



THE STATE

of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

July 16, 2026

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

Submitted electronically to:

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

**Subject: CACFA Comments on Forest Service Manual 2300 – Chapter 2350, Section 2355:
Climbing Opportunities (FR Doc. 2026-12326)**

Dear Mr. Nadas,

The Citizens' Advisory Commission on Federal Areas in Alaska (CACFA) submits these comments regarding the U.S. Forest Service's proposed directive Forest Service Manual (FSM) 2300 – Recreation, Wilderness, and Related Resource Management, Chapter 2350, Section 2355, published June 18, 2026.

CACFA's statutory responsibility is to identify and reduce potential negative impacts on Alaska and its citizens resulting from federal actions on Alaska's more than 200 million acres of federal land. CACFA evaluates the consistency of federal action management, planning, development, and additions to federal management areas—with congressional intent and applicable law.

CACFA supports public access to federal lands and recognizes climbing, including the use of fixed anchors, as a longstanding traditional activity in Alaska's wilderness. While Section 2355 appropriately acknowledges climbing as a legitimate recreational use, the directive must incorporate Alaska-specific statutory protections—particularly those required under the Alaska National Interest Lands Conservation Act (ANILCA)—to ensure consistency with federal law and congressional intent.

ANILCA clarifies Congress' intent for the unique management of Conservation System Units (CSUs) in Alaska, including wilderness areas within national forests. Congress recognized that Alaskans rely heavily on access across vast, remote landscapes for harvesting fish and wildlife, traveling between communities, and engaging in longstanding traditional activities. As a result, certain uses are allowed in Alaska wilderness without a permit that are not permissible in wilderness areas outside Alaska. These provisions ensure that management of Alaska CSUs remains consistent with congressional intent, especially in a state where few roads exist and where most areas are accessible only by boat, snowmachine, or aircraft.

Recommended Revisions

1. Add ANILCA to Section 2355.01 – Authority

ANILCA must be listed alongside the Wilderness Act and the EXPLORE Act to ensure correct legal application. It provides unique management direction for Alaska CSUs and governs access, traditional uses, and closures affecting recreational activities, including climbing.

2. Add ANILCA Section 1110(a) Protections to Section 2355.03 – Policy

Restrictions on climbing or the use of fixed anchors in Alaska CSUs must follow ANILCA Section 1110(a), as climbing predates ANILCA and qualifies as a traditional activity. Any policy or compliance action affecting climbing access or fixed anchor use must therefore incorporate ANILCA's mandatory procedures—public notice, hearings, and findings demonstrating necessity due to detrimental impacts—to ensure transparency and prevent inappropriate restrictions on traditional uses.

3. Clarify That Fixed Anchors Are Not “Installations” in Alaska Wilderness

CACFA recommends adding the following clarification to Sections 2355.32 and 2355.03-5:

“In Alaska CSUs, fixed anchors necessary for belay, rappel, or protection purposes are not considered installations under Section 4(c) of the Wilderness Act due to their temporary nature, limited footprint, and historic use.”

Fixed anchors used in Alaska are temporary, safety-critical, and historically associated with traditional climbing. Treating them as prohibited installations is inconsistent with congressional intent and with ANILCA's protections for traditional activities.

4. Exempt Alaska Fixed Anchors from Minimum Requirements Analysis (MRA)

We agree with the Forest Service's determination that fixed anchors and related climbing safety equipment should not require a Minimum Requirements Analysis (MRA) in Alaska CSUs unless the Forest Service identifies significant adverse impacts to natural or cultural resources, consistent with ANILCA Section 1110(a). Requiring an MRA for each placement is impractical, burdensome, and likely to result in de facto closures due to staffing constraints—contrary to ANILCA's protections for traditional uses.

CACFA urges adoption of these revisions to ensure that FSM 2355 appropriately reflects Alaska's statutory framework, protects traditional access, supports essential safety practices, maintains wilderness character, and upholds congressional intent for the management of Alaska's federal lands.

Sincerely,



Kim Griffith

Executive Director

Citizens' Advisory Commission on Federal Areas