



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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May 20, 2022

Lucy Aragon
Thorne Bay Ranger District
P.O. Box 19001
Thorne Bay AK 99919-001

Re: Prince of Wales Landscape Level Analysis Project Draft Spring 2022 Out Year Plan

Dear Ms. Aragon,

Thank you for the opportunity to provide comments on the proposed activities in the Prince of Wales (POW) Landscape Level Analysis Project Draft Spring 2022 Out Year Plan. The proposed project activities include recreation, stream restoration, fish crossing, aquatic organism passage, and invasive plant management activities. It is acknowledged that no timber sale activities are included in the current Plan.

I have coordinated with the Alaska Departments of Fish and Game (ADF&G), Environmental Conservation and Natural Resources (DNR) on the review of this proposal. In general, the State supports efforts by the USFS to increase recreational opportunities, while managing for invasive species as well as stream bank restoration projects. The State provides the following specific comments:

Department of Natural Resources

DNR would like to take this opportunity to work with the USFS on identifying State owned navigable waters and submerged lands within the project area footprint. There are numerous water bodies within the project area that the State considers navigable for title purposes. More information can be found at the DNR Navigability Project website:

<https://dnr.alaska.gov/mlw/paad/nav/>. Additionally, a map of waters the State considers navigable can be found here: <https://mapper.dnr.alaska.gov/map#map=4/-16632245.12/8816587.34/0>.

It is important for the public to understand the land ownership and responsible management agencies in evaluating this proposed action. The Plan needs to acknowledge State ownership and management of navigable waters and those submerged lands that are within the project area, so the public has a clear understanding of land ownership and possible permitting authorities.

Department of Fish and Game:

The State appreciates the USFS constructing new cabins and shelters and encourages the USFS to maintain existing cabins to support providing hunters, fishermen, and other recreational users with a safe place to shelter.

Cabins have long been associated with traditional and customary uses in Alaska including hunting, fishing, and other recreational purposes. Alaskans and visitors alike have used cabins to support both general and commercial recreation as well as the shore fishing industry and subsistence uses.

While ADF&G is supportive of the new three-sided shelter in the South POW Wilderness, ADF&G considers cabins to be better suited for Alaska wilderness. Cabins, as compared to three-sided structures, are more capable of providing safety from inclement weather and better shelter in the event of an emergency. Their stoves provide for year-round use and can be a lifesaving source of heat, even in the summer, when it can be necessary to warm up or dry out gear. Additionally, fully enclosed structures provide better protection from bears. Overall, cabins better accommodate the variety of hunters, fishermen, and other visitors, each with their own unique set of wilderness skills.

The Tongass National Forest's 2013 Environmental Assessment: Sustainable Cabins indicates the primary reason for choosing shelter construction over cabin construction is locations where very little overnight occupancy is anticipated. If the USFS anticipates overnight usage at the "three-sided shelter" location, ADF&G encourages constructing a cabin. ADF&G understands that there are funds being allocated from the infrastructure legislation to the Tongass National Forest for cabins and shelters. ADF&G is happy to discuss cabin and shelter planning with the USFS and encourage early dialogue in any planning processes so the State can best assist the USFS with maintaining and improving cabins and shelters for our shared users.

Recognizing their safety value, Congress included in the Alaska National Interest Lands Conservation Act (ANILCA) provisions that allow the continued use of cabins in Alaska wilderness areas. ANILCA specifically provides allowances for maintaining existing, and building new, cabins within Alaska Wilderness areas in Sections 1315(c) and (d).

(c) EXISTING CABINS. -- Previously existing public use cabins within wilderness designated by this Act, may be permitted to continue and may be maintained or replaced subject to such restrictions as the Secretary deems necessary to preserve the wilderness character of the area.

(d) NEW CABINS. -- Within wilderness areas designated by this Act, the Secretary or the Secretary of Agriculture, as appropriate, is authorized to construct and maintain a limited number of new public use cabins and shelters if such cabins and shelters are necessary for the protection of the public health and safety. All such cabins or shelters shall be constructed of materials which blend and are compatible with the immediate and surrounding wilderness landscape. The Secretary or the Secretary of Agriculture, as appropriate, shall notify the House Committee on Interior and Insular Affairs and the Senate Committee on Energy and Natural Resources of his intention to remove an existing or construct a new public use cabin or shelter.

Regarding the Josephine Lake cabin, our records from 2010 list the Josephine Lake Cabin as in “good” condition, though ADF&G recognizes that the information is dated. Based on the health and safety utility Alaskan cabins provide, ADF&G requests the USFS reconsider if there is a way to keep the Josephine Lake Cabin open. ADF&G is encouraged that the USFS is considering retaining and repairing the Salmon Bay Cabin, as it provides one of the few options to encourage people to use to the Salmon Lake area.

Again, thank you for the opportunity to provide input. The State looks forward to working with the USFS in this project as we could achieve mutual goals in efficiently managing this area for the benefit of the public. Please contact me if you have any questions or would like to discuss the State’s comments further.

Sincerely,

Sylvia A. Kreel

Sylvia A. Kreel
Large Project Coordinator

cc: State Review Team