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30 March, 2010

Mr. Greg Dudgeon
Superintendent
Gates of the Arctic National Park and Preserve
Fairbanks Administrative Center
4175 Geist Road
Fairbanks, Alaska 99709

Dear Mr. Dudgeon:

Thank you for the opportunity to participate in the scoping process for amending the General Management Plan for Gates of the Arctic National Park and Preserve. Wilderness Watch is a national not-for-profit conservation organization which advocates for appropriate stewardship of the National Wilderness Preservation System and our Wild and Scenic Rivers System. The following comments were developed by members of the Alaska Chapter of Wilderness Watch.

To begin, we must recognize that a great majority of the lands that are subject to this planning exercise are designated as Wilderness, and that the founding purposes for Gates of the Arctic National Park are strongly associated with preserving the wilderness values of the central Brooks Range as Robert Marshall so eloquently described and advocated for protection. It must also be recognized that this Park more than any other in the National Park system is at the wilderness end of the spectrum of our park lands. Given that wilderness is the primary value and purpose of this Park, we strongly urge that it be the central theme under which the General Management Plan is amended.

Our specific points of concern relative to the scoping process are as follows:

1. Preserving wilderness character as referred to throughout the Wilderness Act, must be the primary criterion for judging the appropriateness of all potential agency actions, public uses, and technologies. The Wilderness Act requires the NPS to preserve the wilderness character of Gates, and thus amendments to the General Management Plan must accomplish this basic requirement. Wilderness character includes the natural and scenic condition of the land, natural numbers and interactions of wildlife, and the integrity and freedom of ecological and evolutionary processes. It also includes the intangible spiritual, experiential, and symbolic values of Wilderness.
2. The General Management Plan amendments should adopt a principle of wilderness stewardship for the Park and Preserve. Such stewardship must be more visionary than reactionary; it must anticipate and prevent future threats. It must identify and preclude incompatible uses before they become an entrenched problem. It is most important to identify and emphasize the conditions to be maintained and consequently prescribe strategies to preserve and maintain wilderness character.

3. The "non-degradation principle" must apply to all wilderness areas. That is, no actions will be allowed that diminish the area's current levels of naturalness and wildness. This principle must apply to the agency and recreational and subsistence users alike. The draft plan should also identify all uses and areas where wilderness qualities are currently being degraded and prescribe strategies for restoring values that approximate conditions when the Park was established in 1980.
4. The agency role in recreation should be largely limited to protecting wilderness character, with minimum interference in the visitor's experience. Conditions conducive to self-reliance, freedom, exploration, discovery, challenge and adventure should prevail.
5. The Wilderness must not be modified to eliminate risks associated with wilderness, nor should the agency assume responsibility for visitors. Visitors should be informed that where the wild has not been taken out of the wilderness, there are risks.
6. The amended General Management Plan must recognize that the primary purpose of these wilderness areas is not to serve as settings for recreation. It must recognize the full range of values and benefits wilderness serves: ecological, experiential, cultural, spiritual and symbolic. It must recognize that these areas are also protected for the millions of Americans who will never come, but who find inspiration and hope in just knowing they are here and will be passed on, undiminished.
7. There should be no new developments. Trails, trailheads, airstrips, signs, and other recreational "improvements" are inappropriate in wilderness.
8. The plan should clearly state that as per the Wilderness Act the necessity for commercial services will not be measured by market demand, but rather on whether such services are truly necessary to provide for public use as specified by the Act.
9. Where public use needs to be limited, private users should have preference over commercial users. Provision for some commercial-free zones should be considered.
10. Large-scale commercial operators often exert undue political influence on park policies, both in Alaska as well as the lower 48. The amended General Management Plan should avoid this problem by pro-actively identifying the terms and conditions that will be attached to commercial permits. Commercial permits should only be issued to operators whose trips strive to teach and provide a real wilderness experience rather than a pampered, catered experience. Commercial operators should be held to the highest standard as public examples of wilderness ethics and wilderness travel and practice.

11. Installations, including fixed rock (climbing) bolts, should be prohibited.
12. Hoofed packstock should not be allowed.
13. Competitive events should not be allowed.
14. Access to inholdings must be in compliance with the non-degradation principle.
15. Archeological investigations should be limited to non-invasive means. Digging and trenching should be prohibited except where necessary to protect sites from loss.
16. Recreational and commercial snowmobiling and motor-boating should be prohibited. The definition of qualifying traditional activities developed for the original McKinley National Park should apply to Gates of the Arctic National Park and Preserve..
17. Party size should be limited to current levels.
18. No cabins should be built for either agency or public use. There should be no commercial use of existing cabins.
19. Wheeled aircraft landings should be restricted to durable sites. Some mechanized-free zones should be established as per Roderick Nash's proposal for Gates of the Arctic.
20. Flightseeing should be actively discouraged.
21. Interpretive programs and themes should be limited to those intended to protect and enhance appreciation of the area's wilderness character.
22. Draft EIS should provide data on the number and location of access sites such as airstrips and lakes used for float plane access. It should provide data on previous trends in number of aircraft landings, visitor use and in some cases harvest levels of wildlife. Also it should provide information on the number, location, and status of inholdings.
23. The draft plan must also recognize the National Park Services responsibility to preserve wilderness character in relation to its own administrative activities. This would include appropriate minimal tool analyses which honestly address the effects of an agency activity on wilderness character. Such analyses must not circumvent the law to authorize a method that may appear to be more convenient. This principle must be applied to all scientific programs and all other administrative activities. In designated Wilderness only those activities necessary to administer the area as Wilderness can be authorized.
24. The prohibition on installations in designated Wilderness must be followed, including those proposed for climate change research.
25. Helicopters should only be used for emergency rescues, not for convenient access by agency personnel, or for recreation access.
26. Natural diversity and ecological processes of the Park and Preserve should be allowed to remain unaltered by humans. Introduction of species not native to the area (including “assisted migrations” in reaction to climate change) should not be allowed under any

circumstances.

We hope that this planning process will result in an improved General Management which preserve the unmatched wilderness character and values of the Gates of the Arctic National Park, both for the present and future generations. The Alaska Chapter of Wilderness Watch looks forward to continued participation in the planning process. Thank you for the opportunity to provide these comments.

Sincerely,

Fran Mauer
Alaska Chapter Representative
Wilderness Watch