



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

**Department of Natural Resources**

CITIZENS' ADVISORY COMMISSION ON  
FEDERAL AREAS  
Stan Leaphart, Executive Director

3900 Airport Way  
Fairbanks, Alaska 99709  
Main: 907.374.3737  
Fax: 907.451.2751

January 2, 2014

Mr. Forrest Cole  
Forest Supervisor  
Tongass National Forest  
648 Mission Street  
Ketchikan, Alaska 99901-6591

Re: Tongass National Forest Sustainable Cabin Management Environmental Assessment

Dear Mr. Cole:

The Citizens' Advisory Commission on Federal Areas reviewed the Sustainable Cabins Program Environmental Assessment (EA) for the proposed removal of nine cabins in the Tongass National Forest and the conversion of three cabins into shelters. We offer the following comments for your consideration.

As the EA acknowledges, the public recreation cabin program on the Tongass National Forest have a long and important history in the region. With some 150 cabins to manage the costs and challenges to the U.S. Forest Service are significant and increasing. The Commission appreciates that declining budgets and staffing, coupled with increasing maintenance costs, make management even more difficult. We also understand that it is important for these public facilities to generate revenue as a means to keep the program viable. As the Commission pointed out in our November 2012 scoping comments (copy attached), it is also important for your agency to consider maintaining existing cabins primarily for public health and safety. These cabins are assets that benefit the public and removal of a cabin should only occur when there is no viable alternative.

**EA and Public Process**

The original 2012 scoping letter indicated that a decision on the proposed action would be made under a consolidated categorical exclusion following a 30 day public comment period. Subsequently, a decision was made to prepare an environmental assessment (EA). The Commission supported this decision, but remained concerned about opportunities that the public would have to review and comment on an EA prior to a final decision on the 12 cabins. We appreciate the Forest Service decision to provide an opportunity for the public to review and

comment on the proposed alternatives in the EA. We also thank the U.S. Forest Service staff for meeting with the Commission at our February 2013 meeting in Juneau to provide information about the Tongass cabin program and answer questions about the proposed action.

The Commission understands that the *Ketchikan Daily News* is the newspaper of record for the Tongass National Forest Supervisor, as indicated in the November 20, 2013 cover letter accompanying the EA. We also understand publication of a legal notice initiating the 30 day comment period for the EA fully satisfies the legal requirements for providing notice to the public. However, in the future, the Commission suggests that once publication of notices of this type are made in the newspaper of record, posting the comment deadline on the agency's website would also be helpful to the public. People outside the region often have limited access to local newspapers, particularly when online access may be restricted to subscribers. Publication of the deadline on the website for the project, along with all of the other information related to the program and proposed action would be beneficial to the public.

### **Wilderness Cabins**

In our scoping comments, the Commission pointed out that removal of any of the nine public use cabins located in designated wilderness requires a health and safety analysis prior to removal in accordance with ANILCA and the Region 10 Supplement to the Forest Service Manual 2300 for wilderness management. We are pleased to note the inclusion of the health and safety analysis in Appendix C.

In previous comments on the Tongass cabin program, the Commission expressed its concerns about the high percentage of wilderness cabins identified for removal or decommissioning in the 2005 *Recreation Site Facility Master Planning 5-Year Action Plan*. In the 2005 site analysis, 14 or 15 of 35 cabins (40%) identified for closure or decommissioning are in designated wilderness.

Nine of the 12 cabins (75%) slated for removal or conversion in the current proposed action are within designated wilderness. While we understand that many factors have led to the current proposed removal of these cabins, including declining budgets, the Commission strongly believes that an overly restrictive wilderness management policy is a major cause of the deterioration and loss of the cabins.

In the case of the McGilvery, it appears that this management policy is the primary reason the cabin is slated for removal. In 1996 the cabin was proposed for relocation, in part because after the surrounding area was designated as part of the Karta Wilderness by the Tongass Timber Reform Act in 1990, existing public road access was eliminated by removal of a bridge and conversion of the road to a trail. As the EA points out: *This greatly reduced access and use on Salmon Lake.* (EA, Appendix C, page 6)

The relocation of the cabin was never accomplished for reasons which, also according to the EA, included: *declining budgets, changing priorities and the complexity of using helicopters to move the cabin in newly designated Wilderness.* (EA, Appendix C, pg. 6). The decisions to remove the bridge, convert the road to a trail, and the "complexity of using helicopters in designated wilderness" were policy decisions, not required by law. The result of these policy decisions is a

cabin that is no longer usable, despite the fact that in 1996, it was estimated to have an additional 20 year life expectancy.

The Commission previously noted that these policies adopted by the Forest Service also have resulted in the unfortunate loss of the long-standing Tongass cabin maintenance arrangement with Territorial Sportsmen, Incorporated (TSI). By disallowing the use of chain saws and other power tools for firewood cutting and cabin maintenance, the Forest Service has restricted the ability of volunteers with limited time to participate in maintenance efforts. The agency has also deprived itself and the public cabin program on the Tongass of a valuable partnership.

We note that the EA at least acknowledges this fact:

*Moreover, many of the cabins needing maintenance are in designated Wilderness, where the maintenance must be accomplished without motorized or mechanized means (power tools, generators, helicopters, vehicles etc.) unless it is determined to be the minimum tool. These restrictions make Wilderness work difficult, time consuming and often frustrating for some volunteers. Ultimately, these challenges have reduced the willingness and ability of many volunteers to work on public use cabins. (EA, page 50)*

However, simply acknowledging this fact doesn't offset the loss of an important resource that has not and cannot be replaced. Many of the problems the agency faces in keeping and maintaining cabins not just in designated wilderness, but throughout the Tongass are self-inflicted.

We continue to encourage the Forest Service to allow reasonable exceptions to the stringent restrictions it has adopted on motorized equipment for maintenance of public cabins in designated wilderness. Not only would lifting these restrictions shorten the time needed for maintenance or firewood cutting, actually decreasing impacts, it would increase the likelihood that the agency could successfully pursue other cooperative agreements with groups interested in helping with the Tongass cabin program.

We appreciate the opportunity to comment. Please contact our office if there are questions or if we need to clarify our comments.

Sincerely,



Stan Leaphart  
Executive Director

Cc: Sue Magee – State ANILCA Coordinator  
Beth Pendleton – Regional Forester