



THE STATE

Of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

August 7, 2026

Michael P. Michener
Deputy Associate Director, Visitor and Resource Protection
U.S. National Park Service
1849 C Street NW, MS-2457
Washington, DC 20240

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

Subject: CACFA Comment on EXPLORE Act Mandated Wilderness Climbing Guidance for National Park Service

Dear Director Michener,

The Citizens' Advisory Commission on Federal Areas (CACFA) submits the following comments regarding the National Park Service's draft wilderness climbing guidance mandated under the EXPLORE Act, including Director's Order 41 (Section 7.2 – Climbing) and Reference Manual 41 (Section 7.1 – Managing Climbing Activities in Wilderness). CACFA's statutory role is to evaluate federal actions affecting Alaska's more than 200 million acres of federal lands and to identify and reduce potential adverse impacts on Alaska and its citizens. Consistent with this responsibility, CACFA works to ensure that federal management in Alaska is firmly grounded in congressional intent and applicable law.

While the EXPLORE Act affirms that recreational climbing—including the placement and maintenance of fixed anchors—is an appropriate wilderness use when consistent with the Wilderness Act and other relevant statutes, NPS's guidance must also incorporate the Alaska National Interest Lands Conservation Act (ANILCA). ANILCA provides the controlling statutory framework for the management of Alaska's Conservation System Units (CSUs) and establishes requirements and protections that differ significantly from those applicable in the Lower 48. Explicit integration of ANILCA is therefore necessary to ensure lawful and consistent management of climbing activities in Alaska wilderness.

Climbing has long been a traditional activity in Alaska, predating ANILCA and reflecting the practical realities of safe travel across expansive, remote landscapes where access is limited, conditions are severe, and mountaineering, ice travel, and mixed terrain navigation are customary. This historic context aligns with congressional direction that Alaska wilderness be managed in a manner that accommodates traditional activities without imposing unnecessary restrictions. CACFA emphasizes that, under ANILCA Section 1110(a), any restriction on climbing access or fixed anchor use in Alaska CSUs must follow mandatory procedures, including public notice, public hearings, and a determination of necessity

due to demonstrable detrimental impacts. These procedures are essential to ensuring transparency, public participation, and adherence to statutory protections uniquely applicable in Alaska.

CACFA provides the following recommendations for improving the draft guidance:

1. **Explicitly Include ANILCA as a Controlling Authority in DO 41 and RM 41.**
ANILCA should be listed alongside the Wilderness Act and the EXPLORE Act in the “Authority” sections of both documents. Because ANILCA governs access, closures, and traditional activities in Alaska, omitting it risks inconsistent or unlawful application of wilderness climbing policy within Alaska CSUs.
2. **Affirm That Fixed Anchors Are Not “Installations” in Alaska Wilderness.**
CACFA supports NPS’s determination that fixed anchors are not installations under Section 4(c) of the Wilderness Act and recommends stating explicitly that this determination applies in Alaska. Fixed anchors used in Alaska are typically temporary, safety-related, and integral to longstanding climbing practices. Treating them as installations would contradict ANILCA and could lead to unwarranted constraints on traditional and safety-based use.
3. **Clarify That Minimum Requirements Analyses (MRAs) Are Not Required for Fixed Anchors in Alaska Absent Demonstrated Detrimental Impacts.**
CACFA concurs with NPS’s position that fixed anchor authorizations generally do not require MRAs unless power drills or fixed equipment are proposed. The guidance should clarify that MRAs are not required for fixed anchor use in Alaska CSUs unless significant adverse resource impacts are identified. Broadly applying MRAs to fixed anchors would conflict with ANILCA Section 1110(a) and could result in de facto closures due to capacity limitations—outcomes Congress sought to avoid in Alaska.
4. **Recognize Alaska’s Traditional and Safety-Dependent Use of Fixed Anchors.**
Alaska’s terrain, weather, and remoteness necessitate reliance on fixed anchors in many traditional climbing contexts. CACFA recommends strengthening acknowledgment of this reality. Properly maintained fixed anchors have long been compatible with wilderness character in Alaska and are essential for climber safety in complex and dynamic environments.
5. **Ensure Permit Systems Do Not Create De Facto Closures in Alaska Wilderness.**
While Special Use Permits, compendium actions, and case-by-case authorizations may be feasible in more accessible parks, logistical challenges in remote Alaska could render such systems restrictive in practice. CACFA recommends that the guidance explicitly exempt fixed anchors in Alaska from permit requirements unless substantial and specific adverse impacts are identified for a given area.

CACFA appreciates the National Park Service’s efforts to develop consistent nationwide guidance for wilderness climbing and supports recognition of climbing as an appropriate wilderness use under the EXPLORE Act. For Alaska, however, full integration of ANILCA is essential. Incorporating the recommendations above will ensure that NPS guidance aligns with congressional intent, preserves traditional access, protects necessary safety practices, and maintains wilderness character across Alaska’s nationally and globally significant landscapes.

CACFA urges the National Park Service to incorporate these revisions prior to finalizing Director's Order 41 and Reference Manual 41. We welcome continued dialogue as NPS proceeds with implementing the EXPLORE Act's climbing provisions.

Sincerely,

A handwritten signature in cursive script that reads "Kim Griffith". The signature is written in black ink and is positioned above the printed name.

Kim Griffith

Executive Director

Citizens' Advisory Commission on Federal Areas (CACFA)