

OFFICE OF THE GOVERNOR

**OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION**

SOUTHCENTRAL REGIONAL OFFICE
3601 "C" STREET, SUITE 370
ANCHORAGE, ALASKA 99503-5930
PH: (907) 561-6131/FAX: (907) 561-6134

CENTRAL OFFICE
P.O. BOX 110030
JUNEAU, ALASKA 99811-0300
PH: (907) 465-3562/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 278-8594/FAX: (907) 272-0690

December 8, 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 internal review draft of the final Moose/Habitat Management Plan for the Kenai National Wildlife Refuge. This letter represents the consolidated comments of the State's resource agencies.

We appreciate the opportunity to review this document and commend refuge staff for accommodating most of the concerns raised in the State's letter of June 3, 1993. We particularly appreciate George Constantino's involvement, which was instrumental in encouraging refuge staff to improve communications and cooperation with the Alaska Department of Fish and Game (DFG). Subsequent meetings between Service and DFG personnel were an effective, albeit belated, effort to mutually assess current moose and habitat information. We hope that the resulting understandings reached will set the stage for routine cooperative efforts in the future.

Based on the positive results of these recent cooperative efforts, the State is hopeful that future planning efforts will begin with appropriate coordination on management objectives which affect federal and State authorities and responsibilities. This process was identified as an important component in the development of "step-down" plans implementing the Alaska National Interest Lands Conservation Act (ANILCA).

While we are generally satisfied with the plan's revisions, two significant outstanding issues remain: (1) moose population projection under the no action alternative, and (2) the area selected for initial habitat enhancement activities. The State's ability to support this plan is dependent upon resolution of these concerns.

MOOSE POPULATION PROJECTION

The plan inappropriately emphasizes a modeling projection that the Game Management Unit 15(A) moose population will stabilize at 2,133 moose if no enhancement is conducted (paragraph 2 on page 19 and Appendix 3). This 20-year projection for the no action alternative may be optimistic. Based on data jointly collected by the agencies during the 1990 census, DFG believes 1,000 is a much closer 20-year estimate than 2,133 for Unit 15(A) under the no action alternative.

As noted in our June letter, even a population of 1,000 moose in Unit 15(A) after 20 years may be an over-estimation. Assuming the super high (10.2 moose/sq. mile) and high (5.0 moose/sq. mile) areas deteriorate to current medium density areas (3.1 moose/sq. mile) and current medium density areas deteriorate to low density areas (0.1 moose/sq. mile) in 20 years, the following calculations are logical. A total of 1,063 sq. mile of low density habitat capable of supporting 106 moose and 216 sq. miles of medium density habitat supporting 670 moose would result from no habitat enhancement in Unit 15(A). Under this scenario, a total projected population of 776 moose is probably a more realistic minimum. Compared to the 1992 assumption of 3,100 moose in Game Management Unit 15(A), this decrease would represent a decline of 78 percent in the next 20 years from habitat maturation alone.

The State strongly recommends that the plan reflect a more realistic evaluation of what users can expect from a no action alternative. We recognize the inherent problems agencies encounter in fulfilling habitat enhancement projects and the difficulty in generating public support for prescribed burning. In light of these difficulties, a projected decline from 3,004 moose in 1993 to 2,174 in 2013 (20 years) may be an acceptable loss in lieu of costly enhancement projects. We recommend that the public be fully apprised of this consideration; e.g., include a second column in Appendix 3 showing a plateau of 1,000 or fewer moose after 20 years under the no action alternative, consistent with our comments in the previous paragraph. We also recommend that the discussions more clearly express this likelihood; e.g., as stated in paragraph 3 on page 19. Similarly, the possible errors in the modeling attempt are acknowledged on page 19, but the authors fail to show the projected results in Appendix 3 and Figures 6 through 10.

AREA SELECTED FOR FIRST ENHANCEMENT EFFORTS

The second major issue is the area selected for the first 5-year enhancement effort (page 26). The Mystery Creek area selected has a poor potential for producing quality wildlife habitat. This area will produce increased browse for moose if enhanced. However, the 1990 winter moose densities of 0.1 moose per square mile suggest this area will not recover to 1.75 moose per square mile found in low density areas in 1982. Progressive habitat maturation and predation have driven the moose population so low that enhancement may essentially be a waste of effort in the Mystery Creek area unless additional management actions are taken. We urge the Service to select an area for the first efforts which are not subject to these additional problems. Furthermore, the Mystery Creek area was initially identified for burning in 1987, but nothing has been burned. The implementation of this plan could be stalled for several more years, perhaps unintentionally, but thereby forestalling the benefits for moose and habitat throughout the refuge.

The State appreciates the Service's commitment to working with DFG and the Department of Natural Resources, Division of Forestry, in establishing priorities for habitat enhancement projects (page 23). Recent cooperative discussions among these agencies have confirmed that re-establishing forest health, especially in light of the extensive spruce bark beetle kills, is important to all state and federal land managers on the Kenai Peninsula. To a great degree, the Service's moose habitat enhancement activities will also assist in controlling spruce bark beetle impacts. We encourage the continuation of such cooperative efforts which will maximize overall ecosystem health, regardless of ownership boundary lines.

MANAGEMENT AUTHORITIES

The state appreciates that in most instances, the plan appropriately addresses the respective roles of the Service and State, clarifying for the public that the State manages moose and the Service manages moose habitat. The plan also appropriately acknowledges that this arrangement is reflected in existing federal law, Service policies, and the Master Memorandum of Understanding between the Service and DFG. We also appreciate the change in the title of the plan to reduce public misunderstanding of federal responsibilities and an appearance of preemption of state management authority. Consistent with these changes, we request the following revisions:

Page 1, EXECUTIVE SUMMARY, paragraph 3: Please insert "habitat" in the first sentence so that it reads: "The...Plan was developed to guide future Service management of moose habitat on the KNWR."

The rest of the paragraph explains that several actions are intended to be in cooperation with the DFG, yet retains the impression that the Service is managing moose; e.g., "3) continuation of selective harvest regulations for bull moose and establishment of moose population composition objectives" We encourage some more "wordsmithing" to clarify the Service's and DFG's respective roles and intent to cooperate.

Page 3, paragraph 1: Insert "ADF&G" before "selective harvest regulations".

Page 5, paragraph 5: In the first sentence, delete "for moose" to reduce the misunderstanding of authorities.

OTHER PAGE SPECIFIC COMMENTS

Pages 13, 46, 47: We request recognition that DFG conducted the crushing in 1984-1987.

Page 19, paragraph 4: The entire paragraph regarding "the second assumption" is unfounded and should be deleted.

Page 30, carryover paragraph, last sentence: We request the statement be revised to read: "Mechanical manipulation over frozen ground does not expose mineral"

Page 39, Harvest Strategy 2, No. 2 and Harvest Strategy 3, No. 3: Spike/fork bulls comprised 70.8% of all bulls reported from 1987 to 1992. This new data should be included.

Page 47, first paragraph, last sentence: Change "1989-1991" to "1989-1993".

Pages 49-50: The last paragraph should include the Skilak Loop cow moose hunt from 1989-present. We suggest the following reconstruction: "Conservative limited-entry cow moose hunts were reinstated and occurred in 1983, 1984, and 1986 [delete "and 1989"] where moose numbers . . . by the 1969 wildfire, 1989 to 1993 in Skilak Loop SMA, and from 1980 to present"

Page 51, top carryover paragraph, carryover sentence: We request the phrase "instability of the system" be replaced with "sharp increase in the 15(A) moose population." Regarding the next sentence which claims that "high density moose populations" led to the establishment of Kenai National Moose Range in 1941, please note that the moose population did not "flourish" until the late 1950s and 1960s after the 1947 burn. We therefore recommend dropping the first two complete sentences on this page.


Page 55, paragraph 1: Revise "21-year old" to read "in the 24-year old".

CONCLUSION

To conclude our comments, the State recommends that the Service present this plan to the public as a revised draft, rather than preceding immediately to a final plan. Granted, the document is much improved; but we believe the extensive modifications made since the public review draft warrant the additional public review.

Thank you for the opportunity to review this document.
If you have any questions, please feel free to call this office.

Sincerely,



Sally Gibert
State CSU Coordinator

cc:

Dan Dosier, Refuge Manager, Kenai National Wildlife Refuge
George Constantino, Regional Office, FWS.
Carl Rosier, Commissioner, Department of Fish and Game
Harry Noah, Commissioner, Department of Natural Resources
John Sandor, Commissioner, Department of Environmental
Conservation
Bruce Campbell, Commissioner, Department of Transportation and
Public Facilities
Richard Burton, Commissioner, Department of Public Safety
John Katz, Governor's Office, Washington, D.C.

**CSU Distribution List
Kenai Moose/Habitat Plan IRF
December 9, 1993**

Tina Cunning, Department of Fish & Game, Anchorage

Terry Haynes, Department of Fish & Game, Fairbanks

Priscilla Wohl, Department of Environmental Conservation, Anchorage

Alice Iliff, Department of Natural Resources, Anchorage

Paul Rusanowski, Division of Governmental Coordination, Juneau

Connel Murray, Division of Tourism, Juneau

Colonel Phil Gilson, Fish & Wildlife Protection, Anchorage

Stan Leaphart, CACFA, Fairbanks

Dan Golden, Department of Natural Resources, Division of Forestry, Anchorage