I am in opposition to the proposed changes. I realize I am in the minority of those providing comment as most others are actual cabin owners or those who benefit from them. I assume the entire impetus for this proposed change is directly from cabin owners requesting a change in policy to benefit them.

My understanding is the intent of ANILCA was to allow for the continued use of Alaskan public lands, in other words with the passing of that law, it did not interfere with the long standing traditional and customary uses of them. This is a critical element of ANILCA and guarantees that all Alaskans have access to their public lands.

The section 1303 of ANILCA recognized that private cabins already existed and made provisions for them to continue. But not forever. The discussions and the debates that occurred in the Alaska Legislature and the US Congress at that time wanted to allow for the existence of the cabins but also the need to balance it with other public interests. The compromise was to allow them to exist for another generation, but not in perpetuity.

Most of these cabins were built in the 1960’s or 70’s without authorization and were in trespass, during a time which the Forest Service turned a blind eye to their presence and unauthorized use. Most cabin owners did eventually obtain a permit and used and maintained their cabin in accordance with their authorization. But the families that were able to build cabins were those that had the money and resources to do so.

Many of the cabins were only 10 to 15, some as much as 20 years old when ANILCA was passed in 1980. Years ago, I thought it would have been fair to authorize the cabins for the equivalent period of time they were in existence prior to ANILCA; e.g. a cabin built in 1970 would be allowed until 1990, a cabin built in 1961 could be permitted until 1999. I thought it fair, but that was just a pipe dream. It has now been 44 years since its passing and the cabins are still there, but in that time much has changed. Alaska is big but not infinite and the population is continually growing. Today many Alaskan citizens now have power boats and other resources making access to remote places easier. Many use those means to access public use cabins for sporting, recreational or more critically for subsistence purposes. Unfortunately, the demand for those cabins is high, the opportunity for their use is limited and dates available are very competitive. To make more public cabins diminishes the resource of Alaska’s wild places. To say the general public has public cabins they can use so the private cabins owners should be able to continue to keep them forever is a weak argument.

In contrast with everyone else, those who own a private cabin on public land are in a unique and very privileged position. Essentially a very small number of families have a personal dwelling on public land. The locations of these cabins are often in areas which hunters, fishermen and recreationists would choose to use. The fact that a private cabin is there doesn’t necessarily prohibit others from using the area, but is often a deterrent from doing so, especially if they are occupied. Before a decision on the proposed change is made, with the consideration of whether it would be a *‘direct threat to or significant impairment of the National Forests.’* I would say the threat or impairment is not only to the land resource itself but the use and enjoyment of it by all. Is it unreasonable to ask that the current cabin owners be asked to eventually have equivalent access the resource as others? Is it really so bad to have them be relegated to using public cabins, or to bring a tent with them like the rest of us?

Many of the cabins were initially built as small shacks of only a few square feet. Today many of them have been periodically added to and have grown to be three or four times their original size. Others were allowed to be rebuilt and now resemble a house transplanted from suburbia, certainly out of place in a wilderness setting.

I realize the cabins are located in a variety of land designations and have separate use codes and policies that apply. I don’t oppose the existence of these cabins, but I firmly believe their existence should eventually fade away, especially the ones within congressionally designated wilderness, as was intended when ANILCA was passed. There have always been cabins in the Alaskan wilderness so they are not wholly out of place and the reason why the language allowing them was in ANILCA in the first place. But it is now 2024, if there are cabins out there that were built in the 1930’s they may have a legitimate claim to the ‘customary and traditional use of the land’. However, it’s a stretch of rational for a cabin built in 1975 to have the same consideration.

If I interpret the policy change correctly, there will be an allowance for unlimited transfers. If that is the case, then the Forest Service should just carve out a parcel of land and just give the cabin owners a chunk of public land around their cabin, i.e. give them a deed and get it over with. These cabin owners are very privileged to have them, but its more than just a privilege to them. With their desire and request to be allowed to have unlimited transfers, they exhibit a sense of entitlement. Their sense of entitlement even manifests itself in blatant disregard of agreed upon terms and conditions of their authorized use. Some cabin owners illegally cut trees near their cabin or build out-buildings without prior approval, risking a mild slap on the wrist when they get caught. Nobody should be allowed to use public land indefinitely. Does the continued existence of these cabins fit the purpose and need for which the forest is established?

I realize my opinion will have little effect on the final decision, but I wanted to make sure to provided it and I appreciate the opportunity to do so. This process to solicit comment from the public is required by law certainly meets the standard to have an open dialog with the public. Undoubtedly the majority of comments you will receive will be from the cabin owners themselves, skewing the balance of comments to concur with the proposed change. However, there are approximately 730,000 Alaskans. If each one was asked directly if they think a small number of families should be allowed to keep private cabins on public lands forever, the balance of comments you would be reviewing would be considerably different. In my comments here, I want to be the voice of those Alaskans which did not hear about this proposed change and therefore did not provide comment.

The only benefit I can see for the continuation of these cabins, other than the direct benefit to those families and the extremely rare occurrence of emergency use, is that cabin owners may report back to the agency the presence of trespass cabins if they become aware of them.

Most of the authorizations for these cabins include a clause which stated the cabin is not a permanent structure and would eventually need to be removed after the final transfer has ended. All the cabin owners agreed to it and signed their permit with that clause.

For these reasons, the Forest Service should NOT change the current policy.

Thanks for the opportunity to provide my opinion.