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November 11, 2010

Gates of the Arctic National Park and Preserve – GMP Amendment  
Fairbanks Administrative Center  
4175 Geist Road  
Fairbanks, AK 99709

re: Preliminary Alternatives

Dear Superintendent Dudgeon:

The following comments are submitted on behalf of Wilderness Watch and its Alaska Chapter. Wilderness Watch is a national conservation organization focused on advocating for appropriate stewardship of our nation's National Wilderness Preservation System.

We are gravely concerned about both the structure and content of your proposed “preliminary alternatives,” and the future direction of NPS administration of Gates of the Arctic National Park and Preserve which these alternatives portend. The proposed alternatives represent a significant departure from the current GMP, and are at odds with the spirit and legal mandates of ANILCA and the Wilderness Act. Furthermore, they violate the historic vision of Gates as the place where Robert Marshall so eloquently expressed the wilderness idea.

Following passage of ANILCA, the NPS commonly referred to Gates as the most preeminent wilderness area in the nation's system of park lands, and recognized that it anchored the wilderness end of the spectrum. For most to the past 30 years, the NPS demonstrated a significant commitment to this concept. If not substantially corrected in the draft environmental statement, the “preliminary alternatives” would pose a serious threat to the integrity of Gates wilderness and would over turn the long held agency policy to place Wilderness first at Gates.

In our scoping comments we stressed the responsibility the agency has to preserve the wilderness character of Gates. This means that the quality of wilderness that existed at the time of establishment of the Park and designation of Wilderness (December 2, 1980) must be preserved. Instead of fulfilling this responsibility, and prescribing strategies to restore wilderness character where it has been degraded, and to preserve its future, page 4 of the document merely states that “*each alternative will be evaluated against the park's existing conditions.*” This approach is flawed in that it accepts past degradation of wilderness character and institutionalizes further erosion of wilderness values. In addition, the “preliminary alternatives” introduce a disturbing series of new threats to the Gates wilderness. These are not conventional threats coming from outside the Park, but rather are new threats coming from within the Park Service itself. This insidious approach is completely unacceptable and very irresponsible.

Concepts 2 through 4 are rife with inappropriate directions that would erode the wild values of Gates. The use of vaguely worded statements, for example: “*very limited new infrastructures and facilities*”(Concept 2), “*more opportunities for those with less experience or less time*”(Concept 3), “*inspiring active stewardship and creating advocates for the park and wilderness areas through an array of educational and science based opportunities*” (Concept 4), constitute a bureaucratic smoke screen which obfuscates what is actually being planned. Nowhere in this document is there a clear

affirmation of NPS's legal responsibility to preserve wilderness character. Such clarity is absolutely essential if this planning process is to move forward with any credibility at all.

The proposed zones as displayed in the Concepts 2 through 4, reflect an aggressive fragmentation of the designated Wilderness within Gates of the Arctic National Park. While uniform preservation of wilderness character is mandated across the entire Gates Wilderness, implementation of the proposed zones would sanction varying degrees of degradation to occur within designated Wilderness. This approach is completely at odds with the spirit and letter of the Wilderness Act and the legislated purposes of the Park. There is no justification for such segmentation of the Wilderness other than to reduce its value and significance. What is the justification for only blotches of zone 5, when the whole designated Wilderness area should be in zone 5? Likewise the creation of various sized areas of zone 3 and 4 are completely inappropriate in Wilderness. The special wilderness values around Walker Lake and the upper Noatak River would also be violated by the lowered standards of wilderness stewardship resulting from zones 2 and 3. Liberal application of zone 3 in concepts 2 through 4 are totally unwarranted and inconsistent with Wilderness and ANILCA requirements.

We are also greatly concerned about the apparent separation of the proposed installation of weather stations within the Gates Wilderness from the GMP amendment process. Such maneuvers only engender public distrust and poison any sense of integrity that may have existed for your agency. We strongly urge you withdraw the weather station proposal at this time and instead concentrate on development of an appropriate amendment process for the GMP.

We recommend a completely fresh start on the alternatives process, one that respects the legal requirements of the Wilderness Act to first and foremost preserve wilderness character, and also fulfill the legislative purposes of Gates of the Arctic National Park. All alternatives must assure that wilderness character will be fully preserved. The preferred alternative should combine the most protective wilderness provisions with the most protective zone. Location of any facilities and installations must occur outside of designated Wilderness. Emphasis should be placed on use of lands outside the Park for programs such as visitor information, education and interpretation. Such programs are already in place at the inter-agency visitor information center at Cold Foot, as well as administrative facilities located in Anaktuvuk Pass. For more detail please refer to our original scoping comments (March 30, 2010).

We urge you to reconsider the path you have thus far charted, for it is at odds with legal requirements of the Wilderness Act, and ANILCA, and the entire history of conservation purpose for this remarkable wilderness.

Sincerely,

Fran Mauer  
Alaska Chapter Representative  
Wilderness Watch