

February 27, 2024

Subj: Comments on proposed changes to ANILCA Cabin regulations (Proposed Revision to Alaska Region Supplement Forest Service Handbook 2709.11, Chapters 40 and 50: Alaska National Interest Lands Conservation Act (ANILCA) Cabin Policy, and Associated Permit Terms and Conditions)

To: USFS, Attn: Regional Forester, c/o Jennifer Berger, Tongass National Forest

From: Sam Skaggs, co-owner of "ANILCA cabin"

Thank you for this opportunity to comment on the proposed policy changes to allow renewal and transfer of ownership of "ANILCA cabins." I am in favor of this policy change and the restrictions on use and transfer as outlined in the proposed regulations as I believe they will allow the continuance of the "traditional and customary use" of these cabins.

I am also asking for the Handbook to be revised to include certain cabins that have agricultural use permits (223) in the policy changes or be changed to the new permit code for Alaska Traditional and Customary Use.

I am the co-owner of a cabin in Greentop Harbor at SW Yakobi Island in the West Chichagof-Yakobi Wilderness. The cabin lease permit is listed under Roman Motyka of Juneau and the lease with the USFS is currently an Agriculture Permit Code 223. Mr. Motyka and I have owned this cabin together for 37 years and have split all costs 50/50, including the original purchase from Joe Scott, who lived at the site and built the cabin, shop, and gardens in about 1951. The property is well-established and has been in continuous use for 73 years.

Greentop Harbor itself has a rich history in the 1940s and 1950s as a salmon fishing and gardening community with many seasonal cabins in the "back harbor" (since torn down) including a blacksmith. This history has been well documented by Jerry Dzugan of Sitka. Our cabin is one of three still standing from that time including one with an agricultural lease like ours and a USFS public use cabin.

Thirty-eight years ago, while still living in Fairbanks, I went on a kayak trip from Pelican to White Sulphur Hot Springs. The two-week trip changed my life: I fell in love with the Outer Coast of SE Alaska and subsequently moved to Juneau and bought the Greentop cabin (from Joe Scott) with Mr. Motyka.

Traveling to and spending time at our cabin at Greentop every year has been the number one priority for me and my family ever since 1985. There we live a three-season, homestead lifestyle, similar to the early "Greentoppers": fishing, hunting, gardening, kayaking, hiking, and exploring the rugged Outer Coast. It is our family's spiritual home, and being there, on that edge of the universe, has endowed us with un-measurable knowledge of ourselves and a lifetime appreciation of the wilderness.

It isn't just the experience of *being there*. Decades of exposures to the land and sea there have led me to be an advocate in many crucial conservation efforts to protect the West Chichagof-Yakobi Wilderness including the Living Wilderness Fund at the Sitka Conservation Society, as well as helping to secure the old mine site at Bohemian Basin (in Lisianski Inlet) to be included in public land.

Mr. Motyka and I have been respectful stewards of this precious place and are grateful for the opportunity to be active participants all these years continuing the *traditional and customary use* that Mr. Scott and other "Greentoppers" began.

Looking at the map of ANILCA cabins provided on the USFS website for this issue, I do not see the Greentop cabins listed. I think this is an oversight. I *do* see a cabin in Klag Bay, on Chichagof Island and it *is* in the West Chichagof-Yakobi Wilderness area.

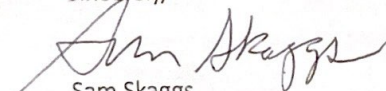
I understand fully that our cabin property is in a Wilderness area. That was the appeal for Mr. Motyka and me to purchase it from Joe Scott and make a commitment to use it and maintain it at considerable cost for the past nearly 40 years. At that time, I couldn't have envisioned that this little corner of the coast would become a focal point for me and my four children. Indeed, their time spent at Greentop each year in their youths and even now as adults has created better people for their time spent in the wilderness of SE Alaska.

While, quite honestly, we did not expect that we might have an opportunity to pass the permit on when we bought the property, our family was overjoyed to hear of the potential change recognizing traditional and customary use since it **could** enable them to continue our family tradition even after Mr. Motyka and I have passed away.

I request that Greentop cabins' permit type be changed to the new Alaska Traditional and Customary Use permit reflecting their historical use, and thus enable them to be included in this proposed rule change.

My family appreciates your consideration.

Sincerely,



Sam Skaggs
Sitka