



United States
Department of
Agriculture

Forest Service

Tongass
National Forest
R10-MB-713a

February 2012



White Sulphur Springs Bathhouse

Environmental Assessment

Volume A, Environmental Assessment

**Tongass National Forest
Ketchikan, Alaska**



White Sulphur Springs Bathhouse Environmental Assessment - Key Acronyms and Other Terms

ACMP	Alaska Coastal Management Plan	NAGPRA	Native American Graves Protection and Repatriation Act
ADF&G	Alaska Department of Fish and Game	NEPA	National Environmental Policy Act
AIRFA	American Indian Religious Freedom Act	NFS	National Forest System
ANCSA	Alaska Native Claims Settlement Act	NHPA	National Historic Preservation Act
ANILCA	Alaska National Interest Lands Conservation Act	NMFS	National Marine Fisheries Service
BMP	Best Management Practices	NOAA	National Oceanic and Atmospheric Administration
CEQ	Council on Environmental Quality	ROS	Recreation Opportunity Spectrum
CFR	Code of Federal Regulations	SD	Service Day
CZMA	Coastal Zone Management Act	SHPO	State Historic Preservation Officer
DN	Decision Notice	SOPA	Schedule of Proposed Actions
EA	Environmental Assessment	SUA	Special Use Authorization
ESA	Endangered Species Act	TE	Threatened and Endangered
FONSI	Finding of No Significant Impact	Forest Plan	Tongass Land and Resource Management Plan
FSH	Forest Service Handbook	TTRA	Tongass Timber Reform Act
FSM	Forest Service Manual	USFWS	United States Fish and Wildlife Service
IDT	Interdisciplinary Team	VCU	Value Comparison Unit
LUD	Land Use Designation		

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Front Cover: 2007 Photo of White Sulphur Springs Bathhouse.

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INTRODUCTION

Document Structure

The Forest Service has prepared this Environmental Assessment for the White Sulphur Springs Bathhouse project in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. This Environmental Assessment discloses the direct, indirect, and cumulative environmental impacts that would result from the proposed action and alternatives. The document is organized into four parts: an introduction, alternatives, existing conditions/environmental consequences, and consultation and coordination.

Additional documentation, including more detailed analyses of project-area resources, may be found in the project planning record located at the Sitka Ranger District Office in Sitka, Alaska.

Background

The decision made concerning White Sulphur Springs Bathhouse, Cabin and Trail project to rebuild the cabin, woodshed, and outhouse, remove the bathhouse to replace it with an open pool, and reconstruct the trail, made in August 2011, has been modified. Appeals submitted during the 45 day appeal period suggested need for additional analysis concerning the bathhouse. Appeals were withdrawn after several points were agreed upon by the appellants and the Responsible Official. The bathhouse component was withdrawn from the decision. The remaining components of the project were unaffected by the appeals. Replacement of the buildings with the exception of the bathhouse will be implemented in 2012. Reconstruction of the trail will be completed as funding allows. This document reflects additional analysis concerning the bathhouse.

Existing Condition

This project site is located in the West Chichagof-Yakobi Wilderness Area designation in 1980. It is about 65 miles northwest of Sitka, Alaska, on northwestern Chichagof Island and is accessible by boat. The community of Pelican is 23 miles to the northeast. White Sulphur Springs Bathhouse is forty feet from a Forest Service Recreation Cabin. Both are on the exposed shore of Chichagof Island with a panoramic view of the Pacific Ocean (Figure 1). Waves, wind, and location can make the site challenging to access, particularly during poor weather and in short winter daylight hours.

Early cabin and bathhouse constructions were done by hunters, trappers, and miners using the area. It is reported that a cabin and bathhouse existed in 1917 and speculated that a Dr. White operated the facility as a health spa during that time. The most recent reconstruction was in 1966. Prior to 1966 there was a period of time when there was no bathhouse at the site.

Warm water emitting from the source vent that supplies the holding tank produced 20 gallons per minute in 2008 at a temperature of 113 degrees Fahrenheit. Warm water flows from the

holding tank to the soaking pool where people bathe. During the month of May temperature loss between the source vent and the soaking pool was 5 degrees.¹

The 24 ft. by 15.6 ft. bathhouse has structurally deteriorated and needs substantial construction work to remain safe for use. The bathhouse receives regular maintenance; however exposure to harsh conditions has taken its toll the structure. The existing bathhouse is located on exposed bedrock adjacent to a bedrock and cobble beach.

¹ Observation recorded by cabin maintenance contractor, May 28, 2008.

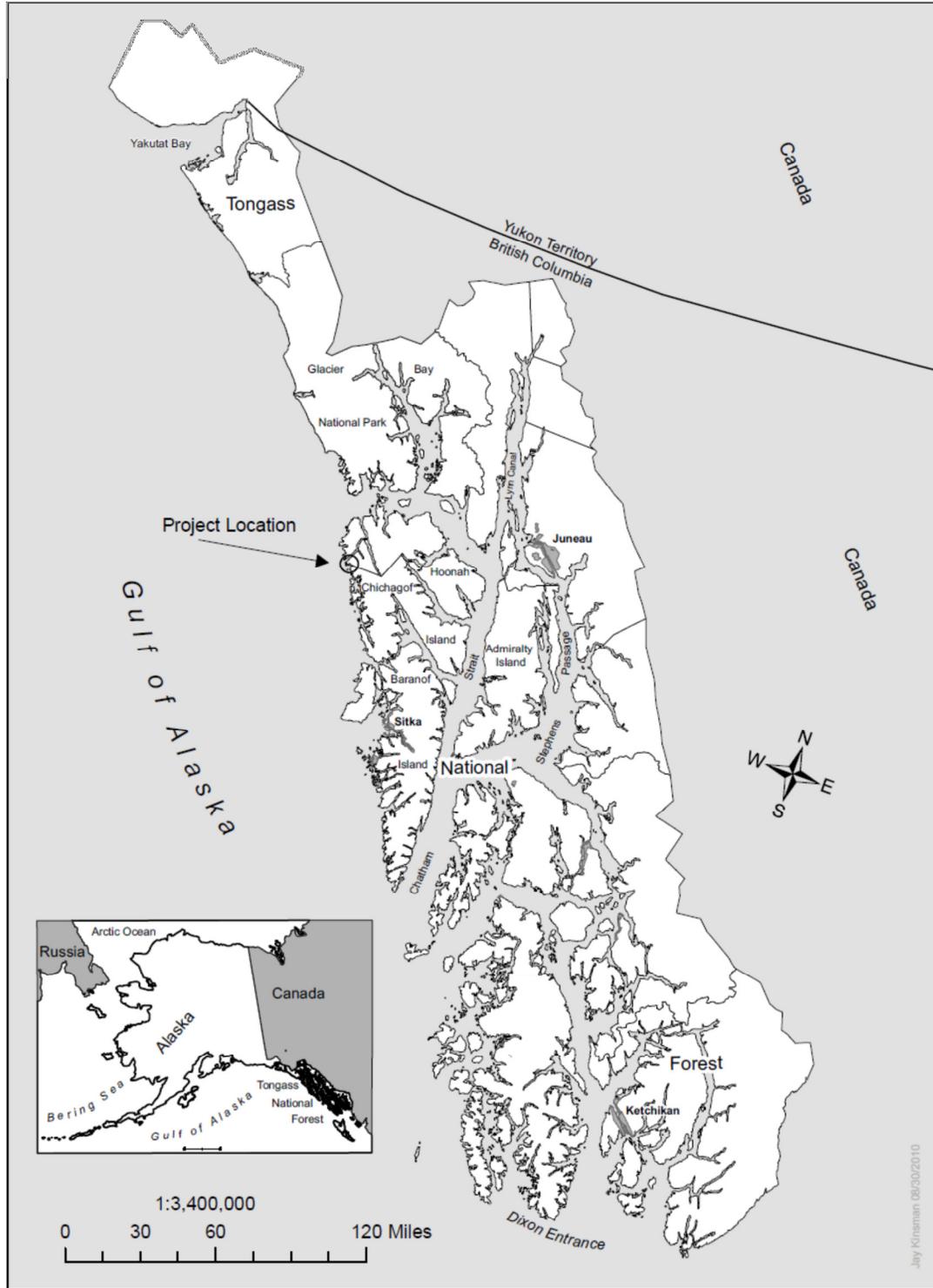


Figure 1: White Sulphur Springs Bathhouse Vicinity Map



The bathhouse built in 1966, is perched over bedrock on a foundation of cinderblock piers. The block corners have cracked and crumbled (see Figure 2). The warm springs come from fissures in the bedrock just above the high tide line. The rear wall of the bathhouse has extensive rot. Water leaking from the holding tank has kept the sill of the building soaked and accelerated rot. The rafters have fungal growth and all doorways are showing signs of decay. The holding tank for the warm water leaks in spite of continued patching. The interior walls of the bathhouse contain carvings of local boat names from past visitors. The building is currently closed because of its poor structural condition, however community members of the nearby towns have requested the bathhouse be stabilized so that it can continue to be used until replacement decision is made. Depending on the cost of stabilization, this work will be completed during the 2012 field season.

Figure 2: White Sulphur Springs Bathhouse Foundation Showing Crumbling Concrete

There have been eye-witness accounts of bats at White Sulphur as recent as October 2011. In 1992 a group of naturalist conducted a survey and determined that there was a population of 461 bats, and that this colony was a maternity roost (West and Swain 1999). West and Swain (1999) describe the location of the roost as being located 20 meters east of the White Sulphur cabin in the secondary spring, downstream from the outdoor warm spring pool, 60 meters inland from the ocean. The roost is described as being located under boulders near the secondary open air warm spring channel.

Recreational Use

The bathhouse at White Sulphur Springs is used by people renting the cabin, outfitter/ guides, fishermen, kayakers, campers, and boaters from Pelican and other places visiting for a bath. The cabin is rented, on the average, 86 nights per year. It is the 9th highest use cabin out of 25 cabins on Sitka Ranger District. Approximately 82 guided clients use the bathhouse per year. Overcrowding sometimes occurs at the site during the summer months. Several different groups may use the indoor and outdoor warm water pools directly in front of the cabin.

Management Direction

White Sulphur Springs is located in a Land Use Designation (LUD) of Wilderness in the Tongass National Forest Land and Resource Management Plan (Forest Plan, USDA Forest Service 2008). This project site is located in the West Chichagof-Yakobi Wilderness Area. The Alaska National Interest Lands Conservation Act of 1980 (ANILCA) and Forest Service policy allow for the continuation of existing public use cabins in Alaska wilderness areas (ANILCA Section 315(c)). Except as otherwise expressly provided for in ANILCA, the wilderness is administered in accordance with applicable provisions of the Wilderness Act. (ANILCA 707). Wilderness is devoted to the public purposes of recreational, scenic, educational, conservation, and historical use (Wilderness Act Section 4(b)).

The Americans With Disabilities Act (ADA), passed in 1990 addresses the issue of accessibility in the National Wilderness Preservation System in Section 507(c):

Congress reaffirms that nothing in the Wilderness Act is to be construed as prohibiting the use of a wheelchair in a wilderness area by an individual whose disability requires the use of a wheelchair, and consistent with the Wilderness Act, no agency is required to provide any form of special treatment or accommodation, or to construct any facilities or modify any conditions of lands within a wilderness area to facilitate such use.

A Wilderness Access Decision Tool was developed as a resource to make appropriate, objective, and consistent decisions regarding use of the Wilderness by persons with disabilities as defined by the ADA.

Alaska National Interest Lands Conservation Act of 1980 (ANILCA)

Congress designated the West Chichagof-Yakobi Wilderness on December 2, 1980 under ANILCA. Except as otherwise expressly provided for in ANILCA, this Wilderness is administered in accordance with applicable provisions of the Wilderness Act of 1964. The provisions of both Acts must be considered together. ANILCA includes provisions that allow for some activities in Alaska wilderness that are prohibited in the Wilderness Act. These provisions acknowledge the importance of continuing uses established prior to ANILCA and also the unique conditions in Alaska. Section 1315(c) of ANILCA provides a specific exception to the 1964 Wilderness Act's prohibition of structures and states the following:

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.

Wilderness Act of 1964

The Wilderness Act defines a wilderness area as "...land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude..."

Section 2.(c) in the definition of Wilderness states "an area of wilderness...(4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value" The act further clarifies the use of Wilderness in Section 4.(b) "...Wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use."

Forest Service Manual (FSM) direction-

Wilderness Management Chapter 2320.6, states the following:

Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy,

convenience, commercial value, and comfort are not standards of management or use of wilderness. Because uses and values on each area vary, management and administration must be tailored to each area. Even so, all wilderness areas are part of one National Wilderness Preservation System and their management must be consistent with the Wilderness Act and their establishing legislation.

Heritage Program Management Chapter 2360.1, states the following:

(8) Protect cultural resources from the effects of Forest Service or Forest Service-authorized undertakings, unauthorized use, and environmental damage. FSM 2363.17 Sacred sites and Traditional Cultural Properties (TCPs) both have religious and/or traditional importance to individuals or cultural groups. Both may be difficult to identify using standard field survey methods and both require consultation with cultural groups. The difference is not in their importance, but rather under which authority they are managed and how they are identified. TCPs are managed under the authority of the National Historic Preservation Act (NHPA). They are, by definition, eligible for listing on the National Register and must be a tangible property – that is, a district, site, building, structure, or object as defined in 36 CFR 64.4. To identify TCPs, the agency official should seek the advice of cultural groups that may ascribe significance to a place and coordinate with the Tribal Government Relations Program in the case of TCPs important to Indian tribes. Once listed on the National Register, information about a TCP becomes public.

Forest Service Manual direction, Alaska Region Supplement – R10

Chapter 2323.13b(2), 2323.04c (14) states:

New and replacement cabins or shelters will use design drawings approved for wilderness use. Appurtenant structures to the cabins will be limited to an outhouse and a woodshed at each cabin or shelter.

Unless specifically reserved to the President (FSM 2323.04a) or the Chief (FSM 2323.04b) or assigned to the Forest Supervisor (FSM 2323.04d) or the District Ranger (FSM 2323.04e), the Regional Forester is responsible for approving all measures that implement FSM direction on the use of other resources in wilderness. Specific responsibilities include but are not limited to: 14. Any actions, which would limit or eliminate existing uses, which were established prior to December 2, 1980, which may be allowed by ANILCA.

The Forest Supervisors shall request approval of new construction or the removal of any public use cabins or shelters at least 18 months in advance of the proposed action. The request shall be accompanied by supporting NEPA documentation and a health and safety analysis sufficient for the Regional Forester to make a decision.

Tongass National Forest Land Resource Management Plan (2008)

Forest plan goals and objectives for the Wilderness LUD are:

To manage all designated Wilderness to maintain an enduring wilderness resource while providing for public access and uses consistent with the Wilderness Act of 1964 and ANILCA.

To protect and perpetuate natural biophysical and ecological conditions and processes.

To provide a high degree of remoteness from the sights and sounds of humans, and opportunities for solitude and primitive recreation activities consistent with wilderness preservation.

Manage recreation activities to meet the appropriate levels of social encounters, on-site developments, methods of access, and visitor impacts indicated for the adopted or existing Recreation Opportunity Spectrum (ROS), as appropriate.

Provide trails and primitive facilities that are in harmony with the natural environment and that promote primitive and semi-primitive recreation experiences. Feature facilities designed primarily to provide resource protection and encourage smaller group size, and emphasize challenge and risk instead of convenience.

The Forest Service has a clear definition of what Health and Safety is in regards to the need of cabins and shelters in the Wilderness LUD. The Forest Plan direction speaks to Health and Safety as it relates to **new cabins or shelters**, refers to ANLICA section 1315d, and further defines what is meant by Health and Safety. (Pg. 3-19). An analysis for public health and safety needs will include at least the following factors: a) Difficulty of access, particularly in terms of timely pick-up by users of boat or floatplane, or for emergency situations, b) presence of natural hazards including brown bear, weather, and dangerous tides or currents, c) History of fatalities and life threatening incidents, d) Natural attractions that entice people to use a particular area.

Heritage resources are available for scientific study to the extent that the study is consistent with 1) the preservation of Wilderness; 2) the intent of the Wilderness Act; and 3) heritage resource management objectives. Heritage resources are available for recreational, scenic, scientific, educational, conservation, and historic uses, consistent with management of Wilderness.

Recreation Opportunity Spectrum (ROS) guidelines are provided in the Forest Plan and are used to guide management activities in order to maintain or attain a range of recreation opportunities. Guidelines for each ROS class describe the physical, social, and managerial setting components that affect the kind of experience forest visitors may expect. White Sulphur Springs falls within the Semi-Primitive Motorized ROS class, which includes the following setting indicators:

Nearby sights and sounds of human activity are rare, but distant sights or sounds may occur. Setting is located within ½-mile of infrequently travelled waterways.

Facilities and structures generally do not exceed Development Scale II (rustic).

User meets less than 6 parties per day in Wilderness during 80 percent of the primary use season. Maximum party size is 12 people.

Visitor caused impacts may be noticeable, but not degrading to basic resource elements. Site hardening is very infrequent, but, when it occurs, is in harmony with, and appropriate for, the natural-appearing backcountry setting.

In the Forest Plan, the standards and guides for the Wilderness LUD include: 1) Provide development facilities appropriate to the Recreation Opportunity Spectrum (ROS) setting after determining that the private sector is not able or willing to meet the demand. 2) Provide barrier-free, accessible facilities appropriate to the site development level and area ROS setting.

A decision concerning replacement of White Sulphur Cabin and to reconstruct the trail leading to the cabin and bathhouse was signed in August of 2011. Circumstances related to what type of tools that would be used to complete this work was determined in analysis for the project. A Minimum Requirements Decision Guide (MRDG) process was completed to determine the least amount of impact to the physical resources and experience of wilderness. (White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment) The MRDG will also apply to work completed on the bathhouse.

Chapter 4 Standards and Guidelines Heritage Resources and Sacred Sites are:
Historic Resource Activities (pg 4-16), HSS1 IB. Coordinate management of heritage resources with the State Historic Preservation Officer (SHPO), The Advisory Council on Historic Preservation (ACHP), Alaska Native Tribes, and corporations, and interested members of the public. Preferred management of sites listed in, nominated to, or eligible for the National Register of Historic Places is avoidance and protection. Sacred Sites Protection Activities

Sacred Sites Protection Activities (pg. 4-19), HSS2 IA.: Tongass National Forest will manage sacred sites as an integral part of its land management. Including tribes early notice in the planning process and taking into consideration the effects a project may have on a tribes or Religious Practitioners access and use of a sacred site as well as any aspects of the project that may constitute a contamination or violation of sacredness.

The National Historic Preservation Act (NHPA), requires Federal Agencies to take into account the effects of their undertakings and consider the effects of their actions on sites that are determined eligible for inclusion in or are listed in the National Register of Historic Places (termed "historic properties") and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings.

Executive Order (E.O.) 11593 directs Federal agencies to provide leadership in preserving, restoring, and maintaining the historic and cultural environment of the nation.

Purpose and Need for Action

The purpose of this project is to address safety concerns and deferred maintenance items at the White Sulphur Springs Bathhouse, in a manner consistent with the Wilderness Act of 1964, the Alaska National Interest Lands Conservation Act of 1980, the Tongass National Forest Land and Resource Management Plan (Forest Plan, USDA Forest Service 2008), and other Forest Service direction.

There is a need for work on the bathhouse because it has structurally deteriorated to the point that, without action, it will become a safety hazard to occupants in the near future. It is currently closed for use until it can be stabilized and reopened. With the deterioration of the bathhouse there is a need to reassess which facilities are necessary in this wilderness

location, and how to manage for uses that have been established at this site prior to the designation of the wilderness.

Proposed Action

The Forest Service's Proposed Action (Alternative 1) for the White Sulphur Springs project would:

Replace the existing bathhouse, including the concrete soaking pool and holding tank used to fill the soaking pool.

See Chapter 2 for a complete description of the Proposed Action.

Decision Framework

The Tongass National Forest Supervisor will be the Responsible Official for this proposal. Based on the environmental analysis in this EA, the Responsible Official will decide whether or not, and how, to replace the bathhouse at White Sulphur Springs. The Responsible Official has the authority to choose the No Action Alternative, the proposed action, other action alternatives, or portions of the action alternatives, and implement the project according to the decision. Such decisions and the rationale for the decision would be documented in the project Decision Notice (DN).

Public Involvement

Supplemental information requests concerning this project were sent to 160 individuals and organizations including those individuals who commented during the 30 day comment periods for the White Sulphur Springs Bathhouse, Cabin and Trail project EA.

Advertisements were printed in the Daily Sitka Sentinel, the Ketchikan Daily News, and the Juneau Empire in December 2011. Supplemental information requesting historical, customary, and traditional use of the bathhouse and emergency use of the structures on site was gathered. Southeast Alaska community representatives were contacted in Elfin Cove, Gustavus, and Pelican. News Releases were sent to radio stations KCAW and KIFW to encourage public comment. Information was available for distribution at the Sitka Ranger District Office and at the Kettleton Memorial Public Library in Sitka. Supplemental information concerning the bathhouse requested the following from respondents:

1. How often do you use the White Sulphur Springs bathhouse?
2. Have you ever had to use the cabin or bathhouse because of emergency and if so what were the circumstances?
3. Are there customs or traditions that you associate with the bathhouse? Please describe.
4. If the bathhouse were no longer at White Sulphur, but instead an open pool, how would this affect your community or social group?

There were 88 respondents to the above questions. Comments used in alternative development are shown in the Issues Section of this analysis.

Thirty-two respondents visited White Sulphur Springs every few years, 22 visited once or twice per year, and 17 visited three to five times per year. Others had never been there, did not specify, had been there a few times in their lives, or more than five times per year. People from Pelican cited generations of use of the bathhouse. Commercial fishermen annually use the bathhouse during summer troll closures since 1960. The bathhouse was used for emergency purposes by 33 people. Nineteen of the 33 reported that the cabin was being used by another group. Thirty people reported weather the reason for using the bathhouse as a shelter. Other reasons included mechanical problems, plane malfunction, or unprepared to leave due to darkness. Major reasons people cited how their community or social group would be affected without the bathhouse were; no shelter from weather, loss of privacy, not as easy to use, loss of historic, treasured, memories and experiences. Comments will be addressed through this analysis.

Additional public involvement records can be found in the White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment. This analysis included comments from 51 respondents that did not want to replace the bathhouse and wanted the site restored to its natural condition. Thirty wanted the existing bathhouse replaced with another structure.

The White Sulphur Springs project has been addressed at monthly Tribal Council meetings with the Sitka Tribe of Alaska and with the Resource Protection Director of the Tribe. No concerns have been expressed.

The Forest Service has consulted with the State Historic Preservation Officer (SHPO) regarding the eligibility of cultural resources recorded as part of this inventory and the effects of this project on those resources. The bathhouse has been determined eligible to the National Register of Historic Places. The State Historic Preservation Officer concurred with the determination of Eligibility of this Historic Property. SHPO also concurred with the determination of Adverse Affect for the bathhouse removal or replacement. Mitigations to negate previously mentioned adverse affects were proposed in the report. The Forest Service has developed a Memorandum of Agreement (MOA) with the State Historic Preservation Officer (SHPO) which addresses these mitigations. Further information can be found in the White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment. The MOA will require an amendment to include a resolution of adverse effects on the site as a Traditional Cultural Property.

A legal notice of the 30-day comment period for this project will be published in the Ketchikan Daily News, the newspaper of record for the Tongass National Forest Supervisor's Office. Forrest Cole, Tongass Forest Supervisor, is the Responsible Official for this project. Notification of the 30-day comment period will also be placed in the Daily Sitka Sentinel and the Juneau Empire.

After the comment period has ended, this EA and a decision notice, when it is completed, will be mailed to those people who responded with interest in this bathhouse project analysis, as well as those who commented during the White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment. Copies of the mailing list, supplemental information, and any correspondence received regarding this EA will be available in the project record at the Sitka Ranger District.

Issues

The Forest Service separates issues into two groups:

- those directly or indirectly caused by implementing the proposed action and represent disputes, disagreements, or debate about the effects of the proposed action. These drive the development of alternatives.
- those: 1) outside the scope (not related to the effects) of the proposed action; 2) already decided by law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to the decision to be made; or 4) conjectural and not supported by scientific or factual evidence. These do not drive alternative development.

Issues used in Alternative Development:

The Forest Service identified four significant issues from public and internal scoping for this project.

Issue 1: Removal of the bathhouse would pose an adverse effect to both the tangible and intangible aspects of this Historic Property and contribute to a loss of Historical, traditional, and cultural values associated with the use of the bathhouse.

Issue 2: The bathhouse would no longer be available for health and safety purposes if it is removed.

Issue 3: Having a bathhouse in wilderness negatively affects wilderness character such as untrammelled, undeveloped, and outstanding opportunity for primitive recreation. Additionally, reconstructing or replacing a bathhouse in wilderness may not be in accordance with the Wilderness Act and ANILCA.

Issue 4: The bathhouse is an integral part of the facilities at the site.

Issues not used in Alternative Development.

The public identified concerns and made suggestions about bathhouse design elements such as, preserving bathhouse carvings, and providing for water temperature regulation of the tub. These relevant concerns and suggestions were treated the same between the action alternatives and were incorporated into the design and mitigation measures. Because these non-significant issues are incorporated into all action alternatives, they did not drive the development of individual alternatives.

The recommendation to reconstruct the bathhouse and preserve the concrete holding tank was considered as an alternative. However, this alternative was eliminated from further consideration because reconstruction is not a reasonable option for the structure based on its condition and structural integrity, the cost of reconstruction, and the uncertainty of success. The bathhouse has decay in the foundation and in the structure. The first five courses of the southeast corner wall timbers are rotting, at least two bottom timbers around the entire perimeter have substantial rot and are in need of replacement, and portions of the concrete block foundation are crumbling. The concrete making up the holding tank and soaking tub were made with local materials and are now crumbling, leaking through patches, and draining onto the building sills; this is further degrading the building and would cause problems with a new building if it were built around the tank and tub. The building's initial structural design may not have been sufficient to stand up to the extreme wind loads on the

outside coast. In the 1980's high winds blew off the entire roof, and in 2002 high winds blew the front doors into the warm springs pool and buckled the east and west walls. These structural failures have been repaired in a manner that probably did not resolve the structural inadequacies. The deferred maintenance actions for the bathhouse are estimated at 90% of replacement costs.

Permits, Certifications, and Other Requirements _____

The Forest Service will not be required to obtain a 401/404 permit (water quality certification/discharge of fill material in wetlands or waters) from the U.S. Army Corps of Engineers because no wetlands are located at the site.

Planning Record _____

Additional documents, including more detailed analysis of project area resources, may be found in the project planning record located at the Sitka Ranger District Office in Sitka, Alaska. Other reference documents such as the Forest Plan are also available at the Sitka office. The Forest Plan is also available on the Internet and CD-ROM.

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

This section describes and compares the alternatives considered for replacing bathhouse at White Sulphur Springs.

It includes a description of each alternative and a map of the proposed action. This section also presents the alternatives in comparative form to display options for the decision maker and the public.

Alternatives _____

Three alternatives were considered in detail: The Proposed Action (Alternative 1), an additional action alternative (Alternative 2), and the No Action Alternative (Alternative 3). A full description of the alternatives is described below. Maps of the alternatives are shown in Figures 3 through 5 at the end of Chapter 2. Figure 6 displays the rock source location for all the alternatives.

Alternative 1

The Proposed Action

The Proposed Action, Figures 3 and 6 at the end of Chapter 2, was developed to address the purpose and need for this action as well as address some of the concerns expressed about the use of this area. The Forest Service proposes the following actions.

Bathhouse

Replace the existing bathhouse, including the concrete soaking pool and holding tank used to fill the soaking pool. The existing 15.6 ft. by 24 ft. Pan Abode style bathhouse structure will be replaced by an 18 ft. by 23.5 ft. building. The building footprint will increase by 65 square feet. The new building will be 3 ft. wider than the existing structure in order to increase deck width on the sides of the bathhouse pool from 2 ft. wide to 3.5 ft. wide. This will enable a bather to walk safely by someone sitting on the deck with less risk of tripping and falling. The entry way, changing area, and deck on the east side of the building will be ADA accessible. The soaking pool will be reconstructed in its current location. A mortared 2-foot by 2-foot stone basin/holding tank for the warm springs source will direct spring water over a cascade of boulders into the soaking pool. A waterline will lead from the stone basin to the exterior of the bathhouse. When the valve on the waterline is opened, water from the stone basin will flow through the pipe to stop the flow of warm water into the soaking pool to allow cooling of the pool and draining it for maintenance.

The building style will be rustic: large timbers will support the roof and the siding would be rough-cut yellow cedar board-on-board siding with wood framed windows, including the large sliding window facing the ocean. The roof peak of the replacement building will be taller than the existing building by approximately 4 feet and the pitch will be steeper. Forest Service structural loading requirements for the building location are higher than they were when the existing bathhouse was built. New information from sources such as U.S. Coast Guard weather observations has resulted in these increased structural requirements. A steeper pitched roof will better sustain snow, wind, and seismic loads with fewer support members than the existing building with a shallower pitch roof. (report from Landscape Architect located in project file) In order to allow enough light to enter the building the roofing will incorporate translucent material, similar to the existing roofing material. A shed framed roof with cedar shakes would protect the door. The proposed bathhouse will be accessible for those with disabilities as required by ADA.

Connected Actions:

- Boulders collected either from above mean high tide at four area beaches or from a commercial source, will be used to construct the basin and build a mortared stone face along the concrete foundation. Approximately 6.5 cubic yards of generally boulder-size stone will be removed from above mean high tide at four locations along the shoreline of Bertha Bay, just south and southeast of White Sulphur Springs for site construction. (See Figure 6) Stone from the beach immediately in front of the bathhouse will be used to create the collection basin in the bathhouse. Local material is proposed for use due to its natural appearance and abundance near the project area. But if inadequate amounts are available above mean high tide, stone will be acquired from a commercial source.

Design Elements Specific to Alternative 1:

- A privacy screen or other structure will be created out of existing bathhouse carving-covered wood if the wood is salvageable; this screen will be installed in the new bathhouse.
- The decision concerning the woodshed made in the White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment will be modified to eliminate the clothes changing area and will function only as a woodshed and a visual screen.

- The position of the building is slightly shifted, (see figure 7) to make the entrance to the building closer to the natural ground level to allow access into the building with a short ramp rather than with stairs or a longer steeper ramp.

Mitigation Measures:

- Rock and gravel acquired from a commercial source will be provided that are free of viable invasive plant seeds. Equipment and tools used for construction will be cleaned prior to being transported to the site to avoid contamination by invasive plant seeds or parts. Only aggregate from an active stockpile that is located in a seed-free zone would be used. Notification one week before moving material from the stockpile will be provided to allow for inspection for weeds.
- The White Sulphur Springs bathhouse (including the holding tank) is considered to be a Historic Property (see the Heritage Resources section in White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment.). Mitigation measures have been developed as a result of the adverse effects caused by the project. Photo documentation of the bathhouse and holding tank, including all elevations and associated features will be taken. Copies of the photo documentation including all existing carvings on the bathhouse interior will be displayed in a binder at the White Sulphur cabin. Additionally, a portion of the existing carved bathhouse wall would be re-used to create a screen in the new bathhouse between the bathing area and the changing area.
- Bat colonies will be located. Boulders and rocks will not be disturbed in the area. An adequate buffer will be provided to provide protection for roosting bats. (it is believed that the roosting site is located under the boulders of the outflow channel of the exterior warm spring bath pool).
- No activities to occur near the bat colony between September-June.
- If additional bat colonies or individuals are found stop work in that area immediately and notify District Biologist.
- Bat feeding activity is greatest just after sunset and prior to sunrise, take extra caution and avoid any actions that will disrupt feeding behavior or affect foraging efficiency.

Proposed activities are expected to take up to 45 days to complete. Activities are expected to occur in 2013, dependent on funding and timing.

Alternative 2

Alternative 2 was developed to be responsive to concerns about the effects of the bathhouse on wilderness and wilderness character

Bathhouse

The existing bathhouse walls and roof and the holding tank will be removed, creating an outdoor soaking pool. The exposed face of the existing concrete pool will be faced with stone to provide a natural appearance. Rock or wood decking will be built around the pool for access. Stone from above mean high tide will be used.

A mortared 2 foot by 2 foot stone basin/holding tank for the warm springs source will direct spring water over a cascade of boulders into the soaking pool. A conduit system will serve to stop the flow of warm water into the soaking pool to allow cooling of the pool and draining it for maintenance.

The woodshed will be reconstructed as decided in the White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment. It will be reconstructed between the spring and the cabin to provide a visual screen with an area for changing and a place to keep clothes dry for pool users.

Connected Actions:

- While use of local native materials onsite will be preferred, stone and/ or gravel from a commercial source in SE Alaska may be boated into the site for soaking pool facing, and to construct the holding tank. Similar to Alternative 1, 6.5 cubic yards of stone from above mean high tide or a commercial source may be used in construction if local material is not available.

Design Elements Specific to Alternative 2:

- As decided in the White Sulphur Springs Cabin, Bathhouse, and Trail Environmental Assessment a changing area and a place to keep clothing dry will be added to the woodshed.

Mitigation Measures:

- Mitigation measures similar to Alternative 1 are proposed to address the adverse affect caused by the project (Alternative 2) to this Historic Property. The mitigations will differ in that portion of the existing carved bathhouse wall will be re-used in the construction of the new woodshed wall between the pool and the cabin. The Forest Service is working with SHPO and identified stake holders that ascribe traditional cultural value to this Historic Property to amend the MOA in order to identify appropriate mitigations if any for Alternative 2.
- Mitigation measures concerning bat colonies are the same as in Alternative 1.
- Proposed activities are expected to occur over the course of one to two summer seasons and take up to 25 days to complete. Activities are expected to occur in 2012 or 2013, dependent on funding and timing.

Alternative 3

No Action

Under the No Action Alternative the White Sulphur Springs Bathhouse will not be replaced or reconstructed see Figures 3 at the end of Chapter 2. Minor deferred maintenance will be completed on the bathhouse as funding allows. The current annual maintenance regime will continue. The expected effect is that the bathhouse, including the concrete soaking tub, will likely need to be removed over time due to unsafe structural conditions. In other words, Alternative 3 does not propose removal of the bathhouse, but the expectation is that safety concerns will require that it be removed. (FSM 2332.1).

Project Design

Best Management Practices (BMPs) are required for implementation in all action alternatives, (FSH 2509.22).

12.8 - Oil Pollution Prevention and Servicing/Refueling Operations

12.17 - Re-vegetation of Disturbed Areas

14.2 - Location of Transportation Facilities

14.3 - Design of Transportation Facilities

14.6 - Timing Restrictions for Construction Activities

14.9 - Drainage Control to Minimize Erosion and Sedimentation

14.18 - Development and Rehabilitation of Gravel Sources and Quarries

16.1 - Recreation Facilities Planning and Location

Additionally, the following project design elements will apply to all the action alternatives and are additional to those described in the alternatives above.

- The existing outdoor pool will remain.
- Water temperature regulation in the tub will occur through a method to divert water from entering the tub, similar to the existing plumbing.
- An additional botany survey before construction begins is recommended to alleviate concerns related to newly listed sensitive plant species. If a sensitive plant is found during the survey, mitigation measures will be taken to alleviate any effects on the plant.
- All structures shall be built of materials which blend and are compatible with the immediate and surrounding wilderness landscape. Building materials are expected to include yellow and red cedar and stone typically found on the site.
- All stone will only be removed from the Federal lands.
- Equipment and materials used will be clean and free of invasive plant seeds and materials to avoid the spread of invasive species.
- All equipment and tools that come into contact with aggregate or are used at the work site will be thoroughly washed before coming to the area (at a site where weed spread is not a concern) to remove all soil, debris, and other material that could contain weed seed or weed parts.
- Forest Service personnel and contractors will be made aware of the risks that activities cause for introduction and spread of invasive plants. During construction the clover patch in front of the cabin will be covered with tarps or roped off to help prevent weed seeds or contaminated soil from being transported to the trail or new cabin site. Dandelion plants in the project area will be dug up and disposed of to prevent seed production. The purple foxglove plants should be carefully dug up and handled with gloves (foxglove is toxic) and disposed of to prevent seed production.
- Do not block streams or impede drainage with waste material from construction.

- Any bared soil from any phase of construction or borrow source should be rehabilitated with stockpiled topsoil or duff. Plants native to the area originating near the project will be used for any restoration of re-vegetation work.
- Borrow sources should be as small as possible while still meeting project needs. If possible, make several small borrow pits rather than one large one. Flatten any steep banks of borrow areas when completed.
- If unanticipated discoveries of cultural resources or items protected by the Native American Graves Protection and Repatriation Act are discovered during implementation, work should cease in the immediate vicinity, and the Contracting Officer's Representative or Technical Representative will be notified and in turn notify Sitka District Archaeologist. The Sitka Ranger District in consultation with the appropriate Native organization and the State Historic Preservation Office will determine a course of action.
- If any previously undiscovered endangered, threatened or sensitive species or key habitat for Management Indicator Species (MIS) are encountered at any point in time prior to or during the implementation of this project, a District Biologist will be consulted and appropriate measures will be enacted.
- If a goshawk nest is identified in the analysis area, a District Biologist must be contacted. The Forest Plan directs for the development of a nest buffer and stopping of any continuous disturbance likely to result in nest abandonment within 600 feet of the active nest from March 15-August 15. Forest Plan standards and guidelines will be applied.
- The bathhouse will be closed during structural work. Individuals working on the structures may use the cabin or they may camp in the vicinity during activities.
- There are no identified active bald eagle nests in the project area. However, if any bald eagle nests are identified in the project area the district biologist will be notified immediately. All activities will adhere to the Forest Plan for raptor nests and the MOU between the Forest Service and Fish and Wildlife Service (FWS) regarding eagle nests (U.S Department of the Interior(USDI 2002)). Activities that are inconsistent with current bald eagle use will be restricted from a 600-foot radius from active bald eagle nest trees between March 1 and August 31.

Project Monitoring

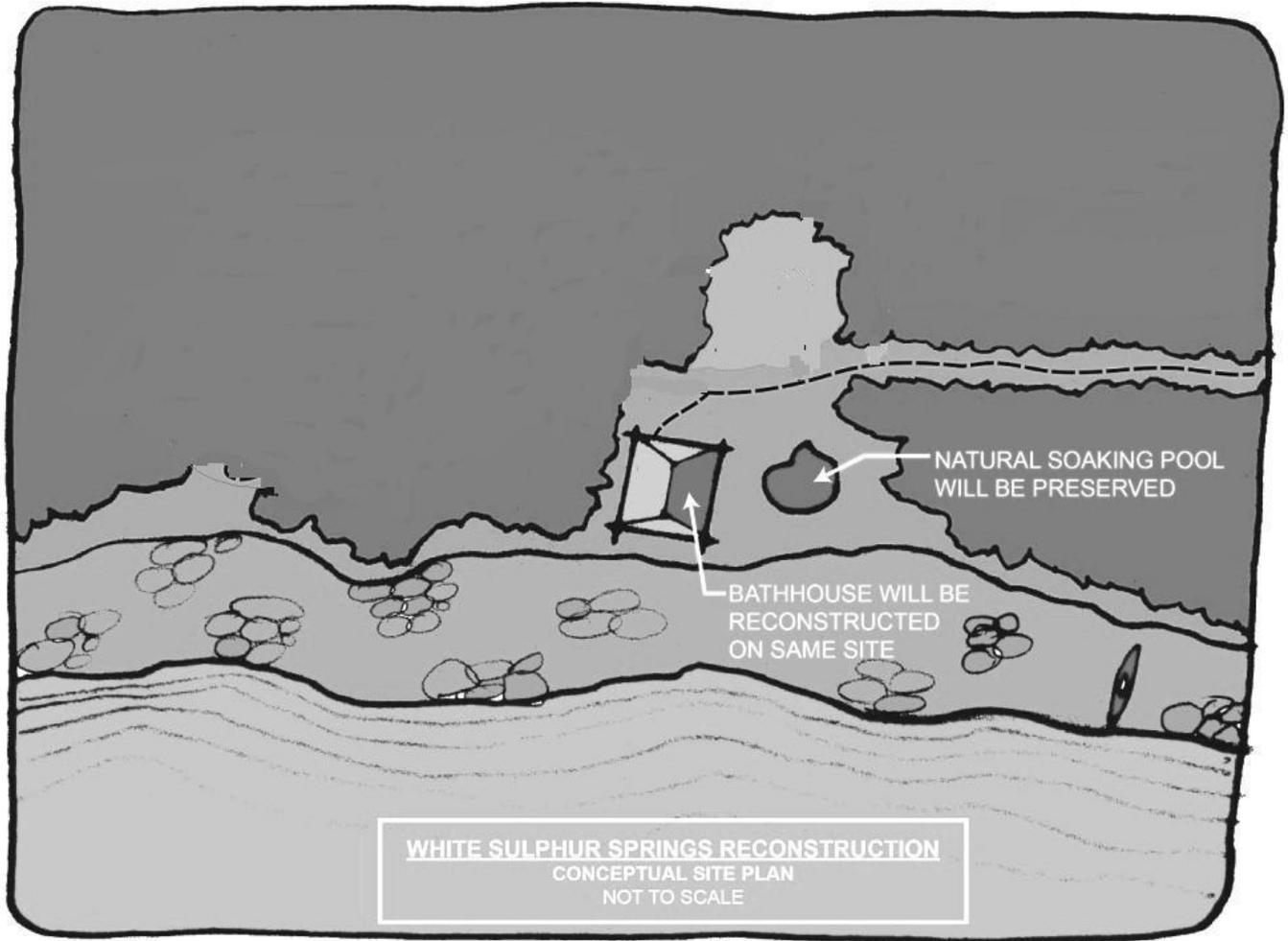
The project area will be monitored for invasive plants for 2 years after completion of the project.

Any changes in condition of the warm spring's pools and buildings will be monitored during annual maintenance visits.

Comparison of Alternatives

A full description of each alternative is found in the Alternatives section (above). The effects of the alternatives are displayed in Chapter 3.

Figure 3:)Alternative 1 – Proposed Action – Replace bathhouse



ALTERNATIVE 1

Figure 4: Alternative 2, Remove bathhouse and replace with open pool

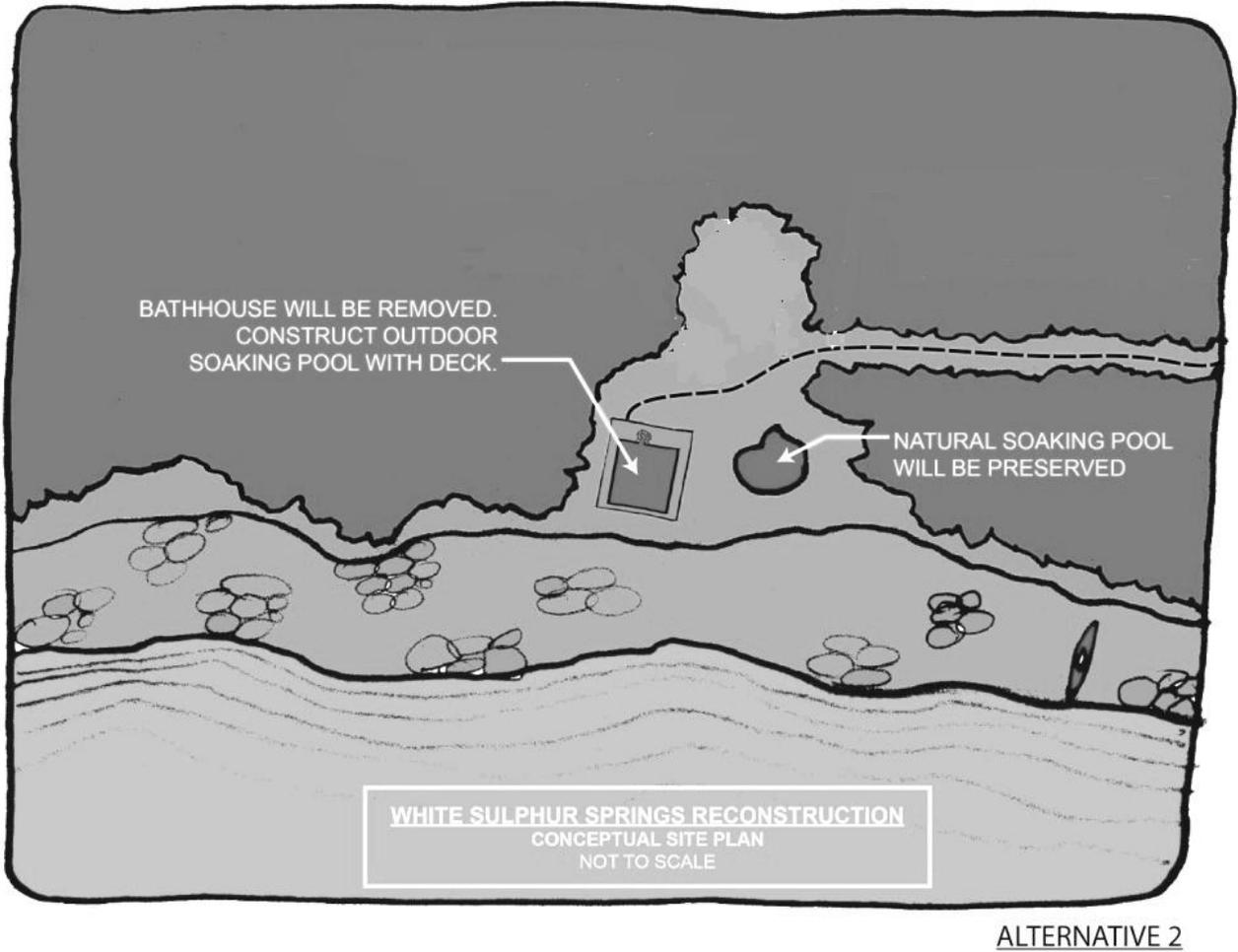
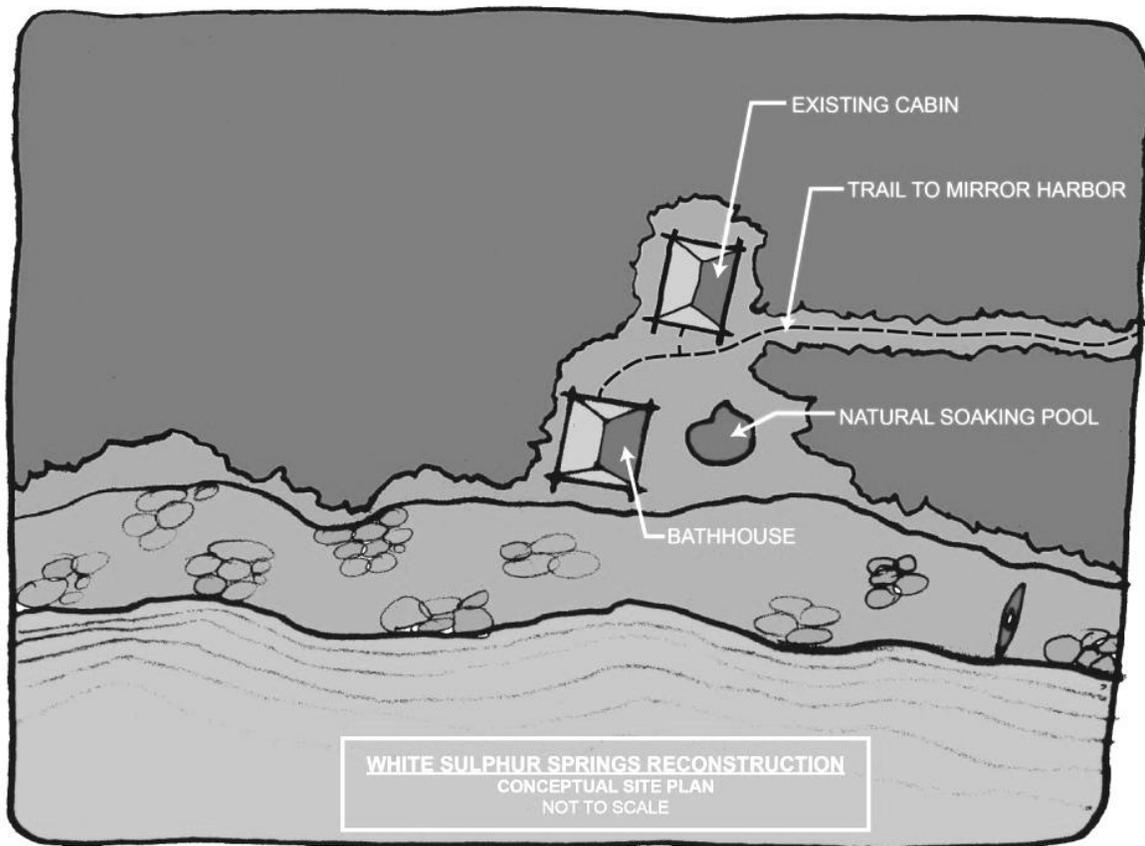
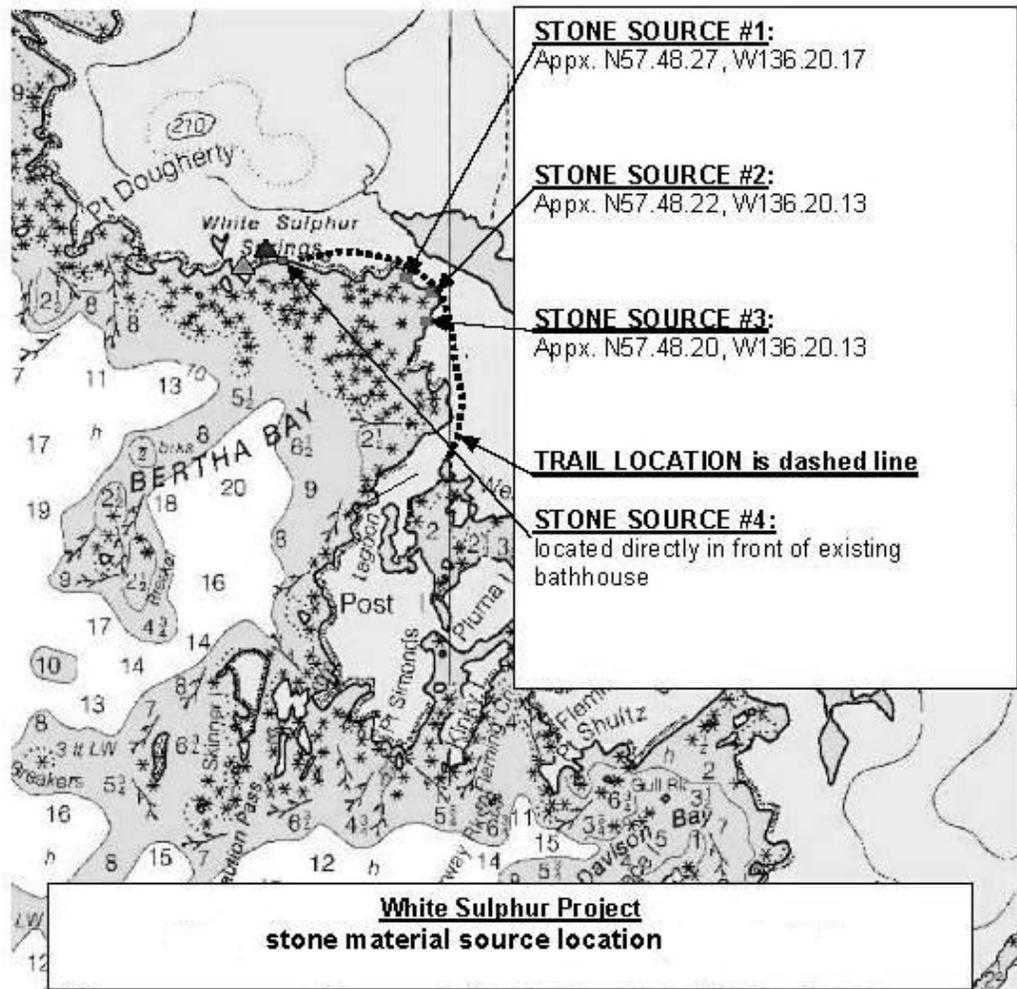


Figure 5: Alternative 3, No Action- Existing bathhouse, cabin, and trail site



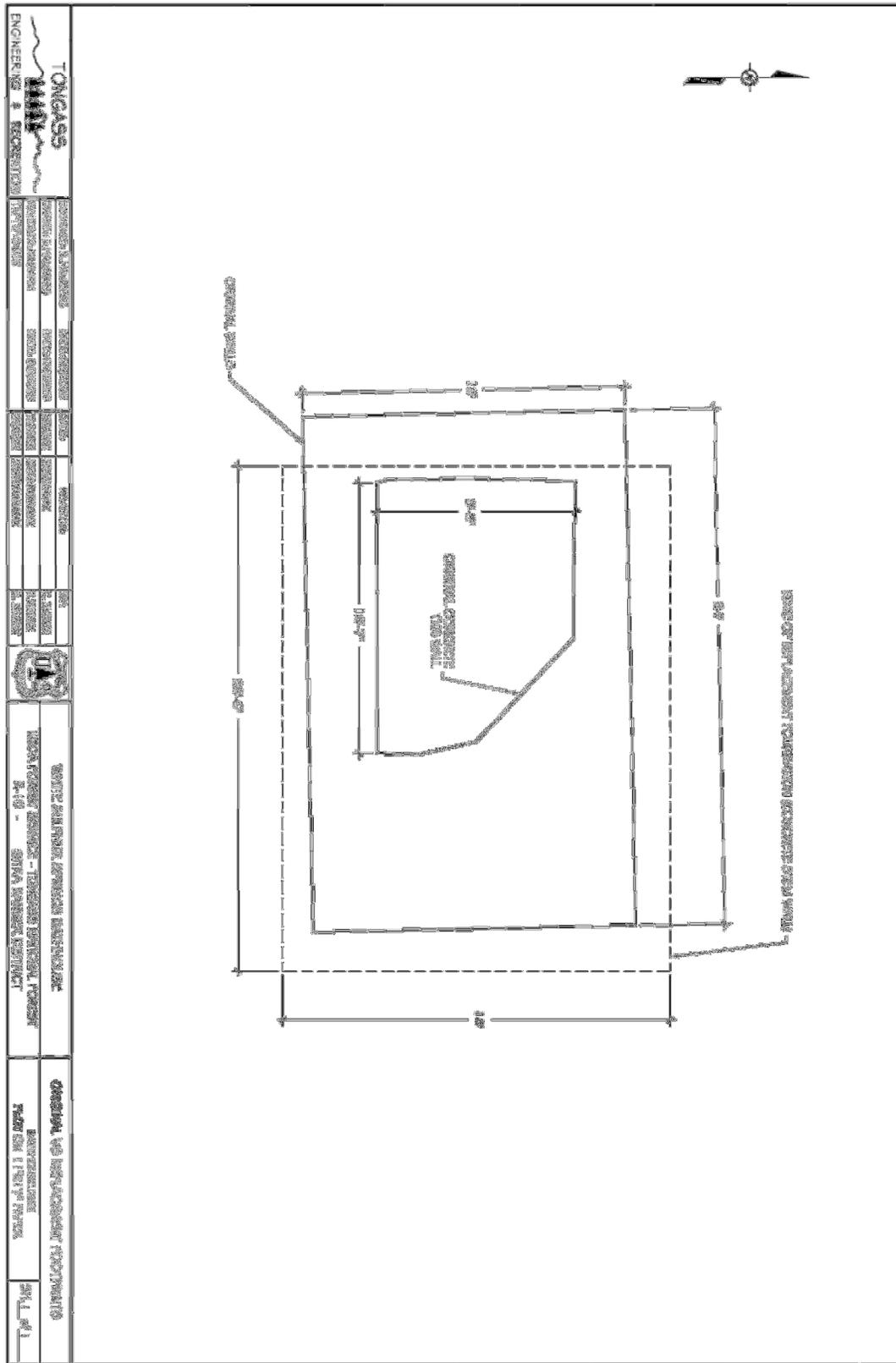
ALTERNATIVE 3
NO ACTION

Figure 5: Stone Source Map



▲ Bathhouse

Figure 7: Footprint change



AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Introduction

This section briefly describes the affected environment of the project area and the potential changes to the environment due to implementation of the alternatives. Direct, indirect, and cumulative effects are disclosed. Effects are quantified where possible, but qualitative discussions are also included.

The following discussion of resources and potential effects associated with each of the alternatives takes advantage of existing information included in the Forest Plan Final Environmental Impact Statement (EIS); other project Environmental Assessments (EAs); project specific resource reports and related information. Where applicable, such information is briefly summarized and referenced to minimize duplication.

The planning record for this project includes all project specific information, including resource reports and other results of field investigations used to support the analysis and conclusions in this EA. Information from reports prepared for this EA such as amended Heritage Resources information as well as amended information concerning Biological Evaluation for Threatened, Endangered, and Sensitive Species for the White Sulphur Springs bat population is included in this section. The planning record also contains information resulting from Tribal correspondence and public involvement.

Some information contained in the Water and Fisheries Resource, Management Indicator Species, Sensitive Plant Species, and Heritage Resources, as well as a Biological Evaluation for Threatened, Endangered, and Sensitive Species were prepared for the White Sulphur Cabin, Bathhouse, and Trail project apply to this EA. That information is located in the project record for the White Sulphur Cabin, Bathhouse, and Trail project EA.

Analyzing Effects

This section summarizes the physical, biological, social and economic environments of the affected project area and the potential changes to those environments due to implementation of the alternatives. The Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) includes a number of specific categories to use for the analysis of environmental consequences. Several of these categories are applicable to the proposed project and alternatives. They form the basis of much of the analysis that follows and are explained below.

Direct, Indirect, and Cumulative Effects

Direct environmental effects occur at the same time and place as the initial cause of action. Indirect effects occur in time or are spatially removed from action. Cumulative effects result from the incremental effects of actions taking place over a period of time.

Unavoidable Adverse Effects

Implementation of any alternative may cause some adverse environmental effects that cannot be effectively mitigated or avoided. Unavoidable adverse effects can result from managing one resource at the expense of others. The application of Forest Plan Standards and Guides, Best Management Practices (BMPs), project specific design, mitigations, and monitoring are all intended to limit the extent, severity, and duration of potential effects.

Short-term Use and Long-term Productivity

Short term uses and their effects, are those activities that occur annually or within the first few years of project implementation. Long term productivity refers to the capability of the land and resources to continue producing goods and services long after the project has been implemented. Under the Multiple-Use Sustained Yield Act and the National Forest Management Act, all renewable resources are to be managed so that they are available for future generations.

Irreversible and Irretrievable Commitments

Irreversible commitments imply a loss of future options. The term “irreversible commitment” applies primarily to the effects of an action on the use of non-renewable resources such as minerals or cultural resources or to the qualities of resources, for example soil productivity, that are renewable only after long period of time. If on site materials such as rock, is used in construction, there would be an irreversible commitment of those resources.

Irretrievable commitments apply to the loss of production or use of a natural resource. For example, while an area is covered by a building, the trees that would have grown on the site are irretrievably lost. A discussion of how these terms should be used when considering environmental consequences is found in the Code of Federal Regulations (40 CFR 1502.16). The definitions above are found in the Forest Service Handbook (FSH 1909.15.05).

Analysis of Effects

The analysis of effects has been organized with Recreation, Wilderness, and Heritage at the beginning to reflect the importance of the significant issues identified in Chapter 1, followed by other resources in alphabetical order.

Recreation

Affected Environment

The Pan Abode log style bathhouse was built in 1966 and has structurally deteriorated. Fresh water for cabin users located near the bathhouse and bathers is collected in a rain barrel and gutter system from the bathhouse roof. Another water source is the tannic muskeg water located nearby. The bathhouse is underlain by bedrock on a foundation of cinderblock piers. The bathhouse has decay in the foundation and structure. The first five courses of the southeast corner wall timbers are rotting, at least two bottom timbers around the entire perimeter have substantial rot and are in need of replacement, and portions of the concrete block foundation are crumbling. The springs come from fissures in the bedrock just above the high tide line. Concrete making up the holding tank and soaking tub was made using local materials.

Leaks from the holding tank have caused rot in the buildings wooden sills and has continued up the wall. The rafters have fungal growth and all doorways are showing signs of decay. The

holding tank for the warm water leaks in spite of continued patching. The bathhouse interior has a changing room with bench and a wood deck that surrounds the soaking tub. Interior walls of the bathhouse have carvings of many boat names and people that have visited the springs since the bathhouse was built. In addition to the bathhouse, there is a second warm spring pool adjacent to the site that is not covered by a structure. A large fire pit with a bench is located adjacent to the bathhouse.

In the 1980's high winds blew off the entire roof of the bathhouse, and in 2002 high winds blew the front doors into the warm springs pool and buckled the east and west walls. These structural failures have been repaired in a manner that probably did not resolve structural inadequacies.

The 1 mile long trail leading from the anchorage at Mirror Harbor to the cabin and bathhouse is the most heavily traveled wilderness trail on Sitka Ranger District. An average of 86 groups rent the cabin annually and many use the trail to access the cabin and bathhouse. Group size averages 4 people. During rough sea conditions bathers anchor in Mirror Harbor and hike the trail. People take evening soaks and spend the night on their boats in Mirror Harbor. The bathers' journey back to Mirror Harbor in the trails current condition presents hazards in the dim evening light.

The bathhouse at White Sulphur is used by people renting the cabin, outfitter/ guides and their clients, fishermen, kayakers, boaters, campers, and day boaters from Pelican visiting for a bath. An average of 79 guided clients use the bathhouse per year. White Sulphur Springs is located in use area 04-15. Two hundred and six outfitter/guide clients could be authorized annually in this use area in the Record of Decision for the Shoreline Final Environmental Impact Statement (FEIS) decision.²

Unguided day use numbers of the area are anecdotal and estimated from cabin log entries at 6 parties per week during the summer months. Conflicts between cabin renters and bathhouse users have been documented in cabin logs; however, positive interactions between groups have also been documented. Dispersed campsites located at a minimum of 500 feet from the cabin site are used by tent users attracted to the area by the springs. Four dispersed sites have been documented in the vicinity of the bathhouse, however only two show signs of frequent use.

Besides soaking in the warm springs visitors may hike the rugged coastline or inland muskegs. Dry Pass Trail intersects the trail to Mirror Harbor. Dry Pass Trail, built by the CCC leads to Sealevel Slough, where people fish for salmon, bear watch, or just enjoy the hike.

Effects to recreation were evaluated using the following criteria and conditions found in the ROS Users Guide, the Forest Plan, Forest Service Manual (FSM) direction and concerns documented during scoping:

Recreation Opportunity was compared between alternatives using consistency with Semi-primitive motorized ROS class and with wilderness LUD.

ROS conditions –

² The decision on the Shoreline FEIS currently determines management of outfitter/guide use of the Sitka Ranger District shoreline area consistent with the Forest Plan. Management of outfitters and guides is necessary to balance commercial and non-commercial recreation opportunities, reduce potential for user conflict, and maintain quality recreational experiences for all users without degrading forest resources. White Sulphur is located in Use Area 04-15 West Chichagof-Hoonah/Sitka Ranger Districts. As stated in Shoreline EIS, outfitter/guide use will not displace unguided users at the White Sulphur Springs bathhouse.

- Moderate probability of experiencing solitude, closeness to nature, tranquility. High degree of self-reliance, challenge, and risk. (FSM 2311.1 –ROS Users Guide)
- Predominantly natural appearing environment. (FSM 2311.1 –ROS Users Guide)
- Low concentration of users but often evidence of others. (FSM 2311.1 –ROS Users Guide)
- Minimum on site controls and restrictions present but subtle. (Site development 2 – FSM2300)
- Vegetative alterations very small in size and number widely dispersed and visually subordinate. (FSM 2311.1 –ROS – R6-REC-118-94-chart)
- Access for people with disabilities is difficult and challenging. (FSM 2311.1 –ROS – R6-REC-118-94-chart)
- Rustic and rudimentary facilities primarily for site protection. No evidence of synthetic materials. Use non-dimensional native materials. (Site development 2 – FSM2300)

LUD conditions –

- Maintain existing public use cabins and/or shelters at present or improved condition. Consider additional public use cabins and/or shelters only when needed for health and safety purposes (ANILCA 1315(d)).
- Appurtenant structures to the cabin or shelter will be limited to a toilet, a woodshed, and minimum structures necessary for resource protection and accessibility.(Forest Plan REC3(E3))

Health and Safety – (External Scoping comments)

- Accessibility of facilities for recreationists, Safety of facilities on the site.
- Use of the facilities for emergency purposes

Site impact – (External Scoping comments)

- Potential for user created impact
- Project related impact

Environmental Consequences

Direct/Indirect Effects

Alternatives 1, 2, and 3

Each alternative has both negative and positive effects to Recreation.

All action alternatives improve recreation opportunity, health and safety, by improving the site facilities to a varying extent. All action alternatives are not anticipated to cause disproportionate adverse human health or environment effects to minority or low income populations. Expected effects are similar to all populations, regardless of nationality, gender, race, or income. All action alternatives eliminate deferred maintenance. All action alternatives benefit the unique warm springs experience offered at White Sulphur by continuing to provide this opportunity. Although Alternative 2 proposes bathhouse removal, the opportunity to soak in the warm springs is maintained with outdoor pools. The remaining alternatives retain the bathhouse bathing experience that has been enjoyed for many years.

Availability of facilities for recreational use at White Sulphur will be reduced during the period of construction. This will reduce revenue from outfitter/guide use. Less time will be needed to complete work in Alternative 2 since the majority of the structure will not be replaced.

Green Top cabin located on nearby Yakobi Island may receive increased use during the period when the project at White Sulphur Springs is being implemented. Use or availability of dispersed campsites in the vicinity of White Sulphur may decline because of construction activities or displacement by workers.

ROS conditions –

In Alternative 1 the new bathhouse design will have a more rustic appearance than the existing structure and the building will be accessible for those with disabilities. Sections of the existing bathhouse wall that has boat name carvings will be used to construct the changing area within the new building. Saving these carvings will help retain the local fishing culture associated with the bathhouse. Current use levels with a bathhouse in place, result in fewer social encounters than required for this ROS of Semi Primitive Motorized (6 parties or less per day). As a result, this alternative is fully compatible with the ROS class since it is estimated that only 6 parties per week use the bathhouse.

Alternative 2 most closely meets the rustic, rudimentary, and naturalistic requirement for this ROS and decreases likeliness for social encounters. Twenty-one respondents to the supplemental information stated they would use the area less or not at all if the bathhouse was removed, increasing the chance for solitude for those at the site. Removing the bathhouse and building an outdoor pool, may result in fewer social encounters, however chances for conflict between parties may increase because of less privacy offered by an open pool. A small changing area will be extended from the woodshed, part of the decision made in White Sulphur Cabin, Bathhouse, and Trail EA. Sections of the existing bathhouse wall that has boat name carvings will be used to construct the changing area. Access into and around the tub may be more challenging for the elderly or people with disabilities. Alternative 3(no action) will have no effect on existing vegetation or conditions currently found on the site. All existing carvings will remain.

LUD conditions –

Alternative 1 retains the bathhouse experience in present or improved condition. The building is designed to shed rain and snow and will have a longer life than a deck exposed to the elements as in Alternative 2. Alternative 2 removes the bathhouse (a non-appurtenant structure). In Alternative 3 the bathhouse would remain closed and eventually have to be removed before collapse. Effects on vegetation would be the same in each alternative.

Health and Safety –

Federal agencies have been required to have accessible facilities since 1968, when the Architectural Barriers Act (ABA), became law. Federal agencies have been required to have accessible programs and activities since 1973, when Section 504 of the Rehabilitation Act was passed. The Americans with Disabilities Act (ADA), which became law in 1990, was modeled on those two laws. The section of the ADA that governs Federal agencies is Title V Section 507 of the ADA, which pertains to Federal wilderness areas. Wilderness resource preservation is the priority in Wilderness. Agencies are not required to construct any facilities or modify any conditions of lands within Wilderness to facilitate use by persons with disabilities. However,

when modifications to protect the resource are made, wilderness managers are encouraged to assess the situation for potential application of Universal Design principles. If the change or request will damage or diminish wilderness resource values, it should not be considered. If it enhances, maintains, or does not change wilderness resource values, it should be considered.

If a modification is made to accommodate some form of visitor use, the principles of Universal Design should be considered to provide the appropriate level of accessibility that does not diminish wilderness resource values.

In gathering information from White Sulphur Springs users, Supplemental Information Sheets were distributed (Public Involvement in Chapter 2). In order for the Forest Service to collect the correct information regarding public Health and Safety as it relates to the need of a cabin or shelter, the term Emergency was used because it meets the intent and eliminates convenience and comfort (See Management Direction, Wilderness LUD in Chapter 2). Our goal was to make the information request as clear as possible for people to understand and respond to. We also asked for the "circumstance" which invited people to tell stories related to the request for supplemental information. Of 36 responses, 13 were due to equipment malfunction, i.e., they were passing by and their boat broke down, plane malfunctioned, etc. and they used the bathhouse or cabin for emergency shelter. Twenty-three had White Sulphur as their primary destination or one destination of many in their trip. Comments indicated that in some cases, people may have put themselves in riskier situations because they knew that they were going to a safe haven and that they would have a place to dry out and get warm. Of the instances when both cabin and bathhouse were used for shelter, 19 people reported that the cabin was being used by another group. In the White Sulphur Springs Cabin, Bathhouse, and Trail EA, one of the effects considered was the degree to which the proposed action affects public health or safety. The analysis stated that there would be no effects on public health and safety due to the removal of the bathhouse because White Sulphur cabin would remain as a shelter in case of emergency. Supplemental information indicated that when the cabin was occupied by another party, there have been circumstances when the bathhouse was used as an alternative emergency shelter.

Alternative 1 will provide an accessible building sufficient for a wheelchair to maneuver, provide a protected environment from the weather, and privacy for bathers potentially reducing conflict between cabin users and bathers. The footprint of the new building will 65 square feet larger than the existing bathhouse and will increase the deck width on the sides of the pool, providing enough space for a bather to safely walk past someone sitting on the deck. The existing entryway and deck do not meet accessibility standards. A secondary building would still be available for emergency shelter. Discussion of the building suitability in wilderness is addressed in the Wilderness section of the analysis.

In Alternative 2 a second building will no longer be available for shelter. The open pool will have an accessible deck to facilitate access to the pool. The footprint of the decking in this alternative will be smaller than the building in alternative 1. The woodshed with attached changing area placed between the cabin and the new outdoor pool will provide screening for bathers; however bathers may feel less privacy without the bathhouse and will experience more exposure to weather conditions. This configuration will be more challenging for those with accessibility needs. In this alternative information about the changes to the site due to the removal of the bathhouse will be made available. This includes informing guidebook producers,

releasing statements to local news sources, and posting it on the Forest and cabin reservation websites.

In Alternative 3, a second building will no longer be available for shelter. Because deferred maintenance will continue to accumulate and will be addressed only as budget allows, the bathhouse which is currently closed, will eventually require removal.

Green Top Cabin and several privately owned cabins are located in Green Top Harbor on the southwest tip of Yakobi Island approximately 6 miles to the northwest of White Sulphur; however crossing Lizianski Inlet to access Green Top can be hazardous due to conflict between tidal currents and open ocean swells. Few structures are available for emergency use in the West Chichagof-Yakobi Wilderness. A high degree of self-reliance, challenge and risk are criteria and conditions used to describe the Semi-Primitive Motorized ROS that is designated along the shoreline of this Wilderness.

Site impact –

In Alternatives 1 and 2 bath improvements will be replaced at the site of the existing bathhouse location. In Alternative 1, an additional 65 sq.ft. will be covered by the new bathhouse, however no new area outside of that affected by use of the site will be disturbed. Project related impacts to the site will not change from the existing condition except for short term effects from demolition and replacement of facilities. People using the bathhouse and cabin from nearby communities have strong attachments to the type of experience that is offered there currently.

Removal of the bathhouse may create use impacts in Alternative 2. Risk of having makeshift shelters built over the springs may increase as people adjust to a bathing experience exposed to weather. Temperature decreases during the winter months between the source vent and the soaking pool could become greater due to increased air circulation over an unenclosed pool, discouraging use. Debris from tree litter will build up in the new outdoor pool just as it does in the existing outdoor pool and will require more cleaning. The footprint of the structure will be less than alternative 1.

In Alternative 3, impact to the site may increase. Typically, at deteriorating sites less care is taken by users to maintain them. During much of the year maintenance is completed by users since there is only a maximum of 3 trips annually by the Forest Service.

Cumulative Effects

Alternatives 1, 2, and 3

White Sulphur Springs cabin, woodshed, and outhouse will be replaced in 2012. At some time in the future as funding allows, the trail from Mirror Harbor to the warm springs will be reconstructed as disclosed in the White Sulphur Cabin, Bathhouse, and Trail project EA. The bathhouse replacement work in Alternative 1 will most likely not commence until the following year. This will increase the period of time that recreationists at the site will be displaced, however no other projects outside of the White Sulphur Springs project area are planned. Alternative 2 will require less time to construct a deck rather than a building. Alternative 3 will require repeated work on the bathhouse to evaluate and potentially stabilize the structure. Tarps may be added by users to replace roofing as the structure continues to deteriorate.

Irreversible and Irrecoverable Commitments

Alternative 2 and 3 will result in the irreversible loss of traditional, historical, and cultural use of the bathhouse by generations of people from Pelican, and seasonal fishermen of the area.

Wilderness

Affected Environment

The White Sulphur bathhouse is located inside the West Chichagof–Yakobi Wilderness Area boundary. This wilderness area was designated by Congress under the Alaska National Interest Lands Conservation Act of 1980. The attraction to this area is White Sulphur Warm Springs which is located in the wilderness. Due to the popularity of the springs and the proximity of the soaking pools to the cabin, there is concern that the wilderness experience may be degraded for some cabin and springs users.

Wilderness Character:

Effects to wilderness character will be measured using the following qualities:

Untrammeled - Discuss the degree to which the components or processes of ecological systems are intentionally controlled or manipulated.

Undeveloped - Identify how human developments will not be evident and wilderness will continue to be in contrast to other areas of increasing mechanization. Include the effects of the use of any motorized equipment, mechanical transport, structures, or installations on maintaining the undeveloped quality of wilderness character.

Natural - Describe the potential for protection, impairment, or restoration of natural conditions (air, water, soil, wildlife, fish, plants, etc.) including endangered, threatened, or rare species, natural biological diversity, and self-regulating ecosystems. Discuss effects related to protecting natural conditions within the regional landscape (i.e. insects, disease, or non-native species).

Outstanding opportunities for solitude or a primitive and unconfined type of recreation - Identify how opportunities for visitors to experience solitude or a primitive and unconfined type of recreation will be protected or impaired. Describe the effects that will be noticeable to the visitor and that could affect their experience in wilderness. Include effects on visitors from the use of motorized equipment, mechanical transport, landing of aircraft, structures, or installations.

Unique components that reflect the character of this specific wilderness - Identify what values of this wilderness are not accounted for in the above qualities, and describe the effects to these additional values.

Environmental Consequences

Direct/Indirect Effects

Alternatives 1, 2, and 3

As discussed in Chapter 1 of this EA, the management of the West Chichagof-Yakobi Wilderness Area is regulated by a number of laws, regulations, rules and direction, notably the Wilderness Act, ANILCA and Forest Service direction. Within these regulations, there is

ambiguity with interpretation of the laws and policy, and thus difficulty in determining the legality of replacing the White Sulphur bathhouse in the West Chichagof-Yakobi Wilderness Area. One interpretation would not allow for bathhouse replacement because it is not a cabin (or a shelter under Forest Service direction). In this example a cabin or shelter is a structure designed to allow you to get warm and sleep. In this interpretation a bathhouse does not fit that description, that ANILCA does not have an allowance for bathhouses, and that a bathhouse is for comfort and convenience, not safety. Another interpretation of these laws and policy is that ANILCA provisions exempt the pre-existing bathhouse structure from portions of the Wilderness Act, thus allowing for bathhouse replacement.

All action alternatives benefit the unique warm springs experience offered at White Sulphur by continuing to provide this opportunity. Although Alternative 2 proposes bathhouse removal, the opportunity to soak in the warm springs is maintained with outdoor pools.

Some comments say that all action alternatives degrade the undeveloped, untrammled, and unconfined recreation qualities by continuing to have structures and improvements at this site. Other comments speak to the purposes of wilderness for recreation and historic uses and how these facilities were a part of the character of the area well before the wilderness designation. Alternative 1 replaces the bathhouse, which degrades the primitive and unconfined qualities of recreation. The bathhouse and associated amenities provide convenience and comfort rather than challenge and risk.

Alternative 2 removes the bathhouse; this provides a more primitive and unconfined recreation experience and a less developed site. The effect of human development is still present with the open pool design, but much less so than if the bathhouse was still in place.

Alternative 3 (No Action) – By taking no action, the building will continue to rot and become hazardous for the public and the unique experience of the bathhouse and pool offered at this location for many years will no longer be provided.

Untrammled

Alternative 1 (Proposed Action) - The replacement bathhouse continues to degrade the untrammled quality of wilderness by diverting the natural flow of water from the spring into a manmade holding tank, which then flows out onto the ground and resumes it's free flowing course.

Alternative 2 – Removing the bathhouse and constructing an outdoor pool continues to degrade the untrammled quality of wilderness by diverting the natural flow of water from the spring into a manmade holding tank, which then flows out onto the ground and resumes it's free flowing course.

Alternative 3 (No Action) – The existing bathhouse would continue to divert water into a holding tank, having a negative effect on the untrammled quality of wilderness character

Undeveloped

Alternative 1 (Proposed Action) - Structures in wilderness degrade the undeveloped quality of wilderness character. Replacing the bathhouse continues to keep human developments obvious and visible to visitors. However, the new bathhouse design would improve upon the undeveloped character by using more rustic materials and design that will blend in more with the natural

setting. The board on board walls of the replacement building better reflects historic Tlingit use of vertical wood planking in traditional buildings than the existing horizontal wall members.

The Wilderness Act defines a wilderness area as "...land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable..." The qualifiers in this portion of the sentence are important. The area does not have to be pristine or pure. It does not have to have no imprint from human activities. It only needs to appear that way with the human imprint substantially unnoticeable. A landscape can still appear primarily affected by the forces of nature. Even a maintained historic structure, such as a bathhouse, could be substantially unnoticeable if it is surrounded by many acres of land that did not contain other structures.

Alternative 2 – Structures are prohibited uses in wilderness that degrade this quality. Removal of the bathhouse moves the site to a more undeveloped state; however the constructed pool and other improvements continue to have an impact. The pool site would be less noticeable from the ocean to passing boaters than a vertical walled building.

Alternative 3 (No Action) – Structures in wilderness degrade the undeveloped quality of wilderness character. The building would continue to keep human development obvious and visible to visitors until the structure was removed.

Natural

Alternatives 1 and 2 – Measures will be taken to protect colonies of bats that inhabit the area around the warm springs during the facility development as described in the mitigation measures for this alternative in chapters 1 and 2.

Alternative 2 – Naturalness of the area may be affected by the construction of illegal shelters by using tarps or imported materials to take the place of protection provided by the bathhouse. This may require increased administrative presence for illegal shelter removal.

Alternative 3 (No Action) – In the short term, the structure will continue to contain the use to the existing impact area. The structure would eventually be removed and the site restored to natural conditions. Without the buildings to contain the use, it is likely that vegetation and soils would be impacted as new campsites develop around the warm springs.

Solitude or Primitive/Unconfined Recreation

Alternative 1 (Proposed Action) - The bathhouse degrades the unconfined quality by directing the use of the area to developed facilities. With respect to solitude, social encounters will be reduced between cabin and bathhouse users by building the bathhouse. However, the expectation for solitude is minimal by most users of the area considering local fisherman and nearby community members are the major users of the warm springs. Regarding the primitive quality of wilderness, the bathhouse does not enhance this quality, but instead degrades it by providing convenience and comfort rather than challenge and risk. The Wilderness Act defines a wilderness area as "...land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of

nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude..."

Alternative 2 – Facility development degrades the unconfined quality by directing the use of the area to developed facilities. However, removing the bathhouse and providing an open pool improves upon the primitive and unconfined qualities. The comfort and convenience that the bathhouse and amenities provide are contrary to wilderness values. Social encounters between cabin and springs users will continue to occur, reducing the opportunities for solitude. An increased administrative presence may be needed to remove illegal shelters which could affect the expectation for solitude.

Alternative 3 (No Action) – Retaining the remaining buildings will continue to result in visitor encounters among user groups. Because the bathhouse is currently closed, the recreation opportunity provided at this site will shift to utilizing the outdoor soaking pool. Although this shift is toward a more primitive experience, the presence of the deteriorating bathhouse will likely detract from the overall experience.

For all alternatives, regardless of the configuration and degree of development, maintaining a developed facility around the warm springs reduces the opportunities for solitude at this site.

Other unique components

Alternative 1 (Proposed Action), Alternative 2 and 3- The attraction to this area is the White Sulphur Springs, which is located in the wilderness. The structure and use was present many years before ANILCA was passed in 1980. Earlier versions of the White Sulphur bathhouse predate the West Chichagof – Yakobi Wilderness Area designation by many decades. Visitors value the bathhouse and the experience it provides. By retaining and utilizing some of the bathhouse walls that have boat name carvings in the new structure, the unique experience offered at this location for so many years will continue to be provided.

Alternative 2 – Removing the bathhouse changes the experience that has historically been available, however the warm springs experience is still available. View from the warm springs will be unimpeded by building walls. Six respondents to the Supplemental Information stated they would not use the site again, 15 said they would not go as often. There was concern that there would be no gathering place and that the bathhouse provides a noise barrier between the bathhouse and cabin. However, there were 3 respondents that stated removing the bathhouse would improve wilderness character and 2 wrote that there would be a greater connection to wilderness.

Alternative 3 (No Action) – By taking no action, the building will remain and continue to rot and become hazardous for the public and the unique experience offered at this location for many years will no longer be provided.

Cumulative Effects

Alternatives 1, 2, and 3

White Sulphur Springs cabin, woodshed, and outhouse will be replaced in 2012. At some time in the future as funding allows, the trail from Mirror Harbor to the warm springs will be reconstructed as disclosed in the White Sulphur Cabin, Bathhouse, and Trail project EA. The bathhouse replacement work in Alternative 1 will most likely not commence until 2013. This will extend the period of time that recreationists at the site will be displaced and the sight and

sound of construction activity in the area. Alternative 2 will require less time to construct a deck rather than a building. Alternative 3 will require repeated work on the bathhouse to evaluate and potentially stabilize the structure. Tarps may be added by users to replace roofing as the structure continues to deteriorate.

Heritage Resources

Affected Environment

The Forest Service has conducted inventories for this project and consulted with the State Historic Preservation Officer (SHPO) regarding the eligibility of cultural resources recorded as part of this inventory and the effects of this project on those resources.

The bathhouse has been evaluated for eligibility to the National Register of Historic Places (NRHP) and found to be eligible. The bathhouse is a historic structure built during a period defined as a significant period in the development of recreation uses on the Tongass National Forest. The period of significance spans 1960 to 1971 and the bathhouse is believed to be from this period. The bathhouse has been evaluated using the historic context document *Everyone's Cabin in the Woods* by Lantz (2010). This document was prepared as a broad examination of the historic recreation cabins in the Alaska Region. The bathhouse was determined to be eligible for nomination to the NRHP by the Forest Service in *White Sulphur Springs Cultural Resource Report, Report No. R2010100531024*, Kinsman 2010.

Concurrence was received from SHPO on determinations of NRHP eligibility for the site, with a determination of adverse affect for the bathhouse alternatives. We consulted on appropriate mitigations for this adverse affect, and executed a Memorandum of Agreement (MOA) between the Forest Service and SHPO. A NEPA decision (Cabin, Bath House and Trail Reconstruction DN) was made on August 10, 2011. During the 45-day appeal period six appeals were received. During the appeal resolution meetings the Responsible Official agreed to rescind the portion of the decision concerning the bathhouse and gather further information in two areas.

1. emergency use of the bathhouse as a shelter
2. historical, traditional, and cultural use of the bathhouse

It is apparent that White Sulphur Warm Springs is important to the communities of Sitka, Pelican, Gustavus, Elfin Cove, and to the trolling fleet fishing the outer coast of Chichagof Island. From the appeal resolution meeting and information gathered it became evident that what was meant by historic was not the physical attributes of the existing bathhouse but the historical use of a bathhouse. It has been noted that there was a bathhouse at the springs as early as 1917 and the surrounding communities have known and used the springs in this manner. There was a bathhouse present as late as 1948 however one informant mentioned using the springs when there was no bathhouse. Another informant who constructed the new bath house mentions that there was no bath house in the early 1960's and that he reconstructed the cement dam for the pool and added walls and a roof in 1962. The informant then went on to build the current structure in 1966. It is apparent that there was a period of time after 1948 or later and prior to 1962 when there was no bathhouse.

Two questions were asked that pertained to historical, traditional, and cultural use of the bathhouse.

Question 3: Are there customs or traditions that you associate with the bathhouse?

Question 4: If the bathhouse was no longer at White Sulphur, but instead an open pool, how would this affect your community or social group?

Question 3: had a total of 85 responses with 69 people stating that there were customs and traditions that they associate with the bathhouse. A total of 31 respondents stated that four generations of Pelican residents have used the site annually since the 1960's. The historic carvings were important to 12 respondents and they associated them with the use of the bathhouse. A total of 13 respondents noted that the spiritual healing benefits of the springs are important. And another 13 respondents cited celebrating holidays, birthdays, weddings, and anniversaries as traditions associated with this site. Additionally, 11 commercial fishers responded that traditionally the fleet gathers at the warm springs during troll closures utilizing the bathhouse as a place to meet, bathe, and wash clothes.

Question 4 had a total of 78 responses with 5 people not responding or their comment did not address the question. Fifteen respondents stated that they would not visit the site as often. Six said that they would never go to the site again. Seven stated that there would be a loss of treasured experiences and memories. Six stated that there would be a loss of historic use. Three commented that the site would be affected by makeshift shelters and tarps. Three people cited the loss of cultural significance. Two mentioned the loss of a washing area. Two cited there would be no gathering place.

In light of this new information the determination of eligibility for the NRHP will be amended to include eligibility under Criterion A Traditional and Cultural Values, for its importance to the communities that have historically used the site. The long term residents of Pelican, Elfin Cove, and Gustavus have used this site going back four generations as a community and family, gathering place. The trolling community has used the bathhouse to celebrate the opening and closing of the season as well as to bathe and wash clothes. This new information will require an amendment to the current MOA between the Forest Service and SHPO, and the amended MOA must be negotiated and executed prior to a NEPA decision.

Environmental Consequences

Direct/Indirect Effects

Alternatives 1, 2, & 3

All alternatives (including the long-term effect of Alternative 3, no action) pose an adverse effect to the historic bathhouse structure because the existing historic structure would be removed (now or in the future). SHPO concurred with the determination of adverse affect for the bathhouse project, in a letter addressed March 7, 2011. Mitigation measures were developed for the action alternatives in White Sulphur Cabin, Bathhouse, and Trail project EA. These mitigations would serve to mitigate the adverse effect on this historic property. Mitigation outlined in the MOA with the SHPO to resolve these adverse effects include photographing the historic bathhouse. Additionally, an element of the former bathhouse would be saved and used as a design element at the site in Alternative 1 and 2.

Indirect effects are not expected due to the intensive nature of this inventory, however there is still a possibility that sites yet undiscovered may still exist in the project area.

Traditional & Cultural

In addition to the effects to the physical (tangible) aspects of the bathhouse one must consider the intangible aspect of how these alternatives affect this traditional and cultural property.

Alternatives 1 & 2 and 3 all have effects on aspects of what make this site important as a traditional cultural property.

Alternative 1 which proposes to replace the bathhouse would not have an effect on a majority of the people who hold this place as important. A new bathhouse would still provide the ability to continue using the warm springs in the manner that they have traditionally and allow for those customs and practices that are important to them. However there would be effects for those people who hold the current physical bathhouse as important to the way those within their social group use the site. The loss of the existing bathhouse would include removal of historic carvings that are important to those that visit and connect them to members of their communities and social groups. This adverse effect would be mitigated through stipulations in the MOA that call for the re-use of portions of the carvings as design elements in a new bathhouse. The amendment to the MOA would call for development of a publication that includes the history of White Sulphur Warm Springs combined with the photo documentation detailed in the original MOA to included detailed photos of the historic carvings inside the bathhouse. This publication would then be available for visitors to the bathhouse or the nearby cabin.

Alternative 2 will have an adverse effect on all those that hold this place as important to the way they interact with their communities and social groups in that the bathhouse is an integral part of the whole in regards to the traditional cultural property. The bathhouse, as represented in our supplemental information, is primary to how users connect with one another within their communities and social groups. The loss of the existing bathhouse would include removal of historic carvings that are important to those that visit and connect them to members of their communities and social groups. This adverse effect would be mitigated through stipulations in the MOA that call for the re-use of portions of the carvings as design elements in a changing area attached to the wood shed. This alternative if selected will result in the complete loss of the bathhouse. Due to this, additional mitigations are necessary however when dealing with a physical attribute that holds importance to the social and cultural framework of a community and the loss of that physical attribute how does one mitigate that. The answer may be that there is no sufficient mitigation for a permanent loss of this nature.

Alternative 3 will have an adverse effect on all those that hold this place as important to the way they interact with their communities and social groups in that the bathhouse is an integral part of the whole in regards to the Traditional and Cultural Property. The bathhouse, as represented in our supplemental information, is primary to how users connect with one another within their communities and social groups. Under this alternative there would be no replacement of the bathhouse, the existing bathhouse would not undergo restoration or rehabilitation and it would only receive deferred maintenance limiting the life of this structure. The poor design and current maintenance regime has led to the deterioration of this structure. As a result the lack of appropriate treatment to the exterior surfaces of wood has contributed to the current condition of the bathhouse. Deferred maintenance alone is not adequate to preserve this structure and allow for continued traditional and cultural use. There will eventually be a complete loss of the bathhouse due to this alternative. When dealing with a physical attribute that holds importance to the social and cultural framework of a community, the loss of that physical attribute may be so great that there is no appropriate mitigation for a permanent loss of this nature.

Cumulative Effects

Alternatives 1, 2, & 3

White Sulphur Springs cabin, woodshed, and outhouse will be replaced in 2012. At some time in the future as funding allows, the trail from Mirror Harbor to the warm springs will be reconstructed as disclosed in the White Sulphur Cabin, Bathhouse, and Trail project EA. The bathhouse replacement work will most likely not commence until 2013. This will increase the period of time that users of the site will be displaced. Camping will still occur at dispersed sites and the springs will be available for use. Alternative 2 will require less time to construct a deck rather than a building. Alternative 3 will require repeated work on the bathhouse to evaluate and potentially stabilize the structure. Tarps may be added by users to replace roofing as the structure continues to deteriorate.

Wildlife

Affected Environment

This amendment is designed to address mitigation measures for a small bat population that was identified in the vicinity of the proposed action, after the original MIS and Biological Evaluation (BE) reports was released for White Sulphur Cabin, Bathhouse, and Trail EA.

There have been eye-witness accounts of bats at White Sulphur as recent as the October 2011. In 1992 a group of naturalists conducted a survey and determined that there was a population of 461 bats and that this colony was a maternity roost (West and Swain 1999).

West and Swain (1999) describe the location of the roost as being located 20 m east of the White Sulphur cabin in the secondary spring, downstream from the outdoor warm spring pool, 60m inland from the ocean. The roost is described as being located under boulders near the secondary warm spring channel.

Mitigation Measures:

Very little information is available on bats in the southeast Alaska. Below are some mitigation measures to prevent any unnecessary disturbance of bat habitat and populations. However, when proposed activities are being conducted additional precautions should be taken. If any level of agitation is noticed (i.e. bats fleeing roost) then activities should stop immediately and the District Biologist should be notified.

- Identify location of colony and do not disturb any boulders/rocks in the area, provide an adequate buffer (it is believed that the roosting site is located under the boulders of the outflow channel of the exterior warm spring bath pool).
- No activities to occur near bat colony between September-June.
- If additional colonies or individuals are found stop work in that area immediately and notify District Biologist.
- Bat feeding activity is greatest just after sunset and prior to sunrise, take extra caution and avoid any actions that will disrupt feeding behavior or affect foraging efficiency.

Environmental Consequences

Direct and Indirect Effects

Alternatives 1, 2, and 3

If the above mitigation measures are followed there will be no effect on the White Sulphur bat population. However, any level of disturbance to the roosting site could have detrimental effects on individuals or the population as a whole. Thermal roosting areas provide a very unique and rare opportunity for maternity colonies and any disturbance could cause bats to abandon the roost, threatening their survival and potentially the survival of any juveniles that might be present in the roost. If mitigation measures as listed in chapters 1 and 2 are followed there will be no effect on the White Sulphur bat population. However, any level of disturbance to the roosting site could have detrimental effects on individuals or the population as a whole. Thermal roosting areas provide a very unique and rare opportunity for maternity colonies and any disturbance could cause bats to abandon the roost, threatening their survival and potentially the survival of any juveniles that might be present in the roost.

Cumulative Effects

Alternatives 1, 2, and 3

White Sulphur Springs cabin, woodshed, and outhouse will be replaced in 2012. At some time in the future as funding allows, the trail from Mirror Harbor to the warm springs will be reconstructed as disclosed in the White Sulphur Cabin, Bathhouse, and Trail project EA. The bathhouse replacement work will most likely not commence until the following year. This will increase the window of time that bats will be exposed to construction activities.

Additional Resource Reports

Remaining resource reports are included in the project record for White Sulphur Cabin, Bathhouse, and Trail EA. The White Sulphur Bathhouse Project EA does not change effects on these resources. They include specialist reports on:

- Fisheries
- Soil and Wetlands
- Scenery
- Subsistence
- Threatened, Endangered, Sensitive, Rare, and Invasive plants

Other Required Disclosures

Many federal laws and executive orders require project-specific planning and environmental analysis on federal lands. Most of this analysis can be found in the sections above. While most related laws and Executive Orders pertain to all federal lands, some of the laws are specific to Alaska.

2008 Tongass Land and Resource Management Plan (Forest Plan) Amendment

All project alternatives fully comply with the 2008 Tongass Forest Plan. This project incorporates all applicable Forest Plan standards and guidelines and management area prescriptions as they apply to the project area and complies with Forest Plan goals and objectives.

The 2008 Forest Plan complies with all resource integration and management requirements of 36 CFR 219 (219.14 through 219.27). Application of Forest Plan direction for the White Sulphur project ensures compliance at the project level.

ANILCA Section 810, Subsistence Evaluation and Finding

The effects of this project have been evaluated to determine potential effects on subsistence opportunities and resources. There is no documented or reported subsistence use that would be restricted as a result of this decision. For this reason, the Selected Alternative would not result in a significant possibility of a significant restriction of subsistence use of wildlife, fish, or other foods.

ANILCA Section 811, Access Evaluation and Finding

This action has been evaluated to determine potential effects on reasonable access to subsistence resources on National Forest System Lands. There is no documented or reported access that would be restricted as a result of this decision. For this reason, this action would not result in a significant possibility of a significant restriction of subsistence users having reasonable access to subsistence resources on National Forest System Lands.

Clean Air Act

Emissions anticipated from the implementation of any alternative would be of short duration and are not expected to exceed State of Alaska ambient air quality standards (18 AAC 50). Using nearby or locally-sourced materials as described in some of the alternatives would reduce the project's overall carbon dioxide emissions.

Coastal Zone Management Act of 1972, As Amended

Under the Coastal Zone Management Act (CZMA), activities of Federal agencies that affect any land or water use or any natural resource of the coastal zone must be carried out in a manner that is consistent to the maximum extent practicable with the enforceable policies of the State's approved coastal management program. The Alaska Coastal Management Program expired on June 30, 2011, pursuant to State law. Thus, there is no approved coastal management plan for Alaska, and no requirement for a consistency determination or review under the CZMA. The Forest Service will continue to take into consideration the views of State agencies and local communities, however, as part of the NEPA process and other procedures to collaborate with stakeholders.

Endangered Species Act of 1973

A determination of "No Effect" has been made for all threatened, endangered, or ESA candidate species. All project activities would be conducted in a manner consistent with the ESA and regulations. A complete BE is included in the planning record.

National Historic Preservation Act of 1966

The Forest Service program for compliance with the National Historic Preservation Act (NHPA) includes locating, inventorying and evaluating the National Register of Historic Places eligibility of historic and archeological sites that may be directly or indirectly affected by scheduled activities. Regulations (36 CFR 800) implementing Section 106 of the NHPA require Federal agencies to consider the effects of their actions on sites that are determined eligible for inclusion in or are listed in the National Register of Historic Places (termed "historic properties").

The bathhouse has been found to be eligible to the National Register of Historic Places. We received concurrence from SHPO on our determinations of eligibility for the bathhouse site, and with our determination of Adverse Effect for this project. The Forest Service has executed a Memorandum of Agreement with the State Historic Preservation Officer (SHPO) which addresses mitigations for the adverse effects of this undertaking.

In light of new information the determination of eligibility has been amended to include eligibility under Criterion A traditional cultural values, for its importance to the communities that have historically used the site. We recognize that this new information will require an amendment to the current MOA between the Forest Service and SHPO, and that the amended MOA must be negotiated and executed prior to a NEPA decision.

Clean Water Act

The Alaska Department of Environmental Conservation (ADEC) is the lead State agency for promulgating and enforcing water quality regulations under the Clean Water Act. The Clean Water Act recognized the need to control nonpoint source pollution. Section 313 of the Clean Water Act requires the Forest Service to comply with all State requirements for control and abatement of water pollution to the same extent as any nongovernmental entity. The Forest Service is the agency responsible for monitoring and protecting water quality on National Forest System lands in Alaska.

The site-specific application of BMPs, with a monitoring and feedback mechanism, is the approved strategy for controlling nonpoint source pollution as defined by Alaska's Nonpoint Source Pollution Control Strategy (2007) and the Memorandum of Agreement between ADEC and the Forest Service, Alaska Region (1992). The BMPs in Forest Service Handbook 2509.22 (Alaska Region Supplement, 2006) are incorporated into the Tongass Forest Plan, and applied site-specifically during project implementation.

Executive Order 11593

E.O. 11593 directs Federal agencies to provide leadership in preserving, restoring, and maintaining the historic and cultural environment of the nation. Completion of an archaeological survey and testing at the White Sulphur Springs has been conducted. Sites have been evaluated for eligibility to the National Register of Historic Places. This evaluation has been done in consultation with the Alaska Office of History and Archaeology. Three sites were found to be eligible to the NRHP during inventory. This undertaking will have an adverse affect on those historic properties. The Forest Service has developed a Memorandum of Agreement with SHPO which addresses mitigations for the adverse affects of this undertaking.

Executive Order 11988

No floodplains or riparian areas will be impacted by this project.

Executive Order 11990

No wetlands will be impacted by this project. There are no wetlands in the project area.

Environmental Justice (E.O. 12898)

Implementation of the Selected Alternative is not anticipated to cause disproportionate adverse human health or environment effects to minority or low income populations. Expected effects are similar to all populations, regardless of nationality, gender, race, or income.

Recreational Fisheries (E.O. 12962)

Federal agencies are required, to the extent permitted by law and where practicable, and in cooperation with States and Tribes, to improve the quantity, function, sustainable productivity, and distribution of U.S. aquatic resources for increased recreational fishing opportunities. As required by this Order, I have evaluated the effects of this action on aquatic systems and recreational fisheries and documented those effects relative to the purpose of this order. Since there are no effects to fisheries resources within the project area there will be no direct, indirect or cumulative impacts related to this Order.

Invasive Species (E.O. 13112)

Executive Order 13112 directs Federal agencies whose actions may affect the status of invasive species to insure coordinated, cost-efficient agency actions addressing the prevention, detection, control, and monitoring of alien species. "Invasive species" refers to those species that are likely to cause economic or environmental harm, or harm to human health. Actions to be taken include planning at the local, tribal, state, regional, and ecosystem levels, in cooperation with stake holders and organizations addressing invasive species. Agencies are not to fund or authorize actions that the agency believes are likely to cause or promote the introduction or spread of invasive species, unless the benefits of the action outweigh the potential harm caused by the species.

An invasive plant risk assessment has been completed for this project, findings and recommendations are incorporated into project design and decision. Refer to the "Decision" above and the Invasive Weed Risk Assessment for mitigation measures addressing the management of invasive plants.

Executive Order 13175 (2000) Consultation with Tribal Governments and ANCSA Corporations

Sitka Ranger District sent letters to the Sealaska Corporation, Sitka Tribe of Alaska, and Shee Atika Inc., on October 22, 2007, describing the project and requesting consultation. On November 12, 2010 and December 9, 2011, update letters about this project were sent to Sealaska Corporation, Sitka Tribe of Alaska, and Shee Atika Inc. as well as to Hoonah Indian Association, Huna Totem Corporation, and the Central Council of the Tlingit and Haida Indian tribes of Alaska. The District Ranger and/or Zone Archaeologist attended Tribal Council meetings in Sitka and highlighted the project requesting feedback on concerns or related issues. No concerns were identified by the Tribes or tribal corporations.

Magnuson-Stevens Fishery Conservation and Management Act of 1996

The Magnuson-Stevens Fishery Conservation and Management Act of 1996 requires consultation with the NMFS on activities that may adversely affect Essential Fish Habitat (EFH). This project will not adversely affect EFH (see the fisheries section of the White Sulphur Springs Cabin, Bathhouse, and Trail EA); therefore, no further consultation with NMFS is required on this project.

CONSULTATION AND COORDINATION

The Forest Service consulted the following individuals, Federal, State, and local agencies, tribes and non-Forest Service persons during the development of this environmental assessment:

INTERDISCIPLINARY TEAM MEMBERS:

Annemarie LaPalme, Recreation and Team Leader
Jay Kinsman, Archaeology
Jennifer McDonald, Wilderness

INTERNAL ASSISTANCE:

Carol Goularte, Sitka District Ranger
Karen Iwamoto, NEPA Coordinator
Barth Hamberg, Landscape Architect

FEDERAL, STATE, AND LOCAL AGENCIES:

Advisory Council on Historic Preservation
Alaska State Historic Preservation Office

TRIBES AND CORPORATIONS:

Central Council of the Tlingit and Haida Indian Tribes of Alaska
Hoonah Indian Association
Huna Totem Corporation
Sealaska Corporation
Shee Atika Inc.
Sitka Tribe of Alaska

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- USDA Forest Service Manual. FSM 2333.03., FS-710 Built Environment Image Guide