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Subject: Alpine Lakes water development proposals and potential impact on Wilderness

Mr. Kaputa:

Thank you for scheduling a meeting in Seattle to make more public some of the proposals Chelan County and the Icicle Work Group are looking at within the Alpine Lakes Wilderness.

I am Director of the Western Lands Project, a non-profit, membership organization conducting research, outreach, and advocacy for responsible federal land exchange policy. We also scrutinize a broad range of projects that propose to sell, give away, or relinquish public control of public lands, and by necessity monitor projects such as these that potentially imperil the integrity of public lands. I am also a board member of Wilderness Watch, the only organization in the country that focuses on preservation and stewardship of lands and rivers included in the National Wilderness Preservation System and National Wild & Scenic Rivers System. These comments are those of the Western Lands Project, but I have taken the liberty of employing some of my Wilderness Watch colleagues' materials on Wilderness to illuminate the issues.

There was a general sense at the February 17 meeting that the proponents have scant understanding of the proposal's implications in the context of Wilderness and a great deal of confidence in their ability to accomplish what they wish without much concern for the protections Congress provided under the Alpine Lakes Area Management Act of 1976.

Many remarks alluded to the relative lack of visual impact or aesthetic degradation, but as I suggested at the meeting, there is a broad spectrum of Wilderness qualities and characteristics that could be affected by these projects, and the Work Group will need to significantly stretch its understanding of Wilderness and the Wilderness Act if it is to understand and answer to the concerns of wilderness advocates and the public.

By now, you may have run across the following language:

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled¹ by man, where man himself is a visitor who does not remain.”

The designation of Wilderness affords the greatest protection for public lands and stands apart from any other protective designation, particularly because of the many intangible qualities and unique purposes associated with Wilderness.

The following excerpts from Wilderness Watch writings (*in italics*) may be of help in leading you to a better initial understanding of Wilderness and the potential impacts of the Work Group’s proposals.

Wilderness Character

The primary author of the Wilderness Act, Howard Zahniser, stated in 1962 that “The purpose of the Wilderness Act is to preserve the wilderness character of the areas to be included in the wilderness system, not to establish any particular use.”

*Wilderness Act visionaries believed that wilderness character consists of both tangible, physical components as well as intangible, psychological and spiritual components. Some tangible components of Wilderness character include the presence of native wildlife at naturally occurring population levels; lack of human structures, roads, motor vehicles or mechanized equipment. Some intangible components include solitude; immediacy; opportunities for reflection; freedom; risk, adventure, and mystery; where natural processes occur without intentional human interference; **places that forever remain in contrast to modern civilization, its technologies, and contrivances [emphasis added].***

Nondegradation

Congress can designate any federal land as wilderness, yet once designated, the stewardship of that area must not allow its wilderness character to diminish below the quality and amount that it possessed on the day it was designated. The concept of nondegradation applies to all aspects of Wilderness character, both its tangible and intangible components.

*A policy of nondegradation cannot be achieved without engaging the cause of degradation, as well as its effects. To this end, management intent is critical – does the intent of an action affirm our role as respectful guests and stewards of Wilderness? **Or does it simply reinforce the “primacy” of our uses and benefits, our convenience and expediency [emphasis added]?***

Solitude

Section 2(c) of the Wilderness Act defines Wilderness, in part, as an area with “outstanding opportunities for solitude.” The Act clearly recognized the human need and benefits of seeking solitude from modern civilization, its pressures and technologies. Opportunities for solitude from civilization forms an intrinsic component of an area’s wilderness character. Good Wilderness stewardship requires protecting this important quality, and not allowing it to diminish over time.

¹ Unconstrained, unrestrained, unencumbered.

Wilderness solitude is diminished by actions and activities that are reminders of civilization, its conventions, and technologies [emphasis added].

Conclusion

The Western Lands Project is leery of the *quid pro quo* equation inherent in this proposal—i.e., offering the public good of improved instream flow that is essentially paid for through diminishment of another public good.

We understand that there are some valid existing water rights grandfathered in with the designation of the Alpine Lake Wilderness, but we are deeply concerned about the possibility that the footprint and impacts may expand outside legitimate boundaries, degrading both the environment and the character of the Alpine Lakes Wilderness, and in a greater sense, the integrity of Wilderness at large.

Please keep us informed as the Icicle Work Group proceeds with its work. Thank you for your consideration of these comments.

Sincerely,



Janine Blaeloch
Director