

# STATE OF ALASKA

WALTER J. HICKEL, GOVERNOR

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January 29, 1993

Walter Stieglitz  
Regional Director  
U.S. Fish and Wildlife Service  
1011 East Tudor Road  
Anchorage, AK 99503

Dear Mr. Stieglitz:

The State of Alaska has reviewed the December 1992 Workbook for the Kenai National Wildlife Refuge Public Use Management Plan. This letter represents the consolidated comments of the State's resource agencies.

The State of Alaska appreciates the challenge faced by the U.S. Fish and Wildlife Service to maintain the integrity of the fish and wildlife habitats found on the refuge, while accommodating the most popular sportfishing area in the state and the most visited refuge in Alaska.

The demand for public uses in the Kenai refuge is continuing to increase and some accessible areas are being subjected to concentrated impacts. The State encourages the Service to develop a Public Use Management Plan (PUMP) which incorporates an emphasis on dispersing recreational use to under-utilized areas in addition to instituting protective management of the heavily used areas. To protect traditional uses of the refuge, the Service is also encouraged to exhaust all management remedies for minimizing wildlife disturbances before prohibiting reasonable public access for sport fishing, hunting, and other fish and wildlife-related recreation opportunities.

To address the increasing demand for recreational opportunities on the refuge, the State specifically requests that amendments to the 1986 Kenai refuge access regulations be considered in this planning process. This letter suggests a number of specific modifications which we believe can be made without compromising refuge resources.

### Public Involvement and Interagency Coordination

The State appreciates that the Service is providing multiple opportunities for public involvement early in the planning process. Planning in phases is more costly than simply issuing a single draft plan; however, the additional steps will facilitate more thorough public involvement and increase the likelihood of satisfactory results. We do believe, however, that it would be worthwhile for all concerned if the comment period on these interim products is lengthened to a minimum of 45-60 days.

The State also hopes that this early effort to define issues in a public forum symbolizes a renewed willingness to consider a variety of options. In the past, the State has witnessed some instances where refuge management seems to have been predisposed toward a particular approach at the expense of investigating alternatives. In contrast, this workbook covers a comprehensive range of categories from the start, with opportunities to address improved management, reducing user conflicts, and prioritizing the importance of certain activities and services.

We are also pleased that this planning effort is moving away from piecemeal development proposals with limited public input or interagency coordination (e.g. campground expansions and boat ramp upgrades at Hidden Lake and Upper Skilak Lake). The higher level of coordination and communication among resource agencies that is expected to accompany this PUMP is welcome. State agencies look forward to on-going cooperation with the Kenai refuge staff on this effort. In particular, the Department of Fish and Game looks forward to involvement in all phases of the plan since nearly every decision made on the Kenai Refuge affects fishing and hunting opportunities and state management of fish and wildlife. Likewise, the Department of Natural Resources' Division of Parks and Outdoor Recreation wishes to continue working closely with refuge staff, especially regarding management of the Kenai River and the canoe trail system.

**Land Status**

The State owns shorelands, tidelands, submerged lands and watercolumns in the refuge. The State suggests inclusion of the standard language and guidelines that have been included in previous PUMPS. The State acknowledges the specific status of certain waterbodies, including the Tustumena Lake court decision; the Kenai River Special Management Area; the Memo of Understanding among the Department of Natural Resources, the U.S. Fish and Wildlife Service and the U.S. Forest Service for the Skilak Lake and the upper Kenai River; and the Swanson River/Swan Lakes National Recreational Trails.

**Water Rights**

The plan should acknowledge the role of the State regarding water rights. Please include the following language:

Federal reserved water rights are created when federal lands are withdrawn from entry for federal use. They are created for the minimum amount of water reasonably necessary to satisfy both existing and reasonable foreseeable future uses of water for the primary purposes for which the land is withdrawn. The priority date is the date the land is withdrawn for the primary purposes.

Federal reserved water rights in Alaska can be claimed and adjudicated in basin-wide adjudications in conformance with the McCarran Amendment under state law, AS 46.15.165-169 and 11 AAC 93.400-440, either administratively or judicially. Alternatively, federal water rights may be applied for and granted under state law for either out-of-stream or instream water rights. In any case, water claimed or requested must be quantified.

The FWS will work cooperatively with the State of Alaska to inventory and quantify its federal water rights under state law. Water resources of the Kenai Fjords National Park will be managed to maintain the primary purposes for which the park was established.

In addition to federal reserved water rights, the plan should note that a federal agency can apply for water rights through the existing state water rights system. By applying for water rights through the State it will, in many cases, provide the NPS with the senior water rights and save both the State and federal government the cost of a federal reserved water right

adjudication. The issuance of state water rights will not preclude the federal agency from applying for its federal reserved water rights in the future if the need arises. The Alaska Water Use Act also allows public agencies to apply for reservations of water for instream uses including fisheries, recreation, and water quality purposes.

### **Kenai River Below Skilak Lake**

The Department of Fish and Game's Division of Habitat and Restoration is currently conducting a cumulative impact assessment of development and activities occurring within the Kenai River riparian zone under a coastal zone management 309 grant program. This process includes the documentation of human use impacts, especially camping and fishing. On refuge uplands below the outlet of the Skilak Lake, the DFG study indicates numerous camping sites and bank impacts from heavy fishing use during the sockeye salmon fishing season. We recommend that the Service consider management options to address these impacts in the PUMP. Refuge staff are encouraged to work cooperatively with other agencies and organizations to develop methods for bank restoration and protection, while providing for continued sport fishing access.

### **Confluence of Kenai and Russian Rivers**

The state strongly recommends that the Service work with the State and U.S. Forest Service to cooperatively design and implement a management strategy for all access and public use facilities in the immediate vicinity of the confluence of the Russian and Kenai Rivers. As you know, the Department of Fish and Game recently purchased the Sportsman's Lodge. We are also aware that the Service has plans to build a bridge at the existing Russian River ferry crossing. In addition, the Forest Service is making significant improvements at the nearby Russian River campground. We see this as a compelling opportunity to coordinate the facilities and management responsibilities these agencies have for the most popular sportfishing area in the state. We urge the Service to use the PUMP as a vehicle to specifically seek public input toward such cooperative management. The PUMP should recognize that State management of the Sportsman's Lodge property will emphasize motorboat access as a priority use.

### Visitor Center

The State encourages the PUMP to consider a visitor information center in the Cooper Landing area. The center could provide information about the Kenai River Special Management Area and other recreational opportunities on the Peninsula.

### Recreational Opportunities vs. Restrictions

The Kenai refuge, encompassing nearly 2 million acres, has the potential to accommodate increased sport fishing and other recreational activities beyond current use levels while still protecting habitat for wildlife populations. To attempt to do so is consistent with a stated purpose of the refuge "to provide...opportunities for fish and wildlife-oriented recreation." Instead, over the past decade public access has been reduced, creating fewer opportunities for recreational fishing and hunting.

A public recreation survey in 1981 indicated that fishing was the primary recreational activity in the refuge. The survey also indicated that refuge visitors favored expansion of traditional outdoor recreational pursuits such as fishing, biking, hiking, and camping; and favored areas with a diversity of opportunities within reasonable proximity to population centers (R. N. Clark and D. R. Johnson, 1981).

Current refuge policies and regulations have resulted in overcrowded, intensive use of some fish stocks and virtually no use of others. The State urges the Service to address these access limitations and recommends consideration of increased public access to carefully selected sites to increase angler opportunities. These recommendations echo those in the Service's own 1989 Fishery Management Plan for the Kenai refuge.

Improving fishing access is also consistent with the Service's recently-developed implementation plan for the nationwide Recreational Fisheries Policy. This policy calls for "preserving and enhancing fishery resources, recreational fishing opportunities and partnerships between governments and the private sector for conserving and managing recreational fisheries."

The State, therefore, strongly encourages the PUMP to take a comprehensive look at how access opportunities can be used to increase and disperse public use in carefully selected areas of the refuge which currently receive little use.

### Traditional Use

Another facet of the State's general concern about access restrictions is the loss of traditional (pre-ANILCA) uses. Despite repeated requests since passage of ANILCA, the Service has not yet conducted studies to document such traditional access protected under Section 1110 of ANILCA. Consequently, the documentation of traditional access becomes more difficult with each passing year, while the Service implements incremental access restrictions which further reduce recreational opportunities on the refuge.

The State also notes that in the past decade, Kenai refuge management has emphasized developments which facilitate nonconsumptive activities. In contrast, activities related to consumptive uses have been increasingly restricted, resulting in reduced fish and wildlife-oriented recreation opportunities. We request that the PUMP discuss this orientation and focus efforts on restoring and improving a full range of recreation opportunities.

### Trail Access

The existing 50 miles of trails with accompanying use restrictions are extremely inadequate given the size and popularity of the refuge. We urge the Service to consider increasing access trails throughout the refuge to provide more recreational opportunities. An increased trail system serving multi-access methods would also disperse users and relieve pressure on specific areas of current concentration.

In addition to expanding the trail system, the PUMP should also consider methods of protecting fragile resources such as vegetation and stream banks, particularly along the canoe trail system. Methods should be determined by monitoring use and resources, rather than imposing arbitrary restrictions.

The State offers the following trail expansion recommendations to increase use and disperse impacts:

**Swan Lake Canoe Trail System extension:** Trail extensions in this system could make Big Mink, Yearling, Meadow, and several small unnamed lakes east of Drake and Skookum lakes accessible

to wildlife viewers, canoeists and hikers. Although trails are believed to connect Drake and Skookum lakes with the Swanson River road, these are not shown on the refuge canoe trail maps distributed to the public. Trail extensions could also make Leaf Lake and several small lakes east of Kinglet Lake accessible.

**Lower Russian River Trail:** Currently there is a heavily used trail located on the east bank of the river on Forest Service land. The Department of Fish and Game's sport fish staff in Soldotna have indicated that the construction of a trail on the west bank of this river, on refuge lands, would benefit sport fishing and reduce habitat damage by dispersing fishing effort. A trail connecting the Kenai River confluence to the Department's closed water marker is preferable, but a trail to the Russian River campground would provide an alternative.

The PUMP should also acknowledge that "No new trails will be constructed in designated Wilderness" is a Service or refuge policy, not a law or regulation. Construction of trails may be allowed in Wilderness under specified conditions. We urge the Service to maintain some flexibility to provide primitive trails in some wilderness locations to reduce impacts without curtailing use. Recreational use will continue to occur in wilderness areas, and trail construction can direct that use to areas with fewer impacts than if use is allowed to develop unplanned.

#### **Non-Motorized Vehicle Use**

The PUMP should also consider opening existing roads and trails to non-motorized vehicle use. This would resolve the current dichotomy that allows horses on all portions of the refuge but does not allow mountain bikes or one-wheel deer carts on any roads closed to public motorized access. We see no justification to limit these non-motorized uses only to roads designated open for public motorized access. Such roads include the gas fields, Finger Lake area, Marathon Road, and Mystery Creek road.

Non-motorized uses which the public has suggested be allowed include mountain bikes, one-wheeled carts, wheel-barrows, and carts pulled by horses. Horse drawn carts on mountain trails would likely not be feasible in most areas of the refuge, hence limited to existing roads. However, reopening use of bikes and other human-powered vehicles should be fully considered. A review of current activities, regulations, and impacts on adjacent Forest Service managed lands would be appropriate in considering this recommendation.

### **Trail Maintenance**

Minimal trail clearing and maintenance should be provided. Creative options for achieving maintenance through volunteers and special interest groups should be pursued to increase funding availability and productivity. In some cases, the bridging of swamps and creeks along existing trails would reduce impacts caused by horses and hikers widening trails to go around muddy areas.

### **Cabins**

The Kenai refuge is encouraged to implement a public use cabin program to meet the increased demand. There are currently only four cabins on the refuge, one of which is only accessible by a 2-3 mile hike. Recent surveys indicate a public desire for more cabins. Historic cabins in remote and road-accessible locations throughout the refuge could be rehabilitated, preserving part of Alaska's heritage as well as providing a desired form of recreation compatible with refuge goals. Cabins should be evaluated for rehabilitation significance, proximity to access routes, wildlife considerations, etc.

### **Bear-Human Conflicts**

In areas with high concentrations of fish during salmon runs, the current management approach seems to rely on closures to access or sport fishing to reduce potential bear-human conflicts. The State suggests there are many alternatives for reducing bear-human conflicts without prohibiting public uses. For example, some locations may benefit from a catch-release fishery, or the refuge could provide fish cleaning stations and mandatory use requirements, similar to those offered at Brooks Camp.

Adequate garbage control can also help minimize bear-human conflicts in camping areas. Similarly, through information and education, recreationists can be encouraged to use food handling techniques which reduce bear attractions. Such efforts require a commitment of refuge programs in cooperation with other agencies, businesses, and/or special interest groups in order to be successful--particularly if an effort is made to avoid more rule-making.



### Caribou Hills

Use has concentrated at Caribou Hills in part because access is not dispersed throughout the refuge and because the refuge lacks provisions for non-motorized vehicle activities. The State will continue to work with the refuge to resolve use conflicts. We believe that resolution can be reached without the refuge eliminating traditional recreational activities. The PUMP should recognize that new policies for managing state land in the Caribou Hills prohibit additional private cabins and call for the removal of unauthorized cabins. The refuge staff have been involved in this planning process.

### Existing Access Developments

**Mystery Creek-gas pipeline road:** We recommend the Mystery Creek-gas pipeline road be opened during the entire summer to at least Trapper Joe Lake, which has a large rainbow trout population. Existing sport fishing opportunities would be accessible without further development. Opening this road during the summer will also provide access to the upper Chickaloon River for fishing. We also suggest the road be upgraded at selected points (e.g. deep ponds and stream crossings) to provide less hazardous vehicle access.

**Finger Lakes Road:** This road was constructed for oil exploration purposes and is currently closed at its juncture with the Swanson River road. In earlier planning efforts, the state proposed this road be opened to public access, which the Refuge Manager agreed to consider along with development of a primitive campground at Finger Lake. We suggest this option again. Based on Service surveys, the Finger Lakes (four interconnecting lakes) can support a sport fishery, and trails could be constructed to several adjacent lakes.

**Swanson River Spur Road:** The PUMP should consider opening this road, located west of Dolly Varden Lake, to public access. This would expand canoeing, sport fishing, hunting, and other recreational opportunities.

**Upper Jean Lake:** In the mid-1980s, the Service blocked access to the road and parking area that provided access to this lake. This was done to alleviate public safety concerns since the entrance to the parking area and road was located on a dangerous curve of the Sterling Highway. The lake had previously been stocked, but the stocking program was discontinued when access was no longer feasible. We request

that the PUMP consider extending the road so that its entrance is located along a straighter section of the Sterling Highway. Designating an Area for Target Practice

During previous planning efforts and regulation discussions, we have encouraged the refuge to designate an area near Soldotna for target practice. Currently, the refuge does not allow any form of target practice on refuge lands. Designation of such an area would provide a recreational opportunity as part of a program that minimizes conflicts among and between recreational, commercial, and other users. Simply prohibiting target practice has not eliminated conflicts, safety concerns, damage to public property and littering problems associated with ongoing "plinking" activities in roadside areas.

### **Revising the 1986 Regulations and Related Access Issues**

Despite the specific goals mandated in ANILCA and reiterated by Service administrators and the refuge's Fishery Management Plan, sport fishing and other recreational opportunities in the Kenai refuge have substantially decreased in recent years as a result of the Service's promulgation of the 1986 refuge-specific access regulations. These regulations were developed primarily to protect wildlife, most notably trumpeter swans.

During public review of these access regulations, the State took the position that the rules went farther than necessary to protect swans and that traditional access points would be needlessly eliminated. The State also asserted that the regulations were promulgated with inadequate rationale, and with little or no assessment of the impact on traditional uses, including sport fishing and other recreational activities. Further, the Service did not seriously consider alternative or mitigative measures (e.g., area and time restrictions, public use limits).

Because of these problems, and more importantly, because the 1986 regulations have steadily and incrementally foreclosed additional public access points, the State urges that these regulations be reconsidered in the PUMP.

### **Aircraft Access**

Several of the major rivers and over 90 percent of the lakes in the refuge are only accessible by aircraft. The majority of these remote lakes are located north of the Sterling Highway. The 1986 regulations have significantly restricted

public access and opportunities for sport fishing and other wildlife-oriented recreation.

The regulations permanently close approximately 116 lakes without other reasonable access in the wilderness unit north of the Sterling Highway. These lakes are judged to be of sufficient size for aircraft use, are 3/8 mile or more from any public access point, and are not part of the interconnected Canoe Lakes Trail system. None of these lakes were closed to aircraft prior to 1986. These regulations also closed approximately 12 lakes to aircraft in the wilderness unit south of the Sterling Highway with resulting restrictions of hunting and fishing access. In addition, the regulations close most traditional non-lake landing areas such as glacial moraines, Chickaloon Flats and old strips. Closures of these traditional landing areas have eliminated fishing, hunting, and other recreational activities in many areas of the refuge.

One of the 1986 regulations [50 CFR 36.39(i)(1)(ii)] provides that the operation of aircraft in refuge lakes with nesting trumpeter swans and/or their broods is prohibited between May 1 and September 30 (except 2 lakes that reopen September 10). This regulation resulted in an additional 35 lakes closed to aircraft for one or more years during the 1987-1991 period. The presence of swans is believed to have resulted in recent closures of at least two lakes where air taxi operators had special use permits to maintain fly-in fishing tent camps.

In 1985 the Service published a management objective of maintaining 40 nesting pairs of trumpeter swans in the refuge, although the basis for selecting this number is unclear. The 1992 swan survey located swans which resulted in closure of at least one additional lake (Harvey Lake) located south of the Sterling Highway which is a major traditional access point for hunters. This closure was implemented despite the results of the survey which indicated 42 nesting pairs in the refuge. The Department of Fish and Game had apparently wrongly assumed that, once the refuge achieved its objective, no additional lakes would be closed. If such a policy is not enacted, eventually the entire refuge would virtually be closed to aircraft if the swan population continues its regional increase. The State recommends consideration of such a policy. We also request that the original swan management objective be cooperatively reevaluated based on recent information concerning population trends and nesting success.

It seems incongruous that the current regulations allow fishing and canoeing on lakes that have swan nests but do not allow basic aircraft access. This problem was clearly evident

in 1992 in Game Management Unit 15(B)-East when a pair of swans nested on the only aircraft access lake in "Hunt Area 832". Thus, although hunting was allowed under state regulations, legal hunters could not access the area. At a minimum, lakes which traditionally serve as aircraft access points should reopen by September 1.

It is also important to consider that cygnet production in non-wilderness lakes is similar to that for wilderness lakes, even though there is more aircraft traffic in non-wilderness areas. More lakes are permanently closed to aircraft in wilderness areas. Trumpeter swans occupied only 4 of the approximate 76 lakes in the Canoe Lakes Trail System during 1987-1991, which may indicate that intensive use by canoeists and campers affect swans more than moderate aircraft use in remote lakes. The effects of aircraft and other human disturbances on trumpeter swans and other wildlife should be cooperatively monitored and evaluated.

The 1986 regulations are also difficult to comply with and/or enforce. The regulation prohibiting landing on any lake where nesting trumpeter swans and/or broods are present essentially necessitates that a pilot distinguish species type, breeding from non-breeding adults, and adults from sub-adults. The result is that any remote lake with a swan present is effectively considered closed to aircraft, hence closed to sport fishing, hunting, and other recreational activities because there is usually no alternate access.

### **Aircraft Access Recommendations**

Under separate cover, the Department of Fish and Game will be providing a report detailing specific lakes and areas for recommended openings or shortened closures. The report also identifies numerous suggestions for improving sport fishing opportunities and areas requiring updated information on the status of remote fishery populations. We specifically request that consideration be given to reopening aircraft access to select remote lakes because of their relatively large size, proximity to adjacent lakes and/or known presence of sport fish. These include the following:

**Diamond Lake**, providing access to 5 adjacent lakes  
**Kuguyuk, Kraenberi, and Angler lakes**

**Dipper Lake**, providing access to 3 adjacent small lakes

**Phalarope, Kenaitze, and Kakoon lakes**, providing access to 7 adjacent smaller lakes

**Neckshorta Lake**; alternate would be to construct trails from Tangerra and Bird lakes which are currently open

**Trigger Lake**, providing access to 2 smaller lakes  
**Crooked Lake**, providing access to 2 smaller adjacent lakes  
**Wren, Embryo, and Falcon lakes**, providing access to several small adjacent lakes  
**Rabbit Foot, Jay, and Muskrat lakes**

We also request consideration be given to reopening aircraft access to primary access points historically used for hunting access. These include the following:

**Goat Lake.** Used as the primary access point to hunt goats and black bear in Hunt Area 854. It was closed under the 1986 regulations. Goat hunting in 854 is limited by permit so there would not be a large influx of hunters due to reopening. There are no moose or caribou in the area. Although brown bear are common in the Goat and Upper Russian Lakes area, Goat Lake was not a heavily used access point for brown bear hunters in the past.

**Timberline Lake and Lake Emma** (15B East). These lakes, which were also closed under the 1986 regulations, should be reopened to aircraft. Timberline Lake would allow access to the recently introduced caribou herd in the Upper Funny River. If it is not opened, the only practical access to this herd will be by horse. Transporters using horses are charging such high rates that the effect will be to have very few public caribou hunting opportunities. Opening these lakes would also allow reasonable access for moose and bear hunting opportunities. Moose hunting is by drawing permit only and black bear occur in high numbers in this area.

#### **Fly-in Fishing Tent Camps**

Just as the number of lakes open to aircraft access has declined since the 1986 regulations, so have the number of special use permits issued to air taxi companies for operating fly-in fishing tent camps north of the Sterling Highway. The Refuge's 1985 Comprehensive Conservation Plan indicates that 23 fly-in tent camps were authorized (on a minimum of 14 lakes). The refuge's 1989 Fishery Management Plan lists 9 lakes with fly-in tent camps. From a Department of Fish and Game survey of almost all refuge air taxi operators in 1992, it was found that only 8 lakes were authorized for 15 fly-in tent camps. This significant decrease appears to have resulted from the Service's not transferring permits to new owners of existing air taxi operations and the aforementioned lake closures due to presence of swans.

The air taxi survey also indicated a widespread public demand for additional lakes where fly-in tent camps can be located. This indicates an increased demand for affordable, overnight fishing trips to scenic, uncrowded areas typified by lakes in northern Kenai refuge. This issue should be addressed in the PUMP.

### **Chickaloon River Area**

As a result of the 1986 aircraft regulations, most of the Chickaloon River has become virtually inaccessible to the public for sport fishing and other recreational activities. Public access to the river currently consists of one aircraft landing area on the Chickaloon Flats, downstream of River Mile 3.5, and a brief opening during autumn hunting season of the Mystery Creek gas pipeline dirt road which crosses the upper river. Two other aircraft landings areas are authorized along Big Indian Creek, but these are over 4 miles away from suitable fishing waters. All the lakes within reasonable distance of the river are either permanently closed to aircraft or are closed to aircraft when nesting trumpeter swans and/or their broods are present. We believe the closures of the strips used prior to 1986 and landings on Chickaloon Flats can not be justified and should be reconsidered.

The Chickaloon River is the third largest watershed on the Kenai refuge. Many species of fish are found within the system. The PUMP should consider restoring access opportunities for sport fishing, river floating, and other recreational activities. At a minimum, the Service should consider reopening the airstrip at River Mile 7.5 on the lower river and selected lakes in the middle and upper river drainages.

The small lake located approximately ten river miles upstream from the River Mile 7.5 airstrip is also a logical site for providing access for fishing and would make an ideal "put-in" for river floaters since it is located downstream of a section of river that is difficult to navigate due to extensive log jams. Its location at the edge of the northern boundary of the wilderness unit and lack of nesting trumpeter swans may be important factors to consider in reopening this lake to aircraft.

### **Snowmachine Access**

We request that the Service review recommendations provided by the State on past plans and regulations regarding snowmachine

access. In particular, traditional (pre-ANILCA) snowmachine access which facilitates trapping, fishing, wildlife viewing, and general outdoor recreation should be continued/restored unless there is documented evidence of resource damage, consistent with ANILCA criteria in Section 1110.

The State believes that current snowmachine management is unnecessarily restrictive. For example, despite ANILCA provisions for snowmachine access when there is adequate snow cover, the Kenai refuge has prohibited snowmachine access when deep snows were present during November. The result is that activities such as ice fishing cannot occur until the refuge opens snowmachine access, except on waterbodies closely accessible to the limited road system. We suggest that the closure be revised to allow snowmachines when snow conditions are acceptable--which would allow snowmachines by December or earlier during normal years.

We also urge reconsideration of the 1986 regulation prohibiting snowmachine access in the canoe trail system. Records indicate the Service failed to evaluate the impacts of this prohibition on winter sport fishing in the area.

Near the end of the workbook, a brief paragraph under "Refuge regulations" describes the reasons why the Service adopted numerous access regulations in 1986. Several statements contained within the discussion are not an accurate reflection of state jurisdiction, state regulatory processes, or the results of the regulations. We welcome an opportunity to work with the Service in revising these statements.

### MISCELLANEOUS

"Recreational Opportunities" - The first topic under this section in the workbook inadvertently misleads the public by indicating that recreational activities must be both fish and wildlife-oriented. Logically, traditional (pre-ANILCA) activities such as moose hunting and salmon fishing have nothing to do with each other; yet each is an activity which is compatible with the refuge purposes.

"Camping" - Although "primitive camping" is virtually unregulated (e.g., does not require permits or control group size), we disagree with the workbook's assertion that it is "unlimited". The very limited access on the refuge limits camping. Consequently, adverse impacts to habitat are concentrated in relatively few accessible backcountry locations. Increased access, dispersed use, and provisions of

minimal facilities (e.g., pit toilets or outhouses, garbage containers, hardened sites, meat caches) will likely reduce habitat impacts and potential bear-human conflicts, at least until user numbers increase dramatically.

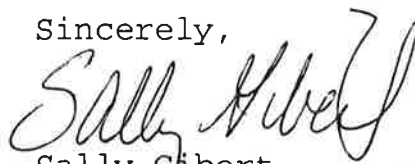
### CONCLUSIONS

We appreciate the positive and difficult aspects of Fish and Wildlife Service management of the refuge. For example, refuge rangers provide an effective day-to-day presence for enforcement of fishing regulations at the Russian River/Kenai River confluence. Biologists note that the trumpeter swan closure at the outlet of Skilak Lake in the spring appears to be effective. In addition, the non-motorized use of that reach of the Kenai river from the power line to Jim's Landing provides anglers and outdoor recreationists with a unique opportunity to enjoy the river by float boats.

We again express appreciation of the Service's interest in garnering full public involvement in the development of the Kenai refuge PUMP. In particular, we welcome an opportunity to revisit access management decisions in their entirety, including revising the regulations as appropriate.

Thank you for the opportunity to provide these comments. If you have any questions or wish to discuss these comments, please feel free to call this office.

Sincerely,



Sally Gibert  
State CSU Coordinator

cc:

Dan Doshier, Refuge Manager, Kenai Refuge  
Carl Rosier, Commissioner, Department of Fish and Game  
Glenn Olds, Commissioner, Department of Natural Resources  
John Sandor, Commissioner, Department of Environmental  
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**CSU Distribution List  
Kenai Pump WB1  
February 1, 1993**

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*Terry Haynes, Department of Fish & Game, Fairbanks*

*Priscilla Wohl, Department of Environmental Conservation, Anchorage*

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