

Alaska Chapter of Wilderness Watch
791 Redpoll Lane
Fairbanks, AK 99712
October 1, 2010

GAP Solutions Inc.
Unimak Caribou Herd Environmental Assessment
P.O. Box 2036
Pocatello, ID 83206-2026

Re: Scoping Comments for Unimak Island Caribou Herd EA

To Whom It May Concern:

The following comments are submitted on behalf of Wilderness Watch and its Alaska Chapter. Wilderness Watch is a national conservation organization that advocates for proper stewardship of our National Wilderness Preservation System.

In 1980 Congress designated 910,000 acres of Unimak Island as Wilderness. The Wilderness Act of 1964 defines wilderness as: *“an area where the earth and its community of life are untrammeled by man.”* The definition goes on to specify that wilderness is: *“protected and managed so as to preserve its natural conditions... and appears to have been affected primarily by the forces of nature.”* The Wilderness Act requires the U.S. Fish and Wildlife Service to preserve the wilderness character of the Unimak Wilderness, and to manage it for whatever other purposes for which it was established *“as also to preserve its wilderness character.”* These legal requirements must be upheld by any decision resulting from the Unimak Environmental Assessment. The Environmental Assessment must provide a complete and thorough analysis of how the proposed wolf control would affect wilderness character.

The Alaska National Interest Lands Conservation Act (ANILCA) which designated the Unimak Wilderness also established purposes for new wildlife refuges that included first and foremost *“...to conserve fish and wildlife populations and habitats in their natural diversity”* and subordinated the purpose to provide the opportunity for continued subsistence uses by local residents to: *“in a manner consistent with”* the purpose to conserve wildlife in their natural diversity. This over-arching legal framework must be at the forefront of how the Environmental Assessment addresses the potential impacts of the proposed action and, ultimately, the decision that is made.

The assessment should provide a complete analysis of the historical record of caribou and predator population dynamics of the island and the adjacent mainland. The unique geographic setting of Unimak Island, the narrow strait of False Pass, and the Alaska Peninsula must be taken into account when characterizing the ecological relationships of the past and assessing impacts. The historical record of movement of caribou between Unimak Island and the mainland should be presented. The status and trend of caribou habitat should also be described and integrated into the assessment. Influences of parasites and disease on the caribou population should also be evaluated. The effects of past and current weather factors and their influences on caribou survival should be assessed. The Assessment must also include the projected effects of climate change on environmental influences such as temperature, rain, snow and icing conditions, which may have profound effects on habitat quality and caribou populations. The role of other predators such as bears and eagles on caribou mortality should be described adequately to determine what effects the proposed action will actually have. A complete historical record of the human harvest of both caribou and predators should be presented to

better understand current dynamics of the existing predator – prey system.

The Environmental Assessment must objectively evaluate the effect of the proposed wolf control would have on meeting legal mandates for preserving wilderness character, and natural diversity.

One of the principle values of Wilderness is the knowledge that can be gained by observing natural processes unfettered by intentional human manipulation, at work on a large scale. The analysis should consider how each of the alternatives would affect this important value of Wilderness.

Further, the preservation of wilderness character requires restraint on both the part of visitors and managers alike. The humility to allow natural processes to function, even when the results may not be to our liking, lies at the heart of the effort to create a National Wilderness Preservation System. The analysis needs to consider how each of the alternatives affects this important quality for preserving wilderness character.

Thank you for the opportunity to provide these comments.

Sincerely,

Fran Mauer
Alaska Chapter Representative
Wilderness Watch