

# STATE OF ALASKA

**SARAH PALIN, Governor**

**ANILCA IMPLEMENTATION PROGRAM  
Office of Project Management and Permitting**

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March 9, 2009

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

Dear Ms. Goularte:

The State of Alaska reviewed the January 8, 2009 scoping letter regarding the removal of two decommissioned cabins in the South Baranof Wilderness. The following consolidated state agency comments were compiled by the State's Alaska National Interest Lands Conservation Act (ANILCA) Implementation Program and cover issues relative to ANILCA and other state interests. Any correspondence or response pursuant to the Coastal Zone Management Act and the Alaska Coastal Management Program will be provided separately by the Division of Coastal and Ocean Management.

The scoping letter indicates the Rezanof Lake and Maksoutof Lake cabins' current condition precludes suitability for the public recreation cabin program and is not being considered for replacement based on their location in low demand areas. Given the information provided it is not clear why use in this area is currently low. The relatively low use could be a result of the cabins' deteriorated condition, access difficulties, low availability of natural resources in the area, or lack of use by outfitter/guides. Additionally the 1982 *South Baranof Wilderness Management Direction Environmental Assessment* indicates there was an additional new log cabin located on Rezanof Lake at that time. The scoping notice does not explain whether that cabin still exists and if so, its availability to provide public shelter in a nearby location. This additional background would help establish whether there would be value in pursuing options to restore or replace either of these cabins. We recommend contacting national or local organizations, such as Territorial Sportsman, Inc. or Friends of the Tongass, to better understand the degree of public interest in cabins at these locations and determine whether these or other organizations would have interest in providing volunteer or monetary assistance for maintenance or replacement.

The scoping letter also indicates that removing these structures would “*improve the undeveloped quality of wilderness character by returning the land back to a natural state.*” While we recognize the basis for this statement is likely Section 1(c) of the Wilderness Act, which states that wilderness areas are to be “*protected and managed to preserve its natural conditions,*” it is equally important to recognize Section 1(a), which specifies Wilderness areas be set aside for the “*use and enjoyment of the American people.*” These cabins, which predate the Wilderness designation, could facilitate use and enjoyment as well as foster an appreciation for wilderness values. Additionally, the Wilderness Act includes provisions to provide for health and safety in times of emergencies. Furthermore, Section 1315 of ANILCA allows for maintenance and replacement of existing cabins in designated wilderness for the purposes of public health and safety.

Should the District reconsider and determine there is public interest in restoring or replacing either of these cabins, we note that additional impacts would be minimal since the cabin footprints already exist. Otherwise, we recommend the District consider whether removing the structures is necessary and worth the expense. Funds available for removal could instead be used toward basic rehabilitation of one or both of these cabins to maintain emergency shelter availability, possible inclusion in the public recreation cabin program, to support needed repairs on other existing cabins, or to facilitate construction of new cabins in high demand areas.

Thank you for the opportunity to comment. Please contact me at 907-269-7477 or Sue Magee at 907-269-7529 or by email at [susan.magee@alaska.gov](mailto:susan.magee@alaska.gov) if you have any questions.

Sincerely,

/ss/

Sally Gibert  
ANILCA Program Coordinator