STATE OF ALASKA

SEAN PARNELL, Governor

CITIZENS' ADVISORY COMMISSION
ON FEDERAL AREAS

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December 22, 2010

Carol Goularte
District Ranger
Sitka Ranger District
204 Siginaka Way
Sitka, Alaska 99835

Dear Ms. Goularte:

The Citizens' Advisory Commission on Federal Areas has reviewed the action alternatives now being considered for the White Sulphur Springs Bathhouse, Cabin and Trail Project outlined in your letter of November 12, 2010. We offer the following comments for your consideration in preparing the Environmental Assessment (EA) for this project.

This Commission is a strong advocate for the U.S. Forest Service public use cabin program in Alaska. These cabins are an important resource which allow the public to enjoy a wide variety of activities and experiences on both the Chugach and Tongass National Forests. In a time of declining budgets, we are concerned that continuation of this program has become increasingly difficult. However, we are encouraged by the recently completed projects to repair or replace cabins and related facilities on the Tongass, as well as future projects such as the replacement of the Anan Bay, Winstanley Island and Kadake cabins. We urge the Sitka Ranger District to complete the necessary analysis for this project as soon as possible so that allocated funding is not lost.

The Commission supports the proposed alternative that would replace the existing White Sulphur Springs cabin in a new location, replace the bathhouse and reconstruct the trail. This appears to be the most practical alternative, as it will replace a structurally deteriorated and unsafe cabin with one that is structurally sound and American with Disabilities Act (ADA) accessible. Also, moving the cabin away from the bathhouse will reduce potential conflicts between cabin users and other visitor groups who often use the bathhouse and springs during the same time period. Increasing the distance between the two facilities will also increase privacy and opportunities for solitude.

As your letter points out, the cabin and bathhouse have been at this site for decades before the West Chichagof-Yakobi Wilderness Areas was designated by the Alaska National Interest Lands

Conservation Act (ANILCA). In designating wilderness areas on the Tongass, Congress was fully aware that public use cabins and facilities such as the White Sulphur Springs Cabin and Bathhouse would be encompassed by these newly designated areas. Consequently, appropriate provisions to allow their continued use and maintenance were included in the statute.

ANILCA Section 1315 (c) states: *"Previously existing public use cabins within wilderness designated by this Act, may be permitted to continue and may be maintained or replaced subject to such restrictions as the Secretary deems necessary to preserve wilderness character of the area."* (emphasis added). Section 1315(d) also allows for the construction of new cabins or shelters if determined necessary for the protection of public health and safety. Replacement of these facilities would be consistent with the provisions of ANILCA and the Tongass Land Management Plan.

Your letter also discusses the possibility of using a helicopter, motorized equipment and mechanized transport to accomplish the proposed project alternative. It also states that a Minimum Requirement Decision Guide would be used to determine the minimum requirements necessary for the project. We would encourage the use of the means and methods, including helicopter access, motorized equipment and mechanized transport, necessary to accomplish the project in the most efficient and cost effective means.

Perceived impacts associated with noise from motorized or mechanized equipment are short-lived and have no permanent impact. Use of low tech tools and "primitive" construction methods would undoubtedly increase the length of time construction activity disrupts the area and also increase personnel and logistical costs. Certainly the cabin and bathhouse would be closed during construction activity, so impacts to visitors would be minimal. Public notice of scheduled construction activities would also allow users of the hot springs to avoid the area during those times.

Please keep the Commission on your contact list for this project. As we have said, we are very interested in helping to maintain a viable program of public use cabins on National Forest lands in Alaska. Please contact our office if you have any questions about our comments or if we can provide additional information.

Sincerely,

Stan Leaphart

Stan Leaphart
Executive Director