

March 17, 2023

Dear National Park Service,

The following comments come from Wilderness Watch on the Glacier Bay Revised Backcountry and Wilderness Management Plan and Environmental Assessment. Wilderness Watch is a national wilderness conservation organization focused on protecting all units of the National Wilderness Preservation System, including the designated Glacier Bay Wilderness.

It is incredibly disappointing to see a plan like this that indicates the NPS has so little fealty to the Wilderness Act and how unwilling it seems to be to live up to the letter and spirit of the law. Unfortunately this Glacier Bay plan is not an isolated instance. Right now, as current examples, the NPS is proposing to chainsaw down standing trees in giant sequoia groves in the Wilderness at SEKI and manually plant sequoia seedlings there. Also now, the NPS admits to using helicopters for routine trail maintenance and campsite work in the Stephen Mather Wilderness in NOCA. Why won't the NPS follow the Wilderness Act?

Our specific comments follow, with our recommendations under each point:

**1. Wilderness Zones; Trails and Campsites.** The plan would create zones in designated Wilderness, and in particular to create a less-protected "Shoreline Access Zone" where development for communication and research installations, trail and campsite constructions, and other degradation can occur. Congress has never given the NPS the ability to create less-protected zones in Wilderness. Congress intended Wilderness to be Wilderness. The NPS must manage all Wilderness in Glacier Bay as Wilderness.

The proposed zoning scheme also appears to be contrary to NPS planning guidance that states, "management zoning or other land use classifications cannot and will not diminish or reduce the maximum protection to be afforded lands with wilderness values. Transition zones adjacent to wilderness may be identified to help protect wilderness values, but no transitional or "buffer" zones are appropriate within wilderness boundaries."

- *Don't adopt the proposed zoning system if it means some areas will be administered to allow degradation of wilderness character. Do not develop trails and campsites where they don't currently exist.*

**2. Communications Towers and Repeaters.** The revised plan proposes to build a new VHF radio tower and up to 10 repeater towers, all 40 feet tall, in Wilderness. These are structures and installations that will degrade the area's wild character and violate the 1964 Wilderness Act. They would also require servicing by helicopters that also violate the Wilderness Act and would further degrade Wilderness. Certainly the NPS is capable of administering the Glacier Bay Wilderness without these structures, as it has for decades. If not, then perhaps another agency should be asked to take over the stewardship job for it.

- *Do not build communications towers and repeaters in the Glacier Bay Wilderness.*

**3. Commercial Mountaineering.** The revised plan proposes to open the door for more commercial activities such as mountaineering in the Glacier Bay Wilderness, despite the Wilderness Act's general prohibition on commercial enterprise. The Wilderness Act bans commercial uses in designated Wilderness, with only a narrow exception. Furthermore, the Wilderness Act does not require the NPS to facilitate ALL possible commercial recreational uses in the Glacier Bay Wilderness. The NPS should not be opening up new commercial uses in the Glacier Bay Wilderness; commercial uses tend to degrade wilderness character. If anything, the NPS should examine all existing commercial uses in the Glacier Bay Wilderness with an eye toward eliminating commercial uses in Wilderness.

- *Do not allow new commercial mountaineering in the Glacier Bay Wilderness.*

**4. Helicopters.** Despite the Wilderness Act's prohibition on aircraft use unless it is essential for protecting Wilderness, the NPS wants to routinely fly and land helicopters in the Wilderness because it's quick and convenient, despite the cost to the wilderness of the Glacier Bay Wilderness. The NPS seems to want to stretch ANILCA's provisions allowing some fixed-wing airplane access to allow ALL helicopter and aircraft use, to the detriment of the wilderness character of the Glacier Bay Wilderness. And in those rare instances where aircraft use might be necessary to preserve and protect Wilderness, there is still harm to wilderness values from helicopter use.

- *Reduce or eliminate the use of helicopters in the Glacier Bay Wilderness. Conduct a cumulative effects analysis of ALL the current helicopter and aircraft use in the Wilderness, including that for the Remote Automated Weather Stations (RAWS) that the NPS approved in 2015 but which are not once mentioned in the revised Plan and EA.*

**5. Research.** The revised plan would allow almost any kind of research (including that which "often requires exceptions for Wilderness Act, section 4c prohibited uses"- Plan, p. 33) to occur within the Glacier Bay Wilderness, even if that research violates the Wilderness Act and degrades wilderness character. Yet elsewhere the Plan states, "Research activities follow the Wilderness Act and subsequent policy." (p. 14). Which one is it? While scientific research can be beneficial, there is no reason for the NPS to allow any and all kinds of research in the Glacier Bay Wilderness if it would violate the Wilderness Act or other laws.

- *Allow only research in the Glacier Bay Wilderness that is compatible with Wilderness. Do NOT allow research that "often requires exceptions for Wilderness Act, section 4c prohibited uses."*

**6. Fixed Climbing Anchors.** Table B2a on page 70 of the EA says that fixed climbing anchors are prohibited in designated Wilderness. Page 76 of the EA also states, that "no fixed anchors may be bolted unless for the reasons described in section 4(c) of the Wilderness Act." Permanent fixed climbing anchors are installations and structures that are prohibited by section 4(c) of the Wilderness Act, and prohibiting them in the Plan and EA is in accordance with the law.

- *Wilderness Watch supports the inclusion of this direction in the EA and Plan prohibiting permanent fixed climbing anchors in the Glacier Bay Wilderness.*

**7. Non-historic Structures and Shelters.** The revised Plan provides appropriate direction on the issue of Non-historic Structures and Shelters. Page 30 of the Plan states: “Based on that guidance, the National Park Service has determined that structures and shelters in the Glacier Bay Wilderness are not appropriate at this time (though they may be considered outside designated Wilderness areas).” This proposed direction follows the directives of the Wilderness Act.

- *Wilderness Watch supports the inclusion of this direction in the EA and Plan to prohibit the construction and use of Non-historic Structures and Shelters in the Glacier Bay Wilderness. Wilderness Watch further supports the direction in NPS management policies that wilderness visitors must accept Wilderness on its own terms.*

Sincerely,

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Conservation Director