

STATE OF ALASKA

SEAN PARNELL, Governor

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

550 W. 7TH AVENUE, SUITE 1430
ANCHORAGE, ALASKA 99501
PH: (907) 269-7477 / FAX: (907) 334-2509
sally.gibert@alaska.gov

December 22, 2010

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

Dear Ms. Goularte:

The State of Alaska received your letter of November 12, 2010 addressing the White Sulphur Springs Bathhouse, Cabin and Trail located in the West Chichagof-Yakobi Wilderness Area. 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 federal Coastal Zone Management Act and the Alaska Coastal Management Program will be provided separately by the Division of Coastal and Ocean Management.

These facilities date back to at least the 1960s, well before the area was designated as Wilderness by the Alaska National Interest Lands Conservation Act (ANILCA). We agree that deterioration of the facilities has led to a public safety concern and we support making repairs for purposes of public safety. This is a very popular site, yet also remote. Since the facilities were in place before the surrounding Wilderness was designated, we assume they are inherently compatible with the wilderness experience and values found in this area. We are also aware that user conflicts occasionally occur at the site. The current project under consideration has the potential to reduce these conflicts, improve opportunities for solitude and primitive recreation, and improve site-specific resource protection.

The State supports the proposed action: replacing the existing deteriorated cabin at a new location about 100 feet from the existing location, replacing (or repairing) the existing bathhouse, and reconstructing the trail, all within the accessibility standards of the Americans with Disabilities Act.

Relocating the cabin will have many advantages; including, enhancing privacy and solitude, and improving visitor experiences for both cabin users and other visitors who use the springs. Even though the cabin and the springs are directly adjacent, the users of each do not necessarily intermingle – and in fact they frequently intrude on each other's experience. Relocating the cabin will also reduce the visibility of the structure (and associated construction) from shore. We understand the proposed site has been subject to human disturbance in the past. Relocation will reduce the likelihood of user conflicts and further lessen the impact to wilderness character.

We also support replacing the bathhouse. Based on informal contacts with those who are familiar with the site, we understand visitors highly value the bathhouse as it enhances their experience. The outdoor pool will remain available for those who prefer an open-air experience. Having two pool opportunities (outdoor and covered) further separates unrelated groups to minimize encounters and will improve solitude.

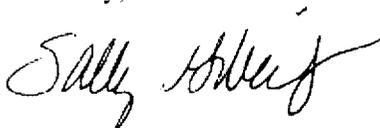
We see helicopter use as potentially beneficial to wilderness values because disruptions can be confined to a short amount of time and scheduled to avoid or minimize overlaps with visitor use. Helicopters leave virtually no footprint and minimize the need for storage, temporary boat launch support, or other temporary infrastructure. We also suggest consideration of helicopter beach landings, which could possibly take place on state-owned tidelands outside the wilderness boundary.

Like helicopters, use of motorized and mechanized equipment can similarly directly benefit wilderness values. Using hand-held tools may be preferable given a similar time period of use, but mechanized or motorized tools allow the necessary work to take place over a shorter period time. Reducing the duration of work also reduces staff presence at the site and associated cumulative resource impacts (e.g., vegetation trampling), and lessens the temporary impairment of wilderness values. The safety of employees should be a paramount factor when considering the appropriate “minimum” tool.

Although the Anadromous Waters Catalog does not specify any streams at the cabin site, the trails proposed for improvement may cross uncataloged fish streams (anadromous or resident-only) in the area. Pursuant to the Memorandum of Understanding (MOU 10MU-11100100-017) between the Alaska Region of the Forest Service and Alaska Department of Fish and Game, concurrence must be reached before conducting activities below the ordinary high water line of any fish-bearing water body. Please contact Kyle Moselle with the Division of Habitat at (907) 465-4287 or kyle.moselle@alaska.gov with any questions or to submit a Notice of Instream Activity for this project.

We appreciate the opportunity to provide this input and hope it will be useful during preparation of the upcoming Environmental Assessment. Please contact me if you have any questions at 907-269-7477.

Sincerely,



Sally Gibert
State ANILCA Program Coordinator

cc: Steve Kimball, Forest Service Alaska Region Wilderness Program Manager