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September 7, 2006

Mr. William Laitner
Superintendent
Olympic National Park
600 East Park Avenue
Port Angeles, Washington 98362

Dear Mr. Laitner:

Our organizations are dedicated to preservation of the resources and values of Olympic National Park. We insist that the National Park Service (NPS) manage park wilderness in accordance with the law. The NPS proposes to burn several acres of designated wilderness at Ahlstroms and Roose's Prairies for the purpose of creating and/or maintaining unnatural conditions. This is but the latest example of the NPS subordinating wilderness values to a putative mandate to perpetuate human created landscapes.

The Fire Management Plan represents a radical departure from current management practices and destroys wilderness by introducing mechanical treatments in wilderness and experimental manipulation of natural landscapes. Further we believe that prescribed fire used to restore natural and cultural landscapes is inappropriate given the current state of knowledge regarding the ecology of coastal prairies. Additionally, the cultural burn of Ahlstroms and Roose's Prairies has the potential to destroy that habitat for two rare butterfly species.

Parks like Olympic are tasked with the complex job of meeting a variety of mandates designed to protect diverse and valuable resources. At Olympic one of the many

challenges involves administering cultural resources within designated wilderness. Burning these prairies fails to meet the requirements of the Wilderness Act.

There is no law, policy, or court decision to which the NPS can point that either mandates or permits the NPS to manage wilderness designated to create, reestablish or perpetuate historic feeling and appearance at the expense of wilderness character. The restoration of a historic feeling and appearance on a landscape is as antithetical to wilderness preservation as is imaginable.

The Wilderness Act defines “wilderness” as “undeveloped Federal land retaining its primeval character and influence...managed so as to preserve its *natural conditions*...” (emphasis added). Further, the Act requires that each Federal agency “shall be responsible for preserving the wilderness character of the area and shall administer such area for such other purposes for which it may have been established as also to preserve its wilderness character.” This legal requirement means more than simply the NPS will only use methods that are consistent with preservation of wilderness character. This requirement means that the NPS must refrain from destroying the wilderness character by creation of artificial, i.e. human-created, landscapes to perpetuate historic feeling and appearance.

The notion of perpetuating manmade landscapes in wilderness finds no support in the history of the Wilderness Act or of early understandings of the Act. Olympic, of all parks, should know that the NPS must scrutinize cultural resource objectives with a close eye on the Wilderness Act mandates. In 2005 a Federal judge rebuked you for degrading wilderness character for the sake of preserving the historic feel and appearance of places within the park wilderness, by attempting to install two new structures. The judge found that the NPS was in violation of the Wilderness Act. The court instructed the NPS: “[Once] the Olympic Wilderness was designated, a different perspective on the land is required. Regarding the Olympic Wilderness, that perspective means ‘land retaining its primitive character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions.’”

The NPS now presumes that burning Ahltroms and Roose’s Prairies for the express purpose of maintaining historic feeling and appearance trumps wilderness character. This is an extreme position. The NPS adopted this position in an environmental assessment (EA) from 2003. Since then a Federal court has clarified the delicate relationship between resources in Olympic’s wilderness. Yet, the NPS appears to believe that the Federal court decision is of no moment to the 2003 EA and has no bearing on whether the NPS subordinates natural conditions to cultural landscapes in wilderness.

We call upon the NPS to review those portions of the 2003 Fire Management Plan and

EA that affect designated wilderness. We request that the NPS revise the Plan and the EA to inculcate the 2005 court decision. It is unwise for the NPS to disregard the courts.

If you have any questions about our concern, please contact any of us at the phone numbers listed above.

Cordially,

Donna Osseward, President
Olympic Park Associates

Sue Gunn, Washington State Director
Public Employees For Environmental Responsibility

George Nickas, Executive Director
Wilderness Watch

cc: National Wilderness Steering Committee