

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

SARAH PALIN, Governor

3700 AIRPORT WAY
FAIRBANKS, ALASKA 99709

PHONE: (907) 374-3737

FAX: (907) 451-2751

March 9, 2009

Carol A. Goularte
District Ranger
Sitka Ranger District
204 Siginaka Way
Sitka, AK 99835

Dear Ms. Goularte:

The office of the Citizens' Advisory Commission on Federal Areas was provided a copy of a January 8, 2009 letter from the Sitka Ranger District notifying the State of Alaska ANILCA Program of the proposed removal of two cabins in the South Baranof Wilderness. We have reviewed the subject letter and submit the following comments for your consideration.

The Commission appreciates that the Rezanof Lake and Maksoutof Lake cabins are in very poor condition and have been for quite some time. We understand the need to take some action with regard to these cabins. The 1982 *South Baranof Wilderness Management Direction Environmental Assessment* noted the poor condition of these two cabins and the adopted alternative stated that both would be removed from the list of recreation cabins and posted as emergency shelters with no active maintenance. To the best of our knowledge this was done. However, it is not clear when the status of the cabins was changed from emergency shelter to decommissioned.

Although these cabins have not been maintained for many years and are in poor condition they have been available to the public for emergency shelter and other use. The provided pictures of the two cabins showing miscellaneous items and what appears to be a covered stack of firewood at the Rezanof cabin indicate fairly recent use. Local and regular users of this area are likely familiar with these cabins and know they are available for either casual or emergency use. Your letter states that the USGS maps identify both cabins as ruins. However, our review of the Port Alexander Quad (1951 base, 1994 revision) shows both identified simply as "cabins."

Because of the existing use, the Commission does not support the removal of these cabins without full consideration being given to rehabilitating or replacing them at either their present locations or locating an equal number of replacement cabins or shelters at appropriate locations in the South Baranof Wilderness. The forthcoming environmental assessment for this proposed action should thoroughly examine alternatives that would include rehabilitation or replacement of these two cabins.

ANILCA Section 1315(c) provides authority for the maintenance or replacement of existing cabins in designated wilderness. Section 1315(d) provides for the construction of new cabins and shelters in wilderness areas if necessary for the protection of public health and safety. These authorities are reflected in the Forest Service Manual Region 10 Supplement for Wilderness Management and in the Tongass Land Management Plan Management Prescriptions for Wilderness.

Further, rehabilitation or replacement of these cabins would have no additional impacts to wilderness values. We would question the purpose or need stated in the letter to “improve the undeveloped quality of wilderness character by returning the land back to a natural state.” Both of these structures predate the 1980 designation of this area as wilderness and have long been a part of the area. Congress recognized that most of the newly created conservation system units, including Forest Service wilderness areas in Alaska would have cabins within their boundaries. This is why the special ANILCA provisions related to cabins were adopted.

The letter states that the Tongass National Forest strategy is to maintain cabins in locations of “high interest and with a predicted average use” and that all cabins are under the recreation fee program. While the Commission appreciates that declining budgets and staffing make it increasingly important for public facilities to generate revenue and pay their own way, it is also appropriate to consider maintaining existing or constructing new cabins or shelters primarily for public health and safety. The environmental assessment should examine the need for cabins or shelters that might primarily be for public safety, but also available for general recreational or subsistence use.

The proposal seeks to send teams of two to three people to each cabin site. These teams would spend three to four days dismantling each cabin. Non-burnable materials would be flown out by floatplane. The Commission would suggest that at only slightly more cost, primarily for materials, those same teams could be used to rehabilitate the cabins. Transportation costs for the teams would be the same. The cost of flying in new material would be similar to that for flying out the non-burnable material from the dismantled cabins. Even minimal rehabilitation and stabilization would result in two functional emergency shelters. The EA should examine this alternative.

In performing work to either rehabilitate, replace or remove these cabins, we recommend that the Service use the minimum tool necessary but not necessarily the most primitive tools available. Hand held power tools, such as chain saws or battery powered tools, may provide a safer and more efficient work environment with only temporary and negligible impacts to the wilderness character of the area. The use of power equipment may also shorten the overall time of the project, further reducing any perceived impacts to wilderness values.

If the Sitka Ranger District has not already done so, the Commission would encourage you to work with local organizations or groups such as Territorial Sportsmen, Inc. or Friends of the Tongass Cabins to assist in maintaining existing or constructing new cabins in the district. The recently enacted federal stimulus legislation has made funds available and provided direction to federal agencies that will make these types of partnership agreements possible.

ANILCA 1315(d) requires notification to the House Committee on Interior and Insular Affairs (now the Committee on Natural Resources) and the Senate Committee on Energy and Natural

Resources before an existing cabin is removed or a new cabin or shelter is constructed within a wilderness area. Your letter does not indicate if notification has already occurred or will be made at a later time. In any event, please provide our office with a copy of the notification for our files.

The 1982 EA listed six public use cabins in the area. One cabin, listed the as the “new” Rezanof Cabin no longer appears on the list of cabins within the South Baranof Wilderness Area. The Rezanof Cabin and the Maksoutof Cabin are now being proposed for removal, leaving three cabins, Plotnikof Lake, Avoss Lake and Davidof Lake open and available for public use. A fifty percent reduction in the number of cabins available for public use in this area represents a significant loss of recreational opportunities in the South Baranof Wilderness Area.

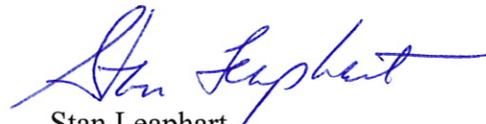
The cabin situation in the South Baranof Wilderness exemplifies a primary concern with the public cabin program in the Tongass. The 1982 decision to remove these cabins from the list of recreation cabins with no active maintenance ensured they would eventually deteriorate to the point where they are now considered unsafe and unusable. After years of no maintenance they are now proposed for removal. A review of the list of Tongass cabins and other recreational facilities slated for closing or decommissioning in the 2005 *Recreation Site Facility Master Planning 5-Year Action Plan* likely points to a similar outcome for many of these facilities.

The Commission is particularly concerned that of the approximately 35 cabins to be closed or decommissioned, some 14 or 15 are in designated wilderness. Despite Forest Service assurances to the contrary, we are led to conclude that the goal is to remove as many cabins from Tongass wilderness areas as possible. We strongly encourage the Forest Service to rehabilitate or replace these two cabins within the South Baranof Wilderness to avoid additional loss of recreational resources and opportunities in this area.

Finally, in October 2008 the Commission sent each ranger district a request that we be placed on your distribution list for notices of projects such as this. I have enclosed a copy of that letter for your reference. While this Commission regularly consults with the State ANILCA Program, we operate independently and should be notified separately.

We appreciate the opportunity to comment. We look forward to reviewing the environmental assessment and to working with the Sitka Ranger District on this and other proposals.

Sincerely,



Stan Leaphart
Executive Director

Cc: Sue Magee - ANILCA Program
Forrest Cole – Forest Supervisor