



THE STATE

of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

August 11, 2026

Cynthia Martinez
U.S. Fish and Wildlife Service
National Wildlife Refuge System
5275 Leesburg Pike
Falls Church, VA 22041-3803

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

Subject: CACFA Comment on Wilderness Administration and Resource Stewardship; Managing Climbing Activities in Wilderness

Dear Chief Martinez,

The Citizens' Advisory Commission on Federal Areas (CACFA) appreciates the opportunity to review and comment on the draft national guidance for managing recreational climbing activities in Wilderness areas. We recognize and respect the Service's ongoing work to protect the ecological integrity, wilderness character, and unique natural values of America's wild landscapes. These protective efforts are critical, and CACFA supports thoughtful, science-based management that sustains wilderness resources for future generations.

At the same time, CACFA is obligated to ensure that federal land management policy fully reflects the statutory framework Congress established for Alaska through the Alaska National Interest Lands Conservation Act (ANILCA). ANILCA provides specific direction regarding traditional activities, access, and uses that existed prior to 1980, and Congress clearly intended Alaska's conservation system units to be managed differently than similar units elsewhere in the United States. Recreational climbing is one of these longstanding traditional uses.

Climbing occurred widely in Alaska prior to ANILCA's passage and is therefore a traditional activity protected under ANILCA Section 1110(a). This section directs the Secretary to permit traditional activities and traditional access methods unless—after notice and a hearing in the affected area, the Secretary determines that such activities would be detrimental to resource values. Because climbing is well-documented as a pre-1980 activity, CACFA respectfully requests that the Service explicitly acknowledge climbing as a protected traditional use in Alaska, for the purpose of policy development and implementation.

Fixed anchors, belay points, and similar equipment are directly and necessarily tied to climbing activity and often facilitate other traditional uses, such as safe game retrieval and fishing or trapping access. Under ANILCA Section 1316(a), temporary facilities or equipment directly related to such activities

must be allowed unless specific resource harm is demonstrated. For these reasons, CACFA recommends that the Service avoid treating fixed anchors as “installations” under the Wilderness Act when applied in Alaska and instead manage them under ANILCA’s more explicit statutory direction.

CACFA thanks the Service for its diligent work to protect wilderness resources and for the opportunity to comment. We respectfully request that the final guidance incorporate ANILCA’s requirements, acknowledge climbing as a traditional use, and ensure that management decisions affecting climbing and fixed anchors in Alaska are made through clear statutory processes and with full recognition of Alaska’s unique legal framework.

Please contact CACFA if additional clarification or information would be helpful during your review process.

Sincerely,

A handwritten signature in cursive script that reads "Kim Griffith".

Kim Griffith

Executive Director

Citizens’ Advisory Commission on Federal Areas (CACFA)