



THE STATE

Of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

August 10, 2026

Carla Bock
Department of Interior
Assistant Director National Conservation Lands and Community Partnerships U.S.
Bureau of Land Management
1849 C St. NW, Room 5646
Washington, DC 20240

Submitted electronically to:
<https://www.regulations.gov>

Subject: CACFA Comments on Draft Policy and Guidance for Managing Recreational Climbing in BLM-Managed Units of the National Wilderness Preservation System

Dear Director Bock,

The Citizens' Advisory Commission on Federal Areas in Alaska (CACFA) appreciates the opportunity to comment on BLM's Draft Policy and Guidance for Managing Recreational Climbing in BLM-managed units of the National Wilderness Preservation System. CACFA's statutory responsibility is to identify and reduce potential negative impacts on Alaska and its citizens resulting from federal actions affecting Alaska's extensive federal land base.

CACFA supports public access to federal lands and recognizes climbing — including the safe and limited use of fixed anchors — as a longstanding traditional activity in Alaska's wilderness. While the draft BLM guidance correctly acknowledges climbing as an appropriate wilderness use consistent with Section 4(b) of the Wilderness Act and Section 122 of the EXPLORE Act, management in Alaska must also remain fully consistent with ANILCA's unique statutory framework, particularly Section 1110(a), which protects traditional activities, access, and reliance on remote travel methods that are essential across Alaska's vast and road-limited landscapes. Section 102(13) of ANILCA defines the terms "wilderness" and "National Wilderness Preservation System" to have the same meaning when used in the Wilderness Act (78 Stat.890).

Consistent with our comments on BLM Manual 6340, policy review, Management of Designated Wilderness Areas, BLM has no designated wilderness areas in Alaska. Therefore, CACFA recommends incorporating Alaska specific language for Manual 6340 similar to the "BLM-Utah Additional Guidance for Manual 6320". Or similar language in BLM Manual 6330 that simply states, this policy does not apply to Alaska due to the absence of designated wilderness areas under BLM management.

Thank you for considering these comments and for working toward management of wilderness climbing that reflects statutory protection, supports safe and responsible recreation, and upholds congressional intent for Alaska's federal lands.

Sincerely,

A handwritten signature in black ink that reads "Kim Griffith". The script is fluid and cursive, with the first name "Kim" and last name "Griffith" clearly legible.

Kim Griffith

Executive Director

Citizens' Advisory Commission on Federal Areas (CACFA)