access, active stewardship, infrastructure, private and public rights, rural economic value, or the safe



and effective management of the public lands during what should remain an interim period of review.

ADDITIONAL RECOMMENDED REVISIONS

Beyond the section-specific changes identified above, UPLA recommends several broader revisions to Manual 6330 that would improve legal clarity, administrative consistency, public accountability, and practical implementation. These recommendations are intended to ensure that WSA management remains tethered to the actual statutory purpose of preserving congressional decision-making rather than becoming an indefinite, increasingly restrictive management regime detached from contemporary land conditions and public needs.

A. Establish a Mandatory Periodic Review of All WSAs

Manual 6330 should require BLM to conduct a periodic review of every WSA, organized by its legal origin and current disposition status. For each WSA, the review should identify:

- the statutory or administrative authority under which it was established;
- the date of establishment;
- its current acreage and boundaries;
- the original wilderness inventory findings;
- the BLM suitability or unsuitability recommendation, where one exists;
- whether that recommendation was transmitted to Congress;
- whether Congress has acted;
- the current condition of the landscape;
- major management changes since designation;
- wildfire and restoration history;
- existing transportation routes and valid existing rights;
- current recreation and economic uses; and
- whether continued WSA status remains legally necessary or administratively justified.

For Section 603 and legislative WSAs, such review should culminate in an updated recommendation to Congress where disposition remains unresolved. For administratively reversible Section 202 WSAs, the review should determine whether BLM should initiate a land-use-plan amendment to remove or modify WSA status.

This recommendation is particularly important because the remaining WSA estate is not a recently created inventory. Many of these lands have remained under interim restrictions for



decades. Periodic review would prevent institutional inertia from becoming the functional equivalent of permanent designation.

B. Require Clear Identification of the Legal Authority Governing Each WSA

Manual 6330 presently discusses multiple categories of WSAs whose legal origins differ substantially. This can produce confusion for managers and the public regarding which restrictions arise directly from statute, which arise from congressional direction, and which arise from BLM planning discretion.

The revised Manual should require every administrative record, map, planning document, travel-management decision, permit evaluation, and project analysis involving a WSA to identify expressly whether the area is:

- a Section 603 WSA;
- a congressionally created or legislatively directed WSA;
- a pre-1993 Section 202 WSA whose disposition implicates congressional review; or
- a post-review Section 202 WSA created through BLM land-use planning.

That distinction should appear at the outset of every WSA-specific decision because it determines the source and scope of BLM's authority.

C. Create a Formal WSA Release and Disposition Program

BLM should not treat unresolved WSA status as a static condition. The revised Manual should establish an affirmative **WSA disposition program** whose objective is to reduce the backlog of lands remaining indefinitely under study status.

For Section 603 WSAs, the program should compile existing agency recommendations, identify areas already recommended unsuitable for Wilderness, update outdated records where necessary, and transmit consolidated disposition recommendations through the Secretary to Congress. For Section 202 WSAs, the program should identify areas in which current land-use needs, resource conditions, existing routes, infrastructure conflicts, restoration priorities, or other factors indicate that continued WSA designation is no longer the most appropriate management mechanism.

BLM cannot itself release every Section 603 WSA, but it can ensure that congressional inaction is not compounded by administrative silence.



D. Create a Presumption Against New Section 202 WSA Designations

Because BLM possesses numerous other planning tools capable of protecting wilderness characteristics, Manual 6330 should establish a strong presumption against creating additional Section 202 WSAs unless BLM demonstrates that less restrictive management alternatives are inadequate.

Before designating a new Section 202 WSA, BLM should be required to demonstrate that:

1. the area possesses qualifying wilderness characteristics supported by current inventory data;
2. those characteristics require protection beyond that available through ordinary RMP prescriptions;
3. alternative management tools have been considered;
4. the social, economic, recreation, infrastructure, grazing, mineral, transportation, and restoration consequences have been analyzed;
5. state and local governments and affected stakeholders have been consulted; and
6. WSA designation is the least restrictive practicable management mechanism capable of accomplishing the identified conservation objective.

An administratively created designation carrying restrictions similar to those imposed upon Section 603 WSAs should be exceptional, not routine.

E. Prohibit Administrative Expansion of WSA Boundaries

The revised Manual should state clearly that WSA boundaries cannot be enlarged through interpretation, mapping error, changing route conditions, administrative restoration, or management of adjacent lands.

Where original boundary documentation is ambiguous, BLM should resolve uncertainty through the best available historical records, cadastral information, inventory documentation, aerial imagery, and route evidence. The agency should not default to the interpretation that captures the greatest acreage within the WSA.

Likewise, closure and reclamation of a boundary road or cherry-stemmed route should not automatically cause that corridor to become part of the WSA. The legal status of the boundary should remain distinct from subsequent management of the route unless formally changed through lawful authority.



F. Require a Demonstrated Material-Impairment Finding Before Restriction

Manual 6330 should adopt a consistent evidentiary threshold for restrictions imposed under the non-impairment standard. Before denying a use, closing a route, prohibiting maintenance, rejecting a right-of-way, restricting recreation, or requiring restoration, BLM should make a written finding that identifies:

- the specific wilderness characteristic affected;
- the existing condition of that characteristic;
- the anticipated magnitude and duration of the impact;
- why that effect would materially impair wilderness suitability;
- mitigation alternatives evaluated; and
- why lesser restrictions would not adequately prevent impairment.

This would prevent the terms "impairment" and "wilderness character" from becoming conclusory substitutes for analysis.

G. Require Use of Current, Site-Specific Data

Decisions should not rely exclusively upon inventory photographs, route descriptions, or landscape conditions recorded four or five decades ago. Historical information is relevant to understanding WSA status, but contemporary management requires contemporary evidence. Manual 6330 should require use of current field inventories, geospatial data, hydrology, vegetation condition, wildfire history, invasive-species information, recreation patterns, transportation data, wildlife information, cultural-resource inventories, and infrastructure conditions whenever a management decision materially affects public use or resource stewardship.

This is particularly important where historical records are incomplete or where landscapes have changed substantially because of wildfire, flooding, invasive species, drought, erosion, vegetation succession, or other natural processes.

H. Establish a Mitigation-First Decision Framework

The revised Manual should establish a uniform sequence for discretionary management: **avoid unnecessary impact, minimize unavoidable impact, mitigate remaining impact, and restrict or prohibit use only where those measures cannot preserve wilderness suitability.**



This principle should govern recreation, rights-of-way, route management, infrastructure, grazing improvements, fuels treatment, restoration, special recreation permits, wildlife actions, and other discretionary decisions.

The purpose of the non-impairment standard is to preserve Congress's option, not to maximize restrictions. Where mitigation allows both objectives to coexist, prohibition is unnecessary.

I. Require Consideration of Effects on Other Resources

Manual 6330 should prohibit decision-making that considers effects upon wilderness characteristics in isolation. An action selected because it produces the least visible impact to a WSA may cause greater impacts to wildlife habitat, cultural resources, soils, watersheds, public safety, private property, recreation, or adjacent multiple-use lands.

The revised Manual should therefore require managers to consider the **net resource consequences** of alternatives. Protecting one wilderness characteristic should not automatically justify transferring greater impacts onto another resource merely because the latter falls outside the narrow definition of wilderness character.

J. Improve Coordination with State and Local Governments

States and counties often manage roads, wildlife, emergency response, search and rescue, water resources, adjacent lands, and other interests directly affected by WSA policy. Manual 6330 should require early consultation with relevant state and local governments, and NGOs that have expressed interest to the coordination, when BLM considers:

- route closure;
- road abandonment;
- boundary interpretation;
- fuels treatment;
- major recreation restrictions;
- access changes;
- wildfire-management decisions;
- rights-of-way affecting community infrastructure;
- changes affecting state trust lands or county roads; and
- creation or removal of a Section 202 WSA.

Coordination should occur before a decision has effectively been made, not solely after an agency proposal is substantially complete.



K. Establish WSA-Specific Recreation and Transportation Inventories

BLM should maintain an accurate geospatial inventory of roads, primitive routes, trails, airstrips, access corridors, historic transportation features, recreation destinations, administrative access, and county or R.S. 2477 claims intersecting WSAs. Routes should be identified by number or name where necessary for navigation, law enforcement, management, emergency response, maintenance, or public communication.

The current practice of avoiding route identification because naming or numbering may appear to create a "de facto route system" elevates appearance over management functionality. Accurate route inventories reduce off-route travel, assist emergency response, improve public compliance, and provide the factual foundation needed for defensible travel-management decisions.

L. Require Network-Level Analysis Before Route Closure

Any proposal to close or restrict a route within a WSA should evaluate more than the physical footprint of that individual route. BLM should analyze:

- whether the route is a connector;
- whether closure eliminates a loop;
- whether other legal routes become isolated;
- whether access to recreation destinations is lost;
- whether closure shifts use onto more sensitive routes;
- whether emergency or administrative access is affected;
- whether neighboring communities lose recreational connectivity; and
- the total acreage rendered functionally inaccessible.

This requirement would prevent piecemeal decisions from producing substantial cumulative access loss without disclosure.

M. Preserve Reasonable Maintenance as a Preferred Management Tool

Manual 6330 should affirmatively recognize maintenance as a conservation measure. A maintained road, trail, culvert, drainage structure, fence, water facility, or other improvement often produces fewer long-term impacts than abandonment followed by erosion, route proliferation, infrastructure failure, or emergency reconstruction.



The Manual should therefore create a presumption that routine maintenance within an existing disturbance footprint is permissible unless BLM demonstrates that the specific maintenance activity would materially impair wilderness suitability.

N. Strengthen Provisions for Natural Hazard Adaptation

BLM should expressly authorize reasonable adaptation where floods, landslides, erosion, rockfall, wildfire, channel migration, vegetation mortality, or other natural events alter existing infrastructure or routes.

A legal route should not lose its functional status simply because a flood moved a stream channel or a landslide displaced the tread. Minor relocation necessary to maintain substantially the same use should be evaluated as maintenance and adaptation, not automatically as creation of a new facility.

O. Expand Preventive Public-Safety Authority

Manual 6330 should permit preventive action before a condition becomes an emergency. BLM should be able to stabilize dangerous slopes, clear hazardous trees, repair dangerous crossings, maintain emergency access, secure abandoned mines, treat wildfire fuels, protect communications infrastructure, and address other reasonably foreseeable hazards.

Waiting until loss of life or property is imminent frequently produces greater disturbance and greater cost than timely preventive action.

P. Establish a National WSA Wildfire and Restoration Database

BLM should compile and publish WSA-specific data regarding:

- acres burned since 2000;
- repeat-burn acreage;
- burn severity where available;
- vegetation conversion;
- invasive-species expansion;
- pre-fire fuels treatments;
- suppression constraints;
- post-fire rehabilitation;
- treatment effectiveness; and
- restoration expenditures.



The absence of a readily accessible national accounting makes it difficult for BLM, Congress, or the public to evaluate whether current WSA policy is producing resilient landscapes.

Q. Require Periodic Reporting to Congress

For unresolved Section 603 and legislative WSAs, BLM should provide periodic reports to Congress identifying:

- the acreage remaining under WSA status;
- original suitability recommendations;
- changes in resource condition;
- major wildfires;
- infrastructure conflicts;
- recreation and access issues;
- economic consequences;
- management expenditures; and
- BLM's current disposition recommendation.

If Congress is the only entity capable of resolving the designation, BLM should ensure that Congress possesses current information necessary to exercise that authority.

R. Establish a Clear Policy Against Buffer-Zone Management

Manual 6330 should state expressly that WSA designation does not create a regulatory buffer outside WSA boundaries. Actions on adjacent multiple-use lands may be analyzed for actual effects where required by NEPA or other applicable law, but the WSA non-impairment standard should not be administratively extended outward through informal viewshed, soundscape, solitude, or development buffers.

Mitigation for an adjacent project should be supported by a demonstrable effect occurring within the WSA and should remain proportionate to that effect.

S. Clarify That Release Restores Management Flexibility, Not Mandatory Development

The revised Manual should explain what WSA release means. Release does not require roads, mining, energy development, grazing expansion, recreation development, or any other particular



use. It returns the land to ordinary BLM planning and allows those uses to be considered alongside conservation, wildlife, watershed, cultural, scenic, and recreation values.

This clarification is important because debate surrounding WSA release is frequently framed as though release means disposal or immediate development. It means neither. It means that future management decisions once again occur through FLPMA's ordinary multiple-use planning framework.

T. Make Final Disposition an Explicit Agency Objective

Most importantly, Manual 6330 should no longer treat indefinite WSA administration as a satisfactory end state. The Manual should state expressly that **final disposition is the objective of the WSA process**. BLM should facilitate congressional action where congressional action is necessary and should exercise its own planning authority where administrative disposition is available.

The success of Manual 6330 should not be measured by how effectively BLM can maintain millions of acres indefinitely in study status. It should be measured in part by whether the agency faithfully preserves congressional options while actively advancing the unresolved lands toward lawful final disposition.

SUMMARY OF RECOMMENDATIONS

UPLA recommends that BLM:

1. **Release the remaining WSA estate to multiple-use management.** Recommend congressional release of unresolved Section 603 and legislative WSAs and initiate planning to remove eligible Section 202 WSA designations.
2. **Recognize WSA status as interim rather than de facto Wilderness.** Non-impairment should preserve congressional options without maximizing or progressively manufacturing wilderness character.
3. **Differentiate WSA categories by legal authority.** Section 603, legislative, and administratively created Section 202 WSAs should not be managed as legally interchangeable designations.
4. **Eliminate the "improved current condition" ratchet.** Wilderness characteristics created by closures or administrative restoration should not automatically become a permanently more restrictive management baseline.



5. **Require material impairment before restricting lawful use.** Restrictions should be supported by specific evidence demonstrating meaningful impairment of wilderness suitability.
6. **Adopt mitigation before prohibition.** Maintenance, rerouting, timing restrictions, engineering controls, permit conditions, restoration, and other targeted measures should precede closure or denial.
7. **Preserve and maintain existing access.** Existing roads, primitive routes, trails, rights-of-way, and access corridors should remain functional where compatible with wilderness suitability.
8. **Protect valid existing rights and inholding access.** Rights must remain practically exercisable, including reasonable maintenance, repair, access, and modernization.
9. **Allow reasonable adaptation to natural landscape change.** Floods, landslides, erosion, rockfall, and channel migration should not automatically extinguish existing route or infrastructure functions.
10. **Prioritize public safety and emergency response.** Preventive and emergency actions should address both human-caused and natural hazards, with protection of life taking precedence.
11. **Facilitate active stewardship.** Fuels treatment, invasive-species control, watershed restoration, wildlife management, vegetation treatment, and other science-based actions should not be unnecessarily constrained.
12. **Expand wildfire resilience authority.** Permit preventive and recurring fuels treatments, preserve fire-management access, and expedite post-fire restoration.
13. **Protect cultural and historic resources.** Existing structures and facilities should not be removed solely to increase apparent naturalness without cultural-resource and functional review.
14. **Apply a mode-neutral sustainability standard to routes and trails.** Maintenance or relocation that reduces total resource damage should be available regardless of whether travel occurs by foot, horse, bicycle, motorcycle, or motor vehicle.
15. **Protect recreation access and rural economies.** Recreation restrictions should address measurable impacts, not popularity or public expectations of continued use.
16. **Evaluate network-level effects of route closures.** BLM should disclose lost connectivity, functional acreage impacts, displacement, and socioeconomic consequences before closure.
17. **Do not create informal WSA buffer zones.** Restrictions on adjacent multiple-use lands should require demonstrable, legally relevant effects within the WSA.
18. **Require contemporary data and accurate mapping.** WSA decisions should use current ecological, transportation, wildfire, recreation, cadastral, and geospatial information rather than rely solely upon decades-old inventories.



19. **Increase state, county, and stakeholder coordination.** Affected governments, right holders, recreation organizations, permittees, adjacent landowners, and other interests should receive meaningful early participation.
20. **Create a national WSA disposition, wildfire, and reporting program.** BLM should periodically report WSA condition, acreage, wildfire history, conflicts, costs, and disposition recommendations to Congress and the public.
21. **Establish a presumption against additional Section 202 WSAs.** New administrative WSAs should be designated only where less restrictive planning tools cannot reasonably protect identified resources.
22. **Clarify that WSA release is not disposal or mandatory development.** Released lands remain federally owned and subject to FLPMA, NEPA, resource management plans, and all other applicable environmental and public-land protections.
23. **Make final disposition an explicit policy objective.** Manual 6330 should facilitate resolution of the remaining WSA inventory rather than normalize perpetual study status.

Collectively, these revisions would restore Manual 6330 to its proper function: preserving the limited wilderness option Congress established while preventing an interim designation from unnecessarily overriding multiple use, active stewardship, public access, resource productivity, infrastructure, rural community interests, and effective administration of public lands.

CLOSING

UPLA appreciates BLM's decision to reopen Manual 6330 for public review. The present policy review provides a long-overdue opportunity to realign Wilderness Study Area management with the text, structure, and original purpose of FLPMA.

The central problem is no longer difficult to identify. WSAs were created to preserve Congress's ability to decide whether particular lands should ultimately be designated as Wilderness. They were not intended to become permanent administrative substitutes for Wilderness. Yet millions of acres have remained under WSA restrictions for decades, including nearly 2.8 million acres in Utah. The temporary has become effectively permanent, while the costs of that unresolved status continue to fall upon public access, rural communities, recreation, infrastructure, active stewardship, wildfire resilience, and the broader multiple-use purposes for which BLM lands are managed.

UPLA therefore urges BLM to make **final disposition of the remaining WSA estate an explicit policy objective**. Where congressional action is required, BLM and the Department of the



Interior should provide Congress with updated inventories, current resource information, and affirmative recommendations for release. Where BLM possesses authority to reconsider administratively created Section 202 WSAs through land-use planning, that authority should be exercised rather than allowing temporary designations to persist through institutional inertia.

Until final disposition occurs, Manual 6330 should implement the non-impairment standard narrowly and faithfully. It should not create de facto Wilderness, progressively ratchet management toward greater restriction, suppress lawful use merely because it becomes popular, prevent reasonable maintenance, impede valid existing rights, or force managers to choose passive preservation where active stewardship would better protect ecological function, public safety, and landscape resilience.

Release from WSA status does not mean disposal, environmental abandonment, or mandatory development. Released lands remain public lands governed by FLPMA, resource management plans, NEPA, the Endangered Species Act, the National Historic Preservation Act, and other applicable law. Release simply restores the management framework Congress established for most BLM lands: **multiple use and sustained yield, informed by science, balanced stewardship, and the present and future needs of the American people.**

For these reasons, UPLA urges the BLM to revise Manual 6330 to facilitate the release of all remaining WSAs to appropriate multiple-use management, preserve lawful access and existing rights, prioritize mitigation before closure, expand active stewardship and wildfire-management flexibility, improve public-safety authority, and prevent temporary wilderness-review status from functioning indefinitely as permanent administrative Wilderness.

After thirty to fifty years of unresolved study status, the clock has run far overtime. It is time to complete the process Congress began, make final land-management decisions, and return lands not designated as Wilderness to the full, balanced, and productive multiple-use framework mandated by FLPMA.

Utah Public Lands Alliance would like to be considered an interested public for the Policy Review: BLM Manual 6330, Management of BLM Wilderness Study. Information can be sent to the following address and email address:

Rose Winn
Utah Public Lands Alliance
PO Box 833, St. George, UT 84771
rose@utahpla.com



Sincerely,

Rose Winn
Natural Resources Consultant
Utah Public Lands Alliance
559.862.6382

Loren Campbell
President
Utah Public Lands Association
909.499.3295

cc: Senator Mike Lee, Senator John Curtis, Congresswoman Celeste Malloy, Congressman Mike Lee, Congressman Blake Moore, Congressman Burgess Owens, Governor Spencer Cox, Redge Johnson, Laura Ault, UPLA Trustees and Members

References

Bureau of Land Management. (2025). *BLM Fire and National Conservation Lands managers collaborate to meet shared goals*. U.S. Department of the Interior.

Bureau of Land Management. (2012). *BLM Manual 6330: Management of BLM Wilderness Study Areas* (Release 6-134). U.S. Department of the Interior.

Bureau of Land Management. (2024). *A critical call to restore our public lands: BLM restoration blueprint*. U.S. Department of the Interior.

Bureau of Land Management. (2025). *A sound investment for America: Economic contributions from BLM-managed lands*. U.S. Department of the Interior.

Bureau of Land Management. (2025). *Celebrating the power of public lands through tourism and community impact*. U.S. Department of the Interior.

Bureau of Land Management. (2024). *Designation of lands inventoried as having wilderness characteristics as Wilderness Study Areas* (Information Bulletin No. 2025-008). U.S. Department of the Interior.

Bureau of Land Management. (2026). *Infrastructure*. U.S. Department of the Interior.

Bureau of Land Management. (2024). *Invasive species and BLM fire*. U.S. Department of the Interior.

Bureau of Land Management. (2024). *Manual 6330: Management of Wilderness Study Areas* (Release 6-144). U.S. Department of the Interior.



Bureau of Land Management. (2026). *Policy review: BLM Manual 6330, Management of BLM Wilderness Study Areas*. 91 Fed. Reg. 35,997.

Bureau of Land Management. (2025). *Public land statistics 2024*. U.S. Department of the Interior.

Bureau of Land Management. (2012). *Travel and transportation management handbook H-8342-1*. U.S. Department of the Interior.

Bureau of Land Management. (2026). *What we manage: Utah*. U.S. Department of the Interior.

Bureau of Land Management. (2026). *Wilderness areas and Wilderness Study Areas summary table*. U.S. Department of the Interior.

Chambers, J. C., et al. (2024). Fuel treatment response groups for fire-prone sagebrush ecosystems. *Fire Ecology*, 20.

Davis, K. T., et al. (2024). A meta-analysis of thinning, prescribed fire, and wildfire effects on subsequent wildfire severity in conifer-dominated forests of the western United States. *Forest Ecology and Management*.

Federal Land Policy and Management Act of 1976, Pub. L. No. 94-579, 90 Stat. 2743 (codified as amended at 43 U.S.C. §§ 1701–1787).

Graham, R. T., McCaffrey, S., & Jain, T. B. (2004). *Science basis for changing forest structure to modify wildfire behavior and severity*. General Technical Report RMRS-GTR-120. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station.

Kreider, M. R., et al. (2024). Fire suppression makes wildfires more severe and accentuates impacts of climate change and fuel accumulation. *Nature Communications*.

National Historic Preservation Act of 1966, Pub. L. No. 89-665, 80 Stat. 915 (codified as amended at 54 U.S.C. §§ 300101 et seq.).

Prichard, S. J., Peterson, D. L., & Jacobson, K. (2010). Fuel treatments reduce the severity of wildfire effects in dry mixed conifer forest, Washington, USA. *Canadian Journal of Forest Research*, 40, 1615–1626.

Reeder, R. J., & Brown, D. M. (2005). *Recreation, tourism, and rural well-being*. Economic Research Report No. 7. U.S. Department of Agriculture, Economic Research Service.

Steed, B. C., Yonk, R. M., & Simmons, R. T. (2011). *The economic costs of wilderness*. Environmental Trends, Jon M. Huntsman School of Business, Utah State University.



U.S. Department of Agriculture, Rural Development. (2020). *Recreation economy at USDA Economic Development Resources*.

U.S. Geological Survey. (2024). *The good, the bad, the ugly: How wildfires reshape landscapes*. U.S. Department of the Interior.

U.S. Geological Survey. (2025). *Wildfire and climate change*. U.S. Department of the Interior.

White, E. M., Bowker, J. M., Askew, A. E., Langner, L. L., Arnold, J. R., & English, D. B. K. (2016). *Federal outdoor recreation trends: Effects on economic opportunities*. General Technical Report PNW-GTR-945. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.

Wilderness Act of 1964, Pub. L. No. 88-577, 78 Stat. 890 (codified as amended at 16 U.S.C. §§ 1131–1136).

Wilderness Connect. (2026). *National Wilderness Preservation System*. Arthur Carhart National Wilderness Training Center, Aldo Leopold Wilderness Research Institute, and Wilderness Institute, University of Montana.