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Alaska Chapter of Wilderness Watch
791 Redpoll Ln
Fairbanks, AK 99712
July 12, 2010

Glen Yankus
Environmental Protection Specialist
National Park Service
Alaska Regional Office
240 West 5th Ave.
Anchorage, AK 99501

Re: Environmental Assessment for Climate Monitoring in Arctic Parks

Dear Mr. Yankus:

The following comments are provided on behalf of Wilderness Watch, a national organization dedicated to the protection and proper stewardship of the lands within the National Wilderness Preservation System, and our Alaska Chapter.

Wilderness Watch is opposed to the National Park Service's preferred alternative which would authorize the placement of up to 17 permanent weather recording stations, 9 of which would be in designated Wilderness, using helicopters in most cases for transportation of the units and for at least annual maintenance visits for each site. We base our opposition on the following reasons:

1. The Wilderness Act (Section 4c) prohibits structures or installations in Wilderness. The proposed weather stations are clearly installations, and their placement in Wilderness would violate both the letter and spirit of the law.
2. The Environmental Assessment fails to provide an adequate range of alternatives for consideration as required by the National Environmental Policy Act.
3. The preferred alternative will result in permanent degradation of wilderness character which the Wilderness Act (Section 4b) requires the National Park Service to preserve.
4. The EA also fails to adequately justify the proposed action as a minimal requirement that is necessary to administer the area as Wilderness.
5. The proposed reliance on helicopters for placement and maintenance reflects an additional disregard for the wilderness resources and the public's interest in these resources.

In reviewing this EA, we find it to epitomize rationalizations aimed to circumvent the legal provisions and intent of the Wilderness Act. For example, the document fails to directly

acknowledge that the Wilderness Act prohibits installations, and requires the agency to preserve wilderness character. Instead, the EA advances the notion that data from the permanent weather stations would “outweigh” impacts to wilderness. Even if this notion was true, it is not justification to violate the law. Another convoluted rationale provided in the EA is that a result of the proposed installations “will allow NPS to fulfill the legislative mandate to manage parks in a manner that leaves them unimpaired for the enjoyment of future generations.” We do not accept the premise that the Wilderness areas of these parks should be impaired with permanent installations and helicopter flights in order to “leave them unimpaired for future generations.” Another example of flawed logic used in this document is the claim that data collected by the installations “would help managers make decisions that would promote naturalness and allow natural changes to occur.” In designated Wilderness, nature is already “allowed” to change, no further information is needed for this to occur. Nowhere in the document could we find a clear justification establishing that the proposed action is indeed the minimum required to administer these areas for the purposes of the Wilderness Act.

From the way the assessment and its appendices are constructed, it appears that NPS is placing the interest of scientific research above its legal responsibilities for Wilderness. This is disturbing because science performed in Wilderness must conform to the requirements of the Wilderness Act. Scientific research, while an appropriate and valuable use of Wilderness, must be conducted without motorized equipment or permanent structures, like all other uses of Wilderness. The only exception is if the scientific project is *necessary* to meet *minimum* requirements to protect the area as Wilderness. Put another way, the area could not be administered as Wilderness, but not for the information this research will obtain. That is a highly unlikely scenario, and is clearly not the case here.

In addition, only a few components of wilderness character (untrammled, natural, undeveloped and solitude) were used to evaluate impacts from the proposed action. Impacts to other components such as respect, restraint and humility were not included. This omission appears consistent with the intent to place scientific endeavors above Wilderness.

Perhaps the greatest deficiency of this document is its lack of an adequate range of alternatives. The document refers to “scoping” only in terms of soliciting advice from meteorological and other scientific realms as to the location and number of data collection sites. There is no mention of any effort to obtain input from the public through an open scoping process. This has apparently resulted in the inadequate range of alternatives presented. There should be a thorough evaluation of the use of data from existing RAWS sites located outside of Wilderness areas to interpret influences within Wilderness. There is no detailed discussion as to why such an approach, coupled with various remote sensing technologies, would not yield adequate information and constitute the minimal requirement.

The presentation of cumulative effects is also limited and incomplete. When attempting to address the cumulative effect of additional helicopter flights associated with the proposed action, on page 105, it is stated: “There is currently no accurate data to approximate the total existing number of helicopter and fixed wing flights so it is difficult to assess the affects to the cumulative total.” This is unacceptable. Why is it that the NPS does not know how many helicopter flights are made into these Wilderness areas? Without an appropriate range of alternatives, and adequate cumulative effects analyses, this document fails to meet NEPA requirements.

Furthermore, even if additional climate information is needed to meet wilderness stewardship needs, an alternative that addresses whether existing RAWS sites can meet that need should have been considered. Similarly, an alternative that addresses whether installing additional climate monitoring stations at existing, accessible (foot, river or fixed-wing) sites can meet Wilderness needs should have been considered.

Wilderness needs to be the driver in this analysis. Instead, in the way NPS has constructed the EA, it has put the interest of the climate monitoring community ahead of its Wilderness responsibilities.

Given the various deficiencies in the environmental assessment outlined above, as well as the permanent nature of the proposed installations and the impacts of helicopter flights in Wilderness, we recommend that a full environmental impact statement be prepared in compliance with the National Environmental Policy Act, before any further decisions are made regarding this proposal. The only other action we can support at this time would be selection of the “no action” alternative.

Sincerely,

Fran Mauer
Alaska Chapter Wilderness Watch