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6250 (HQ-410)

Memorandum

To: State Directors

From: Carla Bock, Acting Assistant Director, National Conservation Lands and
Community Partnerships **CARLA**
BOCK

Subject: Clarifying BLM Policy Guidance in Manuals 6250 and 6280 for National Trail
Comprehensive Plans and Administering Agency Selected Trail Rights-of-Way

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Date: 2026.07.22
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This memorandum provides interim clarification for Bureau of Land Management (BLM) implementation of Sections 5 and 7 of the National Trails System Act (NTSA), 16 U.S.C. 1244 and 1246. A targeted review of BLM Manual 6250 – National Scenic and Historic Trail Administration (Rel. 6-138) and 6280 – Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (Rel. 6-139) identified requirements that are inconsistent with or exceed NTSA statutory requirements or that warrant further clarification. This memo clarifies direction in BLM Manuals 6250 and 6280 to align with NTSA requirements and is to be used in conjunction with the manuals until the manuals are revised.

Key Policy Clarifications (KPC)

1. The Comprehensive Plan (CP) for national scenic or national historic trails must include the elements specified in Sections 5(e) and (f) of the NTSA, 16 U.S.C. 1244(e) and (f), respectively, and may include additional components at the administering agency's¹ discretion. See KPC-1 for explanation.
2. Selection of the NTSA rights-of-way (NTSA ROWs) by the trail-administering agency is a distinct requirement, as specified in Section 7(a)(2) of the NTSA, 16 U.S.C. 1246(a)(2), and is not a required part of comprehensive plans. See KPC-2 for explanation.

¹ Upon designation, the Department Secretary who is designated as the Administrator will designate/delegate an administering agency. There may be more than one administering agency. See NTSA Section 5(d).

3. Land managing agencies retain full management authority for trail segments located on land under their jurisdiction and management decisions are to be made in coordination with the administering agency. (NTSA Section 7(a)(1)(A); 16 U.S.C. 1246(a)(1)(A)). See KPC-3 for explanation.
4. The administering agency may relocate the NTSA ROW after selection, provided there is concurrence by the head of the Federal agency having jurisdiction over the lands involved, as specified in Section 7(b) of the NTSA.

[KPC-1] Comprehensive Plan Requirements--A CP provides a unified framework to advance trailwide coordination and future work by the trail's administering agency, managing agencies, and partners across jurisdictions. Required elements and timelines for developing a CP are set forth in NTSA, Sections 5(e) and (f). The CP contains objectives, practices, and other information useful for selecting a trail's ROW; however, including the actual selection of the ROW is not required. The administering agency has the discretion to include additional components in the CP beyond those required in Sections 5 (e) and (f) of the NTSA and this may include the selected ROW. Any additional components added to a CP must be included within the statutory two-year timeframe. A CP is considered a living document and can be updated, revised, or amended periodically after its submission to Congress.²

Any statements regarding the required elements of a CP in Manual 6250 or Manual 6280 that exceed NTSA requirements should not be treated as mandatory even if they are framed as mandatory in the manuals (e.g., by the use of the words "shall" or "must"). This includes but is not limited to direction related to identifying a process to determine and approve final National Scenic Trail alignment or proposals for exemplary side and connecting trails. If you have questions about the requirements of NTSA, coordinate with the Office of the Solicitor.

[KPC-2] Section 7 Rights-of-Way Selection is a Distinct Requirement--The NTSA ROW defines the official trail route and the area necessary to protect its resources and values, supports its designated nature and purposes, and advances trailwide collaboration, coordination, and development across all jurisdictions. The NTSA describes the requirements of the CP in Section 5 and requirements for selecting the NTSA ROW in Section 7. These are two separate processes, with no mandate that they be completed in combination. The selection of the NTSA ROW has no statutory timeframe and upon completion, a notice of availability of the appropriate maps or appropriate descriptions is published in the Federal Register.

Two sections of the NTSA govern the process for selecting the NTSA ROW: Section 7(a)(2) outlines the requirements for ROW selection, while Section 7(e) provides further guidance for segments of the trail that cross non-federal lands. When selecting the NTSA ROW, the administering agency takes into account evidence gathered in the Feasibility Study, in

² If a CP is revised or amended after it submitted to Congress, the NTSA does not require resubmittal to Congress.

accordance with NTSA Section 5(b), together with evidence obtained by applying the objectives and practices set forth in the CP. When a national scenic or national historic trail crosses lands managed by federal agencies, the NTSA ROW encompasses both the location and width, as specified in NTSA Section 7(a)(2). The determination is made with consideration of existing land-use plans and in agreement with the head of the relevant Federal agency, or as delegated. For segments of national scenic or national historic trails that cross non-federal lands, the ROW would follow the Congressional line available upon designation, without a location or width unless a written agreement (or easement) is voluntarily reached with the non-federal entity.³

[KPC-3] Section 7 Management Authority--NTSA Section 7(a)(1)(A) makes an explicit assurance that land managing agencies retain full on the ground management decision-making authority for trail segments located on lands under their jurisdiction. However, where the word “management” appears in Section 5(e) and (f) of the NTSA, it refers to the administering agency’s responsibility to coordinate the implementation of the CP among the various landowners and land management agencies. Land management agencies are expected to consider the CP to support their on-the-ground management of the trail and its resources to achieve the purposes for which the trail was established. Guidance and support from the administering agency are integral parts of this process in implementing the CP.

The BLM incorporates the framework outlined in the CP through the land use planning process, including establishment of the national trail management corridor with allocation decisions. The CP does not make allocation decisions and does not dictate subsequent land management decisions. It does provide information necessary for federal decision-support during land use planning and when undertaking project specific actions.

The NTSA ROW does not, by itself, establish the BLM’s national trail management corridor under the Federal Land Policy and Management Act (FLPMA). The NTSA ROW establishes the minimum boundary for the national trail management corridor and cannot be changed by the trail managing entities. The national trail management corridor is designated through the BLM’s land use planning process, during which land allocation decisions are made. Allocation decisions for lands within the NTSA ROW must avoid activities incompatible with trail purposes to the extent practicable and not substantially interfere with the nature and purposes of the trail consistent with Section 7(c) of the NTSA. Proposed activities must conform to BLM land use plans and be implemented as activity-level decisions with compliance under the National Environmental Policy Act. Where an NTSA ROW is not yet selected or where a national trail management corridor has not been established, follow guidance in MS-6280 Chapter 5.3(B)(2) and coordinate with the administering agency.

³ Note: Sec. 7(e) says that the Secretary shall encourage state and local governments to enter into cooperative agreements with landowners or acquire lands for the trail. Post-ROW selection, if the state and local governments fail to enter into those agreements or acquire the lands, the Secretary may enter into agreements with landowners for use of the lands for trail purposes or acquire lands.

If you have any questions regarding these matters, please contact Karla Rogers, National Scenic and Historic Trails Program Lead (HQ-410) by email knrogers@blm.gov , or Sean MacDougall, Deputy Division Chief of National Conservation Lands (HQ-410) by email smacdoug@blm.gov.