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Alaska Chapter Wilderness Watch  
791 Redpoll Ln  
Fairbanks, AK 99712  
27 February, 2010

Daniel Noon  
Chief of Environmental Planning  
Katmai National Park and Preserve  
P.O. Box 7  
King Salmon, AK 99613-0007

Re: Swikshak Cabin Environmental Assessment

Dear Mr. Noon:

These comments are being 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 (Alternative 2 which is to build a new cabin at the Swikshak site). We base our opposition on the following reasons:

1. The Wilderness Act in section 4c) prohibits structures or installations in Wilderness. The proposed cabin would violate both the letter and spirit of that law.
2. The EA fails to adequately justify the proposed action as a minimal requirement necessary to administer the area as Wilderness.
3. It will result in degrading wilderness character which the Wilderness Act(Section 4(b) requires the National Park Service to preserve.
4. The EA identifies the No Action alternative as the environmentally preferred alternative and the one that will best protect and preserve wilderness character. With a few modifications described below, the No Action alternative would be even better.

We acknowledge that the EA correctly reports that there are no legislated

exceptions to either the Wilderness Act or the Alaska National Interest Lands Conservation Act which apply in this case.

By selecting Alternative 2 (build a new cabin) it appears that NPS is ignoring its own policy that requires visitors to “*accept wilderness on its own unique terms...including possible dangers from wildlife, weather conditions, physical features, and other natural phenomena.*” Construction of a cabin for NPS use sets a poor example for visitors to the Katmai Wilderness. In addition, the EA states that currently rangers on patrol of the area camp in tents and use an electric fence to keep bears away. This demonstrates the minimal requirement in this case and sets an appropriate example to the public. The preferred alternative does the opposite.

We are very concerned about the increased human activities a new cabin will inevitably attract to this area of the Wilderness. The EA alludes to this by suggesting that the cabin may be also used by scientists, and recreationists, but does not describe how such concentration of human activities degrades wilderness character and creates wildlife conflicts.

The EA does not indicate if there is an existing wilderness stewardship or management plan in effect for the park, and it does not indicate how the proposed cabin would be allowed within such a plan? We would also like to know how many other such ranger patrol or other administrative cabins currently exist in the Katmai Wilderness? Are there plans for other administrative cabins? The EA mentions a patrol cabin at Amalik Bay, we would like to know when this cabin was established and how it was justified. Could you please send us information on these questions as well as a copy of your current wilderness stewardship plan?

Very limited information regarding public use within the region of the proposed cabin is provided as a justification for the patrols that are based there. The EA does not indicate what, if any limits exist for managing public use in this area of the Wilderness. Instead the EA only uses evidence (questionable at best) of rising public use as a justification for the cabin. A permanent patrol cabin can not be justified for failure to properly manage public use.

Instead of building a new cabin which is in violation of the Wilderness Act, we suggest that the NPS remove the old cabin that currently exists at this site. Future ranger patrols should continue to operate as they currently do using temporary tents and electric bear fences. Encouraging leave no trace camping practices, and a “pack it in, pack it out” policy for human waste, would go a long way in further protecting the area. Since park staff and visitors arrive and depart from the area by way of boat or plane, it would seem fairly simple, at least for park staff, to utilize a port-a-potty system.

We also wonder whether it might be better to utilize roving wilderness ranger patrols on foot or kayak in this area of the Wilderness, than to base a ranger out of a patrol cabin that will limit his or her activities to those areas within a relatively short distance from the cabin.

We request that we be informed of your decision on this matter as soon as it is made.

Thank you for the opportunity to comment.

Sincerely,  
Fran Mauer, Alaska Chapter of Wilderness Watch