

Wilderness Watch
P.O. Box 9175
Missoula, MT 59807

June 12, 2015

Superintendent
Glacier Bay National Park and Preserve
PO Box 140
Gustavus, AK 99826

Sent via: <https://parkplanning.nps.gov/commentForm.cfm?documentID=61520>

Dear Superintendent,

The following are comments from Wilderness Watch on the Environmental Assessment for the Climate Monitoring Program in Glacier Bay National Park and Preserve that was put out for public comment in May 2015. Wilderness Watch is the only national wilderness conservation organization focused on the protection and proper administration of all units of the National Wilderness Preservation System, including the Glacier Bay Wilderness.

Our specific comments follow:

1. Wilderness Watch strongly opposes the Climate Monitoring Program as proposed since it will degrade the wilderness character of the Glacier Bay Wilderness, in violation of the mandate of the Wilderness Act and ANILCA to preserve wilderness character.

The Glacier Bay Wilderness in Alaska spreads across 2.66 million acres of the Glacier Bay National Park and Preserve in Alaska, and protects mountains nearly three miles high and one of the wildest coastlines anywhere. Congress designated the Glacier Bay Wilderness in 1980 as part of the Alaska National Interest Lands Conservation Act (ANILCA).

Wilderness Watch supports scientific research in Wilderness, but we do oppose it when such research degrades the wilderness character of the area being studied. The current National Park Service (NPS) proposal unfortunately does just that. Six of these eight proposed stations in Wilderness would be Remote Automated Weather Stations (RAWS), and two more would use existing radio repeaters but would add new data-logging thermistors. Helicopters would fly to and land at at least four of the proposed RAWS sites.

The Wilderness Act's single mandate to the NPS and other agencies that administer Wilderness is to preserve the wilderness character of the areas designated as

Wilderness. Degrading wilderness character to conduct research is simply not allowed, even if that research might produce interesting data. The proposed Climate Monitoring Program also violates at least two of the specific prohibitions found in the Wilderness Act: the placement of structures and installations in Wilderness, and the landing of helicopters in Wilderness.

The proposed research won't benefit the Glacier Bay Wilderness or in any way lead to its protection, so it does not qualify for the Wilderness Act's exception to the prohibitions that says "except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act" which is to preserve wilderness character. On the contrary, this proposal does just the opposite.

In the Environmental Assessment, the NPS admits the installations will degrade the Glacier Bay Wilderness. "The number of helicopter landings occurring each year would increase due to the RAWs station at Brady Icefield," the NPS writes. "The undeveloped quality of wilderness would be diminished for an indefinite period of time by the addition of six new long-term installations" in Wilderness, the agency further admits. "Alternative B" (the NPS alternative) "would contribute adverse impacts from the installation of eight new stations in wilderness," the agency admits.

The current proposal for new stations in the Glacier Bay Wilderness may be only the beginning of more requests to invade this Wilderness with new structures, installations, and helicopters, with more requests over time.

2. The NPS failed to consider an adequate range of alternatives in this proposal. The NPS considered only a No Action alternative, and the proposed alternative for the eight stations inside Wilderness. This is an inadequate range of alternatives and violates the requirements of the National Environmental Policy Act.

The NPS should have considered a better range of alternatives. For example, the NPS should have considered and analyzed an alternative to gather data from new RAWs sites located *outside* designated Wilderness. Such an alternative, for example, would not have violated the Wilderness Act.

A better array of alternatives, including the one just mentioned, would help the NPS evaluate whether gathering data from RAWs stations installed outside of designated Wilderness would provide some if not most of the data wanted by the researchers, again without violating the Wilderness Act and degrading the wilderness character of the Glacier Bay Wilderness.

3. The proposed Climate Monitoring Program must be withdrawn or at least more fully analyzed with an EIS. If the NPS continues to push this program as proposed, and violate federal law in doing so, then a full environmental impact statement (EIS) must be conducted to fully analyze the negative impacts to the

wilderness character of the Glacier Bay Wilderness. Wilderness Watch formally requests the preparation of a full EIS if this proposal advances.

Such an analysis should analyze all other installations and administrative structures that may exist in the Glacier Bay Wilderness, other administrative flights and aircraft landings that may occur in the Wilderness, and conduct a cumulative effects analysis of all the existing and proposed structures, installations, and aircraft use on the wilderness character of the Glacier Bay Wilderness.

Please keep Wilderness Watch on your contact list for future developments for this project in the future.

Sincerely,

Kevin Proescholdt
Conservation Director
Wilderness Watch