



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Natural Resources**  
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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July 20, 2026

U.S. Forest Service  
Attention: Josh Nadas  
Forest Service National Recreation and Wilderness Programs  
Sidney R. Yates Federal Building  
201 14th Street SW, Suite 2SW  
Washington, DC 20250

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?project=Directives-4622>

Re: Forest Service Manual 2300, Chapter 2350, Section 2355 – Climbing Opportunities

Dear Mr. Nadas,

The State of Alaska (State) reviewed the Forest Service proposal to establish directive guidance on climbing opportunities on National Forest System Lands in congressionally designated wilderness. The proposed guidance also provides guidance for management of climbing activities on non-wilderness National Forest System (NFS) lands. The proposal would update Manual 2300 (specifically Chapter 2350, Section 2355), to establish clear national guidance for recreational climbing opportunities on NFS lands.

As noted in comments to the National Wilderness Program Manager on January 30, 2024,<sup>1</sup> the State supports access to public lands and the continuation of traditional activities such as climbing. The comments below incorporate input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

Rock climbing, including technically advanced alpine routes, has long been a recognized traditional activity in Alaska, with documented ascents dating back to the early 1900s. ADF&G supports efforts to clarify recreational climbing management and enhance public safety; however, the proposed directive must fully reflect the unique statutory framework governing wilderness in the State of Alaska. National policies and manuals often overlook the specific exemptions established by Congress to protect traditional activities in Alaska. We appreciate the inclusion of the Alaska National Interest Lands Conservation Act (ANILCA) under subsection 2355.01 – Authority and request that the final directive explicitly incorporate and recognize the provisions of the ANILCA, specifically Section 1316(a), regarding the use of equipment and motorized tools in wilderness.

**ANILCA Precedence in Alaska Wilderness**

Unlike designated wilderness areas in the contiguous United States, wilderness management in Alaska operates, in addition to the Wilderness Act, under the statutory provisions of ANILCA. In

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<sup>1</sup> <https://dnr.alaska.gov/commis/opmp/nilca/pdf/2024%20Letters/24-1-30-SOA-climbing%20commentsUSFS.pdf>

ANILCA, Congress explicitly recognized that Alaskans rely heavily on remote wilderness for recreational activities like rock climbing, as well as for hunting, fishing, and trapping. ANILCA fundamentally amended how the Wilderness Act applies within Alaska by introducing special provisions and exceptions that protect traditional activities, access, structures, and tools. Administrative directives such as Manual 2300 cannot supersede or diminish these statutory rights.

Accordingly, the final FSM 2355 directive must include clear language stating that any restrictions applied to climbing anchors, motorized tools, or mechanical aids or necessary equipment in Alaska wilderness may not restrict or impair rights guaranteed under ANILCA.

### **Climbing Policy**

Section 2355.03 appropriately recognizes that climbing can be an outstanding opportunity to experience a primitive and unconfined type of recreation, including in NFS wilderness areas. However, this section proposes climbing or climbing-related activities in wilderness may be restricted or prohibited when its occurrence, continuation, or expansion would adversely impact wilderness character or other resource values. We request this subsection be re-written to better recognize that climbing is an established and appropriate primitive recreational use within designated wilderness and is recognized as consistent with maintaining wilderness character. Because it is an allowable wilderness use, it should not be limited solely on the basis of a generalized concern about “adversely impacting wilderness character.” Management actions should be tied to specific, documented resource issues or user conflicts, rather than restricting a use that is inherently aligned with wilderness purposes. Additionally, neither a climbing plan nor a permit should be required for climbing to occur in an area.

### **Climbing and Other ANILCA-Protected Uses of Fixed Anchors in Wilderness**

The proposed directive appropriately recognizes that climbing and the use, placement, and maintenance of fixed anchors is an appropriate use of NFS lands, including designated wilderness, when carried out in a manner to minimize resource impacts. Recognizing that climbing is a traditional activity in Alaska wilderness, the placement, use, and maintenance of fixed anchors should be treated as allowable equipment under ANILCA’s Alaska-specific framework. This ensures that climbers, researchers, and other users can safely access terrain while preserving wilderness character, consistent with decades of established recreational and other uses. The placement, use, and maintenance of fixed anchors are also used to support hunting, fishing, and trapping activities. Therefore, a general allowance for these tools is appropriate in Alaska, provided their use is protective of the surrounding area.

### **Minimum Requirements Analysis (MRA)**

We support the Forest Service’s determination that fixed anchors, when limited in scope and installed according to wilderness stewardship principles, are not “installations” under Section 4(c) and therefore do not require a Minimum Requirements Analysis (MRA). This interpretation is consistent with the Expanding Public Lands Outdoor Recreation Experiences (EXPLORE) Act and helps establish a manageable, practical framework for administering climbing activities.

In Alaska, ANILCA provides additional allowances within designated wilderness areas, including the continued use of activities and structures that support public safety, traditional

access, and lawful recreational uses. Given ANILCA's explicit emphasis on maintaining access and allowing uses that do not significantly impair wilderness values, treating limited fixed anchors as permissible without an MRA is consistent with both the statute's intent and historic practice across Alaska's wilderness settings.

We also support the proposal's direction that this activity is essential for visitor safety and does not result in new or additional impacts to wilderness character. ANILCA's access and safety provisions further reinforce the appropriateness of allowing necessary maintenance of existing routes without unnecessary procedural barriers.

To strengthen clarity and implementation consistency across units, we encourage the Forest Service to maintain explicit language in the final directive confirming that:

- Fixed anchors do not require MRA;
- Line officers may authorize new anchors and replacement of existing anchors without requiring MRA; and
- Site-specific climbing management decisions should be grounded in documented resource concerns or visitor-use conflicts rather than the presence of anchors alone.

These refinements will help ensure the directive is applied uniformly across the National Forest System, reduce administrative burden, and uphold wilderness character while continuing to provide safe, sustainable climbing opportunities consistent with the EXPLORE Act's direction.

#### **ANILCA Section 1316(a)**

ANILCA Section 1316(a) explicitly permits the use of temporary campsites, tent platforms, shelters, and other temporary facilities and **equipment** directly and necessarily related to the taking of fish and wildlife where such activities are allowed.

In Alaska wilderness areas open to hunting and fishing, the term "equipment" includes hand-portable motorized tools otherwise prohibited in wilderness outside of Alaska. For example, Alaskans routinely utilize:

- Power winches for the retrieval of heavy big game like moose out of challenging terrain.
- Motorized drills for setting up dip netter anchor points, securing gear, and setting up fish wheels.
- Ice augers, chainsaws, generators, and similar tools for hunting and fishing camps and lawful harvest activities.

If the proposed manual presumes a universal prohibition on motorized tools or fixed mechanical advantages, it will conflict with federal statutory requirements unique to Alaska.

#### **Recommendations for the Final Directive**

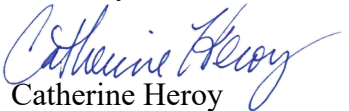
To ensure consistency with ANILCA and protect the rights of Alaskans to continue their fish and wildlife harvesting and other traditional activities, ADF&G recommends the following in the proposed directive:

- Include specific language within proposed FSM 2355 -- or a distinct regional supplement -- clarifying that in the state of Alaska, climbing is a traditional activity in wilderness and being able to continue it is protected under ANILCA.
- Subsection 2355.03 – We request deletion of the sentence “Climbing management plans should be developed for managing climbing opportunities in wilderness.” Climbing management plans should be developed only where they are most needed, such as in areas with high levels of use, user conflicts, or resource degradation.
- State clearly that national wilderness restrictions regarding motorized equipment do not apply to climbing, fishing, hunting, and trapping activities protected under ANILCA Section 1316(a).
- Ensure that local Climbing Management Plans or regional foresters do not inadvertently restrict the placement of fixed or temporary anchors, pins, or winching lines essential for safe climbing or used for game retrieval, dip netting, fish wheel stabilization, or other fish and wildlife harvesting activities. Motorized tools used to place temporary or fixed equipment for the taking of fish and wildlife are statutorily protected in Alaska and must remain unencumbered by climbing-focused directives.

### **Closing**

Thank you for the opportunity to review and comment on this proposed guidance for climbing activities. It is important that the unique provisions of ANILCA be maintained in agency guidance, to ensure management in Alaska that is consistent with this law. Please contact me at (907)269-0880 or by email at [catherine.heroy@alaska.gov](mailto:catherine.heroy@alaska.gov) to coordinate any follow up discussions.

Sincerely,

  
Catherine Heroy  
Federal Program Manager