

**Knik River Public Use Area Management Plan
Public Review Draft
Issue Response Summary**

(See Approved Revisions summary document for plan changes)

Subject	Issue	Response	Recommendation
<p>Rippy Non-Motorized Area</p>	<p>Proposal for a non-motorized area including the Rippy Trail and surrounding area is not consistent with legislation, would restrict a large number of users from accessing this trail, and would impact access for hunting in the surrounding areas.</p>	<p>Disagree in part. Written comments and verbal testimony were received regarding DNR’s proposal to prohibit OVH use on the Rippy Trail and surrounding area. Comments and testimony on the proposed Rippy Non-Motorized Area (RNMA) included opposition to the proposal, support for alternative trail development parallel to the Rippy Trail, support for the proposal as written and expansion of the RNMA to federal lands to the east, and support for “time share” opportunities for this and other areas within the PUA. Many comments questioned the authority of DNR to develop a non-motorized area and stated the development of such an area was inconsistent with the legislation. The proposed Rippy Non-Motorized Area elicited the greatest number of public comments.</p> <p>DNR included this proposed action in the Management Plan for two primary reasons. 1) One of the purposes of the legislation requires DNR to maintain and <i>enhance</i> motorized and non-motorized recreational opportunities. (emphasis added) The proposed RNMA was included in the Draft Management Plan as a management action that could achieve that statutory purpose. 2) The second purpose was to solicit public input and gauge public interest and support for, or opposition to, the designation of a non-motorized area.</p>	<p>DNR will remove the guideline to designate the RNMA from pages 3-17 and 3-18 of the Management Plan. The Management Guideline will be amended to read: “DNR will designate a multi-use (motorized and non-motorized) trail on the current Rippy Trail alignment extending from the Jim Lake parking area to the wetlands of Chain Lake, east of Jim Creek. The trail will include the commonly used spur routes that go to specific locations (i.e. campsites, scenic viewing opportunities, and hunting locations).” In order to maintain current types of uses and vehicles common on the Rippy Trail a weight restriction of 1,500 pounds will be implemented on the entire trail. The entire trail will be upgraded to sustainable trail standards.</p> <p>The remainder of the area adjacent to Rippy Trail will be managed for multiple uses. Only trails authorized by DNR will be developed and may include both motorized and non-motorized trails.</p> <p>The identification of trails may occur at any time, but the Trails Management Process is intended to assess exiting trails and examine the development of additional non-motorized and motorized trails. It is intended that a new non-motorized trail will be developed generally parallel and upslope of the existing Rippy Trail. Extensions of this new trail may be appropriate to access campsites, viewpoints, or to connect with other trails.</p>

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Legislative Intent	Proposed non-motorized areas are not consistent with legislative intent and DNR lacks authority to create non-motorized areas within the PUA. This issue is linked primarily to the proposal for a Rippy Non-Motorized Area.	<p>DNR maintains that the development of a non-motorized trail/area may be consistent with the enacting legislation, since that legislation includes as one of its mandates the need to “enhance” recreational opportunities. Moreover, DNR maintains that it has the authority to create such areas under AS 41.23.180. We concur; however, that a non-motorized area along the Rippy Trail is not in the interest of the public (see following paragraph). A factor in the decision was, in fact, the impact of this proposal in limiting the amount of use along Rippy Trail by the general public.</p> <p>Following the review of comments and testimony received on this issue DNR has concluded that the current proposal lacks the support of a large number of individuals and interest groups. Alternative locations for the development of a non-motorized area may exist within the PUA but the Management Plan will not make further recommendations on this issue. Instead, development of a non-motorized area will remain an option for management of the PUA to enhance non-motorized recreational opportunities. If such an area is developed in the future it will be done through a subsequent public process with public notice, and opportunities for public review, and comment. This would occur as part of the Trail Management Process which is to occur subsequent to the approval of this plan.</p>	No change based on this issue however the Management Plan will be amended per recommendation contained in the Rippy Non-Motorized Area above.

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<p>Legislative Intent</p>	<p>DNR proposed actions related to trail and waterbody restrictions that are not consistent with legislative intent and demonstrate a bias toward non-motorized users.</p>	<p>Disagree. The Management Plan was not written with a bias toward any particular user group. The management intent, guidelines, and facilities recommendations provided in the Management Plan were developed to satisfy statutory direction, existing laws and regulations, and the recreational needs of the public within the PUA. The Management Plan contains several management guidelines that specifically address motorized and non-motorized use. These guidelines enhance recreational opportunities and address safety and habitat concerns. Subsequent analysis of these guidelines and review of public comment has resulted in several changes to the management guidelines. Please review the recommended changes for these specific issues.</p> <p>A second part of this issue pertains to legislative intent. See discussion above related to Rippy Non-Motorized Area and legislative intent.</p>	<p>No change.</p>
<p>Waterbody Management and Restrictions</p>	<p>Proposed 5 horsepower restriction on Jim Lake and 5 mph restriction on a segment of McRoberts Creek are unnecessary given current type and levels of use, would prohibit some users from navigating safely on these waterbodies, or potentially prohibit some existing uses.</p>	<p>Concur in part. Extensive public comments and testimony were received on the issue of waterbody restrictions proposed in the Management Plan. Commenter’s generally supported proposed restrictions for Manmade Lake but opposed restrictions proposed for Jim Lake and McRoberts Creek.</p> <p>Restrictions contained in the Management Plan were to achieve different objectives. Jim Lake restrictions were proposed to maintain current recreational use patterns and provide protection for nesting loons and grebes. McRoberts Creek restrictions were proposed to address safety concerns on a portion of the creek. Restrictions at Manmade Lake were proposed to encourage family oriented recreation and to address safety concerns of the lake. The level of interest on</p>	<p>Jim Lake – Amend restriction to allow watercraft up to 10 hp from April 15 to August 9 annually. The 10hp restriction will be lifted beginning August 10 through April 14 annually.</p> <p>McRoberts Creek – Remove proposed 5mph restriction on a portion of McRoberts Creek and implement an education and signage program to address safety concerns for both Jim and McRoberts creeks. Signs will be posted at major access points into the PUA depicting Jim and McRoberts creeks and will advise boaters of the sometimes narrow and winding nature of these waterbodies. Signs will contain information on the common types of watercraft, and seasonality of use. Additional signs may be posted at the major entry points to Jim and McRoberts creeks.</p>

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		<p>these issues prompted DNR to re-evaluate its proposed management of these resources.</p> <p>Based on field observations and public comment, DNR staff re-evaluated both the need for restrictions and the effectiveness of the proposed actions in achieving the desired objectives on Jim Lake and McRoberts Creek. The re-evaluation has resulted in several changes to the original proposal for a 5hp limit on Jim Lake and a 5mph restriction on a portion of McRoberts Creek. There are no proposed changes for restrictions at Manmade Lake.</p> <p>Jim Lake – Review of comments indicated little support for a 5hp restriction on Jim Lake. Several comments indicated that that limiting horsepower of watercraft on Jim Lake would preclude or restrict current hunting opportunities on the lake and associated wetlands. Comments indicated motorized use by vessels with greater than 5hp does occur on Jim Lake but is limited due to a lack of a developed access road and boat launch and lack of an easily navigable surface water connection. Use of vessels with higher horsepower is generally related to waterfowl and big game hunting in the fall.</p> <p>The proposed 5hp restriction Jim Lake was also based in part on the occurrence of nesting loons and grebes. DNR believes that objectives of protecting these and other species of waterfowl on Jim Lake will be met through area-wide management guidelines contained in the management plan. Specifically those related to the signage and education of nesting sites and habitat and information on the impacts of recreational use on fish, wildlife, and their habitat. This solution should be monitored and remain</p>	<p>Manmade Lake – No Change.</p>

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		<p>adaptive to changing use patterns, habitat changes, and new information related to impacts to waterfowl and existing uses. If it is not working, then regulatory restrictions may be appropriate. This approach is incremental and generally consistent with the techniques used by DNR when there is no clear way to proceed and with the theme of not imposing restrictions unless found necessary.</p> <p>McRoberts Creek – Many types of motorized and non-motorized use occurs on McRoberts Creek. While comments and discussion with members of the public have identified conflict situations on this waterbody; DNR is unaware of documented accidents between motorized and non-motorized users. Commenter’s identified other areas with similar or even more limited sight distances and concerns related to safety of navigation. Concerns were also raised over the ability to navigate safely in an airboat at such low speeds, the ability to transport hunting gear and passengers to hunting locations, and the production of a larger wake. From a bank erosion perspective, to minimize wake for safety, and for navigation purposes it makes more sense to allow greater speeds. The downside of this is that greater speeds reduce the visibility of small watercraft, a proportional greater impact if collision occurs, and reaction time is markedly reduced.</p> <p>The resolution to this issue has been difficult. Education and signage seem the better solutions in this instance. Similar to above discussion for Jim Lake this solution should be monitored and adapted to changing use patterns, safety issues, and resource degradation. If it is not working, then regulatory restrictions may be appropriate.</p>	

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		This approach is incremental and generally consistent with the techniques used by DNR when there is no clear way to proceed and with the theme of not imposing restrictions unless found necessary.	
Waterbody Management and Restrictions	Management Plan restriction is incomplete in its designation of narrow winding waterbodies. Streams from Mud Lake to Jim Lake to Gull Lake to McRoberts Creek are equally narrow or more narrow and winding.	Concur. The waterbodies mentioned are equally narrow and winding and need protection. The response to the general issues of motorized/non-motorized use in these channels is explained in the previous response and these waterbodies are included within the protection area. The Management Plan’s guidelines will be modified to include these streams. (see above)	The portions of Jim and McRoberts creeks that are typically used for navigation will be identified as narrow and winding waterbodies. See previous response and recommendation.
Waterbody Management and Restrictions	Airboats should be separated from other watercraft and provide for specific management.	Disagree. Airboats have been traditionally used in the PUA. DNR has not separated the use of airboats from other forms of motorized boating.	No change.
Waterbody Management and Restrictions	Signage and education will not be sufficient for the protection of these sensitive resources and may have the opposite effect.	Disagree, but specific changes to the current management guideline are recommended. DNR believes that signage and education are effective in changing attitudes and behavior. They have worked in other situations and they appear to be appropriate in this situation as well. The education and signing effort should be re-evaluated 5 years from the effective date of the plan.	Add the following text to fourth bulleted management guideline on pp. 2-11: “Effectiveness of education and signage will be re-evaluated in 5 years from the effective date of the plan.” In the event that these techniques are not found effective after a period of monitoring, regulatory controls similar to the ones initially recommended may be necessary.
Waterbody Management and Restrictions	Anadromy of streams has only been determined for approximately 50% of anadromous streams in Alaska. Need to work with ADF&G in the identification of anadromous waterbodies.	Concur. Anadromous waterbodies included in Appendix B were identified using ADF&G’s Catalogue of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes and interactive mapping available at the Office Of Habitat Management and Permitting website. Since development of this map the anadromy of Upper Jim Creek has been extended upstream into the canyon. DNR will continue to work with ADF&G in the identification of anadromous waterbodies within the PUA.	Update Anadromous Waterbody map on pp. B-1 to include newly designated area of Upper Jim Creek.

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Designated Shooting Areas	Designated shooting areas proposed in the Management Plan.	<p>Extensive comments were received on this issue. The majority of commenter's supported the development of designated shooting area(s). Of the areas proposed in the Management Plan (Maud Road and Pavilion Parking area), the Maud Road site had more support.</p> <p>Determining the location of a shooting area is difficult given the various uses occurring in the PUA, the proximity of the sites to residential areas, and the determination of impacts, if any, to fish and wildlife. Maintaining and enhancing opportunities for recreational shooting in a safe manner is, however, a priority for DNR. DNR envisions development of at least one shooting area within the PUA; however, subsequent analysis may determine an additional site is necessary. Following adoption of the final plan DNR will evaluate both of the identified sites for development and select a preferred site following public review.</p>	Amend existing management guideline on pp. 2-15 to read: "Following the adoption of the Management Plan, DNR will evaluate the Maud Road and Pavilion areas to determine the feasibility of construction of shooting facilities. It is intended that at least one of these sites will be developed over the next five years, subject to the availability of funding."
Designated Shooting Areas	Shooting facilities should be constructed prior to restrictions.	Through Phase I regulations, DNR has restricted shooting in areas where that activity has traditionally occurred. These restrictions have already been adopted by DNR, so the proposed sequencing of development cannot occur.	See previous recommendation.
Designated Shooting Areas	Support shooting areas with time/day restrictions.	Concur. Any developed shooting facility will have time/day restrictions.	Develop regulations that regulate day/hours of operation of a shooting area.
Recreational Discharge of Firearms	Individuals and organizations commented on Management Plan references to restrictions on recreational discharge of firearms. The concern was that the plan stopped recreational shooting on state lands.	Although Phase I Regulations were developed through a separate process, the references to these restrictions in the Management Plan were confusing to some individuals. The Management Plan did not implement shooting restrictions, it simply reference those contained in Phase I Regulations.	No change.
Law Enforcement	The PUA lacks adequate law enforcement and needs more such	Concur. There was widespread agreement on the need for additional law enforcement throughout	No change.

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Law Enforcement	<p>enforcement.</p> <p>Laws already exist regarding reckless discharge of a firearm. Do not need further restrictions.</p>	<p>the legislative and planning processes. DNR agrees that there needs to be an emphasis on law enforcement. However, DNR does not believe that simply providing an increased enforcement presence will totally solve the problems of misconduct in the PUA. There must be a change in public attitudes as well in order to make this a safe place to recreate. That is why the management plan deals with a large range of issues and provides an array of solutions. The net effect of these actions, coupled with a public education program, may bring about this change. Nonetheless, we acknowledge that the continued presence of enforcement officers may be necessary.</p> <p>The range of problems encountered in the PUA exceeds those of a reckless discharge of firearms, and while current state statutes deal with the discharge of weapons in a general way, there is still the need to discourage the use of weapons in ways that might be legal but would, if pursued, could result in unintended safety impacts. The need to provide improved safety for the residents and recreational users in the area of the Old Glenn Bridge is an example of such a problem. DNR maintains that there is a need to provide increased safety within the PUA adjacent to residential areas and in areas with high levels of public use. This necessitates the consideration of additional restrictions.</p> <p>Certain of the Phase 1 Regulations deal with the issue of discharge of weapons not employed for hunting; i.e., discharge related to recreational use. Phase II Regulations will address the discharge of weapons at designated Public Use Sites. Public Use Sites will be designated where high concentrations of recreational use occur or where facilities are proposed for development. These are</p>	<p>Continue with Phase II Regulations necessary to implement the Final Management Plan.</p>

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Law Enforcement	Need to ensure funding for enforcement of regulations developed through the plan.	<p>real problems and DNR believes that additional regulations are necessary in order to address current safety issues.</p> <p>Consistent with the Finance Letter of Intent provided by the legislature with the PUA legislation, DNR has evaluated this issue and recommended establishing a user fee to help pay for management, including law enforcement, and facilities in the PUA.</p>	No change.
Parcel Acquisition	Land acquisitions would increase access and would spread current uses to areas that have no or low use levels currently. Comments supporting and opposing parcel acquisition were received.	<p>The acquisition of parcels from the Borough, Mental Health Trust, and from private sources is recommended in the Management Plan. Identified parcels already have increased use associated with the PUA, some of which is in trespass. Acquisitions by DNR are intended to increase access and use of the PUA and to ensure that access occurs in a legal manner.</p> <p>Increasing use of the PUA is expected to occur the Lower and Upper Knik Flats Management Units and on adjacent state land outside of the PUA boundary. This is the logical place to accommodate motorized and other uses because it is the most suitable location for such activities. It can best support this type of use with limited environmental damage.</p> <p>The goal of acquiring these parcels is to maintain and enhance access to the PUA and to provide for increased use of the PUA. A secondary benefit of state acquisition is the ability to manage these lands in a comprehensive and consistent manner with adjacent lands within the boundary of the PUA.</p>	No change.
Trails Management Process	Currently the Trail Management Process (TMP) lacks specific language regarding public review process. Public review process must be identified in the	Concur. DNR will add a requirement for public review.	Add Management Guideline to pp. 2-42 that reads: "Following standard SCRO procedures for adjudication of easements, the public will be allowed to review and comment on

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Trails Management Process	<p>TMP.</p> <p>Description of the TMP provided in the Management Plan is too vague and needs to be more specific.</p>	<p>Disagree. This section was reviewed and its current wording seems consistent with the intent to describe a process for identify trails issues and developing trail recommendations. It is difficult to provide additional specificity at this point. To do so would undercut the flexibility we intended to provide so that a more detailed methodology could be developed as DNR gets a better understanding of general trail issues and the problems associated with specific trails.</p>	<p>recommendations involving the establishment of easements.”</p> <p>No change.</p>
Trails Management Process	<p>Closure and re-routing of trails is not consistent with legislative intent.</p>	<p>Disagree. Review of the legislation indicated that trail rerouting was clearly intended. Although there is no specific statement that trails may be closed, DNR is empowered to close trails for public safety or to protect public property. This authority is derived from other statutes.</p>	<p>No change.</p>
Trails Management Process	<p>Concern regarding language of “for specific purposes” included in the appendix of the plan text.</p>	<p>This reference is to the sentence “Trails may also be identified for reservation as public easements for specific purposes.” The intent of this sentence is not to misguide the public; that is, we did not intend this sentence to mean that this was ‘code’ for allowing the closure of trails using this wording. Rather, this is an explanatory statement; it is meant to indicate that easements may be identified for a specific purpose.</p> <p>Also see discussion above regarding public notice in the TMP.</p>	<p>No change.</p>
Trails Management Process	<p>Include statement that Class 1-3 trails are acceptable as they are.</p>	<p>Disagree. It is inappropriate to include a statement that Class 1-3 trails are appropriate since, by doing so, it pre-empts the evaluation and assessment of impacts in the TMP. DNR, through the TMP, will designate trails and determine the appropriate Trail Classifications. Some trails in Class 1-3 may be determined acceptable in their current state. Others may be identified for</p>	<p>No change.</p>

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Trails Management Process	Do not support building new trails before significant review of existing trails.	rehabilitation, rerouting, seasonal restrictions, or other management actions based on a determination of impacts to fish, wildlife, habitat, or other resources. Concur. This is what is generally intended in the Trails Management Process. The idea in this process is to inventory trails and assess their impacts, if any, to resources. Management decisions for the trails will be based on the results of that analysis.	No change.
Access	DNR should allow OHV's on any improved surface on RST 17.	Concur. OHV use is allowed on state land, improved or unimproved, under the Generally Allowed Uses of state land (11AAC 96.020) subject to certain restrictions under that section of Administrative Code.	No change.
Access	Opposed to state acquiring 17b easements across land to be conveyed to Eklutna in the area of Hunter Creek.	The imposition of 17b easements is made by the federal Bureau of Land Management, not the state. The purpose of these easements is to continue access across land to be conveyed to a native corporation in order to maintain access to public lands and waters. The state, however, is concerned that access to the remaining state lands east of the federal land be maintained and believes it important to impose such easements. Most commenter's felt that continued access to state lands and waters was a very high priority.	No change.
Time Share	Support time share for all motorized traffic on land and all waters including the Knik River within the PUA excluding current airboat and ATV tour operators and hunting during seasons similar to Eklutna Lake, Chugach State Park.	"Time share" is a restriction on specified uses within an area during a specific time period. It is one of the methods used by resource agencies to provide different recreational opportunities to different user groups in the same geographic area. DNR has not proposed a time share management scheme within the PUA at this time, and believes that modifications to the management guidelines for Rippy Trail and adjacent area obviates the need for such restrictions at this time. It does	No change.

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Swans/ Waterfowl	Management Plan states swan numbers and cygnet survival rates appear to be stable. What data and timeframe support this conclusion?	<p>remain as an option for future management within the PUA.</p> <p>Approximately 6 years of aerial survey data provided by a retired volunteer biologist were reviewed by ADF&G and ADNR. ADF&G review of this data indicates that 6-10 pairs of swans nest annually in the PUA. These swans produce an average of 3-5 broods per year with 20-30 cygnets surviving to fledging. Based upon the types of available habitat and territorial nature of trumpeter swans it is likely that these swan numbers represents a sustainable number of pairs in the PUA if habitat quality is maintained and levels of disturbance do not displace swans. This data suggests a fairly stable population given the limited survey data available for the area and represents a baseline for the PUA. The number of broods produced and cygnet survival compares favorably with statistics for the Pacific Coast Population of trumpeter swans provided in The 2005 North American Trumpeter Swan Survey conducted by US Fish and Wildlife Service. It is intended that management guidelines and TMP will reduce impacts to waterfowl, including swans, in the PUA. ADF&G will monitor waterfowl, including swans, in the PUA to determine if populations remain stable in the future.</p>	No change.
Pollution/ Hazardous Materials	DNR has to stop pollution of streams, lakes, and rivers.	The Management Plan is intended, among other things, to decrease the amount of pollution (and more broadly, of environmental impact) within the PUA. This should occur through the rerouting of activities and the elimination of illegal activities that often result in pollution, which usually takes the form of solid waste, hazardous waste, and water quality degradation. The state is required to implement current statutory and regulatory authorities that apply to this area.	No change.

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Pollution/ Hazardous Materials	Support effective implementation of laws regarding habitat and water quality.	<p>Through this Plan and through increased state management presence within the PUA, these activities should lessen. Increased coordination with state and federal regulatory agencies should also help.</p> <p>It should also be noted that Phase I Regulations adopted by DNR address the discharge of hazardous materials and litter in the PUA. The combination of Management Plan guidelines and Phase I Regulations should reduce discharge of pollutants and hazardous materials.</p> <p>Concur. DNR has developed management guidelines and regulations specifically to address habitat and quality issues. There are overlapping federal, state, and local jurisdictions and authorities within the PUA. These other agencies have authorities to address impact occurring to habitat and water quality beyond DNR authority. Goals and Management Guidelines included in the Management Plan detail how DNR intends to coordinate with these other agencies to address impacts to habitat and water quality.</p>	No change.
DNR Enforcement	DNR shall enforce all state, federal, and local laws that currently apply to management of waters, habitat, fish, wildlife, waterfowl, and migratory birds and/or cause the laws to be enforced through cooperative management agreements with these agencies.	See above. DNR intends that all applicable state, federal, and local laws that apply to the management of the resources that are noted in the comment are enforced. This will largely occur through the direct action of specific regulatory agencies that responsible for wetland protection, the enforcement of water quality standards, and the mitigation of hazardous wastes. If cooperative agreements become necessary, DMLW will consider such approaches. It is not unusual for DNR to enter into management agreements with other agencies, particularly when an agency has expertise and management authority that is specific to the resource under consideration for management.	No change.

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Rescission of Laws	Rescission of laws to damage of groundcover or streambanks by recreational activities is contrary to purpose (2) of HB 307, legislator intent, and some motorized users.	DNR is not intending to rescind laws that are intended to avoid or mitigate the effects of recreational activity on groundcover or streambanks. There is, however, a proposed change to the regulations recently adopted by DNR related to the depth of rutting in the PUA. DNR will remove the enforcement threshold of rutting greater than 6 inches within the area depicted on Map 2-3 in the Management Plan. This comprises the majority of the Upper and Lower Knik Flats Management Units. The purpose of this regulation amendment is to allow current and future uses on an area of the PUA that is already heavily used by motorized vehicles and that is more suitable for such activity. It is intended that this will lessen the impact on other areas that are less suitable for such uses.	No change.
Facilities	Opposed to facilities section as written; the cons do not outweigh the pros.	<p>The PUA is currently used extensively and it is expected that this use will increase over time. Throughout the development of the Management Plan, DNR received comments on the need for facilities related to sanitary and solid waste disposal, camping facilities, and facilities to accommodate motor vehicles (boat launches, parking areas, and the like). These comments reflect what most people see as a compelling need within the PUA. While we recognize that these facilities may represent costs, it is very likely that state or federal, or some other form of funding for these facilities will be available.</p> <p>DNR continues to maintain that some amount of facilities are appropriate maintaining and enhancing recreational uses and to mitigate impacts to fish, wildlife, and habitat. Facilities will become increasingly important as use continues to increase in the future.</p>	No change.
Cultural	Management Plan lacks mechanism for	Add management guideline to direct DNR	Management Guideline will be added to

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Resources	addressing cultural resources prior to site development.	adjudication staff to contact DPOR, Office of History and Archeology during the planning phase of projects involving ground disturbance.	Management Plan and will read: "The Office of History and Archeology should be contacted during the initial planning phase of any project that involves a ground disturbing activity."
Public Use Sites	Reduce number of proposed Public Use Sites from four to two and expand the Jim Lake Public Use Site.	After review of comments and field observations, DNR will drop proposed establishment of Public Use Sites at the Knik Glacier and portion of the Lower Knik Flats. A management guideline will be added to the Management Plan to clearly indicate that public use at the terminus of the glacier is allowed. The Jim Lake Public Use Site will be expanded to include the overlook site at the northern end of the lake.	Amend management guidelines to establish two, not four, public use sites in the PUA. The two sites will be the Jim/McRoberts Confluence Public Use Site and the Jim Lake Public Use Site. The Jim Lake Public Use Site will be expanded to include the overlook at the north end of the lake.
Commercial Use	Commercial use of state shorelands at the terminus of Knik Glacier.	DNR will amend an existing management guideline to direct where commercial uses should occur at the terminus of the Knik Glacier. Currently commercial use is concentrated at the south end of the moraine and is somewhat removed from non-commercial uses on the moraine. DNR should continue to authorize commercial uses on the south end of the moraine and maintain the rest of the moraine for non-commercial recreational opportunities.	Amend first management guideline on pp. 2-5 to read: "DNR may authorize commercial uses in any area of the PUA, however, commercial uses at the terminus of the Knik Glacier should be restricted to the southern end of the moraine. Authorizations for commercial use are subject to the requirements of the management plan."
Unit Specific Comments	Unit A - Oppose boatlaunch facilities because they are not compatible with residential development on both sides of the Knik River by the Old Glenn Highway Bridge.	Facilities should be developed in areas where public use can be enhanced and where impacts to resources can be minimized. The placement of facilities is governed to a large extent by current access and use patterns. That is, the placement of facilities occurs at those locations where people need to use them, and will use them. Moreover, there are relatively few locations that are adequate for the development of these types of facilities; the placement of these facilities is also governed by river shape and depth. These facilities will be located some distance away from residential areas and their impacts upon residential areas should be nominal.	No change.

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Unit Specific Comments	Unit A & B – Safety buffers should be included in the plan in order to protect residents from shooting, noise, dust, and other impacts.	<p>Ultimately, however, DNR must balance out the needs for facilities, which have restrictive location considerations, with potential impacts upon other uses. In this instance, we believe the location of these facilities to be justified.</p> <p>Several of types of disturbance (primarily recreational shooting) are dealt with in the Phase 1 Regulations and should resolve some of the problems that are now being experienced in residential areas along the Knik Road. Specifically, these regulations prohibit recreational shooting on the bed of the Knik River west of the north-south township line of T16N, R3E and T16N, R4E.</p> <p>Much of the impact associated with vehicular use derives from motorized uses within the Lower and, to a lesser extent, the Upper Knik Flats Management Units. The Management Plan designates this area as appropriate for motorized use and therefore some amount of impact from this use is accepted and is considered, on balance, to outweigh the restrictions that would be entailed in the creation of a safety zone. Moreover, much of the use that is currently occurring in the PUA is already buffered by state, borough, or federal lands.</p>	No change.
Unit Specific Comments	Unit B – This unit needs to be designated critical habitat, the term “sensitive” is used in the Management Plan. Sensitive implies a lower standard of protection.	The Knik PUA Management Plan is a type of land use plan, similar to area plans that DNR uses to manage the states’ lands and resources. It is appropriate that this Management Plan should use common terms and concepts in use in area plans. Area plans use the term ‘Habitat’ to designate areas considered particularly significant for the protection of habitat and their associated species. A later response recommends inclusion of the term ‘Habitat’, and provides a definition and an indication of where this definition is to be applied.	No change.

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		<p>The term ‘Habitat’ as used by DNR does not imply a lower level of protection than ‘critical habitat’. The definition is clear in its intent: to protect sensitive areas from the effects of use and/or development. Thus, DNR sees no real difference with the concept that is implicit in the use of the term ‘critical habitat’: the concept of protection is vital to both. Moreover, use of this term may cause confusion in its application by DNR in its adjudicatory decisions.</p>	
<p>Unit Specific Comments</p>	<p>Need to designate Mud, Gull, Swan, Leaf, and Chain lakes as sensitive waterfowl habitat.</p>	<p>Disagree. The map included in Appendix B, pp. B-3, titled <i>Waterfowl Habitat</i> indicates a large area of land and waters as general waterfowl habitat. The plan already identifies these and many other waterbodies and uplands within and adjacent to the PUA as waterfowl habitat.</p>	<p>No change.</p>
<p>Unit Specific Comments</p>	<p>Unit B – Management Plan does not adequately protect fish, wildlife, habitat, and wetlands.</p>	<p>Disagree. The plan contains numerous management guidelines developed consistent with the enabling statutes. Among these are the requirements to perpetuate and enhance recreation and enjoyment of fish and wildlife, protect habitats for fish and wildlife, and to provide for the maintenance and enhancement of recreational opportunities and for increasing use of the PUA. Guidelines in the Management Plan seek a balance between statutory direction to allow recreational use and to protect the natural resources.</p>	<p>No change.</p>
<p>General Issues</p>	<p>Management Plan lacks specific language related to several resources and uses and activities including surface entry near swan nesting sites, moose calving concentration areas, and eagle nesting sites.</p>	<p>Partly concur. Area plans typically include standards under regional policies that deal with the more sensitive habitats and fisheries/wildlife concentrations that we are likely to encounter in the issuance of authorizations. For example, the Southeast Susitna Area Plan (SSAP) has specific guidance related to eagle nests, moose calving concentration areas, and tundra swans nesting sites. Lands within the boundary of the SSAP are</p>	<p>Amend Management Plan text in Chapter 2 to include language regarding authorizations of uses or activities relating to eagles, moose winter and calving concentration areas, swan nesting sites, and sensitive waterfowl habitat.</p>

Subject	Issue	Response	Recommendation
General Issues	The definition of habitat in the plan should be changed to be consistent with recent Land Use Plans Developed by DNR.	<p>east of the KRPUA however, this guidance is applicable within the KRPUA.</p> <p>DNR will add the requirements in the SSAP that deal with bald eagles, moose winter concentration and calving areas, tundra swan testing sites, and activities in sensitive waterfowl habitat. Although it is somewhat unlikely that some of the uses that require state authorizations will occur within the PUA, the inclusion of these management requirements will be useful in the event that they do.</p> <p>Concur. The Knik Management Plan is a type of management plan that is similar to DNR area plans. Similar terminology should be employed. Add: “Habitat. Areas that serve as a concentrated use area for fish and wildlife species during a sensitive life history stage where alteration of the habitat and /or human disturbance could result in a permanent loss of a population or sustained yield of a species.” In this plan the following areas are associated with a Habitat designation: anadromous fish spawning and rearing areas; waterfowl, bear, goat, and sheep concentration areas; moose winter concentration or calving areas; and important wildlife migration corridors.</p>	<p>Add the following to the Glossary in Appendix A:</p> <p>“Habitat. Areas that serve as a concentrated use area for fish and wildlife species during a sensitive life history stage where alteration of the habitat and /or human disturbance could result in a permanent loss of a population or sustained yield of a species.”</p>
General Issues	Commenter’s questioned the intent of the legislation and the use of terms “will” and “shall” as opposed to “may” or “should.”	<p>The Knik PUA Management Plan is a type of area plan and uses the same nomenclature as these plans. It also employs the same terms of art.</p> <p>The fact that the Management Plan uses the words ‘should’ instead of will does not mean that the Department does take a management guideline in the plan seriously. In area plans the term ‘should’ means that the adjudicator must follow the management guideline unless there is a substantive reason to not do so. The rationale for deviation must be explained and justified in the</p>	No change.

Subject	Issue	Response	Recommendation
General Issues	Management Plan does not supply sufficient detail on how DNR will coordinate with other state, federal, and local agencies.	<p>adjudicatory decision. The term ‘shall’ differs in that it mandates adherence to a management guideline, with deviation only possible through the process of plan amendment. The process of plan amendment is explained in Chapter 4 of the Management Plan.</p> <p>DNR uses the term ‘should’ more frequently than ‘will’ since it provides more flexibility to the adjudicator in the decision making process. Plans cannot predict the exact context for a decision and therefore it is appropriate to provide some amount of decision flexibility.</p>	
General Issues	Fees are not necessary if DNR does not develop facilities.	<p>Concur. The Plan cannot, at this time, describe the nature of the coordination that will occur over time between agencies except in a generalized way. What coordination will occur is related to the specifics of the issue or decision and, lacking this specificity, the Management Plan can only generalize as to the type of coordination. The specifics of the issue or action will determine what agencies will be involved.</p> <p>Partly concur, but no change in Management Plan recommended.</p> <p>DNR has evaluated the creation of a fee program and has found a fee program to be appropriate for facilities and the management of the PUA. The management plan further states that “A fee schedule should not be implemented until such facilities are developed.”</p>	No change.
General Issues	Camping should not be restricted outside of Public Use Sites.	The Management Plan does not carry a recommendation that would make camping restricted outside of designated areas. These uses are allowed under the Generally Allowed Uses section of Alaska Administrative Code and that portion related to camping on state land is not changed. That section provides for certain	No change.

Subject	Issue	Response	Recommendation
		<p>restrictions on camping, and these are not changed either.</p> <p>What the Management Plan does state is that camping may be restricted at Public Use Sites. Typically, this has meant that camping occurs within designated camping sites.</p> <p>Generally Allowed Uses on state land allow individuals to use state land in specific ways; this section of Administrative Code was not affected in the Legislation that approved the PUA and state land is still subject to its requirements. Changes to these requirements would, in any event, occur through a regulatory review and revision process, which is a separate process from the Management Plan per se.</p> <p>See Public Use Site recommendation above for proposed changes to sites.</p>	
General Issues	Management Plan definition of “sustainable trail” allows damage and maybe significant if cumulative.	The definition of ‘sustainable trail’ carries no meaning beyond the definition itself. The determination of whether current usage or cumulative usage will result in degradation of resources will be addressed in the evaluation of trails during the Trails Management Process.	No change.
General Issues	Definition of OHV should be amended to include highway and off-highway vehicles up to 10,000 pounds.	This plan does not seek to re-define an OHV The definition of an OHV is taken from the Generally Allowed Use section of Administrative Code (11 AAC 96.020). . Current Generally Allowed Uses allow use of a Highway Vehicle up to 10,000 curb weight to operate on or off an established easement subject to restrictions in 11AAC96.020 and conditions contained in 11AAC96.025.	No change.
General Issues	The term “serious degradation” is a subjective term that is used in the plan. It should be defined in the glossary of the plan.	Concur. It is appropriate to add the definition of serious degradation to the Glossary. This definition is meant to be generalized, however, since specific standards do not exist that we are	Add definition: ‘Serious Degradation. This term is used to refer to the amount of degradation that occurs on trails. It is meant to describe a serious deficiency in the tread of a trail, which is usually

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General Issues	Management Plan does not adequately address human waste and trash.	DNR believes that that the Phase 1 Regulations and the Management Plan, together, deal adequately with the issues of human waste and trash. Under proposed Phase 1 regulations there is a section that states “may not discard or abandon waste, refuse, trash, trash or litter”. The Management Plan recognizes the problem with human waste and trash through its recommendations to provide sanitary and trash facilities at popular recreation spots. Ultimately, however, the problems of human waste and trash cannot be resolved by passing laws and providing facilities, although these help. Ultimately, there must be an attitudinal change in the people that use the PUA: there must be more of a sense of ownership and pride and there must be more of sense that this is place that we want to continue for our kids; this is sometimes referred to as ‘stewardship’.	No change.
General Issues	Management Plan does not adequately address existing environmental damage that has occurred.	We believe that the Management Plan adequately addresses the issue of current environmental impact. Our analyses did not indicate the presence of serious environmental impacts, except in the area at the mouth of Jim Creek in the Lower Knik Flats Management Unit. In this area there is a high level of illegal of activities, some of which undoubtedly result in environmental impacts. Most of the impacts seems confined to the forested uplands adjacent to the Pavilion parking area and the unvegetated shorelands of the Knik River in the area of Jim Creek. In the remaining	

Subject	Issue	Response	Recommendation
		<p>areas of the PUA use and impacts are more dispersed and is primarily related to the use of vehicles crossing through wetlands and anadromous waterbodies.</p> <p>The Management Plan includes management guidelines and facility and management recommendations for units in the PUA. These include recommendations for facilities that will enhance recreational use and mitigate impacts to fish, wildlife, and habitat. Facilities recommendations include designated camping sites to reduce loss of vegetation and compaction of soil, sanitary facilities to address disposal of human waste at heavily used sites, and bear resistant trash receptacles to address litter and waste disposal. Management guidelines and recommendations are provided to address impacts to resources caused by recreational use in addition to providing direction for future uses and authorizations.</p> <p>In addition to guidelines and recommendations in the Management Plan, DNR developed regulations to address many of the current activities that are contributing to environmental degradation in the PUA. The Phase I Regulations address many issues including discharge of weapons, burning of non-native materials (e.g. construct debris, household waste, etc.), discharge of hazardous waste, vehicle abandonment, and trail development.</p> <p>We recognize, however, that plans, facilities and laws will not ultimately resolve the environmental impacts caused by activities in the PUA. Much will depend on an attitudinal change on the part of the general public: to be more interested in and concerned about impacts to the PUA caused by</p>	

Subject	Issue	Response	Recommendation
General Issues	Description of use levels in the Management Plan need to be clarified.	human activity. We hope that the Management Plan will move people in that direction.	
General Issues	Current plan language restricts camping outside of public use sites.	Concur in part. All use levels included in the plan are relative to other uses occurring in the boundary of the PUA. The spatial and temporal aspects of recreational use are discussed in the plan in Chapters 2 and 3. Although a formal use study was not performed for the area, field observations by DNR staff of use patterns over the course of 18 months provided information used in this plan.	Clarify plan text on pp 2-31 by adding a footnote with the following text: "All levels of use discussed in this plan are relative to others use levels occurring in the PUA. A formal study of use was not conducted."
General Issues	Management Plan lacks information regarding spring and fall staging by waterfowl including swans.	Current plan language <i>does not</i> restrict camping outside of Public Use Sites. Language on pp 2-28 of the Management Plan restricts camping within the Public Use Sites only and does not affect camping subject to the Generally Allowed Uses of state land. Because of the comments received on this issue DNR determined that clarification was needed in the plan. Text will be modified to clarify camping restrictions in Public Use Sites.	Amend existing management guideline text on pp. 2-28 to: "Within a Public Use Site, camping may be restricted to a campground, identified campsites, or within a certain distance of a developed facility when a facility is developed." A footnote will be added to this text that will read: "Camping outside of a Public Use Site remains subject to restrictions provided in Generally Allowed Uses of State Land."
Allowed and Prohibited Uses	Consistency of plan language.	Concur. Management Plan text contained in Chapter 2 does not include information regarding the use of the extensive lakes and wetlands for spring and fall migrations of waterfowl and shorebirds.	Amend existing background text to include discussion on pp. 2-10. Text will read: "The extensive lakes and wetlands within the PUA are used for resting and staging during the spring and fall migrations of waterfowl and shorebirds. A number of these waterfowl stay in the PUA to nest, rear broods, or use available habitat for the summer."
Phase One Regulations	Several individual commented on Proposed Phase 1 Regulations including proposed shooting restrictions, proposed rutting regulation, harassment regulation, and Generally Allowed Uses on state lands.	This section of plan needs to be revised to be consistent with language provided in Chapter 2.	Revise text to indicate that land disposals and timber harvest (other than those identified in Chapter 2) are prohibited.
		These regulations were developed outside of the planning process and included their own public notice and comment period. While this plan may amend specific regulations developed through the Phase I Regulation process, the Management Plan is not the appropriate vehicle for comments related to those regulations.	No change.