



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT & PERMITTING

550 West Seventh Avenue, Suite 1430

Anchorage, Alaska 99501

Main: 907.269.8690

Fax: 907.269.5673

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Forest Cole, Forest Supervisor
U.S.D.A. Forest Service
Tongass National Forest
648 Mission Street
Ketchikan, AK 99901

Dear Mr. Cole:

The State of Alaska reviewed the Sustainable Cabins Program Environmental Assessment (EA) regarding the removal of nine cabins in the Tongass National Forest and the conversion of three cabins into shelters. A total of 12 cabins, located primarily in designated wilderness areas, will be affected by the proposed action. The following comments represent the consolidated views of the State's resource agencies.

The EA indicates the Service is trying to provide a sustainable network of cabins and shelters in the Tongass that meet Service standards, minimize maintenance backlogs, and maximize public investments. The 12 cabins selected for removal are considered either unsafe structures or appear to receive very low public use. The removal of the twelve identified cabins will allow the Service to focus funding on more heavily used cabins. Shrinking agency budgets is cited as the primary factor in the decision to remove cabins.

We recognize the Service is faced with decreasing budgets for cabin management each year; however, one of the supporting documents provided with the EA, "Public Use Cabin Financial Sustainability Strategy", prepared by Capital Hotel Management (CHM) in 2011, only recommended decommissioning four cabins (Rainbow Lake Cabin in the Ketchikan Ranger District, De Boer Cabin in the Petersburg District and Binkley Slough and Sergief Cabins in the Wrangell District) and indicated that "*because of the history of the cabins and their original purpose as safe havens for the public that may happen to be stranded in the wilderness, decommissioning of cabins may be difficult to justify*" (pg. 46 of Public Use Cabin Financial Sustainability Strategy).

There is a longstanding intent to retain public use cabins in wilderness as demonstrated by the following excerpt from the "*Summary of Energy Committee's Decisions on Alaska's Lands Bill (With update by decisions of the ad hoc conference committee)*" **126 Cong. Rec. 21235 (Aug. 4, 1980)**:

"Wilderness Management: For the most part, the committee agreed that existing law and practice should govern management where wilderness is established. However, the committee did agree that *a system of cabins for public use and safety should not only be maintained but also upgraded because of Alaska's climactic conditions and the size of the areas proposed.*"

We remain concerned that the removal of cabins from the Tongass (including those in designated Wilderness) may have a negative impact on the health and safety of forest users. In addition to the CHM report, the discussion in Appendix C documents this concern: “*Public outreach on this and past cabin projects reiterated the importance... of cabins for health and safety.*” (Appendix C, page 2) The EA indicates cabins slated for removal are not important for health and safety because no one specifically identified the subject cabins as being used for safety purposes during the various public outreach efforts. However, commenting generally about the importance of cabins for health and safety describes a concern that *all* cabins are important for health and safety purposes, including cabins slated for removal. Commenters likely did not realize the Service would dismiss a general comment of this nature on the basis that specific cabins were not identified.

- We request the Service continue monitoring use patterns on the Tongass to determine if new public use cabin/shelter construction is needed. The need for individual public cabins for health and safety may change over time as public use patterns change. Congress reflected their recognition of this likelihood in ANILCA, Section 1315(d), which allows for the construction of “*a limited number of new public use cabins and shelters.. [if] necessary for the protection of public health and safety.*”

Efficient use of diminishing funding

As evidenced by the backlog of cabin maintenance needs documented in this EA, it appears the Service can no longer afford the labor intensive efforts of using non-mechanized methods (hand operated, crosscut saws) to provision firewood and/or conduct basic cabin repair. Instead of using hand operated tools, we recommend the use of chainsaws and other motorized tools in these remote settings (in support of administrative needs, which we understand includes maintenance of public use cabins), use would be in limited durations for the amount of time necessary to cut and trim trees, repair cabins, etc.

- A minimum tool analysis which considers the use of mechanized equipment for cabin maintenance should be conducted on a site by site basis. A determination allowing minimal use of mechanized equipment could significantly reduce maintenance costs and would be consistent with ANILCA 1315(c), which states that previously existing public use cabins within wilderness may be permitted to continue *and be maintained.*

A directive issued by the Tongass Forest Supervisor in 2008 instructing District Rangers to no longer use chainsaws for administrative use in wilderness, except when the work cannot be accomplished by other means, may have been a contributing factor to the continued decline of some of the cabins. A different budget scenario existed in 2008 when this directive was issued. Reauthorizing the administrative use of chainsaws for cabin maintenance activities in wilderness, by properly trained volunteers, is consistent with Congress’s clear intent to protect the Alaskan lifestyle. Continued upkeep of cabins using motorized tools if the Service, or volunteer groups acting on the Service’s behalf, is unable to adequately maintain them with nonmotorized tools will ensure human health and safety is maintained throughout the region. This would allow the public to continue to experience these wild areas in the face of a challenging climate.

Partnerships

To better sustain the cabin program, the Forest Service has indicated a desire to “*build partnerships with Tongass cabin users to sustain more cabins through volunteer work projects and philanthropy*”

(<http://www.fs.usda.gov/detail/tongass/news-events/?cid=STELPRDB5439270>).

- To aid in accomplishing this goal, we strongly encourage the Service to reconsider how they partner with local area volunteer groups as a cost cutting measure.

Volunteer groups have cited difficulties in obtaining Service-approved training as well as the prohibition on administrative use of chainsaws as reasons their participation in cabin maintenance has declined.

(<http://juneauempire.com/local/2013-11-08/forest-service-considers-closure-12-public-use-cabins>) Necessary volunteer training needs to be easy to comply with, particularly for volunteers already highly skilled in conducting the activities needed. Volunteer groups, too, are cognizant of costs and cannot afford to spend unnecessary amounts of time using inefficient hand tools to supply firewood or make needed repairs to cabins. To allocate limited Service staff resources towards higher skilled cabin repairs, we suggest that lower skilled work, such as firewood cutting, be offered to volunteers. To facilitate the work of these volunteers and ensure they are cutting surplus trees in desired stands, the Service could flag trees approved for firewood use.

We recommend the Service re-consider partnering to allow the retention of some cabins, or consider converting more cabins to shelters where possible to ensure the public safety in these remote areas. While ANILCA allows the construction and maintenance of new cabins and shelters, once removed, opposition from those opposed to public use cabins will make it difficult, if not impossible, to replace these structures. Funds available for removal could instead be used toward basic rehabilitation to maintain emergency shelter availability or to facilitate construction of new cabins in high demand areas.

Wilderness

The EA states: “*The Forest Service is responsible for preserving the wilderness character of the area. The Tongass National Forest Wilderness is managed under both the Wilderness Act of 1964 and the ANILCA. In the 1964 Wilderness Act, Wilderness is defined as without permanent improvements or human habitation.*” (page 65)

While ANILCA is cited, the paragraph neglects to address the reasons why Congress made an exception to the Wilderness Act in Alaska by allowing cabins in designated wilderness for health and safety purposes.

Additionally, harsh and unpredictable weather patterns, and the remote nature of lands in Alaska, also explain the overall need and popularity of cabin programs on all lands in Alaska

The 1980 Forest Service Bulletin 56 “Participation, Preferences, and Characteristics of Outlying-Cabin Users in Alaska National Forests” documents the long-term historical use of cabins in Alaska:

“Rarely have these [cabins] been developed and allocated for public use. This has not been the case in Alaska. Several agencies [in Alaska] have sponsored public outlying cabin programs –....The Forest Service program is the most extensive of these and provides a unique experience within a segment of the continuum of recreational opportunities on public lands.”

The EA indicates that removing these structures “*would have a long-term minor positive affect... in each Wilderness*” 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*” and that ANILCA provided for continuation of existing cabins and construction of new cabins in designated wilderness in Alaska just for that purpose.

In addition to the general comments above we have the following cabin specific comments.

Checats Lake Cabin

The EA states that Checats Lake cabin “...*may have mistakenly been identified as in very poor condition when this proposal was first developed. It is in better condition than first thought and has less of a maintenance backlog than the other cabins in this proposal. It also receives more use than most of the other cabins in this proposal*” (pages 8-9). The EA also states that Checats Cabin is the only cabin near Inventoried Recreation Places where there is no other cabin or shelter offering access to the area (page 42). Given these statements, it is unclear why this cabin would be removed under Alternative 2 (Proposed Action).

- We request the Checats Lake cabin be retained as part of Alternative 2.

Cabin relocation

The EA states that the Binkley Slough and Square Lake cabins could be moved and reused elsewhere, but statements on page 7 imply this would have to be conducted by a third party.

- In keeping with the goal of sustainable cabin management, we suggest the Service consider moving and reusing these cabins in areas of the Tongass where there is a demonstrated need and a potential for use that would enable them to produce enough revenue to pay for annual maintenance, or where volunteers could assist in maintenance.

Other cabins with moderate use

Two additional cabins, Harvey Lake and Beaver Camp, appear to have moderate use, similar to the Checats Lake Cabin. The EA, however, defines “very low use” as between zero and 12 nights of use per year. While 12 nights per year may sound low, this amount of use could equate to being booked nearly every weekend during Alaska’s summer months. The cabin cards information in Appendix A (summarized in the following table) show consistent use of the Harvey Lake Cabin and good use at Beaver Camp Cabin up until the recent economic downturn:

Cabin Use -Harvey Lake, Beaver Camp, Checats Lake

<u>Cabin Name:</u>	<u>2007 Use:</u>	<u>2008 Use:</u>	<u>2009 Use:</u>	<u>2010 Use:</u>	<u>2011 Use:</u>	<u>2012 Use:</u>
Harvey Lake	14	18	18	18	11	18
Beaver Camp	25	16	0	7	N/A (0)	N/A (0)
Checats Lake	21	18	9	19	2	6

- We request that the Harvey Lake Cabin remain in the reservation system and the Beaver Camp Cabin remain available for shelter on a first come first served basis until the minor repairs, identified in the cabin cards, can be completed-- at which time we request that Beaver Camp Cabin be returned to the reservation system.

Page Specific Comments

Page 65 last paragraph, 3rd sentence. ANILCA 1303(c) appears to be a typo; the appropriate reference is ANILCA 1315(c),

Page 69, Minor Impact. We are also unclear as to how the Service arrived at the conclusion that the project will result in “minor impact” (i.e., detectable impact) to both the Queen Charlotte Goshawk and the Vancouver Canada Goose. Regarding the Queen Charlotte goshawk, the EA states “*there are no known active nests in the analysis area.*” Regarding the Vancouver Canada Goose, the EA states “*several cabins are located near suitable nesting habitat*”. In neither case does the EA explain how the project would have a detectable impact on these species given their very limited presence in the area.

Thank you for the opportunity to comment. Please contact me at 907-334-2563 if you have any questions.

Sincerely,



Jennifer Wing
ANILCA Project Coordinator

cc: Michelle Putz, USFS, Sue Magee, ANILCA Program Coordinator