



October 2st, 2015

Monica Alvarez
Chugach State Park Planning
550 West 7th Ave, Suite 1050
Anchorage, AK 99501

via Email: monica.alvarez@alaska.gov

RE: Access Fund Comments on Chugach State Park Management Plan: *Recommended Revisions and Public Review Draft*

Dear Ms. Alvarez,

The Access Fund, American Alpine Club, Mountaineering Club of Alaska and Levitation 49 appreciate this opportunity to comment on the 2011 recommended revisions to the Chugach State Park Management Plan. The Access Fund can provide climbing management expertise, funding, and community outreach to assist Chugach State Park with its climbing resources.

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 advocacy organization with over 10,000 members and 85 affiliates, including [Levitation49](#) in Valdez, Alaska. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach.

American Alpine Club

[The American Alpine Club](#), a 501(c)(3) non-profit, is the national climbing organization that seeks a united community of competent climbers and healthy climbing landscapes. The American Alpine Club provides authoritative climbing information, knowledge and resources that benefit and inspire climbers and future generations.

Levitation 49

[Levitation 49](#) is dedicated to economic diversification through the development and promotion of events and projects that support the mountain sports lifestyle. Their mission is to create and enhance the economy, image and quality of life in Valdez through the development and promotion of world-class mountain sports events and recreation resources.

Mountaineering Club of Alaska

[The Mountaineering Club of Alaska](#) is a 501(c)(7) non-profit corporation, founded in 1958, whose mission is to maintain, promote and perpetuate the association of persons who are interested in promoting, sponsoring, improving, stimulating and contributing to the exercise of skill and safety in the Art and Science of Mountaineering.

COMMENTS

Access Fund appreciates the efforts of Chugach State Park to draft a management plan (the plan) that balances the park's mission with the needs of multiple stakeholders and the protection of its natural and cultural resources. We are pleased that one of the primary purposes for the plan is to "allow for optimum recreational use of the area while protecting the natural and cultural resources".¹ In fact, the 1970 legislation that created Chugach State Park states that the park shall provide "recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas".² The plan also states that the park will "provide recreational opportunities and complimentary facilities to keep pace with the needs and diversity of Alaskans and visitors" and "provide a wide variety of recreation facilities and multi-use recreation opportunities equitably distributed for all capabilities".³

The plan's *Recreation Use and Trends* section notes that "For many, the availability of recreation opportunities is a strong reason for their residence in Anchorage. Major activities occurring within Chugach State Park are camping, picnicking, berry picking, photography, wildlife viewing, backpacking, hiking, nature study, sightseeing, **rock and ice climbing** [bold added for emphasis], hang gliding, boating, ATVing, fishing, hunting, cross-country skiing, and snowmachining".⁴ Access Fund and its partners deeply appreciate the plan's acknowledgement that rock and ice climbing are appropriate recreation activities, and that Chugach State Park is supportive of climbing activities by proposing parking pullouts for the Crack-in-the-Woods and Grunge Wall climbing areas in order to "provide safe parking off of the Seward Highway."⁵

However, Access Fund and the climbing community are deeply concerned that the plan prohibits the use of permanent rock anchors. Permanent rock anchors, also known as [fixed anchors](#), are an integral tool for climbing safely on the outcrops near Seward Highway in Chugach State Park.⁶ Fixed anchors are necessary to protect climbers when there are limited opportunities for removable rock protection and/or the rock characteristics are not conducive to removable protection – both conditions are evident at Chugach State Park. Climbers have been climbing in

¹ Chugach State Park Management Plan, Public Review Draft, May 2011 (p. 1)

² Ibid, (p. 2)

³ Ibid, (p. 29)

⁴ Ibid

⁵ Ibid. (p. 119)

⁶ https://www.accessfund.org/uploads/pdf/AF-AAC_FixedAnchorPolicy_20150428.pdf

Chugach State Park for many decades and depend on fixed anchors to provide a modicum of safety. Fixed anchors, and fixed anchor replacement, should be allowed in order to provide the climbing community with the continued opportunity to adhere to modern, best climbing practices.

State Parks across the country, with similar Recreation Statutes to Alaska, allow fixed anchors for rock climbing. Some of the many examples include: [Banning State Park, MN](#); [Castle Rocks State Park, ID](#); [Eldorado Canyon State Park, CO](#); and [Chimney Rock State Park, NC](#). These parks promote climbing and recognize that fixed anchors are necessary tools to allow climbers to safely enjoy their climbing experience and to conserve the climbing environment⁷.

Access Fund and its partners believe that Chugach State Park should reconsider its prohibition on permanent rock anchors in order to 1) adhere to Chugach State Park's primary mission to facilitate various forms of acceptable recreation, and 2) to align Chugach State Park's rock climbing policy with commonly accepted, best practices for managing rock climbing.

* * *

Access Fund, and its local partners and affiliates, **requests a meeting with the Chugach State Park manager** to discuss this important issue, and to provide personal testimony regarding the importance of rock climbing and fixed anchors to both Chugach State Park visitors and the Municipality of Anchorage.

Thanks for allowing us the opportunity to provide comments and for your consideration. Feel free to contact me via telephone (720-588-3512) or email (erik@accessfund.org) to discuss this matter further.

Respectfully,



Erik Murdock, PhD
Policy Director
Access Fund

and

Charlie Sassara, Past President, American Alpine Club
Lee Hart, Executive Director, Levitation49
Cory Hinds, President, Mountaineering Club of Alaska

cc: Brady Robinson, Executive Director, Access Fund
Phil Powers, Executive Director, American Alpine Club
Wayne Fuller, Alaska Regional Coordinator, Access Fund

⁷ **Fixed anchors are a significant tool for resource management.** Fixed anchors can be strategically placed to minimize climbing related biophysical impacts that can occur to fragile soils, vegetation, and wildlife. This value is sacrificed if any use of fixed anchors is prohibited.