



July 29, 2016

Planning Team
Wrangell St. Elias National Park and Preserve
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RE: Scoping comments for the proposed action for Wrangell St. Elias National Park and Preserve backcountry/wilderness stewardship plan

Dear Park Planning Team:

The Access Fund and Levitation 49 welcome this opportunity to comment on the proposed action for a backcountry and wilderness stewardship plan for the Wrangell St. Elias National Park and Preserve (WRST). Many of our members aspire to climb within WRST. We suggest herein a few significant changes that will protect wilderness resources while also preserving the unique climbing opportunities found only in this remote Alaskan park and preserve. In general, we believe that any alternatives moving forward should provide well-balanced wilderness and backcountry management plan that allows for future recreational opportunities including climbing access.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 13,000 members and 100 affiliates. We currently hold a [memorandum of understanding](#)¹ with National Park Service to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. The Access Fund is also a member of the Outdoor Alliance, a national coalition representing the nation's climbers, hikers, backcountry skiers, mountain bikers and paddlers (www.outdooralliance.org). To learn more about the Access Fund, see www.accessfund.org.

¹ General agreement between the National Park Service and the Access Fund, 2014.
https://www.accessfund.org/uploads/Access-Fund-NPS_MOU_-2014-2019.pdf

Levitation 49

Levitation 49 is a non-profit sports commission dedicated to economic diversification through mountain sports. To learn more about Levitation 49 visit <http://www.levitation49.org/>.

COMMENTS

The Access Fund and Levitation 49 provides the following specific comments and recommendations to help develop appropriate alternatives for the wilderness and backcountry stewardship plan. Our comments regard 1) fixed anchor authorization and 2) climbing access via small aircraft under ANILCA.

Climbing and mountaineering opportunities in WRST are mostly undocumented but hold endless opportunity for the skilled and self-sufficient climber.

Wrangell St Elias wilderness is a world class mountain climbing area containing numerous peaks that have never been climbed. Few mountaineers make the trip because the area is so remote, the storms so powerful and the chances of rescue so slim. These same qualities make it a haven for a select few, those seeking the purest experience unencumbered by crowds, self-reliant on their own skills and judgment to return them safely.²

Fixed Anchor Authorization

We applaud the current WRST climbing management strategy as it maintains opportunities for primitive and unconfined recreation.³ As climbers continue to explore this remote location the use of strategically placed fixed anchors (bolts) may be needed to aid in the ascent or descent from these remote peaks. Fixed anchors are an important climbing tool that can facilitate the ascent or descent of technical terrain but should be used judiciously and as a last resort when adequate, removable gear is not usable.

Establishing the minimum amount of regulation that would effectively achieve the desired result for managing an area as wilderness is a fundamental principle for managing visitor activities in wilderness.⁴ This principle is recognized in wilderness management practices as the “minimum regulatory tool.”⁵ Wilderness fixed anchor management should provide provisions (programmatically or case-by-case basis) to allow climbers some level of control, while in a wilderness setting, to make decisions regarding fixed anchor placements where no other options are available. Such policies allow climbers to make legal, critical decisions regarding personal safety in unforgiving conditions often experienced in rugged wilderness. Only a very small minority of climbers partake in wilderness-based first ascents that involve the placement of fixed anchors; however, the ability of climbers to place a *de minimus* number of wilderness fixed anchors is a privilege worth protecting because it embodies “outstanding opportunities

² WRST wilderness character narrative, page 7.
<https://parkplanning.nps.gov/document.cfm?parkID=21&projectID=44299&documentID=66812>

³ Ibid.

⁴ Hendee, J. C., Stankey, G. H., & Lucas, R. C. (1990). *Wilderness Management*. Golden, CO: North American Press.

⁵ National Wilderness Steering Committee (2006). Guidance White Paper #3, *Minimum Requirements Decision Process*. National Park Service.

for solitude or a primitive and unconfined type of recreation”⁶ associated with the purest forms of wilderness exploration.

Director’s Order #41 clearly states that authorization is necessary for new fixed anchors; however, the type of authorization may range from programmatic to case-by-case depending on the site-specific characteristics of a wilderness climbing resource. We believe that a programmatic authorization for placing fixed anchors is well-suited to the climbing style, visitor-use levels, and visitor flow patterns at WRST.

We support the use of adaptive management and the importance of the role of education in minimizing the need for restrictive closures or limitations.⁷ Fixed anchor authorization at WRST (a relatively low-use climbing resource) should consider successful programmatic authorization processes used in Rocky Mountain and Zion National Parks - where a much higher volume of climbing occurs in designated wilderness yet managers impose few restrictions on the placement of new fixed anchors. Under these successful plans, resource indicators are monitored to determine whether any impacts are caused by fixed anchor use, and if so whether restrictions are necessary as per Director’s Order #41.⁸

Zion’s fixed anchor policy is as follows:

*Bolts should be considered the tool of last resort by visitors who are creating anchors. As mentioned above climbers, canyoneers, and others creating anchors will be encouraged to use natural colored anchor material (slings and hangers). The park will continue to monitor bolting in the backcountry.*⁹

Rocky Mountain National Park also employs an effective fixed anchor policy in its Backcountry/Wilderness Plan¹⁰ as follows:

The use of removable and fixed anchors, as well as other climbing equipment, is appropriate in wilderness. However, fixed anchors must be placed judiciously and closely managed in order to prevent the degradation of wilderness resources and character. Where anchor points are necessary for climber safety, the use of removable equipment is desired and highly recommended. Fixed anchors should not be placed merely for convenience or to make an otherwise "unclimbable" route climbable.

⁶ Wilderness Act of 1964, Pub. L. 88-577, § Sec. 2(c)(2).

⁷ WRST Public Scoping Final Report 2015, Page 8.

<https://parkplanning.nps.gov/document.cfm?parkID=21&projectID=44299&documentID=70318>

⁸ Director’s Order #41 mandates that NPS units consult with other NPS units to share climbing management strategies and experiences.

⁹ See <http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-forreview.htm>

¹⁰ See Rocky Mountain National Park’s Backcountry/Wilderness Management Plan at 2-40, http://www.nps.gov/romo/parkmgmt/upload/alternatives_2.pdf.

The draft WRST wilderness and backcountry stewardship plan should therefore offer an alternative outlining programmatic fixed anchor authorization given the success of programmatic authorizations at national parks with much higher use-levels in much smaller spatial extents.

Small Aircraft Access Under the Alaska National Interest Lands Conservation Act (ANILCA)

WRST is unique relative to National Park units in the lower 48 states due to its ANILCA jurisdiction. Under the 1980 ANILCA, WRST was established as the nation's preeminent mountain wilderness.

The purpose of the park is "to maintain unimpaired the scenic beauty and quality of high mountain peaks, foothills, glacial systems, lakes, and streams, valleys, and coastal landscapes in their natural state; to protect habitat for, and populations of fish and wildlife...and to provide continued opportunities, including reasonable access for mountain climbing, mountaineering, and other wilderness recreational activities."¹¹

The continued, unrestricted recreational access to WRST's vast climbing opportunities often necessitates the use of small aircraft. Due to the remote geography of WRST, we recommend that access to remote climbing objectives in the park and preserve should continue to be allowed by small aircraft as provided under ANILCA.

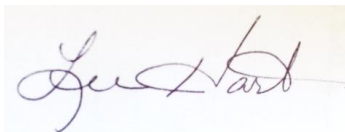
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The Access Fund and Levitation 49 appreciates Wrangell St. Elias Park and Preserves efforts to conduct scoping for alternatives to achieve the appropriate management balance between resource protection and recreational climbing. We urge you to consider adding alternatives that include 1) fixed anchor authorization and 2) climbing access via small aircraft under ANILCA. Thank you for your invaluable work on this important planning process. Please contact me with any questions or concerns regarding climbing management at katie@accessfund.org or via phone 303-552-2843.

Best Regards,



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Access Fund



Lee Hart
Executive Director
Levitation 49

Cc: Brady Robinson, Executive Director, Access Fund
Erik Murdock, Policy Director, Access Fund

¹¹ WRST wilderness character narrative, page 2.
<https://parkplanning.nps.gov/document.cfm?parkID=21&projectID=44299&documentID=66812>