

August 14, 2026

Secretary Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Director Stevan Pearce
Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Jessica Bowron
Comptroller, Exercising the Delegated Authority of the Director
National Park Service
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Director Brian Nesvik
U.S. Fish and Wildlife Service
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Review of Federal Wilderness Policies and Guidance

Dear Secretary Burgum, Director Pearce, Ms. Bowron, and Director Nesvik:

Thank you for the opportunity to provide comments regarding the review of agency policies and guidance related to designated wilderness, wilderness study areas (WSAs), lands with wilderness characteristics (LWCs), proposed wilderness, and recommended wilderness. We, the undersigned organizations representing conservation groups, wildlife advocates, and public lands stewards, write to express our strong support for the Department of the Interior's existing wilderness stewardship policies. These comments pertain to the Management of Wilderness Study Areas (BLM-2026-0069), Considering Lands with Wilderness Characteristics (BLM-2026-0068), Management of Designated Wilderness Areas (BLM-2026-0067), Wilderness Stewardship (NPS-2026-0100), and Wilderness Administration and Resource Stewardship (FWS-HQ-NWRS-2026-2575).

These policies provide critical protections for millions of acres of public lands managed across three federal agencies: the Bureau of Land Management (BLM), the U.S. Fish and Wildlife Service (USFWS), and the National Park Service (NPS). We urge the Department to uphold existing, proven wilderness management standards consistent with existing federal law and maintain the integrity of BLM Manuals 6320, 6330, and 6340; USFWS Manual 610; and NPS Director's Order 41.

Existing agency policies and guidance provide an effective, balanced framework for managing wilderness and wilderness-quality lands and complying with relevant laws such as the Wilderness Act and Federal Land Policy and Management Act. These directives have been refined over decades under both Republican and Democratic administrations to help agencies fulfill their statutory responsibilities, provide consistency for management of lands across geographies, and support informed

decision-making. Maintaining this framework promotes continuity and certainty for agency staff, local communities, and stakeholders. No compelling justification has been provided for substantially revising or weakening these durable standards.

Current policies ensure that wilderness characteristics and values are appropriately identified and managed alongside other public land uses, as federal laws require. Clear guidance promotes transparency and predictability, ensuring that management approaches do not vary dramatically between individual field offices or landscapes. Reopening these foundational policies risks creating severe management uncertainty and confusion across jurisdictions.

Wilderness and recognized wilderness-quality lands across the Bureau of Land Management, the National Park Service, and the Fish and Wildlife Service conserve some of the nation's most critical ecological, cultural, scenic, and recreational resources. These undeveloped landscapes protect critical watersheds, preserve biodiversity, and secure intact wildlife corridors. Furthermore, they serve as vital economic engines for gateway communities. Intact public lands drive a sustainable outdoor recreation economy that contributes \$1.2 trillion to the American economy and supports over 5 million jobs. Opening these vulnerable landscapes to industrial exploitation—such as data center development, extractive mining, oil and gas leasing, or unregulated motorized vehicle use—would violate the intent of Congress and threaten the very assets that drive local business growth. Additionally, these lands hold deep cultural, historical, and spiritual significance for many Tribal Nations and Indigenous communities. Retaining the current policy framework is necessary to respect Tribal rights, protect cultural resources, and support long-term landscape stewardship.

We urge the Department of the Interior to maintain and continue implementing the existing framework. The current manuals have successfully guided wilderness stewardship for generations, balancing conservation, Tribal interests, and public access. Rather than weakening these essential protections for short-term extractive interests, the agency should rely on the proven policies that keep America's public lands wild for future generations.

Sincerely,

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