



June 20, 2023

Andy Loranger
Refuge Manager
Kenai National Wildlife Refuge
33398-B Ski Hill Road
Soldotna, AK 99669-2139

Submitted electronically to kenai@fws.gov

Re: Kenai National Wildlife Refuge draft Compatibility Determinations

Dear Mr. Loranger:

Thank you for the opportunity to review the four Compatibility Determinations (CD) for the Kenai National Wildlife Refuge (Refuge). The State of Alaska (State) resource agencies, including staff from the Alaska Departments of Natural Resources (DNR) and Fish and Game (ADF&G), reviewed the draft CDs for Cabins, Camping, Natural Resources Collection, and Forest Products and support the Refuge's intent to find these uses compatible. We offer the following clarifying comments on our support for all four CDs. We also provide page-specific comments in the attached spreadsheet regarding the cabin and camping CDs, including several comments in support of better reflecting the impact of ANILCA on the Refuge's operations.

Cabins and Camping

We are fully supportive of the Refuge finding cabin use and camping compatible with refuge purposes. Cabin use and camping are integral components of Alaskan Refuges, instrumental in supporting the six wildlife-dependent recreational uses (hunting, fishing, wildlife observation and photography, and environmental education and interpretation) the National Wildlife Refuge System Improvement Act of 1997 identified as Refuge System "priority uses." These priority uses provide visitors with opportunities to participate in outdoor recreation that enhances the value and need for fish and wildlife conservation. In Alaska, camping and cabin use also enhance the support Congress sought to provide for hunting, trapping, fishing, and outdoor recreation on federal public lands under the ANILCA. ANILCA included special provisions to ensure the use of cabins (both existing and new) would continue on Alaska public lands, including in designated wilderness areas (ANILCA Section 1315(c) and (d)). This use is particularly critical in areas such as the Kenai Refuge where cabins have a long history of use.¹

Cabins and campgrounds provide a place for people to safely stay overnight and enjoy the outdoors. They facilitate scientific research and educational outreach and programs. In a refuge the size of the Kenai National Wildlife Refuge (nearly 2 million acres) they are critical in

¹ Cabin Management Plan, USFWS, 2004, p. 20; Draft Cabin CD p. 12. There are over 100 known cabins or cabin ruins that are no longer serviceable documented on the Kenai Refuge.

supporting all six of the priority uses as well as various management operations. Congress specifically included an allowance for new cabin construction in wilderness in ANILCA. We request the Fish and Wildlife Service delete stipulation seven which states: “No new cabin construction will occur in designated [w]ilderness areas.” Deleting this stipulation will not commit the Refuge to build a cabin(s) in wilderness, however, it will allow the Refuge to do so if an opportunity/need arises.

The draft CD proposes to limit construction of new cabins to one additional cabin. This is arbitrary and does not reflect the needs of the public as the existing road-accessible cabins are often fully booked.

Cabins are important for recreation in the Kenai Refuge because:

- When cabins are available, people are less likely to build unauthorized structures in the refuge.
- Cabins can help to reduce human-wildlife conflict. People staying in cabins can store food and supplies safely without the need for bear resistant food containers. Food not stored in bear resistant containers may attract wildlife and lead to conflict.
- Cabins often serve as a basecamp for people who are hunting or fishing; use of a cabin helps to reduce on the ground impacts of the time people spend in the field and the amount of disturbance they cause to wildlife.
- Cabins provide opportunities for solitude. For some visitors, cabins make a remote backcountry experience in a wilderness setting possible. This is important because it allows people to experience the natural world without the noise and distractions of modern life.
- Cabins also provide for the health and safety of visitors. They can provide shelter from the elements, such as cold temperatures, rain, snow, and wind.
- Cabins can be used for educational purposes. For example, teachers can bring their students to cabins to learn about the wildlife, history, and ecology of the refuge.
- Cabins also facilitate the public use and enjoyment of wilderness areas. They provide for public health and safety and can help maintain the wilderness character of an area as cabins can be small, not permanently inhabited, blend in with the surrounding landscape, and can be constructed in areas that are not already used by many people.

Cabins are an important part of recreation in the Kenai Refuge. They provide a place for people to safely stay, explore, and learn. More than one new cabin should be found compatible with the purposes of the Kenai Refuge and not limited to one additional cabin until the outdated 2004 Kenai Cabin EA is revisited.

Forest Products and Natural Resources Gathering

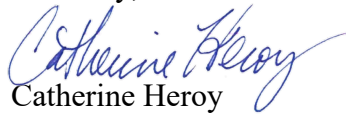
The State recommends the following revision on page one of both the Forest Products and Natural Resource Gathering proposed CDs (strike-through font indicates a request to delete text):

“ANILCA sets out purposes for each refuge in Alaska. The ANILCA purposes of the Refuge are described in Section 303(4)(B) of the Act. The purposes identify ~~some~~ of the reasons why Congress established the Refuge and set the management priorities for it.”

Conclusion

We appreciate the Refuge sharing these CDs for review and comment. We are available for further clarification and discussion once you have had a chance to review our feedback. Please contact me at (907) 269-0880 or by email at Catherine.heroy@alaska.gov to coordinate any follow up discussions.

Sincerely,



Catherine Heroy
Acting State ANILCA Program Coordinator

Attachment: Page-specific comment spreadsheet

Cc: Shane Walker, Branch Chief of Conservation Planning & Policy