



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

ANILCA Implementation Program

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Kevin Hood, Wilderness Manager
USDA Forest Service – Tongass National Forest
Admiralty National Monument
8510 Mendenhall Loop
Juneau, AK 99801

Dear Mr. Hood:

The State of Alaska reviewed the Environmental Assessment (EA) for the Windfall Harbor Shelter Relocation and Rehabilitation Project within the Kootnoowoo Wilderness on Admiralty Island. The following comments represent the consolidated views of the State's resource agencies.

The State strongly supports the Forest Service's intent to rehabilitate and relocate the Windfall Harbor Shelter in order to improve visitor safety and reduce negative human- brown bear contacts, preserve the historic nature of shelter, reduce long-term maintenance needs and costs, and restore the shelter to its original setting nearer saltwater. Cabins and shelters are essential in Alaska's wilderness areas, which are typically remote and subject to harsh and unpredictable weather events. Section 1315 of the Alaska National Interest Lands Conservation Act (ANILCA) and Forest Service regional guidance (Forest Service Manual 2300 - R10 Supplement No. 2300-2008-2) allows for construction, maintenance and replacement of new and existing cabins and shelters in designated wilderness.

This proactive effort to relocate the shelter will both preserve visitor opportunities provided by the shelter and simultaneously reduce the shelter's long-term maintenance costs. The proposed relocation will also reduce the chance of negative bear-human interactions by providing greater separation between the shelter and the nearby trail frequented by bears.

The Windfall Harbor Shelter is often used by hunters and it is our understanding that meat has been hung inside the shelter in the past, which would be a contributing factor in attracting bears. Therefore, relocating the cabin is only a partial solution to the issue. Providing a separate meat hanging shed away from, but within view of the shelter, would encourage safe meat storage, reduce negative bear-human encounters, and increase overall human safety. The Kennel Creek Cabin on Chichagof Island has such an associated structure, which enables hunters to hang meat high off the ground, significantly reducing brown bears' ability to access stored meat. The shed is also located about 50 feet from the cabin, allowing occupants to readily observe and take steps to discourage bears from approaching.

To further provide for the protection of human health and safety, in addition to relocating the cabin, we recommend that a meat hanging shed or similar shelter structure (i.e. a lean-to with one open side as described in regional guidance R10 Supplement No. 2709.11-2006-4 to Forest Service Handbook 2709.11, at Section 41.2) be added to the project design pursuant ANILCA Section 1315(d). The structure could also be designed similar to the historical Windfall Harbor Shelter to blend in with the natural environment, which in contrast to temporary structures constructed with materials brought into the area by users, such as blue tarps and an assortment of ropes or bungee cords, would be more esthetically compatible with wilderness character.

Page Specific Comments

Page 5, Wildlife, Alternative 2; and Page 6, Human Environment, Alternative 2: We disagree with the conclusion that visitor safety will improve if the shelter is closed to overnight use. Given the remoteness of the area, and especially visitation during the fall deer hunting season, overnight use of the area would likely continue regardless of whether the shelter is closed to overnight use. It is also unclear how users camping in the brush in tents would result in improved visitor safety as compared to overnight use of the shelter. Visitor compliance with an overnight closure of a shelter close at hand is also highly unlikely. Shelters are also necessary to protect users from unpredictable and harsh weather events and should remain available at all times. We do not support closing the shelter to overnight use.

Page 6, Human Environment, Alternative 1: The EA states “...*under current management, overnight use at the shelter is discouraged, but not prohibited.*” While we understand the Service is concerned about bear interactions in the shelter’s current location, “discouraging” use when there is no legal prohibition in place leads to confusion in the field and potential enforcement issues. We assume this will no longer be considered necessary once a decision has been made. As noted above, we do not support closing or “discouraging” use of the shelter to overnight use.

Page 6, Human Environment, Alternative 1: Under the no action alternative, overnight use of the shelter is currently occurring so continued overnight use of the shelter will not “bring *increased possibility of close human-bear interaction and the risk of human injury or death.*” We request the decision take into consideration that the current possibility of close human-bear interaction would remain unchanged under the no action alternative.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan Magee
ANILCA Program Coordinator