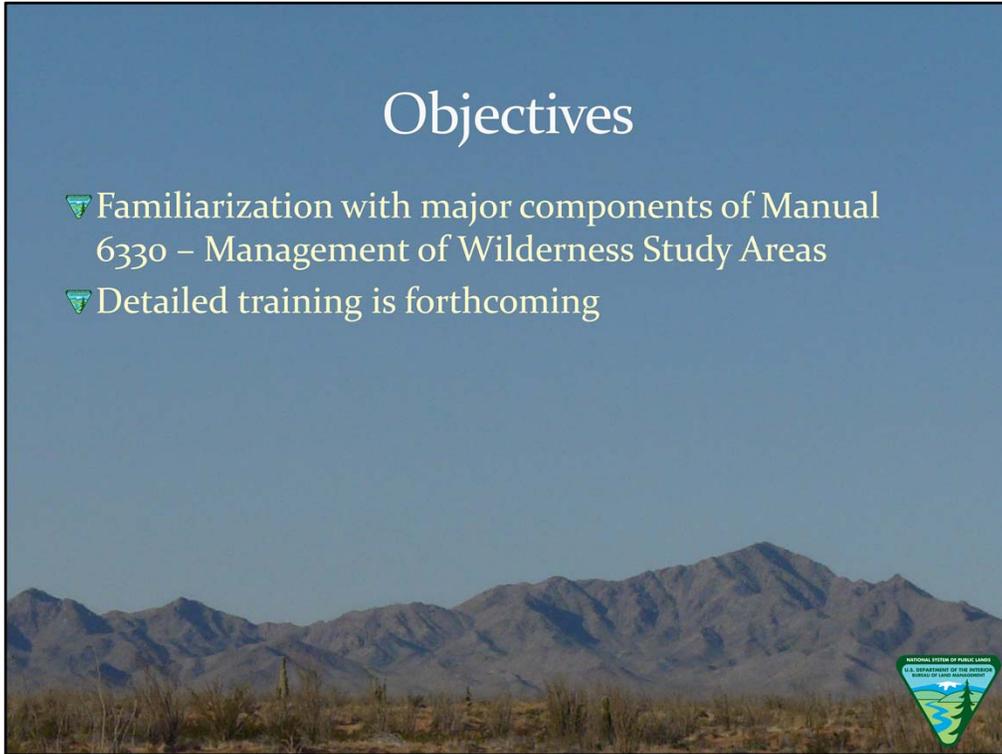


This 20-minute program will take you through a brief overview of BLM Manual 6330, the Management of Wilderness Study Areas.  
ADVANCE SLIDE

# Objectives

- ▼ Familiarization with major components of Manual 6330 – Management of Wilderness Study Areas
- ▼ Detailed training is forthcoming



In this program, we will familiarize you with the major changes in Manual 6330 from our old IMP Handbook 8550, last revised in 1995.

ADVANCE

All these changes, plus other aspects of WSA management, will be covered in forthcoming detailed training.

ADVANCE SLIDE

# Manual 6330 - Overview

▼ Revision of guidance that was prepared in 1995

▼ Based on...

Guidance in Handbook 8550-1 (IMP)

Various IMs that have been issued to clarify guidance in the IMP

Lessons learned from managing WSAs since the early 1980s

Realization that designation or release will take longer than originally envisioned



As just mentioned, this Manual 6330 is a revision of the guidance that was last overhauled in 1995.

ADVANCE

The revision was based on...

ADVANCE

...that old "IMP" Handbook. Plus,

ADVANCE

...various Instruction Memoranda that have been issued over the years, and,

ADVANCE

...lessons we've learned over the past 30 years of managing WSAs about what works and what doesn't.

ADVANCE

In addition, we realized that it will take Congress longer than originally planned to decide whether any given WSA should be designated as wilderness or released to other multiple uses.

ADVANCE SLIDE

# Manual 6330 - Overview

Manual 6330 differs in ten key areas:

- Management of wilderness vs. WSAs
- Non-impairment standard
- Boundaries
- Fire
- Grazing
- Lands actions
- Recreation
- Forestry
- Wildlife
- Name change



Manual 6330 mainly differs from its predecessors in ten key areas:

ADVANCE

There is a section on the differences in the management of wilderness vs. the management of WSAs.

ADVANCE

The non-impairment standard and its exceptions are clarified

ADVANCE

We've had problems with WSA boundaries, so there's a section that addresses those. And we've made substantial changes to the Specific Activity sections of:

ADVANCE

Fire

ADVANCE

Grazing management

ADVANCE

Lands actions

ADVANCE

Recreation

ADVANCE

Forestry

ADVANCE

Wildlife

ADVANCE

And lastly, note the name change!

ADVANCE SLIDE

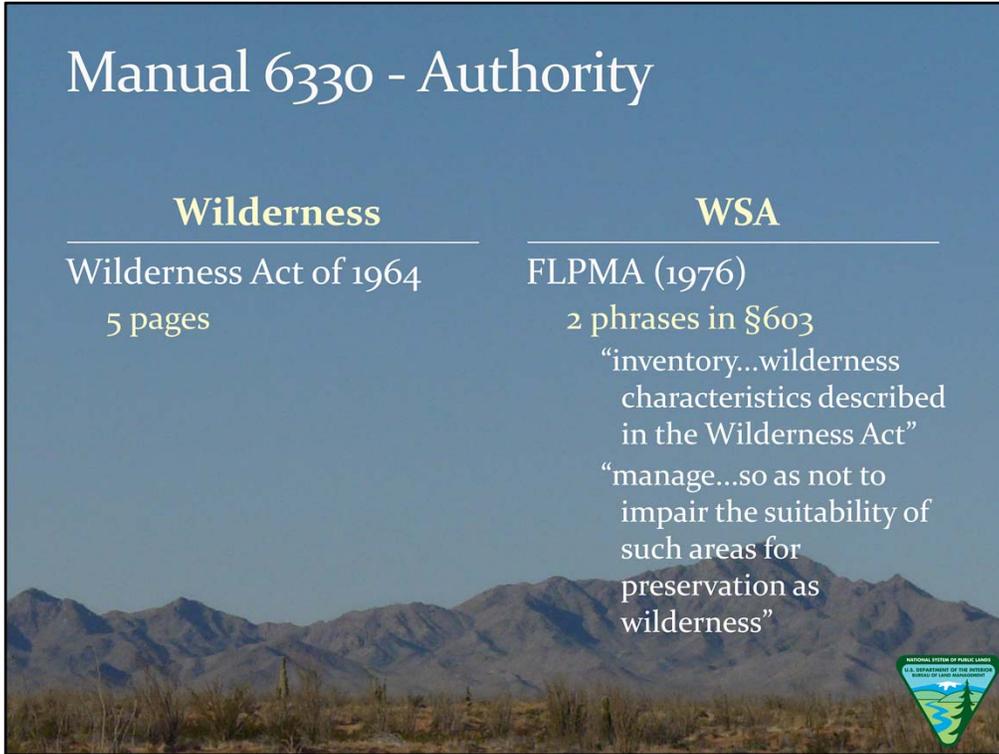
# Manual 6330 - Authority

## Wilderness

Wilderness Act of 1964  
5 pages

## WSA

FLPMA (1976)  
2 phrases in §603  
“inventory...wilderness characteristics described in the Wilderness Act”  
“manage...so as not to impair the suitability of such areas for preservation as wilderness”



The differences in how we manage Wilderness areas and WSAs stems primarily from the different authorities under which we operate.

ADVANCE

Wilderness areas are managed under the Wilderness Act of 1964...

ADVANCE

...whereas WSA are managed under FLPMA.

ADVANCE

There are five pages of legislation in the Wilderness Act directing us how to manage those areas...

ADVANCE

...whereas Congress’s direction in FLPMA is relegated to two phrases in

Section 603:

ADVANCE

603(a) directs us to “inventory [as] required by Section 201(a), [the] wilderness characteristics described in the Wilderness Act.”

ADVANCE

And 603(c) directs us to “manage such lands...so as

not to impair the suitability of such areas for preservation as wilderness”

ADVANCE SLIDE

# Manual 6330 - Authority

## Wilderness

Wilderness Act of 1964

5 pages

“preserve its wilderness character”

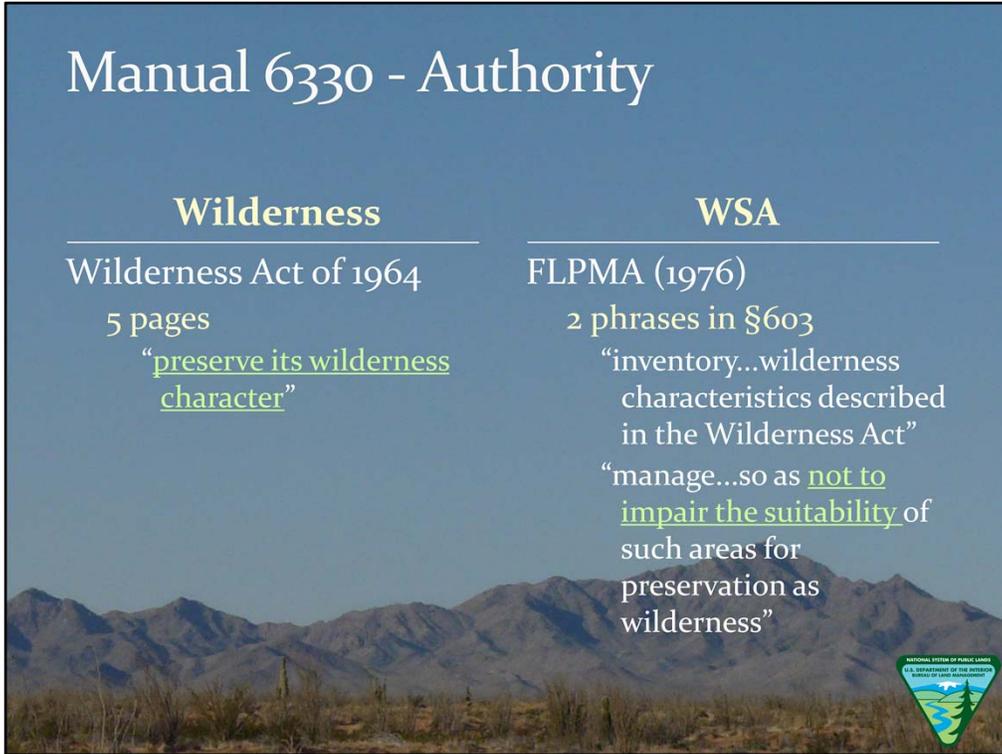
## WSA

FLPMA (1976)

2 phrases in §603

“inventory...wilderness characteristics described in the Wilderness Act”

“manage...so as not to impair the suitability of such areas for preservation as wilderness”



So in WSAs we don't impair the suitability...

ADVANCE

While in wilderness areas our mandate is to “preserve wilderness character.”

ADVANCE SLIDE

# Manual 6330 - Authority

## Wilderness

Wilderness Act of 1964

5 pages

“preserve its wilderness character”

## WSA

FLPMA (1976)

2 phrases in §603

“inventory...wilderness characteristics described in the Wilderness Act”

“manage...so as not to impair the suitability of such areas for preservation as wilderness”



So in wilderness we're preserving the area's character, while in WSA's we're not impairing the area's characteristics.

ADVANCE SLIDE

# Manual 6330 - Authority

## Wilderness Character

“...preserve...”

Untrammeled

Natural

Undeveloped

Outstanding Opportunities

Other Features of Value

## WSA

## Characteristics

<http://www.wilderness.net/NWPS/training>



The detailed WSA training will develop more the subtle differences between these two sets of qualities. But for now, know that the Wilderness Act requires that we preserve these qualities of wilderness character:

ADVANCE

That it be untrammeled, Natural, Undeveloped, has Outstanding opportunities for solitude or primitive and unconfined recreation, and that it may have Other Features of Value which must be preserved.

ADVANCE

For more on these qualities of wilderness character, see the wilderness training developed by the Arthur Carhart National Wilderness Training Center.

ADVANCE SLIDE

# Manual 6330 - Authority

## Wilderness Character

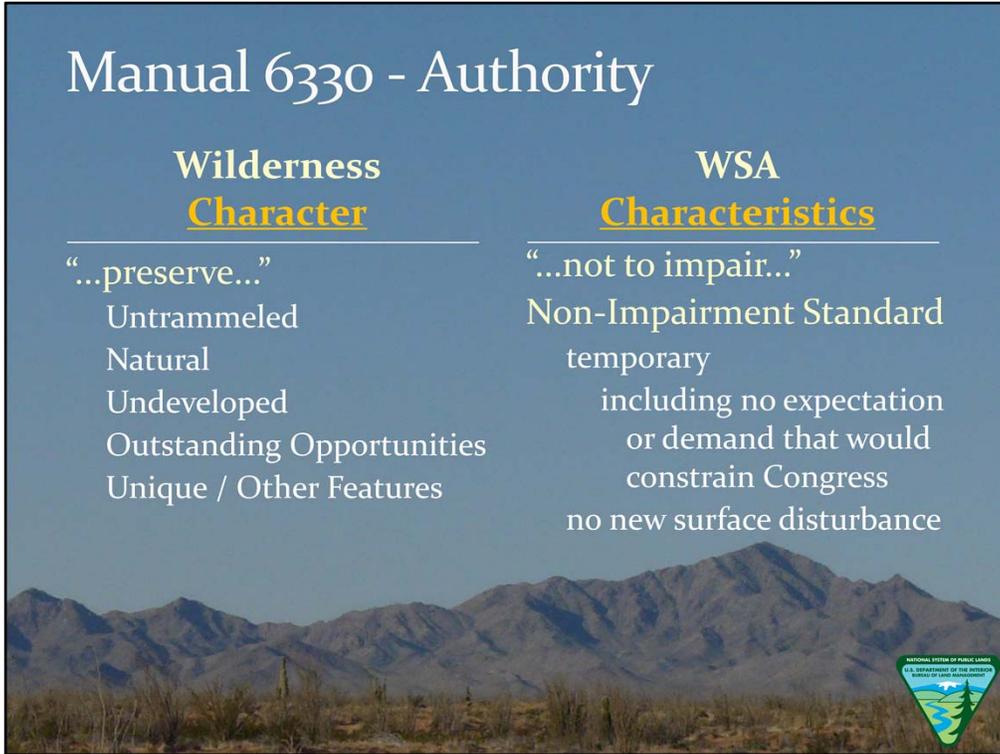
“...preserve...”

Untrammeled  
Natural  
Undeveloped  
Outstanding Opportunities  
Unique / Other Features

## WSA Characteristics

“...not to impair...”

Non-Impairment Standard  
temporary  
including no expectation  
or demand that would  
constrain Congress  
no new surface disturbance



IN WSAs, remember, we manage “not to impair” the area’s wilderness characteristics.

ADVANCE

And we do that by applying what we have defined as the Non-Impairment Standard. There are two parts to this Standard:

ADVANCE

First, the use or activity must be TEMPORARY. Manual 6330 clarifies what we mean by temporary: the use or facility is needed for a **defined time period** to respond to a **temporary need** and would be terminated and removed prior to or upon designation as wilderness.

ADVANCE

A temporary use or activity creates no expectation or demand that would constrain Congress’s ability to designate the area under the management prescribed in the Wilderness Act.

ADVANCE

Second, the use or activity must create no new surface disturbance.

The detailed training will give example of how the appropriateness of any given activity would be analyzed differently if it were in a Wilderness or in a WSA.

ADVANCE SLIDE

# Manual 6330 – Non-Impairment

- ▼ Maintain Improved Conditions
- ▼ Exceptions to monthly monitoring
- ▼ Restore as possible
  - unauthorized impacts
  - pre-existing structures or installations
- ▼ New Discretionary Uses not allowed if would not be allowed in wilderness



So what are the conditions we are keeping from being impaired?

ADVANCE

In Manual 6330, the benchmark for the non-impairment standard is the condition of the WSA in 1976 **or current conditions**, whichever is the better of the two with regard to wilderness characteristics. For example, if a primitive route has been closed and rehabilitated, do not permit it to be re-established.

ADVANCE

We'll know about those conditions through our regular monthly monitoring – and Manual 6330 explains the process for getting an exception to that frequency from the State Director. Alternate surveillance schedules can be tailored for the special needs of a WSA based on relative inaccessibility, its history of unauthorized uses and violations, and weather and seasons of use.

ADVANCE

And we want to restore conditions as soon as possible.

ADVANCE

This could be from Unauthorized Impacts. We want to immediately restore the impacts to at least the condition that existed prior to the impact or that which existed in October 1976 -- **whichever is better**.

ADVANCE

Or, we may remove structures or installations which pre-date the establishment of the WSA if they do not meet any of the exceptions to non-impairment.

ADVANCE

In addition, as before, new discretionary uses will not be allowed if the use or activity would not be allowed in a designated wilderness.

ADVANCE SLIDE

# Manual 6330 – Non-Impairment

## ▼ Exceptions:

- Emergencies
- Reclamation
- Grandfathered uses
- Valid existing rights
- Uses that protect or enhance wilderness values
- Public health and safety
- Other legal requirements



The exceptions to non-impairment are clarified in Manual 6330.

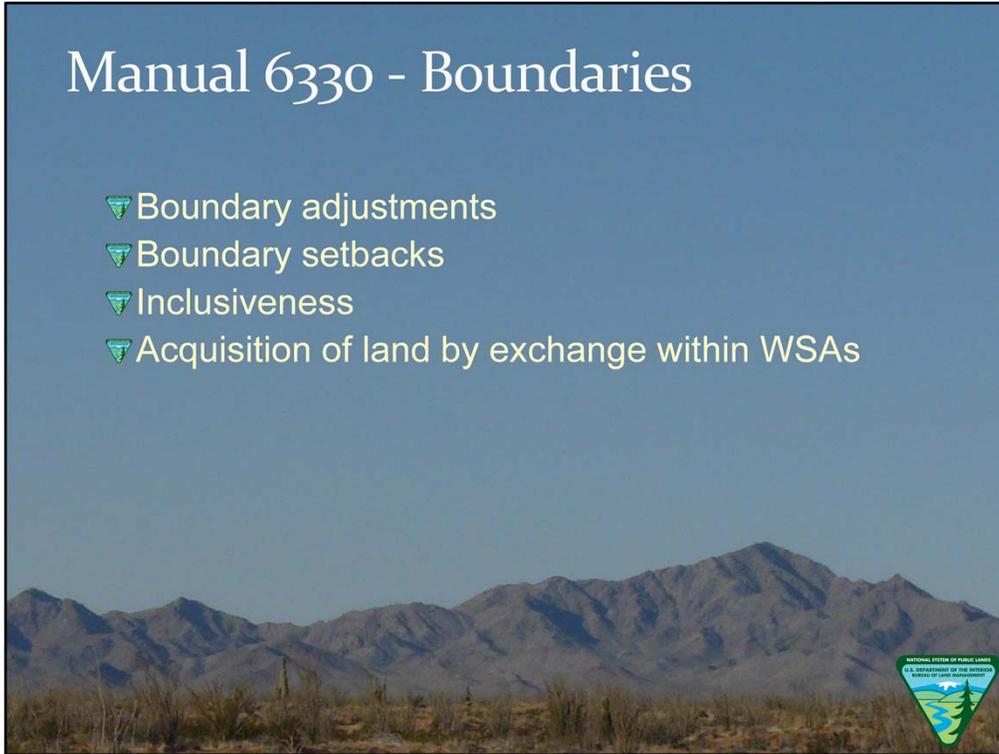
### ADVANCE

And one additional exception has been added: “Other legal requirements” to the list. Activities required to meet obligations imposed by other laws can be allowed even though they may violate the non-impairment standard.

### ADVANCE SLIDE

# Manual 6330 - Boundaries

- ▼ Boundary adjustments
- ▼ Boundary setbacks
- ▼ Inclusiveness
- ▼ Acquisition of land by exchange within WSAs



There was no discussion of boundaries in the old IMP. Manual 6330 addresses frequent questions from the field about WSA boundaries.

ADVANCE

Boundaries of Section 603 WSA's cannot be adjusted without an act of Congress. Boundaries of Section 202 WSAs reported to Congress between 1991 and 1993 cannot be altered through land use planning. Boundaries of WSAs established through an RMP which were **not** reported to Congress may be adjusted through a subsequent RMP process.

ADVANCE

There are **no** setbacks to WSA boundaries, except where Congress has specified or in the case of a Section 202 WSA not reported to Congress.

ADVANCE

The WSA includes all surface **and subsurface** features under jurisdiction of BLM, such as caves.

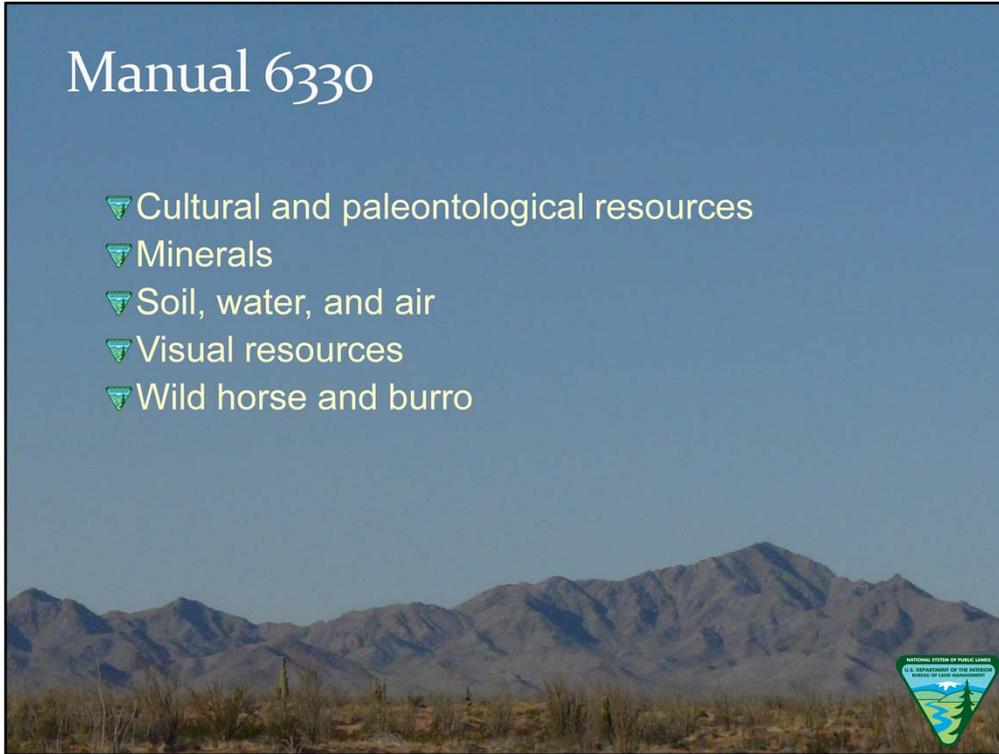
ADVANCE

Lands inside WSA boundary exchanged to the BLM are automatically added to the WSA.

ADVANCE SLIDE

# Manual 6330

- ▼ Cultural and paleontological resources
- ▼ Minerals
- ▼ Soil, water, and air
- ▼ Visual resources
- ▼ Wild horse and burro



Some of the policies for specific activities are relatively unchanged from the old IMP to Manual 6330.

ADVANCE

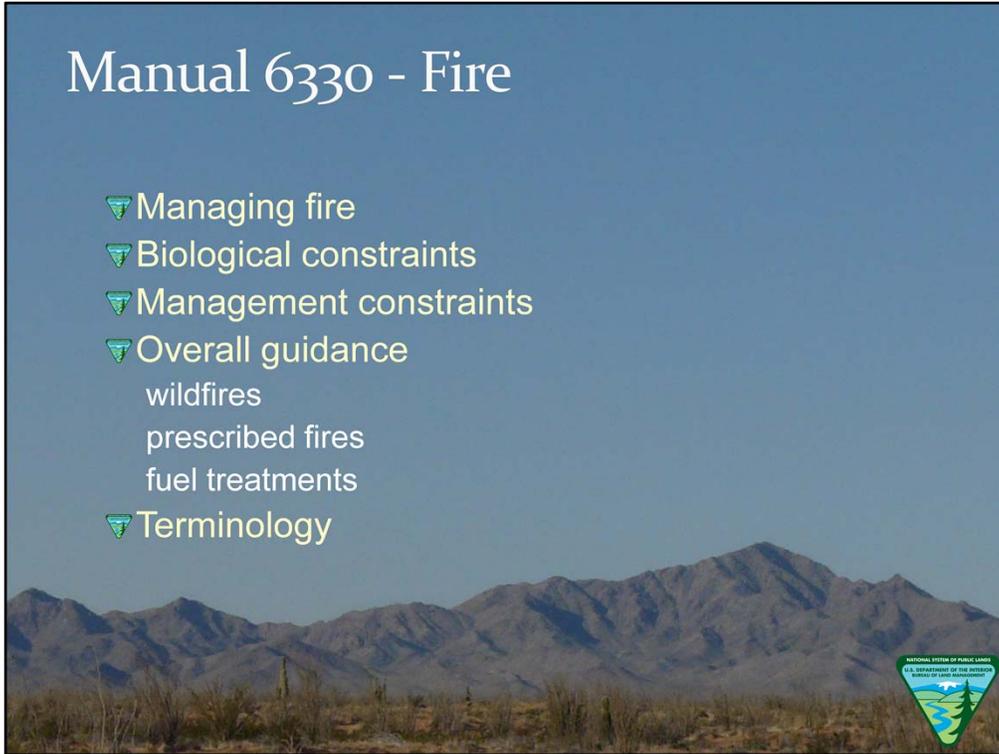
You see a list of them here. There will be detailed training available on each of these, but we'll skip them in this overview as we want to focus on the areas that have changed the most.

So let's look at those specific activities now.

ADVANCE SLIDE

# Manual 6330 - Fire

- ▼ Managing fire
- ▼ Biological constraints
- ▼ Management constraints
- ▼ Overall guidance
  - wildfires
  - prescribed fires
  - fuel treatments
- ▼ Terminology



Fire. The old IMP reflected fire program policy in 1995 and included no discussion of fuel treatment. Manual 6330 updates this to reflect current fire program policy and terminology. It discusses the option of fuel treatment.

ADVANCE

The overall goal of managing fire in WSAs is to allow the frequency and intensity of the natural fire regime to play its inherent role in the ecosystem – whether that’s allowing fire in ecosystems that evolved with fire, or preventing the unnatural spread of fire in ecosystems that evolved without broad-scale fires.

ADVANCE

This goal may be affected by past human actions altering the biology of an area, such as past fire suppression or the invasion of exotic annual grasses.

ADVANCE

And the goal may be affected by management constraints, such as budgets, national fire management demands, and adjacent land issues.

ADVANCE

6330 gives overall guidance on three areas of fire management. This is NOT a replacement for detailed fire training, just an outline of how these types of fires might be handled differently in WSAs than on other BLM lands. These three areas are:

ADVANCE

wildfires – unplanned ignitions (or prescribed fires that exceed the prescription parameters);

ADVANCE

prescribed fires – otherwise known as “planned ignitions,” their goal is to

make possible the return of natural fire to a WSA. Or occasionally, to mimic natural fire where reliance on wildlife is not feasible; and

ADVANCE

fuel treatment by non-fire methods. This is allowed as an option in very limited circumstances detailed in the policy.

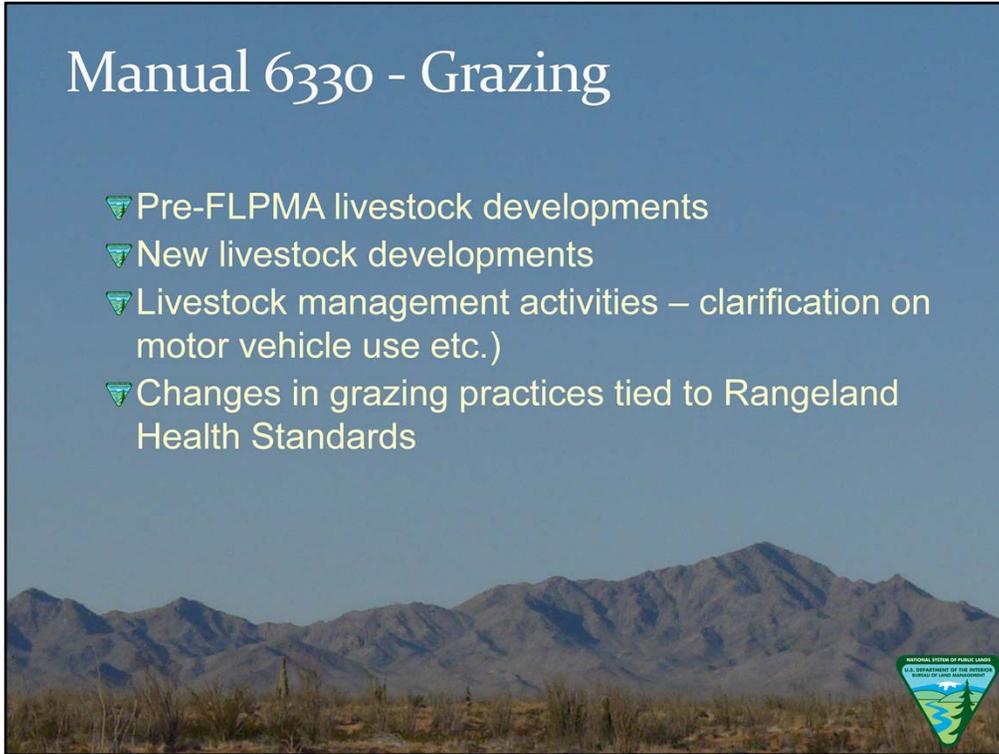
ADVANCE

This training – and Manual 6330, recognizes that fire management terminology will change more rapidly than our WSA policy. But for the foreseeable future, the principles of fire management should not change.

ADVANCE SLIDE

# Manual 6330 - Grazing

- ▼ Pre-FLPMA livestock developments
- ▼ New livestock developments
- ▼ Livestock management activities – clarification on motor vehicle use etc.)
- ▼ Changes in grazing practices tied to Rangeland Health Standards



Manual 6330 updates grazing guidance to reflect the BLM’s Land Health Standards concept, which was developed and put in policy since the IMP.

ADVANCE

The section on pre-FLPMA developments is unchanged – that is, they may be used and maintained in the same manner and to the same degree as at the passage of FLPMA (or the designation date for Section 202 WSAs not reported to Congress).

ADVANCE

The section on new livestock developments makes a change from the IMP. No longer is there a distinction between new temporary developments and new permanent developments. Under 6330, developments that meet the non-impairment standard are allowed, and developments which meet one of the exceptions to the standard (such as protecting or enhancing wilderness characteristics) **may** be allowed.

ADVANCE

The section on livestock management activities is largely unchanged, though that part dealing with motor vehicle use is clarified: except as provided for in the maintenance of pre-FLPMA developments and in emergencies, the use of motor vehicles or mechanical transport is restricted to those primitive routes open to the general public.

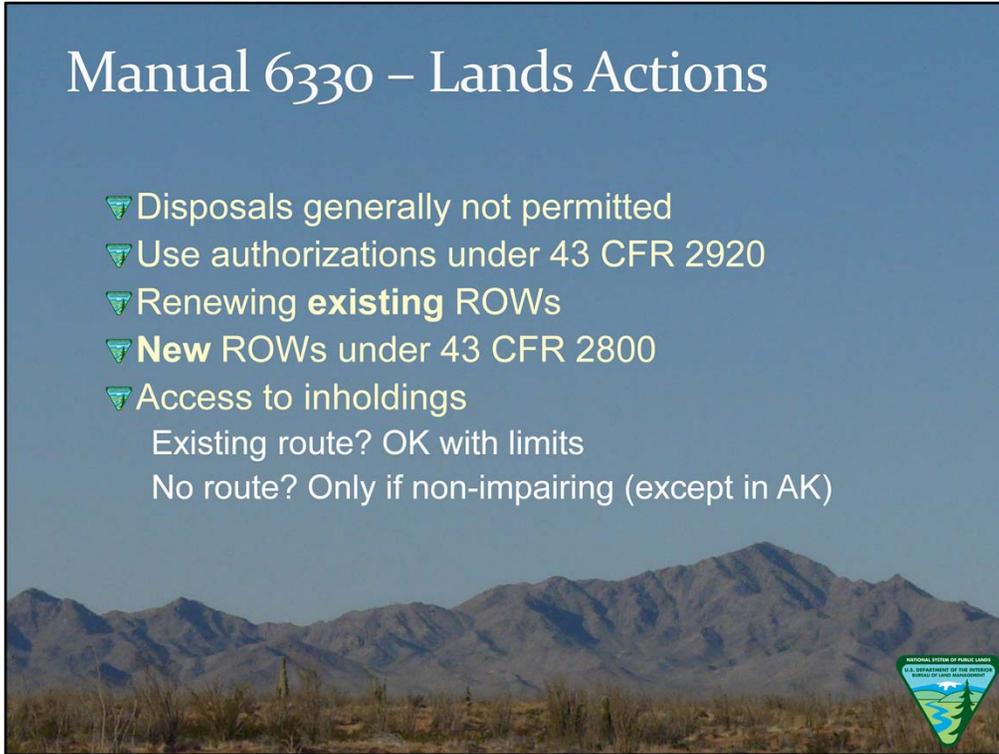
ADVANCE

The section on changes in grazing practices (level of use, season of use) incorporates reference to current Rangeland Health Standards. Changes in grazing practices (absent a request from the livestock operator) may not be changed solely because the use may impair a WSA’s suitability for preservation as wilderness, but may be required if Rangeland Health Standards are not being met.

ADVANCE SLIDE

# Manual 6330 – Lands Actions

- ▼ Disposals generally not permitted
- ▼ Use authorizations under 43 CFR 2920
- ▼ Renewing **existing** ROWs
- ▼ **New** ROWs under 43 CFR 2800
- ▼ Access to inholdings
  - Existing route? OK with limits
  - No route? Only if non-impairing (except in AK)



There are several types of lands or realty actions covered in Manual 6330.

ADVANCE

There are only two narrow and rarely applicable conditions which would permit us to dispose of land in a WSA – read the policy if you need to know more!

ADVANCE

Any permit issued under 2920 must meet the non-impairment standard or one of its exceptions, and must stipulate that if the activity would be prohibited in a wilderness, the permit would be terminated upon wilderness designation.

ADVANCE

Rights-of-way may be renewed if they are still being used for their authorized purpose, but conditions may be added to minimize impacts to wilderness characteristics.

ADVANCE

No new rights-of-way are allowed – EXCEPT...

ADVANCE

For access to inholdings.

ADVANCE

Where an access route already exists, there are limits to the level of maintenance or upgrading of the route that can be conveyed in these rights-of-way. For details, read the manual – and check with your solicitor!

ADVANCE

Where no access route exists – outside of Alaska – the non-impairment criteria must be satisfied.

ADVANCE SLIDE

# Manual 6330 - Recreation

- ▼ Guidance from Manual 1626 was added

  - “Ways” = “primitive routes”

  - Need for supplementary regs. for mtn. biking

- ▼ Primitive routes

  - Biophysical impacts must be no more than 10/21/1976

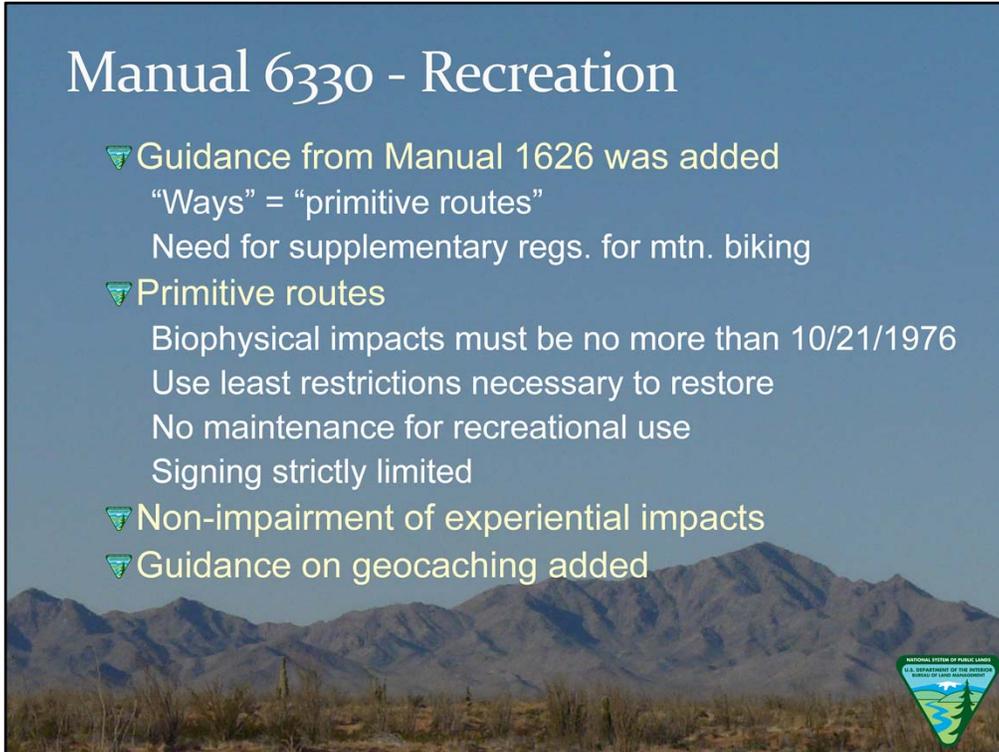
  - Use least restrictions necessary to restore

  - No maintenance for recreational use

  - Signing strictly limited

- ▼ Non-impairment of experiential impacts

- ▼ Guidance on geocaching added



The Recreation section contains several major changes or clarifications to previous policies – largely due to the realization that Congressional designation or release of these areas was not happening as quickly as originally foreseen. Among the bigger changes...

ADVANCE

  - ...guidance consistency with BLM Manual 1626 -- “Travel and Transportation” -- was added. This included

ADVANCE

  - changing the terminology from “ways” to “primitive routes.”

ADVANCE

  - And we have discovered that supplementary regulations are needed to **enforce** the prohibition on cross-country use of mountain bikes and other non-motorized mechanical transport – even though that’s been our policy for over 25 years.

ADVANCE

  - These primitive routes may only be used to the extent that the physical impacts of the route are no greater than existed on October 21, 1976.

ADVANCE

  - Actions taken to improve the wilderness characteristics of the route should impose the least restrictions on visitors while effectively restoring the route. These actions can include closure -- either seasonally or year-round -- of the primitive routes to all – or only some -- types of motorized or mechanical transport.

ADVANCE

  - No maintenance of these routes is allowed for recreational use.

Maintenance can only be allowed under one of the exceptions to the non-impairment standard.

ADVANCE

Signs along routes are allowed **only** to prevent resource damage or users getting lost. They cannot be assigned names, numbers, or otherwise appear to create a route system. In addition, the primitive routes will not be made a part of the transportation system, classified as a transportation asset, or entered into the Facility Asset Management System unless they are designated as non-motorized and non-mechanized trails.

ADVANCE

In addition, as the result of several recent lawsuits, Manual 6330 adds direction on the non-impairment of the experiential as well as biophysical environment. We cannot allow use (including increased vehicle use on routes open to motorized or mechanical transport) greater than that present at the passage of FLPMA if it would impair outstanding opportunities for solitude if these were identified as present during the original inventory.

ADVANCE

Oh, yeah – and we added direction on geocaching. It has to meet the non-impairment criteria.

ADVANCE SLIDE

# Manual 6330 - Vegetation

- ▼ Forestry section now removed
- ▼ Rely on natural processes
- ▼ Manipulation of vegetation allowed only if it meets the non-impairment standard or an exception
- ▼ Stringent justification parameters for restoration



The Vegetation section contains the biggest changes on a specific activity in Manual 6330.

ADVANCE

The Forestry section from the IMP is removed, replaced here and with a greatly expanded section on restoration.

ADVANCE

Whenever possible, natural processes will be relied on to maintain native vegetation and to influence natural fluctuations in populations. Natural disturbance processes, including fire, insect outbreaks, and droughts, are important functions of the ecosystem.

ADVANCE

Manipulation of vegetation is allowed only where it meets the non-impairment standard or one of the exceptions.

One of those exceptions likely to be used is that it improves wilderness characteristics.

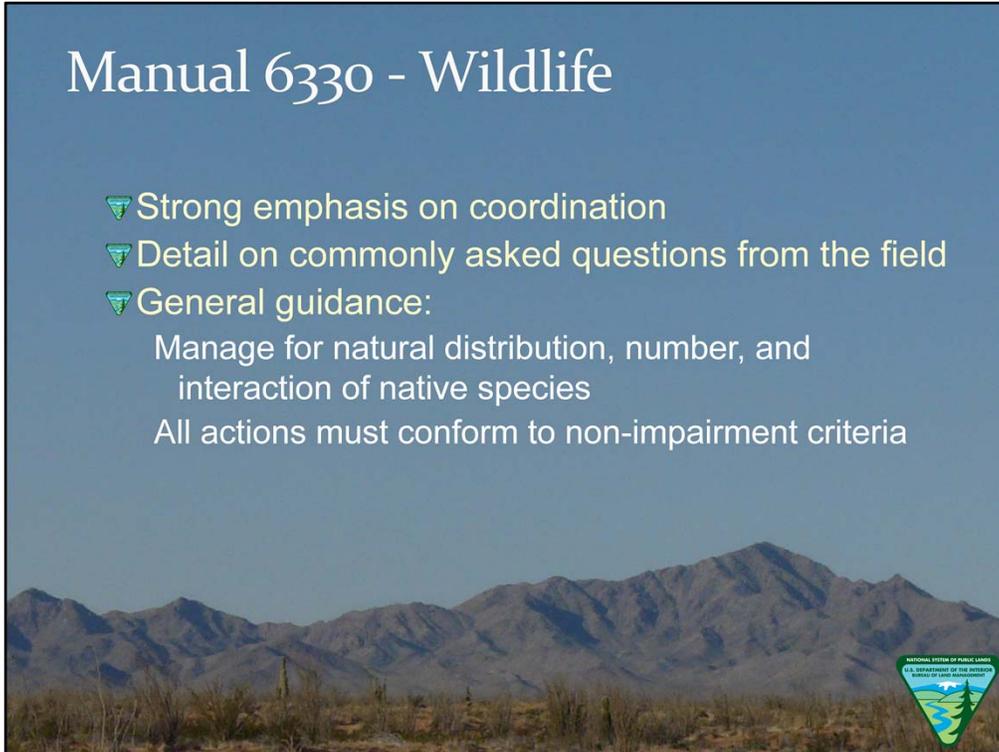
ADVANCE

But we know this can be the proverbial “slippery slope.” So Manual 6330 contains detailed, stringent justification parameters.

ADVANCE SLIDE

# Manual 6330 - Wildlife

- ▼ Strong emphasis on coordination
- ▼ Detail on commonly asked questions from the field
- ▼ General guidance:
  - Manage for natural distribution, number, and interaction of native species
  - All actions must conform to non-impairment criteria



The Wildlife section is likewise detailed.

ADVANCE

Manual 6330 updates our policy to reflect a strong emphasis on coordination between BLM and state agencies...

ADVANCE

...and it offers more detail on commonly asked questions from field.

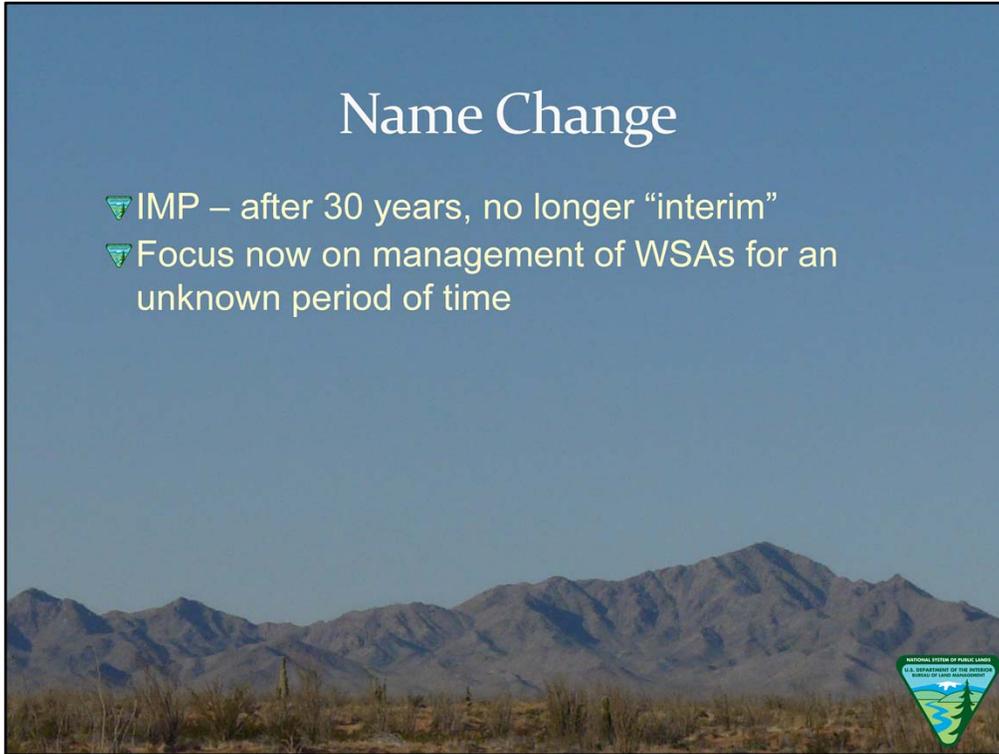
ADVANCE

But in general, we will manage for a **natural** distribution, number, and interaction of **native** species...

ADVANCE

And management actions taken to support wildlife management, whether proposed by the State or the BLM, must conform to the non-impairment standard or one of its exceptions.

ADVANCE SLIDE



## Name Change

- ▼ IMP – after 30 years, no longer “interim”
- ▼ Focus now on management of WSAs for an unknown period of time

And one final word about the policy's...

ADVANCE

...name change. We used to manage Wilderness Study Areas under a policy called the **Interim** Management Policy – because it was the management policy used in the **interim** between our inventory and the Congressional decision to either designate the area as wilderness or release it to other multiple uses.

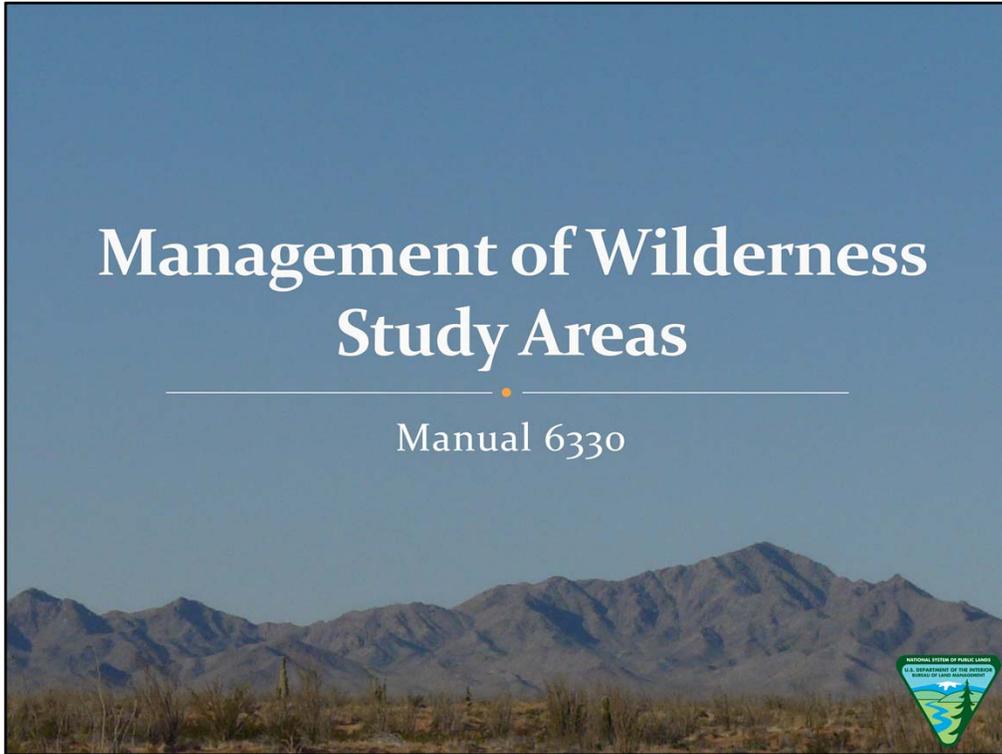
ADVANCE

Well, after over 30 years, and with over 500 WSAs still waiting Congressional action, we've come to realize that this isn't really an “interim.”

ADVANCE

Since we are now focusing our management for an unknown period of time -- possibly decades more – not only have we adjusted the management, we now call it simply the Management of Wilderness Study Areas.

ADVANCE SLIDE



This concludes the brief overview of BLM Manual 6330. Thank you.

ADVANCE SLIDE