

## Issue Response Summary

### General Comments

Subject	Issue Summary	Response	Recommended Revision
Technical Corrections – Plan Wide	Make all appropriate technical and factual corrections to the Plan. These corrections will not affect Plan policy.	Concur.	Change as suggested.
Standardize Terms	Standardize terms throughout document – e.g. Leisure Lake and China Poot are the same lake. Also, OHV and ORV are the same thing.	Concur on both counts.	Change Leisure Lake to China Poot Lake and OHV to ORV throughout the plan.
Language Edits	Editorial suggestions were received to add more detailed descriptions of the parks and make the plan more readable.	Concur.	Rework language throughout the plan to incorporate suggestions as appropriate.
Include Source Citations	Sources should be cited for all scientific and legal statements.	Concur.	Include a bibliography in the final plan.
Plan Numbering	Number the pages, maps, figures, introduction, cover, contents, appendix, etc. consecutively so subjects are easier to find and page numbers on the digital PDF copy and the printed copy are the same. Some page numbers skip pages. Also, all maps should have numbers.	Concur.	Improve the page numbering.
Unreferenced Statutes and Regulations	Numerous regulations and one statute are used in the plan but not referenced in Appendix B. Also, why not internet link to the full text of these to get exact wording?	The statutes and regulations directly relating to these particular parks are all referenced. The rest are easily found by quick internet search.	None.

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Plan Should Follow Statutes and Regulations	The management plan should follow all relevant statutes and regulations – if exceptions are made, justification should be supplied. By prioritizing commercial and recreational activities over protection and preservation of park resources, compatibility determinations within the plan conflict with law, since the purpose of KBSP has been legally defined to “protect and preserve it’s unique and exceptional scenic nature.”	The plan follows all relevant statutes and regulations without exception. Recreation is one of the major values of KBSP and is embodied in the definition of a scenic park (41.21.990 (1)). Commercial and recreational activities are not prioritized over protection in the plan. The KBSP regulations provide for consideration of park purposes and the appropriateness of the activity within the park.	None.
Add New Chapter Titled: “Park Issues and Management Strategies”	The park management plan must dedicate a chapter to both describing and responding to changes in use of and conditions in the park in accordance with the Alaska Constitution, Article 8; Alaska Statutes 41.21.131; 41.21.140; and 41.21.990. This chapter should be called “Park Issues and Management Strategies.” The response to the issues listed below must include policy strategy and recommendations. These strategies and recommendations must be clearly reflected in the Guideline Tables and proposed development: increased visitation to the park and increased use of park resources; enforcement challenges; maintenance challenges; pollution; terrestrial and marine invasive species; impacts to park management resulting from other agencies’ activities; and climate change.	Chapter 4 describes park uses and issues. Management policies and recommendations contained in Chapters 5 and 6 address the issues described in Chapter 4, to the extent the issue is within DPOR’s purview.	None.
Respect Inholders	Park inholders should be treated with respect by park staff and visitors.	Concur.	None.

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Inholdings – Private Land Zoning	Privately owned parcels within the park boundaries could be zoned under AS 41.21.025.	Concur.	None.
Pollution Issues: Oil Spills	<p>There is still residual oil on the outer coast from EVOS. Any development of trailheads or cabins there must be preceded by analysis of hydrocarbons in substrate.</p> <p>The history of jack-up oil rigs in Kachemak Bay must be given, along with associated management strategies.</p> <p>The plan should include a description of the risk of oil spills in KBSP along with the park's strategy to protect itself from spills, such as engaging in the writing of contingency plans and the permitting of oil and gas leases.</p> <p>Homer is a port of refuge for distressed tankers in Cook Inlet.</p>	Oil and gas leasing are not permitted within the parks and DPOR does not have the authority to regulate this activity. These issues are beyond the scope of this management plan. Various agencies, including DPOR, coordinate with ADEC on spill response efforts and planning.	None.
Noise Pollution	DPOR needs to establish decibel limits and standards for noise exposure in the park. Fixed wing and helicopter traffic have increased. Natural sounds (and lack of noise pollution) are vital to the natural functioning of park ecosystems. A sound monitoring program should be established to create baseline data to be used in sound management in the park. Preserving natural sounds should be a high priority management objective in the new plan.	DPOR only has the authority to regulate aircraft landings. DPOR must balance the needs of the various types of recreational activities (including those facilitated by commercial activities, which may include transport via rotary or fixed-wing aircraft) with some users' desire to limit noise pollution.	Add this Objective to the plan: "Develop strategies to minimize harmful disturbances such as noise and light."

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Human Waste Management	There should be a human waste management plan within the plan.	Human waste management was considered as the facility recommendations were developed. A detailed human waste plan is not appropriate to be included in this plan.	None.
Scientific Value of the Park	This plan has not recognized the park's enormous "scientific value," as mentioned in the Alaska Constitution's Article VIII, Section 7 for Special Purpose Sites. Recognize in the plan the major research facility infrastructure that has grown around Kachemak Bay. Federal, state, city and NGO scientific entities all create an enormous economic base in surrounding communities.	Article VIII, Section 7 (Special Purpose Sites) of the Alaska Constitution states: "The legislature may provide for the acquisition of sites, objects, and areas of natural beauty or of historic, cultural, recreational, or scientific value." This is an "or" statement. KBSP and KBSWP were set aside for their scenic and wilderness values respectively (AS 41.21.131 and AS 41.21.140) not for their scientific value.	None.
Non-Use Values	<p>Non-use values also need to be included in this plan.</p> <p>Non-use terms include:</p> <p>"Option value" – the value placed on individual willingness to pay for maintaining an asset or resource even if present use is unlikely. This value can arise when the asset's continued existence is uncertain and people may want to use the asset in the future.</p> <p>"Bequest value" – values placed on individual willingness to pay for preserving an asset that has no current use, so that it is available for future generations.</p>	The plan doesn't use these terms for non-use values but these ideas were considered in development of the goals and objectives for the park.	None.

Subject	Issue Summary	Response	Recommended Revision
	<p>"Existence value" – the benefit people receive simply from knowing that a particular environmental resource exists.</p> <p>"Altruistic value" – the value placed on individual willingness to pay for maintaining an asset unused by that individual, so that others may use it.</p>		
Planning Principles	<p>The plan should reference and follow the Society of Outdoor Recreation Professionals planning principles. (<a href="http://www.recpro.org/planning-principles">www.recpro.org/planning-principles</a>). The plan rarely cites information sources, so it's hard to determine if "best available science and information" is being used. The plan also doesn't clearly formulate alternatives "which address [each of] the significant issues and concerns"; nor does it "include the projected budgetary needs to implement the plan."</p> <p>Regarding the last point, the plan proposes extensive public use cabin and trail developments, with no assessment of the cost of their construction, operation and maintenance; nor a countervailing assessment of the potential environmental impacts (i.e. costs) of these proposed developments.</p>	<p>This is not a master development plan, but rather a management plan. If funding becomes available for these proposals, more detailed site-planning and design will be conducted using current information. Because of the 20-year planning window, site design information, including cost, is best evaluated when a project is being considered.</p>	None.
Planning Principles	<p>DNR fails to enunciate what planning principles or standards it applied in developing the draft plan, and it provides few citations or sources to substantiate its management decisions. Best available science and peer-reviewed sources should drive this process and DNR should provide a scientific basis for its decisions.</p>	<p>The planning process is guided by statute, regulations, and the Statewide Framework. Many of these are quoted and referenced throughout the plan. The planning team includes inter-agency subject matter experts.</p>	None.

Subject	Issue Summary	Response	Recommended Revision
Federal Resource Determinations	Federal agencies have made findings concerning the park's wildlife resources that are not included in the plan. These include NOAA's determination that certain waters are Essential Fish Habitat, certain marine mammals are depleted, and certain habitats are critical to some species' survival. The USFWS has made similar determinations for some of the park's bird species. The plan also doesn't discuss how DPOR will protect the wildlife and habitat involved in federal determinations from recreational and non-recreational uses.	The plan provides management recommendations designed to protect habitat, and recreational uses. DPOR does not manage fish and game resources.	None.
Educational Materials	Education materials regarding bears and leave no trace principles should be given to park visitors in writing and be made available at all trailheads.	Concur.	None.
Park's Creation and Traditional Hunting & Fishing Activities	The park plan should mention that when the park's creation was being considered local residents were promised that their lifestyles would not be forced to change, including hunting and commercial fishing in the park's adjacent waters. Also, traditional activities and lifestyles should be mentioned in the plan, as well as in educational brochures given to visitors.	AS 41.21.020(14) provides for maintaining traditional activities within all park areas – it is appropriate to mention the traditional uses that occur within the parks. Hunting and commercial fishing are not affected by this park plan – fishing and hunting activities are not regulated by DPOR.	Add language to the Natural and Cultural Resources chapter discussing traditional use of the park.

**CHAPTER 1: Introduction**

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
Statutory and Constitutional Language	Put the distinct statutory and constitutional language at beginning of the plan. Put Article VIII, Section 7 of the constitution here and throughout all commentary and tables.	The parks' enabling legislation and the statutory definitions of scenic and wilderness parks are referenced in Chapter 1 of the plan. Article VIII, Section 7 of the State Constitution allows the Legislature to acquire Special Purpose Sites and reserve them from the public domain. This is not necessary to add to the plan.	None.
Regional Characteristics and Planned Area Overview (Page 1)	The plan should consider the goals of protecting park values using a watershed rather than the current jurisdictional perspective. The plan has no discussion of managing the park's lakes, rivers and streams as habitats on a watershed basis. The plan should consider the watershed attributes of ground water, and fjord and lagoon fisheries productivity.	The purpose of the plan is to provide management direction for the various park units addressed in the plan. DPOR only has jurisdiction over state-owned land within the park boundaries.	None.
Regional Characteristics and Planned Area Overview (Page 1, lines 4, 8)	Change "Planning" to "Park". Insert mention of the Cook Inlet Basin Ecological Region of the Alaska Range Transition.	Concur in part. The planning area includes KBSP, KBSWP, and the SRSs, therefore it is appropriate to leave the term "Planning Area Overview" rather than "Park". The second suggestion is accepted.	Add mention of the Cook Inlet Basin Ecological Region of the Alaska Range.
Regional Characteristics and Planning Area Overview	Add language describing the various legislatively designated areas (LDAs) that recognize the remarkable resources of the area. Note that this is the only area in Alaska of overlapping Park/CHA jurisdiction.	Concur.	Add a description on the overlapping Park/CHA jurisdictions.

Subject	Issue Summary	Response	Recommended Revision
Plan Scope and Purpose – Use of the Word “Park”	Wherever the plan says “Park,” it must specify whether it is referring to the Wilderness Park, the State Park, or an SRS. Management of the area must be consistent with the statutes and regulations governing that area.	In the interest of brevity and readability, the term “Parks” is used throughout the plan to refer to all the various park units. In chapter 5, management guidelines are provided for each land use zone; in Chapter 6, management guidelines are given for each park unit.	None.
Plan Scope and Purpose – Plan’s Jurisdictional Limitations	The plan’s jurisdictional limitations and failure to prescribe management actions on an ecosystem-wide basis largely prevent DNR from meeting the plan’s primary purpose as provided by statute and the listed plan objectives which unequivocally mandate that the primary purpose of the park is to protect habitat, aesthetic, wilderness and ecosystem values. For example, one of the main objectives listed in the plan is to address “significant changes” that have occurred since issuance of the previous plan; yet, the plan fails to address the dramatic impacts that climate change has had on fish and wildlife habitat, aesthetic resources, ecosystems and other park values.	<p>The purpose of KBSP is to “protect and preserve this land and water for its unique and exceptional scenic value...” The purpose of KBSWP is to “protect and preserve this land and water for its unique and exceptional wilderness value...” (AS 41.21.131 and AS 41.21.140).</p> <p>The purpose of this management plan is to provide management direction that facilitates recreational use opportunities while conserving the natural and cultural resources through a set of policies and recommendations that guide permitting activities, uses, facilities, and trail development on all the state owned and managed land and waters within KBSP and KBSWP. This plan also addresses a variety of park units and so does not just apply to KBSP and KBSWP that were created by statute.</p>	None.

Subject	Issue Summary	Response	Recommended Revision
Plan Scope and Purpose -- The Plan Should Consider the Full Watershed	The plan's Purpose and Scope (and enabling statutes) are unequivocal that the primary purpose of the Park is to protect habitat, and aesthetic and wilderness values. However, there is little mention in the plan of managing the planning area on a watershed basis.	The purpose of the Parks (as stated in their enabling statutes) is to protect scenic values for the state park and wilderness values for the wilderness park. While protecting habitat is an aspect of that, it is not the primary purpose of the Parks. Furthermore, this is a DPOR plan and DPOR only has jurisdiction over state-owned land within the park boundaries. There are also other park units covered by this plan that were not statutorily created.	None.
Plan Scope and Purpose – General – Eliminate Confusion Between LDAs and SRSs	Make the distinction clear between the legislatively designated areas and State Recreational Sites (SRS).	The plan already makes this distinction – see bottom of page 1.	None.
Plan Scope and Purpose – Conservation of Natural and Cultural Resources (Page 1, line 35)	Rewrite as follows: “The purpose of this management plan is to provide management direction that conserves the natural and cultural resources while facilitating recreational use opportunities.” This is consistent with AS 41.21.990 while the current language is not.	A variety of park units are covered in this plan, and this section of the plan describes what the plan does and its scope. As such, the purpose of the plan is correctly stated.	None.

Subject	Issue Summary	Response	Recommended Revision
Plan Scope and Purpose (Page 1, lines 35-36)	Reword end of this sentence: “control, development and maintenance, to provide for their administration and preservation for the use, enjoyment, and welfare of the people <sup>1</sup> and insure that use levels do not diminish the values of the park’s resources. <sup>2</sup> ” Change next sentence to read: “management direction that conserves the natural and cultural resources while facilitating recreational use opportunities which is compatible with the units resource values <sup>3</sup> through a set of policies...”	A variety of park units are covered in this plan, and this section of the plan describes what the plan does and its scope. As such, the purpose of the plan is correctly stated.	None.
Plan Scope and Purpose (Page 1, line 37, 39)	Reverse this language so that recreation is not the priority – to conform to AS 41.21.990. Insert “reserved from the public domain” after “waters”.	The plan addresses a variety of park units and so does not just apply to those areas described in AS 41.21.990. Furthermore, not all park units are withdrawn from the public domain.	None.
Plan Scope and Purpose (Page 2, line 4)	The use of the term “unit” throughout this draft is confusing because it denotes both larger areas and smaller areas within them. For clarity, throughout the plan, KBSP and KBSWP should be referred to by name and the SRSs within them should be referred to by name.	“Park unit” is a common reference for the variety of types of park areas that exist in Alaska and is used for brevity when applicable to all the areas.	None.
Plan Scope and Purpose (Page 2, lines 7, 12)	Insert “Past, present, and impending” before “management” and “and regions” after “units”. Insert “provide solution to present, chronic or potential issues,” after “characteristics” and “and regions” after “units”.	These editorial suggestions would decrease the clarity and/or concision of this section.	None.

<sup>1</sup> Alaska Constitution Article VIII, Section 7: Special Purpose Site

<sup>2</sup> Alaska State Park System Framework, Page 7

<sup>3</sup> Alaska State Park System Framework, Page 7

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Plan Scope and Purpose (Page 2, line 10) – Planning Period	A 20-year “development plan” is unrealistic – too many things are subject to change in 20 years. A wiser course would be a 5-year “maintenance and public health plan” addressing long-term pressing issues, rather than creating many new issues.	This is a management plan and the 20-year planning window is customary and appropriate.	None.
Reason for Revision (Page 2, lines 18-21)	Reword sentence after “reassess”: “...its dominant management objective to maintain the parks natural and cultural resources for long term use and enjoyment by the public <sup>4</sup> ”	The stated objective is not dominant over DPOR’s objective to provide recreational opportunities.	None.
Reason for Revision (Page 2, line 23)	Rewrite as follows: “The primary reason for revising the management plan is to update the management guidelines to protect the scenic and wilderness values of the parks in the context of increasing numbers of visitors. Trail and facility recommendations are updated when consistent with the purposes of the units.”	The plan addresses a variety of park units, not just the legislatively designated parks (KBSP and KBSWP). The purpose for the plan revision is correctly stated: To update management guidelines and trail and facility recommendations.	None.
State Park Unit Purpose and Definition (Page 2, line 28)	Change title to “Kachemak Bay State Park and the Units Within the Legislative Boundary.”	The title cannot be changed because there are distinct boundaries to the various units and the administratively created units are not within the legislative boundary.	None.

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<sup>4</sup> Alaska State Park System Framework page7

Subject	Issue Summary	Response	Recommended Revision
State Park Unit Purpose and Definition – Values Within the Scenic Park Definition	Three major values define a “scenic” park as compared to the other types of parks as classified under AS 38.04.070. Scenic parks have the unique statutory language (AS 41.21.990) to “protect and preserve” where “major values are in their (1) geological (2) faunal and (3) floral characteristics.” These values must be highlighted in the beginning of the plan to alert park managers to this distinction.	Every park has unique statutory language that sets it aside for its particular purpose. These concepts are more appropriately and fully discussed in chapter 5.	None.
State Park Unit Purpose and Definition (Page 7, line 16)	State the relationship between the statute defining a scenic park and the Statewide Framework. Update the Framework to conform to statutes and regulations if possible.	The relationship of the Statewide Framework to the scenic park statute is included in Chapter 5.	None.
State Park Unit Purpose and Definition (Page 7, line 16)	<p>Restate page 7 of the Statewide Framework to clarify the role and intent of the Framework vis a vis the Articles of the Constitution, enabling legislation, and statutes:</p> <p>“Definition and Purpose:</p> <ul style="list-style-type: none"> <li>• A relatively spacious area of scenic and/or scientific value.</li> <li>• The dominant management objective of the unit is to maintain the park’s natural and cultural resources for long-term use and enjoyment by the public.</li> <li>• A level of recreational opportunities, which is compatible with the unit’s resource values, shall be provided.</li> <li>• The primary purpose of a state park unit is set forth by the legislature through its</li> </ul>	For the purposes of this plan how the Statewide Framework is applied is discussed in Chapter 5. The section on page 7 is merely provided to define a park versus a different kind of unit.	None.

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	<p>enabling legislation and accompanying reports.</p> <p>Characteristics:</p> <ul style="list-style-type: none"> <li>• State Parks have statewide or regional significance...represent physiographic (features and phenomena of nature) provinces of the state.</li> <li>• Provide high quality natural areas for use by nearby residents as well as visitors.</li> <li>• Insure long-term protection of an area's primary resource values.</li> <li>• Watershed boundaries should be used.</li> <li>• The majority of lands in a state park...classified as natural and wilderness zones.</li> </ul> <p>Developments and Activities:</p> <ul style="list-style-type: none"> <li>• Providing access to or enhancing enjoyment of the natural environment is encouraged.</li> <li>• Development must insure that use levels do not diminish the values of the park's resources"</li> </ul>		
State Park Unit Purpose and Definition (Page 7, lines 16-21)	Specifically, the Framework puts the goal of Recreation as the first goal. However, the "predominant character" of a State Wilderness Park, according to its statute "is the result of the interplay of natural processes" and is a "physical condition which activates the innermost emotions of the observer:" To call this kind of experience "recreation" is a mischaracterization; in fact, recreation may often get in the way of this kind of	The framework document complements the park unit's statutory purposes and provides more clarification of the management applicability of the various units and zones. Additionally, the framework is referenced and used because it is a DNR policy.	None.

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	experience, and the difference in the intent of this Wilderness Park vs. the Framework must be clear.		
State Recreation Site Definition and Purpose (Page 8, line 7)	<p>Insert a new section “Park Partners” here. Describe the relationship between the state park and the Advisory Board, as well list all organizations with agreements, MOUs or MOAs with the park and a brief explanation of the relationship to, and contributions of, the partners of the park including:</p> <ul style="list-style-type: none"> <li>• ADF&amp;G Cooperative Agreement With DNR</li> <li>• Friends of Kachemak Bay State Park</li> <li>• KBSP Community Advisory Board</li> <li>• Nordic Ski Club</li> <li>• Homer Cycling Club</li> <li>• Kachemak Nordic Ski Club</li> <li>• Ground Truth Trekking</li> <li>• Kachemak Bay Water Trail</li> <li>• Kachemak Bay Conservation Society</li> <li>• Any other entity holding an MOA or MOU.</li> <li>• MOUs and MOAs with partners should be included in the appendix.</li> </ul>	Concur in part. DPOR values its partners and will acknowledge them in the plan. However, the MOUs and MOAs for these groups are maintained by DPOR staff in Soldotna and accessible there by request – adding these as an appendix would lengthen the plan unnecessarily.	Add an acknowledgements page to the Preface.
Current Planning Process (Page 8) – Plans Should be Apolitical	Public management plans should not be political! They should be based upon statutory language, legislative intent, and scientific fact. No policy should be based upon favoritism to any industry or interest group.	Concur.	None.

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Current Planning Process (Page 8) – Public Participation	The only people allowed to participate in the last few sessions of planning were Advisory Board members. No one with any specialized training, experience or representatives of stakeholder groups were allowed to participate. At least a couple “outside” experts could have been added, which is allowed under the By-Laws of the Citizen’s Advisory Board.	All meetings with the Kachemak Bay State Park Advisory Board members were open to the public. These were workshops for the Advisory Board’s benefit to better understand the plan.	None.
Current Planning Process (Page 8) – Public Participation	The planning process seems rushed through, with little public input. If the reason for the rush is to get the plan signed before a new governor’s administration comes in, then that is a sad state of affairs. Many stakeholders were unaware of the planning process until the final days of the PRD review period.	It is within the purview of the DNR Commissioner to set priorities and deadlines for planning processes. On December 2, 2018 former DNR Commissioner Andy Mack adopted the Kachemak Bay State Park and Kachemak Bay State Wilderness Park Management Plan. On December 7 DNR Commissioner Corri Feige rescinded the plan, reinstating the 1995 Management Plan. An Intent to Adopt version of the Plan will be released, giving the public another chance to comment on a revised Plan.	None.
Current Planning Process (Page 8) – Public Participation	The plan review process was flawed. Last minute, the State Parks Management made a reasonable attempt to rectify the process, but it was too little too late. The draft process has been going on for six years, with only one scoping meeting in 2012. Consequently, the information collected then is already dated. No member of the Homer community was involved in Management Plan Working Group. There is no indication of who or what agency participated in drafting the plan, so	Several meetings were held during the scoping phase of the process in Homer, Seldovia, Nanwalek, Port Graham, and Anchorage. Focused meetings were conducted with park stakeholders during the scoping process in spring of 2014 and then again in the summer of 2016. Stakeholders who participated in meetings were: <ul style="list-style-type: none"> <li>• Homer Cycling Club</li> </ul>	Add a page acknowledging the agencies and people that contributed to the plan.

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	the public has no idea where the information/scientific data/maps came from.	<ul style="list-style-type: none"> <li>• Friends of Kachemak Bay State Park and Kachemak Bay Water Trail</li> <li>• Helicopter and Airplane Operators</li> <li>• Personal Watercraft Advocates</li> <li>• Kachemak Bay Conservation and Cook Inlet Group</li> <li>• Kachemak Nordic Ski Club</li> <li>• Water Taxi Operators</li> <li>• Lodges, and</li> <li>• Yurt Owners.</li> </ul> <p>See Page 8 for more information on the planning process. An acknowledgements page will be added including agencies and people that contributed to the plan. Another opportunity for input will be provided when the Intent to Adopt version of the plan is issued.</p>	
Current Planning Process (Page 8) – Public Notice of Public Meetings on Plans	In the future please consider public notice for meetings on plans in the Homer News, Homer Tribune and a local radio station two weeks prior to event day.	A media release was issued advising the public about the meetings and the comment period. This information was picked up by local media sources.	None.
Current Planning Process (Page 8) – Public Notice of Public Meetings on Plans	We are in-holders and were never notified of the PRD draft of the plan.	The PRD release was public-noticed and various media outlets broadcast the release and comment period. Additionally, in-holders were directly notified at the beginning of the plan process. It is incumbent upon interested parties to stay engaged in the process.	None.

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Current Planning Process (Page 8) – Public Comment Period	PRD review period should be increased for 30 to 90 days.	The PRD review period deadline was extended from October 19, 2018 to November 16, 2018. An Intent to Adopt version will be issued to provide an additional opportunity for input.	Issue an Intent to Adopt version to allow for additional comments.
Plan Organization (Page 9) – Chapter Re-Organization	<p>Chapters must be reorganized to clarify that policies are aligned with the law and that both policies and histories are evidence-based.</p> <p>Chapter 1 - Introduction</p> <p>Include a section on the Wilderness Park.</p> <p>Clarify the role of the State Park Framework vs. AS 41.21.990</p> <p>Chapter 2 - Goals and Objectives</p> <p>Policies that protect scenic and wilderness values while providing public access are consistent with AS 41.21.990.</p> <p>Chapter 3- Natural and Cultural Resources</p> <p>Oceanography</p> <p>Tides and Waves, Tide Rips</p> <p>Hydrography</p> <p>Climate (Include description of trends)</p> <p>Precipitation</p> <p>Warmer winters means more ice in alpine in winter: implications for mountain goats.</p> <p>Decreased snowpack and implications to fish and wildlife</p>	<p>The role of the Statewide Framework document will be clarified. The Goals and Objectives in that chapter will be significantly reworked. These goals and objectives must be consistent with the statutory definitions of the parks. The Natural and Cultural Resources chapter is meant to provide context for the recommendations in the management plan; it is not meant to be a detailed description or scientific study of all the park resources.</p>	<p>Clarify how the State Park Framework document is used by DPOR for management of the park units.</p> <p>Reorder the plan to the extent it is appropriate.</p>

Subject	Issue Summary	Response	Recommended Revision
	<p>Ocean Acidification and impacts to marine and estuarine life.</p> <p>Winds, Barrier Jet Winds through bays and passes and extreme winds on ridge tops.</p> <p>Spruce Bark Beetle</p> <p>Ecological Zones</p> <p>Marine: Geology, Fauna and Flora.</p> <p>Fjord: Geology, Fauna and Flora</p> <p>Estuarine and Wetland: Geology, Fauna and Flora</p> <p>Freshwater Lakes and Streams: Geology, Fauna and Flora</p> <p>Forest: Geology, Fauna and Flora</p> <p>Subalpine: Geology, Fauna and Flora</p> <p>Alpine: Geology, Fauna and Flora</p>		
Relationship to Other Plans (Page 9)	The plan weakens the cross-jurisdiction coordination requirement of the previous Kachemak Bay State Parks Management Plan, which clearly states that the KBSP, KBCHA and other land use classifications will be managed across boundaries using a coordinated agency effort.	Disagree. The section merely describes how this plan relates to other plans. It is not meant to provide any type of management direction.	None.
Relationship to Other Plans (Page 9)	Reference should be made to Cook Inlet Salmon Enhancement Plan.	Concur.	Change as suggested.

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<p>Relationship to Other Plans (Page 9)</p> <p>--</p> <p>Integrate the Plan Process with the Kachemak Bay and Fox River Flats Critical Habitat Areas Management Plan Revision</p>	<p>DPOR should better integrate the plan ADF&amp;G's Kachemak Bay and Fox River Flats Critical Habitat Areas Management Plan Revision process in order to consider public input on the Critical Habitat Plan. DPOR and ADF&amp;G should hold joint public meetings and additional comment periods before finalization of both plans, so the public can comment on overlapping issues and so the two plans are integrated and fully implement the Cooperative Agreement between the two agencies.</p>	<p>DNR is working with ADF&amp;G on the CHA plan revision. It is not clear that the timelines for these two separate planning processes will align to make these suggestions possible, but they will be considered.</p>	<p>None.</p>

**CHAPTER 2: PARK GOALS and OBJECTIVES**

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
General – Order of Chapters	Swap position of Chapters 2 and 3.	Concur.	Change as suggested.
General – Aligning the Plan with Park Statutes and the Statewide Framework	DPOR should also revise the plan to align with the statutes and regulations describing the purposes and goals of the park and to better implement the Alaska State Park System: Statewide Framework, particularly as it concerns recreation and scenic values of the Kachemak Bay State Park and incompatible uses of the park negatively affecting these values.	Concur.	Revise Goals and Objectives in the plan to better align with the rest of the plan. Include language on preserving park resources; minimizing noise and light disturbances; and limiting commercial use of the park to activities which enhance the park's intended use.
General – Park Objective Regarding Protecting Park Resources	Prioritize “the dominant management objective to maintain the parks natural and cultural resources” above increasing the recreational opportunities throughout the plan, as per the governing statutes.	Goals and objectives are not listed in priority order.	None.
General – Park Goals Regarding Visitation	Many towns are being overrun with tourists. What are the goals of the park? Never-ending growth? Do we want a park that requires a lottery system for visitation?	There is a Goals and Objectives chapter in the plan. DPOR has a statutory mandate to develop a plan to maximize use of park resources. Public access to the park should be facilitated as much as possible.	None.
Area-wide Goals and Objectives (Page 11)	The Area-wide Goals and Objectives must begin by clarifying the complex legal structure guiding the management of KBSP and KBSWP – what laws, regulations, Supreme Court rulings, agreements,	This plan provides management intent for the park units, based on the enabling statutes, the Alaska Constitution, regulations, and case law. The necessary	None.

Subject	Issue Summary	Response	Recommended Revision
	<p>etc. guide specific decisions. This legal context should be explained using a schematic, maps, and a narrative that tells the policy history of these parks including the following:</p> <ul style="list-style-type: none"> <li>• The Alaska Constitution</li> <li>• Alaska State Park and State Wilderness Park definitions, AS 41.21.990</li> <li>• Kachemak Bay and Fox River Flats Critical Habitat Plan</li> <li>• The Cooperative Agreement between the ADF&amp;G and ADNR</li> <li>• Kenai Peninsula Borough Comprehensive Plan and its effect on State Recreation Sites</li> <li>• Nuka Island, Berger Bay, Herring Pete's Cove Conservation Agreements</li> <li>• SRS Cottonwood-Eastland, Diamond Creek, Eveline and Overlook</li> <li>• Map of Mental Health Trust Land in Tutka Bay</li> <li>• Map of Alaska Maritime National Wildlife Refuge</li> <li>• Land and Water Conservation Funds (LWCF), where they have been applied, and how the Statewide Comprehensive Outdoor Recreation Plan (SCORP) meets the requirements for continued eligibility to receive matching LWCF. This plan was funded in part through a grant from the National Park Service under provision of the LWCF Act of 1965.</li> <li>• Specific case law guiding management</li> </ul>	<p>legal foundation to support the plan recommendations are included and addressed where appropriate.</p>	

Subject	Issue Summary	Response	Recommended Revision
	<ul style="list-style-type: none"> <li>• State lands that were added to the park: Cottonwood-Eastland sections, Aurora Lagoon, Nuka Island and Petrof and a small section to the Wilderness Park.</li> <li>• Kachemak Bay Buy-back and George Ferris jack up rig.</li> <li>• EVOS (Exxon Valdez Oil Spill Trust). Land Purchases and stipulations.</li> <li>• Zoning of Private Property.</li> </ul>		
Area-wide Goals and Objectives (Page 11)	KBSWP must be managed as a Wilderness area and KBSP must be managed as a scenic area. Include the definitions of Scenic and Wilderness Parks (AS 41.21.990).	The statutory park definitions are included in Appendix B.	None.
Area-wide Goals and Objectives (Page 11, line 12)	Insert language explaining that Area-wide includes KBSP, KBSWP, and the three State Recreation Sites (SRS) on the north side of the bay.	Concur.	Change as suggested.
Area-wide Goals and Objectives (Page 11)	Put Resource Protection goals before Recreation goals.	Concur.	Change as suggested.
Area-wide Goals and Objectives (Page 11)	Support for the Area Wide Goals and Objectives, i.e. increase public use, First Day Hikes, promote Trail Day events, and initiate and encourage Adopt-A-Trail programs.	The objective on First Day Hikes and the Adopt-a-Trail program were too specific and will be deleted.	Delete reference to First Day Hikes and the Adopt-a-Trail program.

Subject	Issue Summary	Response	Recommended Revision
Area-wide Goals and Objectives (Page 11, line 21)	Increasing visitor numbers should not be DPOR's job or goal.	Per statute, DPOR is charged with fostering the growth and development of recreational facilities and opportunities in Alaska. DPOR has a statutory mandate to develop a plan to conserve and maximize use of park resources. <sup>5</sup>	None.
Area-wide Goals and Objectives – Recreation (Page 11, line 17)	Rewrite to be consistent with AS 41.21.990: "Enhance year-round recreational opportunities that are compatible with the preservation and protection of the park's unique and exceptional scenic and wilderness values."	This section applies area-wide to all the park units addressed in the plan, not just the scenic and wilderness parks.	None.
Area-wide Goals and Objectives – Recreation (Page 11, lines 23-24)	Delete Objective concerning First Day hikes.	Concur. This objective is too specific.	Change as suggested.
Area-wide Goals and Objectives – Recreation (Page 11, line 28)	Delete Objective on Adopt-a-Trail program.	Concur. This objective is too specific.	Change as suggested.
Area-Wide Goals and Objectives (Page 11) – Access for Disabled Persons	Add "as much as is practical, all developments should be made handicapped friendly."	DPOR applies Americans Disability Act (ADA) standards and Accessibility Guidelines for Outdoor Developed Areas to all recreational programs and facilities within units of the state park system. The intent is to make the wide variety of outdoor recreational programs within the system accessible and give all visitors the opportunity to experience park resources. All constructed	None.

<sup>5</sup> Footnote AS 41.21.010-.020

Subject	Issue Summary	Response	Recommended Revision
		facilities within park units such as parking, access routes, restrooms, and trail information kiosks will apply ADA standards using Universal Design to make them barrier-free to all visitors. If the terrain, environment, natural or cultural resources, are impacted to the extent that the character of the site is lost, the individual facility may not be made fully accessible.	
Area-wide Goals and Objectives: Recreation (Page 11, line 31)	Add objectives on promoting education on park rules; seeking funding and resources for long-term maintenance of existing facilities, including trails; designing and constructing sustainable park trails and facilities to reduce long-term maintenance needs; and add an objective related to public safety.	Concur.	Add objectives where appropriate that capture the intent of these suggestions.
Area-wide Goals and Objectives: Resource Protection (Page 11, line 32)	Change the resource protection goal to also include preserving resources while allowing for diverse visitor experiences.	Concur.	Change as suggested.
Area-wide Goals and Objectives: Resource Protection (Page 11, line 32)	Add these goals under <u>Resource Protection</u> : 1) <i>“Create and maintain scientific monitoring of flora and fauna to create a database for use by management to make informed decisions.”</i> Currently there is very little data on animals and plants. Consequently, State Parks has no baseline data in which to make informed decisions. For example, sea duck populations continue to decline and are subjected to intense, commercially guided	An objective under the area-wide resource protection goal in the plan captures some of these suggestions and will be enhanced to further address these concerns through public input.  It should be noted that DPOR does not manage fish and game resources, which are under the purview of ADF&G.	Enhance the area-wide resource protection objective relating to research by adding language encouraging inventory and monitoring of park resources.

Subject	Issue Summary	Response	Recommended Revision
	<p>hunting. This has caused localized depletion.</p> <p>2) <i>“Minimize harmful disturbance and maintain and protect nesting, rearing, staging and wintering resident and migrant waterfowl, shorebirds and seabirds and their habitats”</i></p>		
Area-wide Goals and Objectives: Resource Protection (Page 12, line 9)	Insert new objective relating to consideration of historical information and inventories when making resource management decisions.	Concur.	Change as suggested.
Park Unit Specific Goals and Objectives: Kachemak Bay State Park (Page 12, line 23)	Add language expressing that the scenic values of the park are inherent in the park’s natural geological, faunal or floral characteristics.	Concur.	Change as suggested.
Park Unit Specific Goals and Objectives: Kachemak Bay State Park (Page 12, line 28)	Insert “and water” between “vegetation” and “management”.	This objective is specific to vegetation only.	None.
Park Unit Specific Goals and Objectives: Kachemak Bay State Park (Page 13, line 6)	Insert a new objective on developing strategies to minimize harmful disturbances such as noise and light.	Concur.	Change as suggested.

Subject	Issue Summary	Response	Recommended Revision
Park Unit Specific Goals and Objectives: Kachemak Bay State Park (Page 13, line 12)	Insert “biological, ecological” between “protect” and “the”.	Goal 3 concerns only the park’s cultural resources.	None.
Park Unit Specific Goals and Objectives – Goal 4 (Page 13, lines 21-29)	Goal 4 and Objectives 4-1 and 4-2 conflict with the park providing a quiet and natural experience. The park should be kept free of noise and light pollution as much as possible.	Per statute, DPOR is charged with fostering the growth and development of recreational facilities and opportunities in Alaska. Goal 4 aligns with that statutory charge. <sup>6</sup>	None.
Park Unit Specific Goals and Objectives – Goal 4 (Page 13)	Goal 4 – to develop the park to be self-sustaining – runs counter to why the park was established. Creating new revenue streams through intensive marketing, concession development, increased and expanded user fees, and recreational development, particularly motorized recreation, is an unwise approach to managing this park.	Over the years DPOR has been tasked with developing strategies to become more self-sustaining. DPOR’s budget has been cut extensively in recent years. In order to fulfil its mission, DPOR must continue these efforts to develop a more self-sustaining budget.	None.
Park Unit Specific Goals and Objectives – Goal 4 (Page 13, line 30)	Insert new objective 4-3: “Avoid any business relationship that results, or could result, in conflict of interest with any provision of this plan or state law.”	This is not an appropriate objective to include in a management plan.	None.
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, lines 10)	Strike “and develop”	The plan calls for additional trail development; however, Objective 5-2 was deemed unnecessary and deleted.	None.

<sup>6</sup> AS 41.21.010

Subject	Issue Summary	Response	Recommended Revision
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, lines 12-13)	There should be no structures constructed within KBSWP – as defined by statute. Strike objective 5-3.	AS 41.21.990 (2) states that a wilderness park is an area “where development will be strictly limited and depend entirely on good taste and judgement so that the wilderness values are not lost.” This does not preclude limited and appropriate development. Note that Objective 5-3 was merged with Objective 5-1.	None.
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, lines 12-13)	Delete the language stating that structures may be constructed to facilitate use.	Concur.	Delete “to facilitate use” when merging Objective 5-3 with Objective 5-1.
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, lines 12-13)	KBSWP only needs structures necessary for safety of life and limb in the event of harsh weather.	Some development may also occur for resource protection purposes.	None.
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, lines 19-23)	The idea that the wilderness needs state parks or anyone to perform “...environmental monitoring to protect the wilderness resource and experience” is over-stepping the intent of the wilderness classification. The language on lines 22-23 should be deleted after the word “experimentation.”	This objective is not about needing to perform environmental monitoring to protect the park, it is about researchers using the lowest impact methods available to protect the wilderness experience. Note that Objective 5-5 was shortened and is Objective 1-1 in the ITA version.	None.

Subject	Issue Summary	Response	Recommended Revision
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, line 28)	Insert language stating that strategies to limit noise and light disturbances should be part of protecting the park’s wilderness character.	Concur.	Add an objective to address this issue.
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, line 29)	Insert new objective to limit commercial use of the park to those activities which enhance the intended use of the park.	Concur.	Add an objective that includes this sentiment.
Park Unit Specific Goals and Objectives – Kachemak Bay State Wilderness Park (Page 14, line 30)	Each individual SRS needs unique goals and objectives. Maintenance plans should be included.	The SRSs are unique, yet similar enough that they can appropriately share a common set of goals. It is not necessary to add maintenance plans to the plan.	None.
Park Unit Specific Goals and Objectives – Overlook Park SRS, Diamond Creek SRS, and Eveline SRS (Page 15, line 1-2)	Reword this to: “Identify, design, and develop trailhead facilities that provide adequate parking for vehicles,”	Concur.	Rework this objective to capture this sentiment.

Subject	Issue Summary	Response	Recommended Revision
Park Unit Specific Goals and Objectives – Overlook Park SRS, Diamond Creek SRS, and Eveline SRS (Pages 14-15)	These goals and objectives do not accurately reflect Overlook Park. The park is not easily accessed by the public; parking, trailhead and restrooms are not and will not be developed; and no recreational use development is planned. The statement later in the plan that Overlook Park is being re-designated as a State Preserve reinforces Overlook Park’s incompatibility with these goals.	Overlook Park is included in this section because it is a state recreation site and most of the objectives still apply.	None.
Park Unit Specific Goals and Objectives – Overlook Park SRS, Diamond Creek SRS, and Eveline SRS (Page 15, line 14)	Insert a new objective speaking to the promotion of proper trail etiquette among diverse users.	Concur.	Change as suggested.

**CHAPTER 3: NATURAL and CULTURAL RESOURCES**

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
Chapter 3: Natural and Cultural Resources – Environment Headings	The Natural Environment headings should use the statutory terms “geological faunal and floral” to denote “major value” characteristics and interactions.	This section applies to all the units, not just the scenic park which includes this specific language. Additionally, the order is similar to the 1995 plan.	None.
General – Subsistence Activities	The plan should recognize and interpret native subsistence use and activities.	Concur. Subsistence use and activities are managed by ADF&G; however, the plan will recognize the subsistence activities.	Add more information to the Natural and Cultural Resources Chapter to recognize subsistence use and activities.
Natural and Cultural Resources – Preserving Plankton Populations	Effective ecosystem and habitat management of the park must include efforts to understand the roles and population dynamics of phytoplankton and zooplankton in Kachemak Bay and must include measures to preserve healthy and diverse plankton populations.	DPOR does not manage fish and game resources; however, DPOR does consult with ADF&G as appropriate.	None.
Natural and Cultural Resources – Park Resource Information	The plan needs more location-specific information on significant park resources. For example, there is no location information on where pink salmon spawn in tidewater or on herring spawning areas. Also, no temporal data on when sea bird populations are high or most vulnerable, or similar information on marine mammals. If DPOR does not have funding to include this level of detail in the plan, then the plan should state that when significant park resources are at risk, a permit applicant may be required to collect the site-specific resource data needed for DPOR to make	The Natural and Cultural Resources chapter provides background information on the natural and human environment for the park units and is included to provide context for planning and managing park use.  ADF&G manages fish and game resources; DPOR consults with ADF&G on land management issues as appropriate. The planning team included subject matter experts who provided input for the plan’s development. During the permitting process, DPOR consults other agencies as	None.

Subject	Issue Summary	Response	Recommended Revision
	reasoned decisions that will conserve park resources.	appropriate for current resource information.	
Natural and Cultural Resources – Add Ecological Stressors	<p>Just as this plan mentions invasive species it must also mention all marine ecological stressors occurring in Kachemak Bay, including:</p> <ul style="list-style-type: none"> <li>• The failed nesting and major die-off of the Murre</li> <li>• The melting of sea stars</li> <li>• The excessive straying of up to 93% of introduced hatchery fish into significant and sanctuary stocks of Kachemak Bay</li> <li>• Depletions of wild stocks in 75 rivers, streams, and tributaries</li> <li>• The removal, with no recovery, of crustaceans</li> <li>• The controversy of hatchery wild salmon's interaction with other species.</li> </ul> <p>These indicators must be acknowledged to develop partnerships with relevant research facilities.</p>	DPOR does not manage fish and game resources; however, DPOR partners with research organizations to conduct research in the park.	None.
Natural and Cultural Resources – the Park's Uniqueness and Fragility	This chapter must embody the unique nature of the Park to educate future planners of the mandate to protect and preserve while utilizing these areas. The park's fragility must also be stressed to uphold the mandate to "protect and preserve".	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Natural and Cultural Resources – Suggestion on Park Studies	Compile park inventories, baselines, surveys and information into an accessible, easily-updateable database designed to: uphold balanced and diverse multiple use; preserve low- density recreational opportunities; and preserve watersheds, wildlife and fish, and scenic, scientific, cultural and historic values that take into account the short-term and long-term preference for beneficial uses of present and future generations.	Many of the concepts in the comment are captured in the chapter on Goals and Objectives. Other studies and inventories may be undertaken by DPOR staff as time and budget allows, in addition to research conducted by other organizations within the parks.	None.
Natural and Cultural Resources – Description of Fish and Wildlife Resources	The description of the natural and cultural resources is very limited, especially on fish and wildlife resources. Is this typical of state park management plans?	Yes. The Natural and Cultural Resources chapter of the plan are provided only for context.	None.
Natural and Cultural Resources – Add Sections	Add sections on fjords, coastal lagoons, and freshets.	The Natural and Cultural Resources chapter is intended to be a brief summary and is provided in the plan only for context.	None.
Natural and Cultural Resources – Geology (Page 17-18)	A wholesale re-write of the geology section was submitted.	Noted.	Incorporate some of these suggested changes.

Subject	Issue Summary	Response	Recommended Revision
Natural and Cultural Resources – Lakes, Rivers and Streams (Page 21, starting on line 30)	<p>Add to this subsection: “The anadromous Waters Atlas of Habitat Divisions Atlas has a listing of 75 Rivers on the South side of Kachemak Bay. About 13 of these 75 rivers systems are within Park boundaries. On the Outer Gulf coast there are 175 rivers listed, with 100 located within KBSWP and the Petrof-Nuka Island portion of KBSP.</p> <p>Because these park lands and waters have been reserved from the public domain, all and any river systems located within KBSP can and should be designated as “significant” because of the “local importance and utilization” to the people of the state of Alaska as directed by the Genetics Policy of the State of Alaska.”</p>	This subsection was reviewed and deemed unnecessary and therefore deleted. The purpose of this chapter is just to provide context. A new map showing the park’s anadromous waters will be added.	None.
Natural and Cultural Resources – Winds (Page 23)	Insert mention of possible high wind speeds in Kachemak Bay.	Concur.	Insert in the Natural and Cultural Resources chapter more information about high wind speeds in Kachemak Bay.
Natural and Cultural Resources – Habitat (Page 24)	Mirror the 6 habitat regions closer to eco-regions.	Map 4 shows the 6 general habitat regions in the parks. Eco-regions are much larger and would not provide the appropriate level of detail.	None.
Natural and Cultural Resources – Forest Habitat (Page 27, line 37)	Consider changing first basic forest subzone to Sitka spruce, White, and Lutz spruce.	While Lutz spruce is present in the parks, the existing text better describes the forested areas.	None.

Subject	Issue Summary	Response	Recommended Revision
Natural and Cultural Resources – Marine Animals (Page 28, line 36)	Delete “Dall’s porpoises,”	Concur. Dall’s porpoises are not commonly seen in the bay.	Remove mention of Dall’s porpoises in the bay.
Natural and Cultural Resources – Marine Animals (Page 28, line 36)	This section is very brief and should be expanded. Add that sea otters are VERY abundant in the bay – the latest USFWS survey estimated 7000 animals. Sea otters are not just coastal but occur throughout the bay. Harbor seals are found throughout the bay.	This section is merely provided for background and context.	None.
Natural and Cultural Resources – Marine Animals (Page 28, line 36)	Break out Marine mammals, finfish, bottom fish and shellfish in this section, consistent with the 1995 plan. Reference should be made here to the info on salmon systems in the Cook Inlet Salmon Enhancement Plan.	Concur, in part. The 1995 plan does not include those section headings and it is not deemed appropriate for this plan either. Reference will be made to the Cook Inlet Salmon Enhancement Plan.	Reference the Cook Inlet Salmon Enhancement Plan.
Natural and Cultural Resources – Marine Animals (Page 28, line 36)	This section inaccurately represents the presence of beluga whales and Steller sea lions; and the diversity of marine mammals is under-represented.  Recommend the following revision:  “The parks are best known for fauna found in the marine habitat (See Map 5- Marine Mammals & Terrestrial Species). The Northern sea otter and the harbor seal are two marine mammals most frequently seen in Kachemak Bay. Additional species that occur include Dall’s porpoise, harbor porpoise, minke whale, Steller sea lion, and orcas. Occasionally, humpback and finback whales and the endangered Cook Inlet beluga whale (once	Concur. Note map 5 was deemed unnecessary and deleted.	Rework this section to include this information. Delete Map 5 – Marine Mammals and Terrestrial Species.

Subject	Issue Summary	Response	Recommended Revision
	prevalent) are sighted. Humpback whales and orcas have become more prevalent in Kachemak Bay since about 2010.”		
Natural and Cultural Resources – Marine Animals (Page 31, lines 12-16)	<p>The paragraph on shellfish should be revised as follows:</p> <p>Shellfish are common in Kachemak Bay, with crab, shrimp and clams found throughout the area. Of crab species, Tanner crab are the most common, and the only species where any harvest is currently allowed during a sport fishery (all commercial fisheries are closed). Dungeness crab are present and are frequently eaten by sea otters; king crab are present but not common. Shrimp are distributed throughout the bay but appear to be concentrated in the waters of the outer bay deeper than 50 feet. Pink and side stripe shrimp are the most common, with seasonal presence of humpy and spot shrimp. Razor, redneck/surf, soft-shelled, littleneck, butter, gaper clams, blue mussels, and cockles are found in the intertidal waters.</p>	Concur.	Rework this section to include this information.
Natural and Cultural Resources – Terrestrial Animals (Page 31, lines 22-23)	Delete “Dall sheep are found in the rugged, relatively dry area of the park on the northwest side of the Kenai Mountains.”	Concur.	Change as suggested.

Subject	Issue Summary	Response	Recommended Revision
Natural and Cultural Resources – Birds (Page 31, lines 31-39)	<p>Rewrite these two paragraphs to read:</p> <p>“Due to its high bio-productivity and wide range of habitats, KBSP is among the most important marine and terrestrial bird habitats on the Kenai Peninsula and southcentral Alaska. Ice-free bays and coves form a long shoreline along nutrient rich Kachemak Bay. Old growth temperate rain forest and alpine talus slopes offer multiple niches for avian species. Rich estuarine and intertidal areas attract tens of thousands of shorebirds and other migratory species each spring and fall. The area also offers significant habitat for overwintering waterfowl and seabirds.”</p> <p>“More than <u>215</u> species of migratory and nonmigratory birds have been identified in and around the parks. (West et al. 2011, Martin Renner, pers. comm.) More than 140 different species reside in the parks at some time during the year, and more than 110 species breed and raise their young <u>there</u>. More than 60 species migrate through the <u>area</u>. See Map 7 - General Bird Habitat on page 35 of this chapter. Major categories of birds identified within and around the parks include waterfowl, shorebirds, gulls, seabirds, songbirds and raptors. (See Appendix D – Bird List.)”</p>	Concur, in part. Note that Map 7 was deemed unnecessary and deleted.	Rework this section to include this information. Delete Map 7 – General Bird Habitat.

Subject	Issue Summary	Response	Recommended Revision
Natural and Cultural Resources – Invasive Species and Infestations (Page 32)	Rising temperatures is causing certain bird species such as rock doves and starlings to invade the Kachemak Bay area. Efforts should be made to eradicate these invaders that compete with native species for food.	DPOR does not manage avian resources; however, mention of rock doves and starlings will be added to the Park Use and Issues chapter.	Mention rock doves and starlings as non-native species present in the parks in the Park Use and Issues chapter.
Natural and Cultural Resources – Invasive Species and Infestations (Page 32, line 24)	-14 degrees as a temperature needed to reduce spruce aphid populations is incorrect.	Concur.	Delete temperature reference.
Natural and Cultural Resources – Natural Hazards (Page 32, starting on line 32) – Tsunamis	Add a category “Tsunamis” that should include discussion of marine and terrestrial landslide into lakes.	Language on avalanches, landslides and tsunamis will be reworked under the Natural Hazards heading. Some additional language on the possibility of a landslide causing a large surface wave in Grewingk Lake will be added to the Park Use and Issues chapter.	Add language on the possibility of a landslide causing a large surface wave in Grewingk Lake to Chapter 4 (Park Use and Issues).
Natural and Cultural Resources – Natural Hazards – Steep and Unstable Terrain (Page 37, line 18)	Reference that such a landslide occurred in 1967.	Concur.	Add mention of the 1967 Grewingk Lake surface wave.
Natural and Cultural Resources – Human Environment (Page 37, starting on line 31) – Human Caused Impacts	Add a section on human-caused impacts (quarries, Mariculture, salmon hatcheries, pollution, oil spills, etc).	Concur.	Add a new section Effects of Human Use on the Environment to the Natural and Cultural Resources chapter.

Subject	Issue Summary	Response	Recommended Revision
Natural and Cultural Resources – Human Environment – Regional Setting and Overview (Page 37, lines 35-36) – Icefield Clarification	Replace “(including the 1000+ square mile Harding Icefield)” with “(including the 1400+ square mile Harding Icefield and Grewingk-Yalik ice field)”.	Concur.	Rework this section to include this information.
Natural and Cultural Resources – Human Environment – Regional Setting and Overview (Page 38, line 7) – Research	Insert “research;” after “tourism;”	Research is not a major economic driver in the region compared to the other industries listed.	None.
Human Environment – Regional Setting and Overview (Page 38, line 7) – Oil & Gas Exploration	Oil and Gas exploration may be an economic base via taxes for the Kenai Peninsula Borough; however, at this time, it has no direct impact on the Homer area but could in the future.	Concur.	Clarify language in this paragraph as suggested.
Human Environment – Regional Setting and Overview (Page 38, line 9) – Alaska Native Settlement	Put in language about Alaska Native settlement in the area before European settlement.	There is information on Page 39 regarding native people settling this area long before European contact.	None.

Subject	Issue Summary	Response	Recommended Revision
Cultural History – Western Contact (Page 41, starting on line 31)	Add information on Alaska Natives that currently inhabit the Kachemak Bay region & their language & their villages of Seldovia, Port Graham, Nanwalek.	Concur.	Change as suggested.
Cultural History – Western Contact (Page 41, line 45) – Original Inhabitants	There should be more added on the original inhabitants of the area that are still alive today.	Chapter 3 - Natural and Cultural Resources is provided only for background and context. The suggestion is not necessary to augment this chapter.	None.
Cultural History – Western Contact (Page 42, line 6)	Josephine lived on Nuka Island and married Herring Pete in her later years after her first husband passed on.	Concur.	Change as suggested.

**CHAPTER 4: PARK USE and ISSUES**

Subject	Issue Summary	Response	Recommended Revision
Chapter 4: Park Use and Issues – General – Add More Issues	<p>The plan does not adequately address current and future issues and impacts to the Park:</p> <ul style="list-style-type: none"> <li>• Increased visitation &amp; pressure of the Park</li> <li>• Changing values in a changing world (birding as an important recreation wasn't even mentioned in 1995)</li> <li>• Challenge of enforcement with limited staff and funding</li> <li>• Challenge of maintenance of facilities &amp; trails with limited staff and funding</li> <li>• Challenge of permitting with limited staff and funding</li> <li>• Lack of funding for baseline assessments</li> <li>• Pollution (should overlap with Critical Habitat Plan) <ul style="list-style-type: none"> <li>○ Light, sound, air, oil &amp; gas pollution</li> <li>○ Hatchery &amp; marine discharges</li> <li>○ Human waste management</li> </ul> </li> <li>• Invasive Species</li> <li>• Hatchery impacts on wild populations &amp; the environment</li> <li>• Future oil &amp; gas &amp; mining development (visual as well as environment)</li> </ul>	Concur, in part. This chapter will be reworked extensively to improve readability.	Rework this chapter to improve readability and add some of these suggestions.

Subject	Issue Summary	Response	Recommended Revision
General – Dark Sky Park	The Park should be designated as Dark Sky Park. All lighting in the park should adhere to international dark sky standards.	Concur.	Add information about the Dark Sky program to Chapter 4 (Park Use and Issues) and objectives encouraging reduction in light disturbance to the Goals and Objectives chapter.
General – Park Use	The more people using the park for enjoyment, sustenance, and economic value, the better. This includes hunting, boating, fishing and hatchery activities.	The plan is designed to harmoniously integrate the myriad uses of park resources as much as possible while protecting park resources.	None.
General – Add Oil & Gas Development Impact Issue	The draft plan fails to discuss or address foreseeable impacts on park and wilderness park resources from oil and gas exploration and development on the Outer Continental Shelf, including but not limited to increased vessel traffic, potential oil spills and drilling mud discharges.	Oil and gas leasing are not permitted within the parks and DPOR does not have the authority to regulate this activity. These issues are beyond the scope of this management plan. Various agencies, including DPOR, coordinate with ADEC on spill response efforts and planning.	None.
General – Alaska Climate Action Plan	Adopt relevant recommendations from Governor Walker’s Alaska Climate Action Plan.  Regardless of the plan’s jurisdictional limits, the plan should incorporate ways that ADF&G may collaborate with federal, state, local and tribal governments, conservation organizations, research facilities, land trusts and other stakeholder entities to protect the plan’s goals and objectives in face of a rapidly changing climate.	Governor Walker’s Alaska Climate Action Plan lacks specific recommendations that would be appropriate to incorporate into a park management plan. These are mostly state-wide recommendations and most require funding, statutory change, or policy initiatives from the Governor’s Administration – all of which are outside the purview of a park plan. Collaboration on some of these issues is already occurring between many agencies.	None.

Subject	Issue Summary	Response	Recommended Revision
	The plan revisions must incorporate coordination and collaborate with other federal, state, tribal, local, research, conservation and other stake holders to apply integrated water management criteria and watershed manage research, data and management strategies.		
General – Add Climate Change Topic	<p>The draft plan fails to capture the ongoing effects of rapid climate change in Kachemak Bay and the Gulf of Alaska region, and fails to provide a management regime responsive to the anticipated impacts of future climate change, including: ocean acidification; stream temperature impacts; more insect infestations and invasive species; increased wildfire activity; the “warm blob” and melting glaciers; and also the drying of the area’s wetlands and peatlands. Add topic on climate change that includes suggestions on how to address it in the Parks. Related thoughts include:</p> <ol style="list-style-type: none"> <li>1. Switching to vegetable oil for chain saw lubrication;</li> <li>2. Changes in flora and fauna can indicate climate change, but baseline studies need to be completed throughout the park first;</li> <li>3. If temperatures increase, oysters in local farms could start reproducing – contingency plans to deal with this possibility should be put in place;</li> <li>4. Include language that anticipates making vehicles and field equipment more environmentally safe; and</li> </ol>	A section will be added under Chapter 4 to recognize climate change and its anticipated effects. Some of the suggestions are too specific to be included in the plan or are within the purview of another agency.	Add a section on Climate Change as a park issue to Chapter 4.

Subject	Issue Summary	Response	Recommended Revision
	5. Anticipate new vehicles/machines, such as 1 or 2-seater flying machines and 1-man helicopters.		
Overview of Current Use (Page 43-45) – Personal Use Fishery	Include a short description of the personal use fishery.	Concur.	Add language describing the China Poot Bay personal use salmon fishery.
Overview of Current Use (Page 44, starting on line 7) – History of TBLH	<p>A long addition to this section on the history of the hatchery was submitted. It included the following points: In 1976, without permitting, or knowledge of interactions with other species rearing in the Tutka Bay Lagoon, an “Incubation Facility” was built by ADF&amp;G.</p> <p>CIAA took over in 1992 and negotiated for a cost recovery hatchery ranch permit to collect up to 125,000,000 pink salmon eggs with the permitted promise to the common property fisherman that they would receive 2/3 of all fish returning to the facility. A 3% enhancement tax was instituted on all 1400 limited entry permit holders of Cook Inlet as additional funding for the CIAA.</p>	Concur, in part. This chapter is intended to provide only a brief statement on uses and issues; however, additional information on the history of the hatchery will be incorporated.	Rework the section on TBLH in this chapter to include some of this information.
Overview of Current Use (page 44, lines 7-15)	Replace existing language with this: “Hatcheries provide important sport, personal use, and commercial salmon fisheries, attracting commercial, sport, and personal use fishers. Fishery enhancement projects in the park provide valuable terminal fisheries that attract commercial fishers, fishing guides, sport, and personal use fishers to the park.	Much of the language provided is too detailed; however, some of this information will be incorporated.	Rework the section on TBLH in Chapter 4 to include some additional information.

Subject	Issue Summary	Response	Recommended Revision
	<p>The Tutka Bay Lagoon Hatchery located within Kachemak Bay State Park (KBSP) has been in operation since 1976. This facility is owned by the State of Alaska, Department of Fish and Game, and has been operated by the Cook Inlet Aquaculture Association (CIAA) on behalf of the State since 1992. The hatchery is a function of long-standing State fishery enhancement policy. CIAA helps implement this policy by operating the hatchery under a contractual agreement with the Alaska Department of Fish and Game.</p> <p>The hatchery is permitted to collect up to 125 million pink salmon eggs and has released an annual average of 37 million fry since beginning operations. While the bulk of the releases have been in Tutka Lagoon, significant releases have occurred in Halibut Cove Lagoon from 1986–1992, as well as the fishing lagoon on the Homer Spit. On average, approximately 2% of the fish released since hatchery operations began survived the ocean phase of their life history and returned to these sites where they were harvested by commercial or sport users.</p> <p>Trail Lakes Hatchery, owned by the State of Alaska, Department of Fish and Game, and operated by CIAA under a contractual agreement similar to the Tutka Bay Lagoon Hatchery, releases sockeye salmon to Leisure and Hazel lakes and Tutka Bay Lagoon in KBSP. An average of 1.6 million sockeye salmon fry have been released to Leisure Lake annually since 1976 and 1.1 million</p>		

Subject	Issue Summary	Response	Recommended Revision
	sockeye salmon fry have been released to Hazel Lake annually since 1989. An average of 0.4 million sockeye salmon smolt have been released to Tutka Bay Lagoon annually since 2005. Adult sockeye salmon returning to these sites are harvested by commercial, personal use, and sport fishers.”		
Overview of Current Use (Page 44, line 20)	Not an “extreme” spike of park use in the summer – just the usual increase in park summer use in any place that has a winter.	Survey responses indicated very few visits from November to March.	None.
Use Trends (Page 45, Figure 2 and Page 46, line 9) – Survey Sample Size Too Small	122 completed surveys are a statistically insignificant sample size compared to 270,000 visitors (line 9) and so the results should be disregarded.	The questionnaire was not meant to be a scientific sampling, but just another means to gather public input during the plan’s scoping period to augment DNR’s understanding of park use.	None.
Changing Recreational Use (Page 48) – Add More Recreational Uses Likely to Increase	Under current uses of the park which are likely to increase, I would add: hiking accessible trails, sailing, photography, diving, ice skating (Grewingk Lake), snowshoeing, horseback riding, dog walking, wildflower viewing, birding, bike riding, paddle boarding, flight seeing, Nordic skiing, mountaineering, and skijoring.	Concur, in part.	Add most of these activities.
Overview of Current Use – Personal Watercraft (Page 49, lines 14-16) – Add Citation	This statement that technology advances have mitigated some concerns about PWCs needs a citation of supporting data.	The statement is true, but a citation is not needed because during the rewrite of Chapter 4, this statement will be recast as a comment received rather than a statement of fact.	None.

Subject	Issue Summary	Response	Recommended Revision
Overview of Current Use – Personal Watercraft (Page 49, line 14)	Contrary to what is stated in the draft plan, personal watercraft do not constitute a large segment of overall boat sales in the Kachemak Bay area.	This was not intended to refer to boat sales just in the Kachemak Bay area, but to overall boat sales.	In the PWC section in Chapter 4, note that the boat sales were in the United States and not just in the Kachemak Bay area.
Changing Recreational Use – Aircraft (Page 49, lines 33-36) – Heliskiing	This section implies that heli-ski operators have recently been permitted in the Park. The current helicopter landing area for summer use is at the Grewingk Glacier.	Concur.	Remove the language “and relatively new operations have been permitted in the past that offer heli-skiing in the winter” from Chapter 4.
Changing Recreational Use – Aircraft (Page 49, lines 38-40) – Unmanned Underwater Vehicles	Plan should mention underwater drones, also known as unmanned underwater vehicles (UUVs).	Concur. UUVs will be mentioned in Chapter 4 and addressed in permitting tables in Chapter 5.	Add a UUV section to chapter 4 and address UUV permitting in Chapter 5.
Access – Aircraft Access – Rotary-winged Aircraft (Page 51, lines 2-3)	Page 51, lines 2-3 should read: “There will be no typical use of multi helicopter flights to ferry skiers to the top of the run from the base. Other potential helicopter use will not include heli-hiking (transport from an access point to an elevated drop off in the summer, without ferry flights).  There is some potential for limited permitting for winter heli-skiing (transport from an access point to an elevated drop off point in the winter, without ferry flights).”	This section states that operators have applied for landings in the park for various reasons.	None.

Subject	Issue Summary	Response	Recommended Revision
Access – Personal Watercraft (Page 52) – Revise this Park Management Plan Concurrently with the Kachemak Bay Critical Habitat Area Plan	While I understand the complications of dual authority, after reading this narrative I am disappointed that a long-term solution to such an important issue will not be addressed in this plan. Both ADF&G and DPOR should consider revising the Kachemak Bay Critical Habitat Area (CHA) Plan and the Park plan concurrently, to deal with the PWC issue and other important issues.	DNR is working with ADF&G on the (CHA) plan revision. To the extent these processes can align they will. Dual authority exists and this section points out that the ADF&G currently has similar regulations to DPOR on PWC use.	None.
Access – Personal Watercraft (Page 52, line 15)	End sentence after “but was eliminated.” Overlapping jurisdiction is not in itself a reason to consider or not consider a specific use.	This entire sentence was deemed unnecessary and will be deleted from the ITA version of the plan.	Delete this sentence.
Access – Personal Watercraft (Page 52, line 17)	Reference must be made here to AS 41.21.990 as well as the Alaska Supreme Court ruling that state law does not authorize disposals within legislatively designated park units.	PWC use has nothing to do with the AS 41.21.990 (definitions), nor the Supreme Court ruling, and this use is not considered a disposal. PWC use is a recreational use that is currently restricted in park areas.	None.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52)	ADF&G has repeatedly admitted it would never permit a new hatchery in the lagoon, where it interferes with a run of wild salmon in Tutka Creek. The Lagoon was also a spawning area for herring decades ago, but no longer. The plan should acknowledge these facts and propose plans to address them.	The plan recognizes and discusses the issues related to the operation of the hatchery.	Add more background information related to hatchery activities.

Subject	Issue Summary	Response	Recommended Revision
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52) – History of CIAA Activity	Include a complete history of CIAA’s activities, including discussion of the widespread straying in 2014 and the cost to DPOR for legal expenses and time for public forums over the last 6 years during CIAA’s latest production push. Mention how much CIAA pays to DPOR. This figure should be raised to compensate for the large disturbance caused by their activities.	A complete history of CIAA activities is too detailed and inappropriate for the plan; however, some additional background will be provided. DPOR receives no compensation from CIAA for their operation of the hatchery within KBSP.	Add more background information related to hatchery activities.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52-29) – Hatchery Oversight	The hatchery needs better oversight so as not to degrade park resources. Recently funded research will be looking at ecosystem health and should dictate management of hatcheries in the future.	ADF&G has the responsibility to monitor hatchery operations.	None.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52-53)	Comments were received suggesting adding a history of traditional commercial fishing on wild stocks; not conflating commercial fishing with aquaculture and mariculture; and noting that herring is not a currently commercially harvested species in the area.	ADF&G provided a large addition and rewrite to this section that: deletes “Mariculture” from the section heading; adds a history and description of current commercial fishing (including salmon, shellfish and groundfish); and adds language on the origin of the Tutka Bay Lagoon Hatchery.	Incorporate the information ADF&G provided as appropriate.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52-53) – Net Pens	The history provided here on CIAA’s net pens is incomplete and inaccurate. The plan also does not explain the purpose of including such a history.  CIAA’s special use permit application sought DPOR’s authorization to move net pens to the head of Tutka Bay. The public was not given notice by DPOR, nor did ADF&G give public notice	The history of the net pens is included because it was a major issue that is addressed later in the plan. Some public comments and ADF&G feedback led to expansion and improvement of this section.	Edit the Hatchery section in Chapter 4 to expand and improve the background.

Subject	Issue Summary	Response	Recommended Revision
	<p>of CIAA's request for a critical habitat permit for the net pens. DPOR initially rejected the application. Later the DNR Deputy Commissioner overruled DPOR and directed issuance of the permit. Around this time, local people became aware of the permit application and requested the DNR Commissioner reconsider the Deputy's decision. The Commissioner held the permit under further agency review for a time, then finally granted CIAA's permit application. DPOR issued a permit for a net pen site a third of the way from the head of the Bay. Near this time, ADF&amp;G issued a critical habitat permit for the net pens, but at a different location, miles from the DPOR site and on the opposite side of the bay. In 2018, CIAA moved its net pens past both these designated sites and anchored them near the waterfall at the head of the bay – a site neither permitted nor applied for. After notification by the public of the net pens location, DPOR initially claimed an error in drafting the permit had occurred and CIAA's net pens were properly located near the waterfall. But agency documents showed an inconsistency between the locations permitted by DPOR and ADF&amp;G. Agency documents also revealed that CIAA had applied for a ADEC wastewater permit for the very location specified in DPOR's permit. DPOR reversed course and directed CIAA to move the net pens. But before CIAA could do that, a windstorm unanchored and apparently grounded the net</p>		

Subject	Issue Summary	Response	Recommended Revision
	pens. Then CIAA dragged the net pens back into the Lagoon for the rest of 2018.		
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52, lines 24-27) – Marine Life Abundancy	Include an accurate representation of the abundance and diversity of marine life that existed when the park was established. Also describe the number and types of boats fishing in 1976-1980.	This chapter provides a summary of the issues and uses of the park that are later addressed in the plan. It is intended to be a brief summary to provide context.	None.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52, line 35)	This paragraph should mention that Tutka Bay Lagoon Hatchery releases pink salmon in Tutka Bay Lagoon.	Concur.	Change as suggested.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 52, line 45 to Page 53, line 1) – Ephemeral Stream	Here the plan erroneously states that there was “no proximate freshwater imprinting source...” The ADF&G 2013 Management Report mentions a nearby “ephemeral stream.”	The stream was highly ephemeral and dependent on surface runoff, not a ground water source.	None.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 53, lines 1-2) – Straying	Here the plan erroneously states “...returns to this site were disappointing.” Actually, all the fish were allowed to stray into Humpy Creek and surrounding areas even though two permits warned to avoid this.	Returns to the site were disappointing per description on page 25 of the 2013 Lower Cook Inlet Annual Management Plan. These fish were not thermally marked and the otolith recovery project did not begin until 2014. A map on page 25 of the above plan shows no observations of straying in the area of Humpy Creek in 2013.	None.

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Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 53, line 2) – Net Pens	“In 2013 the DPOR received an application from CIAA to imprint pink salmon in net pens at the head of Tutka Bay at a site approved by ADF&G.” This statement is false.	CIAA applied for a permit with DPOR in 2013, therefore this statement is correct.	None.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 53, line 7) – Net Pens	Delete this phrase from the sentence: “Given the disappointing returns from the previous DPOR selected site.” CIAA chose not to imprint and release fish from that location in 2017 not due to poor returns, but because they were out of compliance with the Clean Water Act and would have faced \$30,000-a-day fines if the net pens were placed at the head of Tutka Bay.	Please see the Park Use and Issues Chapter for a history of the hatchery.	None.
Commercial Use – Commercial Fishing, Aquaculture/ Mariculture (Page 53, line 9) – Releases	Please include sockeye releases from Trail Lakes Hatchery to Tutka Bay Lagoon since 2005 in this sentence.	This language will be reworked, and the fact there have been sockeye releases from Trail Lakes Hatchery to Tutka Bay Lagoon will be added.	Add note of historical sockeye releases from Trail Lakes Hatchery to Tutka Bay Lagoon.
Commercial Use – Commercial Recreation Activities (Page 53, line 23) – Definition of Commercial Activity	What is the standard means to permit these activities and where? The production size of publications, video guides and commercials should determine whether it is a “Commercial Activity.” Large permitted activities inside the park should be considered a Commercial Activity.	Information on permitting commercial activities is provided in Chapter 5. All commercial activities, regardless of size, within the parks require a permit issued by DPOR.	None.

Subject	Issue Summary	Response	Recommended Revision
Exxon Valdez Oil Spill (Page 54, line 31-32) – EVOS Conservation Easements	The conservation easements and their stipulations should be listed here.	This level of detail is not included in management plans because it can be lengthy, varies from easement to easement and the information can be found elsewhere.	None.
Fees, Park Pass, and Visitor Use Management (Page 54, starting on line 35) – Increase Fees to Hire More Staff	Make more direct and focused efforts to procure funding in order to hire additional staff. Examples include aircraft coming near or entering the park paying per-passenger fees; initiating or increasing fishing charter, hunting guide, and other commercials fees; and initiating hatchery fees. Do not, however, charge general user entrance fees.	Commercial entities are already charged commercial use fees for using park lands. It is not within the purview of this plan to determine the commercial use fee amount. DPOR is prohibited in AS 41.21.026(b) from charging a park entrance fee; they can only charge user fees and commercial use fees.	None.
Fees, Park Pass, and Visitor Use Management (Page 54, starting on line 35) – Park Entry Fee	There should be a park entry fee equal to what commercial operators charge.	Per AS 41.21.026(b), DPOR may not charge an entrance fee to a park unit.	None.
Fees, Park Pass, and Visitor Use Management (Page 54, starting on line 35)	Increase the park's ranger presence and public education funding by increasing the fee for individuals to travel to the park, collected by water taxis.	It is not within the purview of this plan to determine the commercial use fee amount.	None.
Fees, Park Pass, and Visitor Use Management (Page 54, line 35) – User Fees	Increased user fees, balanced and reasonable for various users, are important for funding development, maintenance, and oversight.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Fees, Park Pass, and Visitor Use Management (Page 54, line 35) – Fishing User Fees	Discussions regarding user fees should be held with fishing groups and processors.	Concur.	None.
Fees, Park Pass, and Visitor Use Management (Page 54, line 35) – User Fees	User fees should be established for all activities in the park that do not directly relate to protecting and preserving the scenic values. This includes hatchery operations (\$1/500 eggs fertilized?) and the HEA transmission line.	The authority to charge for certain activities is found under AS 41.21.026 – Fees for use of state park system facilities. Fee amounts are set in regulation (11 AAC 05.170).	None.
Invasive and Non-Native Species (Page 55, Line 5)	Early Detection Rapid Response (EDRR) is a small effort that pays off significantly. KBSP is essentially an island – the installation of boot brushes, interpretative materials, and cleaning stations are points of entry can be highly effective. Also, for existing infestations, volunteer efforts are a good way to control/manage invasive plants.	Concur.	Add mention of the early detection and rapid response strategy.
Invasive and Non-Native Species (Page 55)	Bird species such as rock doves, starlings, and house sparrows are invading Alaska and should be eradicated to protect native bird species. Invasive species such as Green Crab need to be discussed in full. Reference research that has been done on invasive species by ADF&G and the Kachemak Bay Research Reserve. Describe the role of state agencies responsible for managing invasive species and how the park works with them.	Concur in part. Although considered invasive, ADF&G is not aware of any European green crab populations present in Alaska.	Add language listing prominent non-native and invasive species in the region and information on how the state agencies manage invasives.
Invasive and Non-Native Species (Page 55, line 11)	Spruce bark beetle is not invasive or non-native.	Concur.	Remove language on Spruce Bark Beetles from the Invasive section.

Subject	Issue Summary	Response	Recommended Revision
Invasive and Non-Native Species (Page 55, line 18)	Add an additional sentence to include marine invasive species: green crab & sea star wasting disease; bird invasive species: starlings, rock doves, and pheasants; and invasive mammals: coyotes.	<p>The only invasive marine species in the parks known to ADF&amp;G is <i>carpella mutica</i> (Japanese skeleton shrimp). ADF&amp;G knows of no studies demonstrating that rock doves, starlings, house sparrow or coyotes cause negative environmental, economic or human health impacts in Alaska. Thus, while those species may be non-indigenous to the area, at this time they are not officially labelled as “invasive”.</p> <p>ADF&amp;G now thinks sea star wasting disease is not caused by a pathogen, but by more decaying organic matter entering the ocean due to climate change.</p>	Modify some of the invasive species language in the plan based on this comment.
Land and Water Conservation Fund Act (LWCF) (Page 55, line 30-31)	Net pens violate LWCF regulations.	Net pens are temporary in nature and do not violate LWCF regulations.	None.
Land and Water Conservation Fund Act (LWCF) (Page 55, line 39)	Statement on Page 55, line 39 implies that KBSP and KBSWP have both received state and/or federal funding from the LWCF. HEA has been unable to locate LWCF funds granted to KBSP. The plan should state the source of such funding.	As stated in the plan, the entirety of KBSP and KBSWP are subject to LWCF program provisions. The LWCF grant administrator located within DNR maintains these records which can be furnished upon request.	None.
Land and Water Conservation Fund Act (LWCF) (Page 55, starting on line 21)	Add more details of where these funds have been used and their management implications.	LWCF funds are discussed as an important issue in the park on this page, and their management implications are discussed further in Chapter 5.	None.

Subject	Issue Summary	Response	Recommended Revision
Land and Water Conservation Fund Act (LWCF) (Page 55, line 39)	The draft plan states that LWCF provisions cover the “entirety” of KBSP and part of KBSWP. Provide a map of covered areas and a brief discussion of requirements and the Statewide Comprehensive Outdoor Recreation Plan (SCORP), which meets the requirements for eligibility to receive matching Land and Water Conservation Funds.	As stated in the plan, the entirety of KBSP and KBSWP are subject to LWCF fund provisions. The periodic SCORP update is an eligibility requirement for the State of Alaska’s participation in the federal LWCF State & Local Assistance matching grant program which provides capital project funding for close-to-home recreation per the LWCF Act of 1965 as amended.	None.
Land and Water Conservation Fund (LWCF) (Page 55, line 40)	This sentence implies that below-ground utilities would not be a conversion and would otherwise be allowable.	Below ground utilities are not a conversion under LWCF.	None.
Private Structures and Uses – In-holders	A goal should be included to buy inholdings from all willing sellers.	AS 41.21.134 allows for the state to purchase property lying within the boundaries of KBSP. As funding becomes available, DPOR will consider purchasing inholdings.	None.
Private Structures and Uses – In-holders	The park prevents development from devaluing neighboring and inheld properties. These property owners are indebted to the park – discussions should be held on how they can assist the park and its objectives.	Inheld properties predated park establishment.	None.
Private Structures and Uses – In-holder Access	All in-holders should have access and heritage rights to and across state land and waterways to access their property and subsistence.	In-holders have access to and across state land to access their property in accordance with existing laws and regulations.	None.

Subject	Issue Summary	Response	Recommended Revision
Private Structures and Uses (Page 56, lines 28-29)	Delete: “gathering firewood for use at adjacent private property” and “using hand tools to clear trails.” Given the difficulty of keeping trails clear, the hazard of dead trees and the fire hazard of down timber in-holders should be encouraged to assist in Park maintenance by using this fuel resource. Just restrict use to down timber and hazard trees near trails.	This use is restricted by 11 AAC 12.170 (d) and requires a permit to gather dead or burnt wood on state park land for personal use off of state park land.	None.
Private Structures and Uses (Page 56, lines 28)	Since any lands where LWCF funds have been expended cannot be converted for non-recreational uses without Secretary of Interior approval, the gathering of firewood for use at an in-holding is a prohibited activity.	Gathering of firewood for use at an inholding is not prohibited by LWCF fund restrictions, but it is restricted under regulations. (11 AAC 12.170)	None.
Private Structures and Uses (Page 56, line 42)	Just amend the utility easement. It is easy to draw lines on paper. This is challenging topography.	DPOR will work with Homer Electric Association and property owners to rectify this issue.	None.
Electrical Lines (Page 56, lines 42-43 and Page 57, lines 1-2)	This language implies that all electrical lines within KBSP were constructed illegally without DPOR knowing. HEA’s distribution lines (and possibly others) predate the Park. Plan should refer to HEA’s valid, pre-existing Right-of-Way permit to clarify this.	The plan will acknowledge that the easements predated formation of the park.	Add a clause stating that HEA’s electrical easements predated formation of the park.

**CHAPTER 5: AREAWIDE MANAGEMENT DIRECTION and GUIDELINES**

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
Chapter 5: Area-wide Management Direction and Guidelines – Notification of Pending Permit Applications	The plan should include a promise that DPOR will notify the public of a pending permit application before any permit decision is made that may be controversial or greatly impact park resources.	Generally, DPOR already provides notice on controversial permit applications. There is no requirement to do so and including this in the plan would be inappropriate.	None.
Chapter 5: Area-wide Management Direction and Guidelines – ADF&G and DNR Cooperative Agreement	Document what management authority commercial fish employees possess (regarding gear, bag limits, quota, SEG and catch limits as per the regulations they must follow from the Board of Fish) and what authority DPOR employees have in order to protect and preserve park resources. Conflict arises when the authority directives blur between ADF&G management divisions and ADNR division of DPOR. Clear statutory directives must be respected.	Statutory directives are clear: DNR DPOR manages the parks' land resources, and ADF&G manages fish and game resources.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Park Studies to Justify Permitting	<p>Please document studies performed by the park or evidence-based peer reviewed literature consulted for consideration of compatible or conditionally compatible activities allowed in park lands or waters.</p> <p>Please provide baseline and inventories that the park has performed “ensuring that uses and activities are not significantly impacting the natural and cultural resources.”</p> <p>Include baseline population studies and pre and post-hatchery population studies on meroplankton, zooplankton, faunal species,</p>	Generally, DPOR does not conduct these types of studies and relies on subject matter experts in sister agencies for this type of information.	None.

Subject	Issue Summary	Response	Recommended Revision
	aquatic vegetation, seagrass meadows, and macroalgal canopies; benthic sampling studies on PCB's and impacts to bottom substrate; and inventories of Dungeness crab, herring, and the 5 species of shrimp in the park.		
Chapter 5: Area-wide Management Direction and Guidelines – Legal Framework Underpinning Park Management	Alaska Constitution, Article VIII Sec. 7, Alaska Statutes 41.21.131, 41.21.140 or 41.21.990 cannot be superseded by the <i>Alaska State Park System: Statewide Framework</i> . To ensure that park management is within legal bounds: all proposed development and all changes in management must reference one of the above statutes. It is unclear that the Statewide Framework is still valid as it states, “This document is intended to provide the framework within which more detailed planning efforts and management actions can be undertaken over a twenty-year period (1982 to 2002)” (p. 2)	The framework document complements the park unit’s statutory purposes and provides more clarification of the management applicability of the various units and zones. Additionally, the framework is referenced and used because it is a DNR policy.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Motorized Use & Noise Pollution	Noise in Kachemak Bay is amplified due to the steep mountainsides rising straight from the ocean.	Concur.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Motorized Use	My main concern is allowing <i>additional types</i> of uses, especially motorized uses. Uses such as personal watercraft and heli-skiing are new uses that would degrade existing uses.	Concur in part. New uses should be given extra scrutiny to assure they do not conflict with existing uses.	None.

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
Chapter 5: Area-wide Management Direction and Guidelines – Motorized Travel	No motorized travel within (or motorized access to) KBSWP should be allowed.	Aircraft and motorized activity are already allowed in KBSWP and are restricted by regulation.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Newly Introduced Activities	Begin allowing newly introduced activities in the park only after the park has the long-term budget and staff in place to responsibly monitor and manage both new and existing park activities.	Recreational trends are constantly changing. Per AS 41.21.010, DPOR is charged with managing recreational opportunities for the enjoyment of visitors.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Park Permitting	Permits should be used to ensure park users are educated on wildlife etiquette, managing campfires, and leaving no trace.	Permitting is not an appropriate method for education. However, interpretative panels and materials provide this information.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Park Permitting	In light of limited funding, conditionally compatible special use permitting should be limited. The park does not have enough personnel to enforce these “marginal” uses in the park.	It is the responsibility of DPOR to determine when certain uses need to be restricted or prohibited. When a use is considered conditionally compatible, it is only permitted when certain conditions are met.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Park Permitting	DPOR permitting for questionable uses and activities should demand evidence-based documentation of proof before any permit is issued. This will ensure that activities have no significant impact on resources or visitors.	Permits are short term in nature and part of normal park operations. The procedures for issuing permits contained in 11 AAC 18.025 are designed to prevent the permitted activities from negatively affecting park resources or visitors.	None.

Subject	Issue Summary	Response	Recommended Revision
Chapter 5: Area-wide Management Direction and Guidelines (Starting on Page 59)	Put the name of the intended designation for each Guideline table under the text “Public Review Draft” at the top of each page. For example: Public Use, Private Structures, Commercial Uses, or Resource Management Activities.	Concur in part.	Add titles to the tables in Chapter 5 in the headers of each page.
Chapter 5: Area-wide Management Direction and Guidelines (Starting on Page 59)	At least one Public Use Cabin should be designed to imitate a native barabara.	It is not appropriate for the plan to be so specific on public use cabin design. These specifics are normally considered during a site and facility design phase. Increases in construction and maintenance costs for a cabin designed to imitate a native barabara would have to be considered at that time as well.	None.
Chapter 5: Area-wide Management Direction and Guidelines (Page 59, lines 30-34)	This statement assumes that fees DPOR generates will automatically flow back into DPOR’s budget, yet under state law all monies an agency receives are deposited into the general fund, which only the Legislature may appropriate.	Concur, however 100% of these fees have been receipted back to DPOR in recent years.	None.
Chapter 5: Area-wide Management Direction and Guidelines (Page 59, lines 30-34)	It is within the Legislature’s, and not DPOR’s, purview to decide to manage the state’s natural resources with a goal of increasing revenues to justify a desired budget level.	Ultimately the Legislature approves DNR’s budget; however, it is appropriate for DPOR to have an over-arching management intent to become self-sustaining given the decreasing amount of general funds appropriated to DPOR in recent years.	None.
Chapter 5: Area-wide Management Direction and Guidelines (Starting on Page 59)	Don’t exclude user groups if their activities meet the criteria set forth.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Chapter 5: Area-wide Management Direction and Guidelines – Introduction (Page 59, Line 11)	Move Framework discussion here for context.	Concur.	Add a general description of the Framework document to the introduction to Chapter 5.
Chapter 5: Area-wide Management Direction and Guidelines – Overarching Management Intent	DNR should require public notice and the opportunity to comment for all permits in KBSP and KBSWP.	Permits are short term in nature and part of normal park operations. The procedures for issuing permits contained in 11 AAC 18.025 are designed to prevent the permitted activities from negatively affecting park resources or visitors. There is no statutory or regulatory requirement for DPOR to notice permits. Hundreds of permits for the park units are issued annually. As a courtesy, controversial permits have been noticed.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Overarching Management Intent	Support granting one-time, no-cost, special use permits to allow recreational cyclists to attempt unconventional routes in restricted areas.	There is a provision for the Director waiving special use permit fees. See 11 AAC 05.010.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Overarching Management Intent (Page 59)	I strongly support developing a sustainable revenue stream for support of the park and recreation sites. I have some concerns about the possibility of charging for publications, movies, and videos about the park. I am not sure charging an author to write a trail guide for the Kachemak Bay Water Trail would be productive. It might serve to deter positive outreach about the park. I	User fees are a way to generate revenue to allow for the protection and maintenance of park facilities and resources.	None.

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	think videos, movies, books and magazines can do a lot towards the goal of increasing public use. I also have concerns about day use fees for the Park and SRS.		
Chapter 5: Area-wide Management Direction and Guidelines – Overarching Management Intent (Page 59, line 19)	The purposes of the Scenic Park and Wilderness Park as described in AS 41.21.990 must guide their management. AS 41.21.990 must be quoted in the Overarching Management Intent.	AS 41.21.990 is the definition section. The enabling legislation provides the purpose for which each park was established and shall be managed for.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Overarching Management Intent (Page 59, Line 21)	KBSP was not created for public use of resources. Per AS 41.21.131 on Page 2, lines 30-42, the park “was created to ... protect and preserve this land and water for its unique and exceptional scenic value. On pages 2 and 7, a scenic park is defined “including activities which involve no major modification of the land, forests, or waters, and without extensive introduction of artificial features or forms of recreational development that are primarily of urban character.” Helicopters, hatcheries, drones, airboats, and hovercraft are urban/industrial grade tourism type activities which have no place in a scenic park protection and preservation plan.	Per statute, DPOR is charged with fostering the growth and development of recreational facilities and opportunities in Alaska. The definition of a scenic park also includes this language: “for the purpose of making the areas available for public enjoyment in a manner consistent with the preservation of the natural features.” Most of the stated park activities are recreational in nature and temporary and do not involve “extensive introduction of artificial features or forms of recreational development that are primarily of urban character.”	None.

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Chapter 5: Area-wide Management Direction and Guidelines – Overarching Management Intent (page 59)	Do not be site specific on huts or PUCs when no ground-trothing has been done. Instead, use general site selection guidelines such as: number of miles apart; not near goat rearing areas; near a water source.	The plan provides general areas where siting may be appropriate, but the precise locations would be determined later after more detailed site-specific investigation.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Kachemak Bay State Park Intent (Page 60, line 1 to Page 61, line 2)	The State Legislature created the Kachemak Bay State Park as a scenic park, and all management decisions must adhere to the intent, purpose and definition of a scenic park.	Concur.	None.
Kachemak Bay State Park Intent (Page 60, Line 26)	I support increased trail connectivity between Jakolof Bay Tutka Bay.	Concur.	None.
Chapter 5: Area-wide Management Direction and Guidelines – Kachemak Bay State Wilderness Park Intent (Page 61, lines 5-18)	The State Legislature created the Kachemak Bay State Wilderness Park as a state wilderness, and all management decisions must adhere to the intent, purpose and definition of a wilderness park.	Concur.	None.

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Chapter 5: Area-wide Management Direction and Guidelines – Kachemak Bay State Wilderness Park Intent (Page 61, Lines 7-9)	Sentence on Page 61, Lines 7-9 should be deleted. One cannot both “preserve unique and exceptional wilderness values while providing limited trail and facility developments that facilitate access and use....”. State Parks should not be “providing limited trail and facility developments” within KBSWP.	This intent language is consistent with the intent, purpose and definition of a wilderness park.	None.
Kachemak Bay State Wilderness Park Intent (Page 61, Lines 9-12)	In KBSWP, Regulations should be in place to protect wildlife and non-motorized use from float plane and motorboat use. This could include limits on outboard motor horsepower to reduce noise, speed, and wake size. There should also be times of day when motorized use is prohibited to provide quiet time for non-motorized users.	There are already regulations in place in the wilderness park restricting these types of activities.	None.
Kachemak Bay State Wilderness Park Intent (Page 61, Line 12)	People who have paddled and portaged should not have their Wilderness experience disrupted by power equipment like motorboats.	Motorized access is only recommended for Upper Hazel Lake, which is near the border with KBSP.	None.
Kachemak Bay State Wilderness Park Intent (Page 61, Line 18)	Add “A few minimum survival cabins would be appropriate.”	More detail on this is provided later in the plan. This section only provides management intent.	None.
Kachemak Bay State Wilderness Park Intent (Page 61, Line 18)	Delete this line. State Parks should not “Provide limited development to facilitate access and use.”	The definition of a wilderness park includes provision for limited development.	None.

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Diamond Creek SRS Intent (Page 61, Lines 35 and 41)	Development of a road-accessible campground is mentioned here, but not in the list of proposed facilities on pages 120-121. Also, the campground mentioned on page 61 was not included on Map 11.	This was an oversight.	Add a campground to the proposed facilities for Diamond Creek. The campground may include a PUC. Also add a development area for the campground to the Diamond Creek map.
Overlook Park State Recreation Site Intent (Page 62)	Suggested descriptive and grammatical changes regarding Overlook Park were submitted.	Concur in part.	Incorporate some of these suggestions.
Chapter 5: Area-wide Management Direction and Guidelines – Land Use Zones (Page 62, starting on line 19)	Do NOT rezone mountains as Natural Zone. Mountains should stay zoned as Wilderness. The alpine tundra is too fragile and very easily damaged.	<p>The 1995 plan did not zone all alpine areas as Wilderness. The entirety of all KBSWP uplands are zoned as Wilderness, as is most of the portion of KBSP on the Outer Coast. None of the remaining portion of KBSP adjacent to Kachemak Bay is zoned Wilderness due to a higher concentration of use; more development and trails; and because a large amount of nearby park land is zoned as Wilderness. Most of KBSP lands in the Outer Coast unit are zoned as Wilderness because this area is intended to be managed more in character with adjacent KBSWP lands.</p> <p>The Natural Zones are to be relatively undeveloped and undisturbed and are managed to maintain high scenic qualities which is consistent with the definition of a state park.</p>	None.

Subject	Issue Summary	Response	Recommended Revision
Chapter 5: Area-wide Management Direction and Guidelines – Land Use Zones (Page 62, starting on line 19)	The changes to land use zoning and expansion of facilities in the draft plan would dramatically change the nature of the park and are not in line with its founding purpose. Upgrading existing facilities and trails to prevent degradation of park resources, coupled with a modest increase in carefully sited facilities would better preserve the parks scenic character.	Often the recommendations are in response to existing and anticipated public use. These plan recommendations are intended to accommodate use while protecting park resources. If these facilities are constructed, construction will likely occur over a span of many years.	None.
Chapter 5: Land Use Zones – Recreational Development Zone – Application Areas (Page 63)	Such large areas on the south side of the bay should not be designated as in the Recreational Development Zone. Visitors centers, roads, commercial lodges and off-road vehicle use are not compatible with this area of the park.	Recreational development zones recognize the high levels of use these areas receive and allows DPOR to provide facilities to accommodate this intensive use while protecting park resources.	None.
Chapter 5: Land Use Zones – Recreational Development Zone – Application Areas (Page 63, Lines 28-31)	Oppose creating Recreational Development Zones in the Grewingk Glacier, Halibut Cove-China Poot, and Sadie-Tutka. Further recreational development such as roads, high standard trails, intensively developed recreational facilities, commercial lodges or buildings, and allowance for motorized vehicles are not compatible with the scenic park designation.	These are the most intensively used areas of the park. As such, this zoning is applied appropriately.	None.
Chapter 5: Land Use Zones – Recreational Development Zone (Page 63, Lines 33-34)	It states here that “Certain marine waters adjacent to Recreational Development zones classified on the uplands are similarly classified as Recreational Development.” These are not clearly defined. How would this affect allowed uses?	This was an error. All marine waters are zoned “Natural”.	Delete these two lines.

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Chapter 5: Land Use Zones – Wilderness Zone (Pages 64-65) – Park Development	Amenities such as outhouse, firepits, picnic tables, etc. in the areas designated as wilderness should be kept to a minimum to preserve the wilderness experience.	Concur.	None.
Chapter 5: Land Use Zones – Wilderness Zone (Pages 64-65)	Why are there no “wilderness zones” in Kachemak Bay State Park?	The state park was set aside for a different purpose than the wilderness park. There are, however, extensive areas zoned as wilderness in the eastern portion of the state park (along the gulf coast), including most of Nuka Island.	None.
Chapter 5: Land Use Zones – Wilderness Zone – Purpose and Characteristics (Page 64, Lines 43, 44 and Page 65, Lines 11, 16, 20)	Delete the sentence beginning “Resource modification....”  Delete rest of sentence after “Natural processes will be allowed to operate freely.” State Parks should not be in the business of protecting public human safety, or private property protection in a Wilderness zone. Page 65, line 11, remove “that significant threats to public safety exist or in order”; and on lines 16 and 20, change “may” to “will”.	In all instances, the suggested changes were to passages in the plan that were quoted directly from the Statewide Framework.	None.
Guideline Table – Public Uses – ADA Access by Wheelchairs (Page 71)	Access for disabled persons should not be a consideration. As people age, they cannot meet certain outdoor challenges and this is as it should be. Take away the challenge and you destroy the wilderness.	DPOR applies Americans Disability Act (ADA) standards and Accessibility Guidelines for Outdoor Developed Areas to all recreational programs and facilities within units of the state park system. The intent is to make the wide variety of outdoor recreational programs within the system accessible and give all visitors the opportunity to experience park resources. All constructed facilities within park units such as parking,	None.

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		access routes, restrooms, and trail information kiosks will apply ADA standards using Universal Design to make them barrier-free to all visitors. If the terrain, environment, natural or cultural resources, are impacted to the extent that the character of the site is lost, the individual facility may not be made fully accessible.	
Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	Expand the list of lakes that float planes can land on. Upper Hazel Lake offers good recreational opportunities and is only accessible by float plane. Gore Point Lake is large, in a lovely area of the Outer Coast, has very poor boat access, and is only reliably accessed by float plane. Kinnikinnik Lake and Port Dick Lake would also provide great access with minimal impact. These lakes have a history of use by seaplanes before they were designated as wilderness. Also, allowing landings on Wosnesenski Lake would increase hikers' access.	Concur in part. The plan suggests regulations be promulgated to allow aircraft to land on Upper Hazel Lake and Wosnesenski Lake, but not on the other lakes mentioned.	None.
Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	Allow aircraft access to lakes, navigable waters, and mountain ridges in certain areas of the park for 3-5 years. Then assess impact and designate future usage. This would allow access for people not capable of hiking into remote areas.	The plan suggests regulations be promulgated to allow aircraft to land on Upper Hazel Lake and Wosnesenski Lake. This would expand recreational opportunities and enhance access.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	Install a more robust permitting system for all aircraft uses in the park. No aircraft should be allowed in the park except by permit.	Aircraft are restricted by regulation and the permitting procedures detailed in 11 AAC 18.025.	None.
Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	Low level flights over or adjacent to the Wilderness Park should be avoided whenever feasible.	Concur.	None.
Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	Add best practices for noise abatement in the Recreation Zone. Also, commercial fixed wing aircraft should be limited to specific routes with restricted altitudes.	This level of detail is best handled in permit stipulations considering current best management practices and site-specific conditions.	None.
Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	Landings of fixed wing aircraft at Tutka Bay Wilderness Lodge should be restricted in number and to certain times due to the noise disruption in that wilderness area.	This use is not occurring in an area zoned as wilderness and is minimal in nature.	None.
Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	DPOR must make provisions to carefully monitor this use to ensure that park values are not degraded by human-caused noise.	Concur.	None.

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Guideline Table – Public Uses – Fixed Wing Aircraft (Private & Commercial) (Page 71)	Opposed to floatplanes landing on Upper Hazel Lake. The area is being degraded by overuse, especially the proliferation of human waste.	Access to this area by float plane enhances public use which is a goal of DPOR. Park visitors are responsible for managing their own human waste.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Remove “in support of other authorized activities” in all zones. If this wording is to be maintained, specify what these activities may be.	Authorized activities could include search and rescue, or park maintenance or construction activities performed by DPOR or its contractors.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Low level flights over or adjacent to the Wilderness Park should be avoided whenever feasible.	Concur. Airspace is controlled by the FAA.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Helicopter activity should not occur on or near occupied or suspected nursery group habitats between May 1-June 15 each year.	Concur. This would be managed through permit stipulations.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	DPOR should work with the FAA to establish flight restrictions where deemed appropriate and necessary to further park management goals. DPOR also needs to outline the development of noise abatement procedures in cooperation with the FAA and impacted neighborhoods.	Airspace is controlled by the FAA and any airspace restrictions are beyond the purview of DPOR.	None.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	59% of visitors to the park surveyed did so to enjoy the quiet, natural setting. Helicopters are disruptive.	Helicopter landings are limited through regulation and permit stipulations to minimize disruption.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Authorizing recreational helicopter use may conflict with AS 41.21.020(a)(14). Helicopter-assisted recreational uses aren't included as an acceptable motorized activity in state parks.	The section of statute cited refers to DNR legislative reporting requirements related to restricting traditional recreational activities. Helicopter activity can be allowed in state parks and is restricted by regulation.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	DPOR should not compete with Native corporations by offering the use of State lands to helicopter transport companies when these corporations could profit from such uses on their lands. DPOR's commercial use permit fee would be far below the rate that ANCSA corporations could charge.	DPOR is required to consider the permit applications that are submitted using the criteria and procedures in 11 AAC 18.025.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Helicopters should not be encouraged due to the magnitude of that activity's contribution to greenhouse gas emissions.	This is beyond the purview of this plan. Additionally, many activities in the park contribute to greenhouse emissions and it would be inappropriate to single out a particular use.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Helicopters, possibly from a lodge, were repeatedly observed in summer flying less than 500 feet above Tutka Bay. Whether they had permits is unknown.	DPOR can only control or permit helicopter landings on state park lands. The FAA controls the airspace.	None.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Helicopters can land in most any flat open area – this use suddenly exposes territory to machinery, people, noise, and pollution.	The plan provides guidelines for when and where helicopter use can be permitted and the use is already restricted by regulation.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	There is enough helicopter traffic already: 6 landings a day on Grewingk Glacier; a lodge takes people up and down Jakolof Mountain daily in summer; a local helicopter company operates an active private airstrip in Little Jakolof Bay; and HEA uses helicopters to maintain its extensive powerlines. Often one person’s fun ride is a hundred persons’ annoyance.	DPOR can only control or permit helicopter landings on state park lands. The FAA controls the airspace. The plan provides guidance for when and where helicopter use can be permitted and the use is already restricted by regulation.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Is DPOR considering a competitive bid for this activity to raise funds?	DPOR is trying to make all of Alaska’s state parks more self-funding. However, the relatively small amount of revenue that would be generated from permitting this activity was not a major consideration in the decision to consider allowing it.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Helicopter use for recreational pursuits is not compatible with the park and is not allowed in any other state parks in Alaska or in the United States.	Aircraft are a means of access for recreational pursuits. Aircraft (including helicopters) are allowed in many of Alaska’s state park units.	None.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Be specific about other landing areas for helicopters in the plan.	The plan provides some flexibility for identifying future landing areas because factors related to landing area choices could change over time.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Helicopter landings in sensitive alpine habitat areas should not be allowed in the park unless for search and rescue, research, or management purposes.	The plan provides guidelines for when and where helicopter use can be permitted and the use is already restricted by regulation.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Helicopters should be banned, except for search and rescue. If allowed, they should be restricted to a few areas and number of daily flights capped at 4; be charged high fees; not be allowed to fly under 1500 feet; and have to apply for single use permits.	The plan provides guidelines for when and where helicopter use can be permitted and the use is already restricted by regulation.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Plan states “HEA may be authorized under 11 AAC 18.010 for distribution line maintenance on existing pre-approved landing areas only.” HEA would appreciate revising this to either clarify how DPOR will accommodate such future efforts; state factors DPOR will evaluate to approve landing areas; or at least reflect that HEA and DPOR will use their “best efforts” to continue to allow helicopter access for line maintenance.	HEA must work with DPOR if HEA wishes to expand the list of pre-approved helicopter landing areas for routine maintenance. Any additional landing areas will not be approved unless a definite need can be demonstrated.	Change the Rotary Winged Aircraft section of the Commercial Uses Guidance Table in Chapter 5 to clarify these requirements.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Do not allow helicopter landings in the park. Even residents and tourists who are incapable of (or disinterested in) climbing mountains benefit from knowing that these remote and rugged areas are untouched by all but the most adventurous. Knowing that anyone can pay to easily access a mountain-top detracts, for some, from the pleasure of viewing such peaks from afar.	The plan provides guidelines for when and where helicopter use can be permitted and the use is already restricted by regulation.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	The “other authorized activities” in the wilderness zone should not include commercial helicopter use.	Every activity authorized for the Wilderness Zone must consider wilderness values before being permitted. Commercial helicopter use could be allowed in support of another authorized activity. For example, if building a safety cabin was authorized, helicopter use in support of that could also be authorized.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Comments were received on general helicopter activities’ (including heli-ski operations) negative effects on black bears, brown bears, mountain goats, moose, waterfowl, shorebirds, wolverines and marine mammals.	Impacts to park resources will be considered during any adjudication on permit applications for helicopter use in the parks. Furthermore, DPOR will consult with ADF&G on the adjudication process.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	If DPOR decides to include an option in the plan to approve a winter helicopter operation, the plan should include a requirement that any proposal would need to be evaluated for compliance with ADF&G guidelines.	The plan will be changed to only authorize helicopter landings at Grewingk Glacier from May 1 to October 15.	Remove reference to permitting for heli-ski operations in the Sadie-Tutka unit and clarify that commercial rotary aircraft landings may only be authorized between May 1 to October 15 at Grewingk Glacier.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	As Grewingk Glacier retreats, alternative helicopter landing sites should take into consideration for the protection of wildlife.	Impacts to park resources will be considered during any adjudication on permit applications for helicopter use in the parks.	None.
Rotary Winged Aircraft (Private and Commercial) (Page 72)	On Grewingk Glacier, include a permit stipulation allowing only less intrusive types of helicopters. If not stipulated, someone might lease a very noisy helicopter like a Boeing Chinook (CH-47).	This plan does not address specific permit stipulations. This is to allow flexibility for changing conditions and best management practices.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	What would the heli-ski permit stipulations include regarding human waste management?	This plan does not address specific permit stipulations. This is to allow flexibility for changing conditions and best management practices.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Several comments were received suggesting establishing various limits on helicopter landings on Grewingk Glacier.	Due to historical use and other factors, Grewingk Glacier was chosen as the one location in the park where helicopters can land. Any operator that meets all the qualifications (such as proper insurance, qualified pilots, etc.) may be permitted for unlimited landings at the glacier between May 1 and October 15. There is an annual operator fee and a per-client fee. If helicopter landings caused significant negative impacts to park resources, the process could be changed to a competitive bid system or otherwise limited.	None.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	I enjoy camping in the low-lying areas of Grewingk Glacier – heli-skiing operations would preclude this activity.	The heli-ski operations that were proposed are for the Sadie-Tutka area. Helicopter operations on Grewingk Glacier are only allowed at one landing area from May 1 to October 15.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Under “natural zone” are the words: “and landings for one operator during the winter within the Sadie-Tutka Unit by competitive permit under 11 AAC 18.040.”  What does this mean? How many landings? Is this for heli-skiing? It looks like unlimited landings, which is a bad idea.	The language was intended to address heli-skiing and did not limit the number of landings allowed. However, the plan will be changed to remove the heli-skiing recommendation for the Sadie-Tutka unit.	Remove references to permitting for heli-ski operations in the Sadie-Tutka unit in Chapter 5.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	The Park does not have enough staff to manage a complex commercial activity such as heli-skiing.	The draft plan proposed one operator in one unit of the park. Park permitting staff has experience with much more complex operations than what is being proposed here. However, the plan will be changed to remove the heli-skiing recommendation for the Sadie-Tutka unit.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Heli-ski operations would conflict with AS 41.21.131 which states that the park should be “reserved from all uses incompatible with its primary function as a scenic park.” Such operations also constitute an “extensive introduction of artificial features or forms of recreational development that are primarily of urban character” and would therefore be contrary to the definition of a scenic park in AS 41.21.990.	Helicopters, like boats, are a means of transportation for visitors to access the park for their recreational activities. To access most of the park, a variety of transportation methods are already utilized.	None.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	There are non-park areas to the west that would be more appropriate for heli-ski operations than park lands.	The plan provides guidelines for when and where helicopter use can be permitted and the use is already restricted by regulation. The plan does not address non-park lands.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Heli-skiing will only financially benefit the single use permit holder and will hurt local businesses like ski shops, water taxis, and lodging providers.	Heli-skiing operations provide outdoor recreation opportunities during a season where there are few visitors. This contributes to the fulfillment of the area-wide recreational goal articulated in this plan to: “Enhance opportunities for year-round recreational use of the park units while maintaining the scenic, wilderness, and other natural resource values in the plan area.” Furthermore, heli-skiing operations would benefit numerous local businesses. However, for other reasons the plan will be changed to remove the heli-skiing recommendation for the Sadie-Tutka unit.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Noise tends to reverberate in Sadie Cove and Tutka Bay so allowing heli-skiing here would have serious negative consequences.	Many other motorized recreational activities in the area generate noise, such as airplanes, motorboats, etc. However, for other reasons the plan will be changed to remove the heli-skiing recommendation for the Sadie-Tutka unit.	None.

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Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	DPOR should consider possible liability issues from accidents, injuries or lost skiers that commercial heli-skiing might engender.	All visitors recreating in the park assume some level of risk. It is the personal responsibility of park users to assess and manage their own exposure to risk. However, for other reasons the plan will be changed to remove the heli-skiing recommendation for the Sadie-Tutka unit.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Heli-skiing and heli-hiking are misused as denoting a recreational activity. Helicopters are correctly denoted in the plan as a form of transport. Thus, the impacts of helicopters should be compared to impacts from other forms of transport that may already adequately facilitate hiking, skiing and sightseeing in the park.	Helicopters represent a small fraction of the motorized transportation methods used to access the park. For example, hundreds of boats daily use Kachemak Bay and park waters.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	KBSP provides the only local access to backcountry downhill skiing – helicopter-supported operations would significantly degrade this experience. The next closest place for such skiing is a 3-hour drive away in the Chugach Mountains.	KBSP is a large park and offers many options for backcountry skiing. The public review draft version of plan proposed only one heli-ski operator in one unit of the park. However, the plan will be changed to remove the heli-skiing recommendation for the Sadie-Tutka unit.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private and Commercial) (Page 72)	Allowing heli-skiing in the Sadie-Tutka area would greatly detract from the human-powered experience. The ski terrain available in the management area is too limited to harmoniously accommodate both user groups. Conflict would range from the annoyance of finding the run you’ve spent hours climbing was poached by helicopter skiers, to the life-threatening danger of helicopter-dropped skiers triggering avalanches and sluff on human-powered skiers climbing	KBSP is a large park and offers many options for backcountry skiing. The plan proposes only one heli-ski operator in one unit of the park. However, the plan will be changed to remove the heli-skiing recommendation for the Sadie-Tutka unit.	None.

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	access gullies from below. When two user groups compete for access to a limited resource, preference should be given to the pre-existing user group. Backcountry skiing in KBSP is expected to grow in coming years, only increasing the potential for this type of conflict.		
Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	No recreational drone use should be allowed in the parks. They are disruptive to birds and other wildlife and destroy the serenity of the park experience. Hunters might also use them for scouting.	Not allowing UAVs to be flown within 500 feet of wildlife nor above people are restrictions designed to protect wildlife and the park experience. Furthermore, 5 AAC 92.080 (7)(G) prohibits the taking of game with the aid of “any device that has been airborne, controlled remotely, or communicates wirelessly, and is used to spot or locate game with the use of a camera or video device.”	None.
Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	Allow UAV's in the recreational zone, in addition to natural zone, by permit only.	Private use of UAVs may be authorized only in the Natural Zone. Recreational Zones are more heavily used areas, so UAV use is not appropriate.	None.
Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	How could anybody with a drone and no training or special equipment tell if they are within the safe 500-foot range of wildlife or not? Also, due to vegetation and topography, an operator may not know the drone is disturbing someone nearby. If DPOR lacks staff to monitor the appropriate use of recreational drones, they should not be allowed at all.	It is incumbent upon users to know the rules and follow them, just like with any other restricted activity.	None.

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Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	UAVs in the park would conflict with AS 41.21.131.	UAV use is already restricted by regulation and may be permitted using the guidelines in the plan.	None.
Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	Drone use constitutes an invasion of privacy for people using the park.	If authorized by permit, the plan guidelines would apply and do not allow for UAV flights above people.	None.
Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	Allowing recreational drone use conflicts with the definition of a scenic park (AS 41.21.990). Drones are an introduction of an “artificial feature”, albeit temporarily, and are a form of recreational development that is more urban than natural.	Drone use is a recreational activity like many others (bicycling, kayaking, etc.) that requires an artificial feature.	None.
Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	Fines for misuse of drones should be implemented.	Fines already exist for violating a use restriction.	None.
Guideline Table – Public Uses – Unmanned Aerial Vehicles (UAVs) (Page 73)	Drones should be conditionally compatible in the Recreational and Wilderness Zones, like they are in the Natural Zone. Drones offer amazing landscape views with low impact and would draw users to the park.	Public use of UAVs may be authorized only in the Natural Zone. In the heavily used Recreational Zones, public UAV use is prohibited due to concerns about safety and disturbance. In Wilderness Zones, public UAV use is prohibited to preserve the wilderness values.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Archery (Page 73-74)	Archery should only be allowed in specifically designated locations away from people and trails.	Per AS 41.21.022 and 11 AAC 12.190, discharge of firearms, which includes archery, can only be done during lawful hunting, trapping and fishing. The use is further restricted by 11 AAC 20.100 in KBSP.	None.
Guideline Table – Public Uses – Bear Baiting (Page 74)	No bear baiting should be allowed in the parks. This activity could be dangerous if not properly marked by the hunter. Bear baiting is also not needed, as bears are plentiful on the bay's south side.	Bear baiting is a hunting practice allowed by ADF&G. This plan restricts bear baiting to the Natural and Wilderness Zones.	None.
Guideline Table – Public Uses – Bear Baiting (Page 74)	Bear baiting should not be allowed in the Natural Zone.	Bear baiting is restricted to the Natural and Wilderness zones that are not as heavily used as the Recreational Zone.	None.
Guideline Table – Public Uses – Bear Baiting (Page 74)	Baiting bears with food is against all bear safety actions taken in the park. This activity habituates bears to human food and puts at risk campers, picnickers, hikers, hunters, wildlife viewers, private in-holders and their property.	ADF&G regulates bear baiting.	None.
Guideline Table – Public Uses – Bear Baiting (Page 74)	Before opening the park to bear baiting, we need to patrol and educate current hunters.	Before being eligible to register a bear baiting station, hunters are required by ADF&G to complete a bear baiting clinic. Hunters in GMU 15 must also complete a Basic Hunter Education course.	None.
Guideline Table – Public Uses – Bear Baiting (Page 74)	Bear sightings in Sadie Cove were common but are now rare; numbers are significantly down in the Outer Coast as well. Bear baiting could dramatically decrease bear populations and the opportunity for visitor sightings.	ADF&G manages and monitors wildlife populations. Note that in 2018, there was only 1 bear baiting station registered in the park units.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Bear Baiting (Page 74)	Hikers may accidentally hike or camp close to a bear baiting station, greatly increasing the chances of a dangerous encounter. Also, bear baiting poses risks to wildlife and dogs and will lead to closing popular trails and killing nuisance bears.	ADF&G regulates bear baiting. This activity is restricted to the Natural and Wilderness zones that are not as heavily used as the Recreational Zone. Note that in 2018, there was only 1 bear baiting station registered in the park units.	None.
Guideline Table – Public Uses – Bear Baiting (Page 74)	The plan provides no definition of what constitutes bear bait.	ADF&G defines what constitutes bear bait in regulation. Only biodegradable materials may be used for bait. Scent lures may be used. Fish and big game (but only the head, bones, guts and skin) and the skinned carcasses of some animals may be used. Since these regulations can change over time and change for different areas of the state, this definition is not included in the plan.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Support access for cyclists on all reasonable beaches (such as Glacier Spit) throughout the park.	The plan includes a provision to allow bicycle use by permit as a means to explore the appropriateness of the use before changing regulations to allow the use without permit.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Bicycling should not be allowed in the park unless research suggests this won't cause high rates of trail erosion. Perhaps the Grewingk Glacier moraine area and the Wosnesenski Trail would be open to bicycling if soils are deemed suitable.	If bicycle use is allowed on a trail, the trail will have been designed to sustain that use.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Glacier outwash plains, such as Grewingk Glacier, could be damaged by bicycles.	Bicycle use is restricted by regulation and the plan recommends expanding the use and changing regulation as necessary to accommodate it.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Bicycles should be allowed in all areas of the park, except in cultural zones.	Bicycle use is restricted by regulation and the plan recommends expanding the use and changing regulation as necessary to accommodate it.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Support allowing bicycles in the Recreational and Natural Zones. Bicycles shouldn't be allowed in the Wilderness Zone.	Bicycle use is restricted by regulation and the plan recommends expanding the use and changing regulation as necessary to accommodate it.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Support all new accesses and proposed trail developments, including bicycling access, within the plan.	Concur.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Allow on tidal flats, between high and low tide only, as they could be very disruptive to nesting birds.	Bicycle use is restricted by regulation and the plan recommends expanding the use and changing regulation as necessary to accommodate it.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Cycling opportunities in the park can play a role in assisting Homer and the southern Kenai's tourist and travel destination economy.	Concur.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	DPOR should consider designating some, but not all, trails as multiple use and consider creating new trails for bikes.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Wheeled vehicles, including bicycles, can facilitate the introduction of invasive species. If bicycles are allowed on the south side of the Bay, there should be an educational program to alert riders to be aware of nesting birds and wildlife and to clean seeds and plant materials off their bikes.	Invasive species can be introduced in many ways that are not limited to wheeled vehicles. The plan will, however, include an education objective aimed at protecting and encouraging a better understanding of the park's natural and cultural features.	Add a new education objective aimed at encouraging a better understanding of the park's natural and cultural features to the area-wide goals and objectives in the Goals and Objectives Chapter.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Bicycles should not be allowed on hiking trails that are not wide enough or lack safe sightlines. Bikes don't mix well with hikers, and especially not with dogs.	Bicycle use is restricted by regulation and the plan recommends expanding the use and changing regulation as necessary to accommodate it.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Pages 74-75)	Fat tire bikes should be allowed in the park in winter – low environmental impact and during the park's least visited season.	Bicycle use is currently restricted by 11 AAC 12.020. The plan recommends authorizing expanded bicycle use by permit under 11 AAC 18.010 into areas and trails to assess the use's compatibility, and then changing regulation if appropriate to accommodate the expanded use.	None.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	Airboats and hovercraft should not be allowed in the park. They are visually and sonically disruptive; polluting to both air and water, and able to access shallow areas that harbor wildlife, including sensitive areas where birds nest.	Airboats and hovercraft are defined in regulation as vehicles, just like any other motorized boat and are already allowed subject to 11 AAC 20.215. While already allowed, current use of airboats and hovercraft is rare to non-existent in Kachemak Bay.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	These vessels have a limited weather tolerance and would be operated on good weather days, which would exacerbate the effect on park users' quiet enjoyment.	Airboats and hovercraft are defined in regulation as vehicles, just like any other motorized boat and are already allowed subject to 11 AAC 20.215. While already allowed, current use of airboats and hovercraft is rare to non-existent in Kachemak Bay.	None.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	Hovercraft and airboats pose harassment and disturbance risks to waterfowl, marine mammals, fish, and animals that utilize coastal beach habitat.	Airboats and hovercraft are defined in regulation as vehicles, just like any other motorized boat and are already allowed subject to 11 AAC 20.215. While already allowed, current use of airboats and hovercraft is rare to non-existent in Kachemak Bay.	None.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	Change to N/A in Recreational, Cultural, and Wilderness Zones.	Concur. Since all marine waters in the parks are zoned as Natural, this change is consistent.	Change as suggested.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	These uses should be restricted to deep water offshore, to limit disturbance to onshore humans and wildlife.	This use is restricted to saltwater only by regulation and not allowed on tidal flats and uplands.	None.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	Clearly define where the plan would allow hovercraft to travel.	This use is restricted to saltwater only by regulation and not allowed on tidal flats and uplands.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	Hovercraft have a very strong downdraft propulsion and may be damaging to productive intertidal habitat, whether covered by water or not. Hovercraft could scar the tideland, whether water was 6 inches deep or 3 feet deep.	This use is restricted to saltwater only by regulation and not allowed on tidal flats and uplands. The disturbance of natural objects is prohibited by 11 ACC 12.170.	None.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	Commercial operators of airboats and hovercraft issue hearing protection to clients to prevent permanent hearing damage. They are very loud, emitting sound up to 108 decibels, well above the tolerable threshold for wildlife. The noise from these vessels is not compatible with the “preservation of the natural values such as camping, picnicking, sightseeing, nature study, hiking, riding and related activities,” nor does it preserve natural “faunal... characteristics” as mandated by the statutory definition of a scenic park (AS 41.21.990.)	Airboats and hovercraft are defined in regulation as vehicles, just like any other motorized boat and are already allowed subject to 11 AAC 20.215. While already allowed, current use of airboats and hovercraft is rare to non-existent in Kachemak Bay.	None.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	Airboats and hovercraft are prohibited in many state parks, state recreation sites, and national parks.	Concur.	None.
Guideline Table – Public Uses – Airboats and Hovercraft (Page 75)	“Does not include small boats with electric trolling motors, house boats, or personal watercraft.” Does this sentence ban electric trolling motors since they are not included elsewhere in the plan? Is the intent to allow these as non-motorized uses? Upper Hazel Lake is in wilderness park – motorized boating is neither appropriate nor necessary (the lake is small and easily walked around). Also, allowing this use while banning	House boats and personal watercraft are addressed under different headings. Trolling motors will be added to the definition of motorized boating for permitting purposes. The use on Upper Hazel Lake is proposed in the plan to facilitate hunter access. The recommendation for motorized boats on Upper Hazel Lake will be updated to include	Change the motorized boating permitting section to include trolling motors and the horsepower limitation for motors on Upper Hazel Lake.

Subject	Issue Summary	Response	Recommended Revision
	power driven mobility devices in the wilderness (p. 82) is inconsistent and discriminatory application of park policy.	a provision that limits motors to 10 horsepower or less.	
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	Continue ban on PWC’s. Despite technological advances, these craft are visually and sonically disruptive and highly polluting to both air and water. PWCs are especially disruptive to birds on the water, marine mammals and spawning fish. Unlike a motorboat, which is used primarily for transportation, PWCs are designed for aggressive, erratic, and thrill-seeking aquatic recreation – they can be very fast and dangerous objects.	Most newer PWCs utilize four-stroke, direct injection and catalyst two-stroke technology allowing up to 90% fewer emissions than models manufactured before 1999. Beginning with the 2003 model year, all PWC manufacturers produced models with four-stroke engines. Newer PWCs also include muffling technologies that incorporate hull insulation, exhaust system sophistication and materials selection resulting in watercraft that are 70% quieter than models produced in the late 1990s.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	A jet ski wake could be very dangerous or disruptive to small or slow-moving vessels on the bay. These wakes could also contribute to shoreline erosion – erosion exacerbated by climate change.	PWCs weigh less and produce smaller, less dangerous wakes than most larger motorized boats.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	PWCs will provide access to the park, business opportunities, and foster even more appreciation for the park.	Concur.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	Completely banning an entire user group is irrational. There are no facts or science to back the current regulation banning PWCs. If the state is going to deny PWCs access to Kachemak Bay, they need to explain why in this plan.	PWCs are restricted by a regulation in place before this plan process began. DPOR may consider a regulation change if ADF&G changes their regulation restricting PWCs in the Critical Habitat Area (CHA).	Alter the plan to reflect that DPOR may consider changing PWC regulations if ADF&G changes the PWC regulations for the Critical Habitat Area (CHA).

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	PWCs should be allowed. The Constitution clearly states equal access for water ways. Critical habitats are the exception if there is factual evidence in support.	The Constitution provides for free access to navigable or public waters, but the Legislature may by law regulate or limit such access for other beneficial uses or public purposes.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	<p>PWC's should be allowed in Kachemak Bay. Current models are 4-stroke, very quiet, environmentally safe, and even surpass EPA standards.</p> <p>There are no regulations on boat engines in Kachemak Bay, including exhaust noise. Every PWC has a wet exhaust; there are some very loud commercial boats.</p> <p>PWCs are the cleanest boats on the water. Pollution from a century of PWC use would be less than a single day's pollution from existing old 2-stroke outboard motors and diesel motors.</p> <p>Legal boats with propellers that impact marine animals are much more damaging than jet pump systems. All vegetated shallows in Kachemak Bay have the risk of rocks, and grasses plug jets quickly. The few PWC operators that risk the shallows will cause much less impact than boats. PWCs will not sink or harm vegetation or wildlife.</p>	PWCs are restricted by a regulation in place before this plan process began. DPOR may consider a regulation change if ADF&G changes their regulation restricting PWCs in the Critical Habitat Area (CHA).	Alter the plan to reflect that DPOR may consider changing PWC regulations if ADF&G changes the PWC regulations for the Critical Habitat Area (CHA).
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	Authorizing PWC use may conflict with AS 41.21.020(a)(14). PWC use isn't included as an acceptable motorized activity in state parks.	AS 41.21.020(a)(14) is merely a reporting requirement to the Legislature. PWCs are restricted by regulation but allowed in certain areas of the state park system.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	The use of PWCs would undermine the local eco-adventure economy that has been gradually built around the park.	Allowing PWC use may well enhance the “eco-adventure economy.” There is no inherent reason PWC use could not harmoniously co-exist with kayak and other watercraft use.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	Jet skis should not be allowed in the park, as they can access shallow areas that harbor wildlife and where finfish spawning beds could be disturbed by excessive water turbulence.	If allowed, DPOR would evaluate areas where habitat disturbance may be of special concern and determine if PWC access should be limited based on possible impact to park resources.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	The issue of jet skis in the park was thoroughly vetted over at least two years through well-attended public hearings and much public comment. In keeping with this public process, the plan should not allow PWCs in the park.	DPOR continually reevaluates how it fulfills its mission to provide recreation opportunities to the public. This plan is the vehicle to articulate and update those policies – it is appropriate that the issue of PWCs be addressed in this planning process. Furthermore, PWC technology continues to improve – newer models pollute the marine environment less and are less noisy. Should ADF&G change their PWC regulation regarding use in CHA, DPOR will consider a similar change for management consistency in the overlapping areas.	Alter the plan to reflect that DPOR may change its guidance related to PWC use if ADF&G changes its PWC regulations.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 76)	The state does not have the power to deny access to the federal shipping lane that projects into Kachemak Bay.	This plan does not address shipping lanes.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Primitive Camping – Undeveloped Areas (Page 76)	Camping within the park and the subsequent problems with garbage, potential for bear encounters, destruction of habitat flora and fauna and managing human waste should be addressed in detail. Increase education and monitoring of camping’s impact. There must be adequate facilities to provide for human excrement and garbage.	Camping is allowed in both KBSP and KBSWP consistent with 11 AAC 12.230. Campers are responsible for properly disposing of human waste and garbage when facilities are not available.	None.
Guideline Table – Public Uses – Dog Sledding and Skijoring (Page 77)	These activities should not be allowed on any designated ski trails.	Skijoring is allowed on trails anywhere in the park units. This type of use is minimal.	None.
Guideline Table – Public Uses – Use of Chainsaw (Page 77)	Chainsaws are not needed to gather firewood in the park. An axe or hatchet is sufficient.	The use of chainsaws for gathering dead and down trees is allowed in all zones without authorization but must be done consistent with 11 AAC 12.170.	None.
Guideline Table – Public Uses – Use of Chainsaw (Page 77)	Add language encouraging the use of “mineral base lubricants” during chainsaw operations.” to 11 AAC 12.170 (Disturbance of natural objects.)	This plan does not make any specific suggestions for regulatory changes related to the use of chainsaws to gather firewood within the park units for use within the park units.	None.
Guideline Table – Public Uses – Use of Chainsaw (Page 77)	This use is listed as compatible in the Wilderness Zone. Noise from gasoline chainsaws can carry for miles. Chainsaw use should be limited to agency use and only when non-motorized means are impractical. Non-agency use of chainsaws should generally be prohibited as unnecessary in the Wilderness Zone.	Chainsaws can facilitate the collection of dead and down firewood in the park and are allowed in all zones.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Geo-caching (Page 78)	This activity should be incompatible in all zones due to the possibility of unfound items and caches and frenzied activity.	Geo-caching is conditionally compatible (can be authorized by permit) in all zones except the Cultural Zone. Also, in the Wilderness Zone only virtual caches are allowed.	None.
Guideline Table – Public Uses – Geo-caching (Page 78)	This activity should be compatible in SRSs.	Geocaches are conditionally compatible in the Recreational Zone. This activity must be authorized under 11 AAC 18.010 and be limited to micro-cache size.	None.
Guideline Table – Public Uses – Recreational Gold Panning (Page 78)	Recreational Gold Panners should be allowed to use the hand tools needed for crevicing (scraping gold out of cracks in rock).	The use of any tools aside from a shovel and a gold pan is restricted by regulation (11 AAC 20.918).	None.
Guideline Table – Public Uses – Recreational Gold Panning (Page 78)	This should be incompatible in all zones because the park does not have the staff to monitor stream and land disruption.	This use is allowed but restricted under regulation (11 AAC 20.918), allowing only the use of a gold pan and a shovel; no chemicals; no motorized equipment; and no disturbing areas above the highwater line.	None.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	Add clause on need to use “weed free hay” for horses and pack animals in the park to 11 AAC 20.910 (Horse use in Kenai state parks).	Although regulation changes can be suggested through the plan process, the actual change is done through a separate process. This type of restriction would be very difficult to enforce. However, as part of a larger rewrite, a great deal of information was added to the plan on invasives including the suggestion of only allowing livestock fed on weed free feed.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	Horses should be allowed in all areas of the park, except in cultural zones.	11 AAC 20.910 states the use of horses is allowed everywhere in Kenai state parks except for: campgrounds, swim beaches and picnic areas; officially designated and marked hiking trails; and areas above timberline.	None.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	Diamond Creek is a great option for horses because you can ride the beach from Homer and then up Diamond Creek and make a loop. Why would a trail system that has been used for riding horses for over 50 years now be closed to this use?	Currently the Diamond Creek trail is not constructed to sustainable standards capable of supporting horse use and this use is not allowed in this area.	None.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	List Equestrian horse-mule use prominently as one of the allowed user groups. Keep equestrian use as an active part of the plan.	Concur.	Add mention of equestrian use to Chapter 4.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	These activities should not be allowed on any designated ski trails.	Most designated ski trails are also designated hiking trails. 11 AAC 20.910 states that horses in Kenai state parks are not allowed on “officially designated and marked hiking trails”.	None.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	Horses should not be allowed on hiking trails – they ruin the trails and are potentially dangerous to hikers, especially young children. Horse riders need their own trails, but they are such a small minority that resources should not be allocated for this. Tourists do not come to Kachemak Bay to ride horses, and locals who can afford it should stay on beaches.	11 AAC 20.910 states that horses in Kenai state parks are not allowed on “officially designated and marked hiking trails”.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	Consider National Park Service standards before implementing policies on horses and pack animals in the park. Ban these from areas designated as wilderness.	Per 11 AAC 20.910, horses, mules and burros are allowed in almost all Kenai state parks (including KBSP and KBSWP) except on officially designated hiking trails.	None.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	There should be more public access for parking and camping with horses. Support creation of an actual horse park with overnight camping, a four-horse corral, and riding trails out East End Road.	Concur in part. The plan includes proposed expansion of parking areas at Cottonwood Eastland. The parking area will be designed to facilitate horse use.	Note in the plan that proposed parking facilities will include parking for horse trailers. Add an equestrian designed use looped trail to the Trail Plan. Also add Pack and Saddle design parameters (including graphics page) to the Trail Plan.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	Horses should not be allowed in the Park because most of the trails are not designed for horse use. Perhaps in the Grewingk outwash plain limited horse use could be permitted without damaging trails.	11 AAC 20.910 states that horses in Kenai state parks are not allowed on “officially designated and marked hiking trails”.	None.
Guideline Table – Public Uses – Horses, Pack Animals (Page 79)	There is a long history of equestrian use across the Bay. Many areas have permanent resident livestock that use the park daily.	Concur. In general horses are allowed across the bay but note that per 11 AAC 20.910 horses in Kenai state parks are not allowed on “officially designated and marked hiking trails”.	None.
Guideline Table – Public Uses – Human-powered Transport (Page 80)	Add paddling and rowing as examples of human-powered transport.	Concur.	Change as suggested.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Hunting & Fishing (Page 80) – Hunting Regulations – Definition of a Facility	<p>11 AAC20.100 prohibits the use of a weapon within one-half mile of a developed facility. The definition of “developed facility” 11AAC 20.990 (4) needs clarification. Does it apply to park facilities only or also to structures on private inholdings? Are trails that branch from other trails considered trailheads?</p> <p>A map or list of GPS coordinates of sites that meet the criteria for this regulation would help avoid inadvertent violations.</p> <p>Other regulations that should be easier to find are the definition of a firearm 11 AAC 20.990(6), the definition of weapon 11 AAC 20.990(15), and 11 AAC 12.050(d) dealing with animal waste. Include these in Appendix B and on the park website.</p>	The ½ mile limit on firearm discharge near a developed facility is a common standard that is employed on state lands statewide. No GPS coordinates are provided in other areas of state. The onus for understanding and complying with regulations falls upon the user.	None.
Guideline Table – Public Uses – Hunting & Fishing (Page 80)	11 AAC 20.100 states that firearm discharge is prohibited within ½ miles of developed facilities. In the Kenai National Wildlife Refuge, discharge of firearms is prohibited within ¼ mile of facilities, such as trailheads and campgrounds. DPOR should consider revising the regulation to provide for ¼ mile setbacks from facilities so these restrictions are consistent.	Concur. DPOR should consider this as it develops its next regulatory revision package.	None.
Guideline Table – Public Uses – Hunting & Fishing (Page 80)	No hunting in the park, including large animals, sea mammals, or migratory wildlife. No bear baiting, trapping, or shooting bears or waterfowl from boats. We do not even know where goats winter and they are being harvesting at an alarming rate. Good hunting lands exist next to the park.	Hunting and trapping within the park are not regulated by DPOR or the management plan, but rather by the Board of Game through Fish and Game regulations.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Off Road Vehicles (Page 82)	Off Road Vehicles (ORV) should only be allowed for emergency response or administrative use by DPOR. Low levels of ORV use can cause severe vegetation and soil damage. DPOR staffing is inadequate to manage ORV use to prevent significant, irreversible impacts.	Public use of ORVs is allowed without authorization on existing roads and parking areas. In other areas, ORVs may only be authorized elsewhere for park management purposes, research, or in support of other authorized activities, and only in the Recreational and Natural Zones. Use of ORVs is managed to limit damage to park resources.	None.
Guideline Table – Public Uses – Off Road Vehicles (Page 82)	CIAA uses ORVs and vehicles in support of the Tutka Bay Lagoon Hatchery on the hatchery access road and on land identified in the Interagency Land Management Agreement.	Use of vehicles in state parks is not allowed off-road unless specifically authorized by permit under 11 AAC 18.010. If the hatchery wishes to continue this use, they should work with DPOR on authorization.	None.
Guideline Table – Public Uses – Off Road Vehicles (Page 82)	I do not support ATV use anywhere in the park, and do not support established trails for motorized use. ATVs damage park resources, degrade habitat values, and adversely impact other park visitors and trail users.	Public use of ORVs is allowed without authorization on existing roads and parking areas under 11 AAC 12.020.	None.
Guideline Table – Public Uses – Organized Events (Page 82)	Organized events of more than 20 people in the Wilderness Park is listed as “conditionally compatible”. Such events often create a disproportionately detrimental impact on the natural soundscape and other resources; and also detract from other users’ solitude. Restraint should be exercised when considering allowing this use in the Wilderness Park.	In all zones, such events would require a special use park permit under 11 AAC 18.010 and would be subject to conditions that mitigate use conflicts and protect park resources.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Pets (Page 83)	Dogs, 9' leash. At a cabin, dogs must be within 300' and under voice command.	Concur. The plan allows pets without authorization in all zones. 11 AAC 12.130 states that pets must be on a leash not exceeding 9 feet in length. If within 300 feet of a reserved public use cabin, only voice control is required.	None.
Guideline Table – Public Uses – Snowmobiles (Page 84)	Support park-wide ban. There should be a place where people and wildlife can get away from motorized noise.	Snowmobile use may be authorized for park management purposes, research, or in support of other authorized activities, and only in the Recreational and Natural Zones.	None.
Guideline Table – Public Uses – Trapping (Page 84)	Oppose any limits to currently allowed hunting or trapping in KBSP. Trapping should be allowed in spite of the concern from some people that it is "inhumane." Any purposeful harvest of wildlife by humans causes exponentially less suffering to wildlife than the majority of their natural deaths.	Hunting and trapping within the park are not regulated by the park or the management plan, but rather by the Board of Game through Fish and Game regulations.	None.
Guideline Table – Public Uses – Trapping (Page 84)	Trapping should not be allowed. Setting traps creates a public hazard and is particularly dangerous to small children and dogs. Also, trappers cannot fully control which wild animals and birds get trapped.	Trapping within the park is not regulated by the park or the management plan, but rather by the Board of Game through Fish and Game regulations.	None.
Guideline Table – Public Uses – Trapping (Page 84)	Are trappers on the Kenai Peninsula required (by statute or regulation) to check their traps within a certain time frame, mark them in any way, have any identifying information on the traps, or set them a certain distance from a trail? Are there restrictions on the types of traps that may be used? I think most park users are unaware of the danger traps pose to them and their children. The small percentage of people that trap should not	Trapping within KBSP and KBSWP is not regulated by the park or the management plan, but rather by the Board of Game through Fish and Game regulations. Federal regulations for the Kenai National Wildlife Refuge include requirements for marking traps, time-sensitively checking traps, and prohibit trapping within one mile of roads and trailheads. Currently there are no regulations for trapping on state lands	None.

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	<p>be allowed to compromise the safety and enjoyment of park users.</p> <p>If trapping is allowed in the park, it should only be allowed more than 2 miles from trails and the activity should be very well signed.</p>	<p>(including KBSP and KBSWP) requiring checking traps within a certain time frame, marking traps in any way, or having identifying information on traps. There are some limits on the types of traps and bait that can be used. Some areas of state land are closed to trapping, but there is no regulation requiring traps be set a certain distance from a trail.</p>	
Guideline Table – Public Uses – Trapping (Page 84)	<p>Trapping should be allowed in the park. AS 41.21.131 specifies that KBSP was established as scenic park. The definition of scenic park (AS 41.21.990 (1)) states that: “...related activities which involve no major modification of the land, forests or waters...” Trapping certainly falls within this definition and in fact impacts the natural flora and fauna far less than building trails, hiking, camping or picnicking. Trapping occurs in the winter, when less people will be impacted by it.</p>	<p>Trapping within the park are not regulated by the park or the management plan, but rather by the Board of Game through Fish and Game regulations.</p>	None.
Guideline Table – Public Uses – Trapping (Page 84)	<p>Trapping should be Incompatible in the Recreational Zone.</p>	<p>Trapping within the park is not regulated by the park or the management plan, but rather by the Board of Game through Fish and Game regulations.</p>	None.
Guideline Table – Public Uses – Use of Generators (Page 84)	<p>Define “Quiet Hours”.</p>	<p>11 AAC 12.230(f) states that “In a sleeping area or campground of a state park between the hours of 11:00 p.m. and 6:00 a.m. daily or as otherwise posted, a person may not disturb other campers by making excessively loud noises...”</p>	None.

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Guideline Table – Private Structures – Private Docks (Page 86)	Docks that are falling apart should be removed and any further necessary steps taken to prevent dock debris from littering the bay.	The plan states that all docks must be constructed of non-polluting materials and any foam flotation used must be commercially encapsulated.	None.
Guideline Table – Private Structures – Private Docks (Page 86)	Community docks, seasonal docks, mooring buoys, and running lines should be encouraged over individual private permanent docks.	Concur.	None.
Guideline Table – Private Structures – Private Docks (Page 86)	The Supreme Court of Alaska concluded in STATE of Alaska, DNR v. ALASKA RIVERWAYS, INC., and Tanana River Properties, L.L.C. that “the Alaska Constitution and the Alaska Land Act have modified the common law right to wharf out by granting authority to the state to enter into leases with landowners who build wharves over state-owned land adjacent to their property.” This ruling should not be guiding the park’s policy on the right to wharfage for two reasons. Firstly, the court decision explains: “In reaching its decision in favor of Alaska Riverways, the superior court held that under the common law in Alaska, Alaska Riverways had a riparian right of access that included ‘the right to construct a wharf or dock when necessary to enjoy access with boats or ships to navigable water.’” What in fact was being granted here was “practical access to the point of navigability” rather than simply the right to wharf out. Secondly, this ruling either does not apply, or has limited applicability to the context of a state park where private inholders have access rights, but citizens of the state of Alaska have an	The plan provides guidance for authorizing docks. There are a variety of policies considered in the development of the plan guidance on docks. While community docks are encouraged, they will not be required. Language will be added to this section encouraging the use of community docks, mooring buoys, and running lines.	Add language encouraging the use of community docks, mooring buoys, and running lines.

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	additional and significant claim to the protections of the “scenic” and “natural values” described in AS 41.21.990. For these reasons, community dock development, seasonal docks, mooring buoys, and running lines should be encouraged over individual private permanent docks whenever they can reasonably be accessed by applicant; applications for permanent docks must show that the aforementioned are not reasonable options for access from the inholding to navigable waters.		
Guideline Table – Private Structures – Private Docks (Page 86)	Flotation materials should be required that are: closed cell (extruded) expanded polystyrene or equivalent material of good quality; manufactured for marine use; commercially encapsulated; and do not become waterlogged or sink when punctured. “Extruded polystyrene” language improves on the draft plan because it specifies the best current technology while allowing technological advancement.	The language in the plan seeks to disallow homemade flotation devices while allowing flexibility to include improved construction methods that may be developed in the future.	None.
Guideline Table – Private Structures – Private Docks (Page 86)	Add language: “For existing docks, un-encapsulated foam or other flotation will be authorized until it has deteriorated to the point of releasing beads; or is no longer functional or capable of supporting the structure. When any of these conditions exists, the dock must be newly constructed according to those stricter guidelines.”	No authorization will be issued for docks that do not meet the conditions listed in the plan.	None.
Guideline Table – Private Structures – Private Docks (Page 86)	Docks containing Styrofoam should not be allowed in the park. They can break down into trash that wildlife can mistake for food. Rigid hollow floats could be used instead.	The plan provides the condition that any foam flotation used must be commercially encapsulated to avoid this concern.	None.

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Guideline Table – Private Structures – Private Docks (Page 86)	Add language stating that docks must be placed as close as practicable to the private property in a manner that minimizes impacts to scenery and recreational use.	Concur.	Change as suggested.
Guideline Table – Private Structures – Private Mooring Structures (Page 86)	Restrict the length of “floating lines”, which are a danger to the public.	For coastal private inholdings, DPOR is working to institute a system allowing one free mooring buoy or running line – each additional mooring or running line would cost money. These moorings will have stipulations: must be a certain color, must be labeled, limited length, etc. Floating lines should not be allowed as a stipulation in the permitting process, but this level of detail is not necessary for the Plan.	None.
Guideline Table – Private Structures – Structures facilitating Storage of Personal Property (Page 88)	This is not appropriate on state park land. Who owns the structure and would it be easily removable without leaving permanent changes to the land? It would need to be carefully sited to not impair scenic views.	This was meant to concentrate and facilitate storage at designated sites to limit impacts while maximizing recreational opportunities.	None.
Guideline Table – Private Structures – Structures Facilitating Storage of Personal Property (Page 88)	Add in the Recreation Zone that no fuel may be stored longer than 72 hours.	Concur.	Change as suggested.

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Guideline Table – Private Structures – Water Collection and Transmission Structures (Page 88-89)	Water Collection and Transmission Structures should be incompatible in the Wilderness Zone. Since there are no private structures in this zone, no water collection or transmission structures are needed.	While there are no private inholdings in the Wilderness Zone, there are some water collection and transmission structures on parcels that border the Wilderness Zone. The plan states that easily removed structures for this purpose may be authorized in all zones except the Cultural Zone.	None.
Guideline Table – Private Structures – Electrical Distribution Lines (Page 89)	This section states that electrical lines to private property are incompatible, seemingly whether overhead or underground. Conflicts with implication on Page 55, line 40. Footnote 9 states that DPOR lacks authority to authorize private distribution lines within the park. Clarify these statements and provide the legal authority behind DPOR’s belief that it cannot authorize this use.	The section on Page 55 describes the LWCF program and what may constitute a conversion of use under that program. While it is true that underground utility lines may not be a conversion under the LWCF program, DPOR lacks the authority to issue easements for this purpose. Utility easements are disposals and disposals are not allowed in special purpose sites.	None.
Guideline Table: Commercial Uses – General – Commercial Use and Access	Increased access will only lead to greater appreciation of the park. Noise pollution from aircraft bringing visitors to the park is not the problem – an attitude of exclusion or jealousy is the problem. It’s a public park – our park. Commercial operators who follow the rules (water taxis, air taxis, the hatchery) are compatible with the purpose of the park.	This plan encourages uses that are consistent with the parks founding statutes and the definitions of scenic and wilderness parks for KBSP and KBSWP respectively.	None.
Guideline Table: Commercial Uses – General – Park Commercial Operator Fees	Commercial operators should pay fees commensurate to their impact on park resources and users. Impacts include: noise pollution; visual disturbance; displacement of other users; and disturbance of wildlife, vegetation, or waters.	The commercial fee schedule is set by regulation and falls outside the purview of this plan.	None.

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Guideline Table: Commercial Uses – General – Limit Commercial Uses (Page 90)	The park should be closed to all commercial activities except yurt/cabin rentals and water taxis.	<p>Many commercial activities provide opportunities for the public to recreate in and enjoy the parks. Limiting commercial use to only two activities would detract from the visitor experience.</p> <p>Per 11 AAC 12.300, no person may engage in commercial activity in a state park without a permit issued under 11 AAC 18 except for: commercial fishing operations; operators under a concession contract issued under AS 41.21.027; or as otherwise provided in AS 23.15.</p>	None.
Guideline Table: Commercial Uses – General (Page 90)	Water taxis, naturalists, and hunting and fishing guides should be required to educate their clients (using DPOR-provided materials) on: campfire protocol, recreational drone policies, leave-no-trace-ethics, wildlife etiquette/bear safety, and firearm safety. In addition, clients should be encouraged to pick up plastic trash on the beach and avoid bird nesting locations; hikers updated on trail conditions; hunters instructed to pick up shell casings; and dip-netters asked to clean up fish carcasses. Fees paid by these operators should contribute to funding this educational program.	Commercial operators such as water taxis and guides are not required by permit stipulation to educate their clients on these issues. Permit stipulations do, however, include mandates that the permittee “shall exercise diligence in protecting from damage lands, facilities and resources” and that the permittee will be held liable for the repair of any damages to lands, facilities or resources resulting from the permitted activities.	None.

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Guideline Table: Commercial Uses – Aquatic Farming – Mariculture and Aquaculture (Page 90)	It is confusing to list the hatchery under commercial use on p. 52, and then not list it under the commercial use table. Mariculture is only in the title (and not mentioned in the text below) on p. 52 but is included in the table on p. 90. Commercial fishing is discussed both on p. 52 and in the p. 90 table, but not in the Resource Management Activities table.	In the ITA version of the plan, the hatchery (TBLH) will be moved from the Commercial Fishing section to its own section in Chapter 4. It is not appropriate to list commercial fishing under the Resource Management Activities table, because this table addresses department activities, not commercial activities.	Move TBLH from the Commercial Fishing section to its own section in Chapter 4.
Guideline Table: Commercial Uses – Aquatic Farming – Mariculture and Aquaculture (Page 90)	Mariculture and aquatic farming should be incompatible in all zones, rather than not applicable in some zones.  A scenic park is defined in Alaska statute (AS 41.21.131) as a place “where development is minimal and only for the purpose of making the areas available for public enjoyment in a manner consistent with the preservation of the natural values...” Commercial aquatic farms are incompatible with this statutory definition.	These activities are inherently not applicable (N/A) in all zones except for the natural zone, since all marine waters within the park are zoned as natural.	Add a footnote reminding readers that all marine waters within the park are zoned as natural.
Guideline Table: Commercial Uses – Aquatic Farming – Mariculture and Aquaculture (Page 90)	Support keeping this activity “incompatible” in the Natural Zone.	The plan lists this activity as “incompatible” in the Natural Zone and N/A in all other zones since all marine waters are classified being in the Natural Zone.	None.
Guideline Table: Commercial Uses – Commercial Docks and Other Mooring Structures (Page 91)	Add language stating that docks must be placed as close as practicable to the private property in a manner that minimizes impacts to scenery and recreational use.	Concur.	Change as suggested.

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Guideline Table: Commercial Uses – Commercial Fishing Gear Storage (Page 92)	This should not be allowed. This is a scenic park, not a commercial gear storage area.	In general gear storage should be short term in nature, but at times longer term storage may be necessary and appropriate. This entry in the table provides a provision for permitting storage for longer the already allowed 72 hours.	None.
Guideline Table: Commercial Uses – Transmission Lines/Pipelines (Page 93)	HEA transmission lines mentioned in the plan are actually distribution lines.	Concur. There are no transmission lines in the Parks. These lines move large amounts of energy over long distances.	Change “transmission” lines to “distribution” lines where appropriate in the plan.
Guideline Table: Commercial Uses – Transmission Lines/Pipelines (Page 93)	The HEA power line cuts a 40-foot wide, about 20-mile long swath through the park, representing about 100 acres of park land that was denuded, failing to adhere to KBSP’s enabling statute dictate to “protect and preserve” (Page 1, line 16).	The HEA distribution line easements pre-date the formation of the parks. HEA has the right to maintain the easement as appropriate to conduct its operations.	None.
Guideline Table: Commercial Uses – Transmission Lines/Pipelines (Page 93)	Charging rent for the corridor of HEA’s distribution lines across the park might cause HEA to investigate new generation facilities closer to the markets they serve.	The HEA distribution line easements predate the park’s formation; therefore, DPOR cannot charge fees for the easement.	None.
Guideline Table: Commercial Uses – Commercial Wildlife and Nature Photography and Filming (Page 94)	How does this section apply to businesses that offer wildlife tours? As a commercial trip guide in the park, am I required to obtain a photo/film license if one of my clients ends up selling a picture or two?	This section applies to operators guiding for the specific purpose of photography and filming. A commercial operator only needs a permit for the particular service or services they are providing.	None.

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Guideline Table: Commercial Uses – Guiding and Outfitting (Page 95)	These commercial activities should not be allowed anywhere in the park.	Under the plan, these activities may be authorized (in all zones except Cultural) under 11 AAC 18 subject to conditions that mitigate use conflicts and protect park resources.	None.
Guideline Table: Commercial Uses – Resource Extraction (Page 96-97)	No resource extraction for commercial purposes. All types of resource extraction degrade park values and are not compatible with the purposes for which the Park was established.	Resource Extraction was inadvertently listed in the Commercial Uses table. As listed on Page 100, resource extraction will only be authorized for resource management purposes by DPOR or its contractors.	Delete Resource Extraction entry in the Commercial Uses table.
Guideline Table: Commercial Uses – Resource Extraction (Page 96-97)	The disturbed landscape from resource extraction would conflict with AS 41.21.131 and degrade the scenic nature of the park.	Resource extraction will not be allowed for commercial purposes, but for management purposes it is sometimes the only practical solution to protect park resources. This activity would be completed in a manner designed to minimize any collateral damage to park resources.	None.
Guideline Table: Commercial Uses – Resource Extraction (Page 96-97)	Use by other agencies is not appropriate for state park resources and DPOR use is covered under resource management on page 100.	See above.	None.
Guideline Table: Commercial Uses – Resource Extraction (Page 96-97)	Include more detail on what types of resource extraction could be allowed in cultural zones for government purposes. Preventing large trees from growing on the site of a barabara (a sod or turf hut) would aide preservation, but any activity such as gravel or rock extraction would endanger or alter cultural sites.	If resource extraction is necessary to protect park resources, the activity will be completed in a manner designed to minimize any collateral damage to park resources.	None.

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Guideline Table: Commercial Uses – Unmanned Aerial Vehicles (UAVs) (Page 97)	This use should be Incompatible in all zones.	The plan states that commercial UAV use is compatible in all zones, but requires a Special Park Use permit be issued under 11 AAC 18. If it is determined this use must be limited for any reason in the future, such as protecting park resources, it will be.	None.
Guideline Table: Commercial Uses – Unmanned Aerial Vehicles (UAVs) (Page 97)	Allowing commercial drone use conflicts with the definition of a scenic park (AS 41.21.990). Drones are an introduction of an “artificial feature”, albeit temporarily, and are a form of recreational development that is more urban than natural.	If a drone were interpreted as constituting an “extensive introduction of artificial features” (AS 41.21.990) so could most types of recreational equipment, such as a kayak or bicycle. This is clearly not the intent. Commercial drone use is conditionally compatible in all zones subject to permitting under 11 AAC 18.	None.
Guideline Table: Commercial Uses – Unmanned Aerial Vehicles (UAVs) (Page 97)	Drone permits should only be issued for education, research, commercial use, film projects, public safety, and search & rescue. These permits should only be authorized if operators meet FAA requirements under 14 C.F.R. Part 107. These permits should also be issued in consultation with ADF&G to designate distance from wildlife based on flight path, species, and time of year. In absence of ADF&G recommendations, drones should not be allowed within 1000 feet of wildlife, aligning with the NOAA drone animal harassment guidelines.	The plan states that commercial UAV use is compatible in all zones, but requires a Special Park Use permit be issued under 11 AAC 18 and requires operators meet FAA requirements under 14 C.F.R. Part 107. UAVs may not be flown within 500 feet of wildlife.	None.
Guideline Table: Commercial Uses – Unmanned Aerial Vehicles (UAVs) (Page 97)	In the future, CIAA may want to use drones.	Depending on the purpose and the potential impact on park resources, a permit may be issued for commercial drone use in any zone.	None.

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Guideline Table: Resource Management Activities (Page 98, line 7)	Add language stating that activities in this section will be done after adequate research and consideration to ensure that there are no detrimental effects to park resources.	Concur.	Change as suggested.
Guideline Table: Resource Management Activities – Motorized Equipment (Page 99)	Use of motorized equipment by agency staff should be limited to only when no other tools will suffice.	Use of motorized equipment by agency staff is sometimes necessary, and often practical from a time-efficiency standpoint.	None.
Guideline Table: Resource Management Activities – Resource Extraction (Page 100)	In the Wilderness Zone, this activity should be conditionally compatible only for DPOR management purposes. This is already occurring on the Tutka Alpine Traverse trail.	Concur – DPOR may need to engage in this activity to protect park resources in the wilderness Zone, such as the Tutka Alpine Traverse trail.	Change Wilderness Zone to compatible for DPOR or its contractors.
Guideline Table: Resource Management Activities – Resource Extraction (Page 100)	Also add language saying that any activity under this use will consider the sensitivity of cultural sites.	Concur.	In the Cultural Zone, add language stating that activity under this use will take into account the sensitivity of cultural sites.
Guideline Table: Resource Management Activities – Resource Extraction (Page 100)	Resource extraction should not be compatible in a scenic park.	If resource extraction is necessary to protect or enhance park resources, DPOR is allowed to do so without authorization.	None.

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Guideline Table: Resource Management Activities – Trail Development and Maintenance (Page 101)	Trail development and maintenance should not be allowed in the Natural or Wilderness zones. Much of the park is alpine, where no trails are needed. The recent “backdoor” trail displaces wildlife, especially goats.	Hiking is allowed in all zones, and trails channel hikers into one track, which on the whole serves to protect park resources.	None.
Guideline Table: Resource Management Activities – Trail Development and Maintenance (Page 101)	In the Wilderness Zone, this should be conditionally compatible rather than compatible. There should be more oversight on the number of trails developed in this zone.	The Trail Management Plan determines the number and type of trails developed in a particular zone. This section applies to the trail maintenance requirements.	None.
Guideline Table: Resource Management Activities – Trail Development and Maintenance (Page 101)	In general, I support the use of ATVs, ORVs and snow machines for trail development and maintenance. That is the only way the trail system at Eveline State Recreation Site could have been developed and maintained by volunteers.	Concur.	None.
Guideline Table: Resource Management Activities – Vegetation Management (Page 101-102)	This language doesn’t appear to allow HEA to remove right-of-way vegetation. The plan should reflect HEA’s ability, under the pre-existing DNR permit, to perform this work.	This HEA use is addressed in the Commercial Use table under “Tree/Vegetation Removal”.	None.

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Guideline Table: Resource Management Activities – Vegetation Management (Page 101-102)	Change to “Incompatible” in Wilderness Zone.	DPOR and its contractors, DNR, or other recognized representatives will be allowed to manage vegetation in the Wilderness Zone only for safety and resource protection purposes.	In the Wilderness Zone cell, add explicitly who is allowed to conduct this work.
Guideline Table: Resource Management Activities – Waterbody Modification (Page 102)	Opposed to waterbody modification being compatible in the Recreational and Natural Zones. This activity should be conditionally compatible even for DPOR staff and contractors. There should be some oversight on decisions to modify a waterbody.	This activity is only ever conducted in consultation and cooperation with DPOR and sometimes necessary for public safety and to protect park resources.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement (Page 103)	<p>This heading is too broad – it is crucial for permitting what activities are included. Building fish passes does not belong here. Split out some activities from this heading into more distinct separate categories.</p> <p>For instance:</p> <p>The 1,700,000 sockeye salmon, cost-recovery, stocking program at Leisure Lake and 1,000,000 Hazel Lake programs should be listed under commercial (not management) activity.</p> <p>The 100,000 Chinook salmon recreational stocking program at Halibut Cove Lagoon, is a small resource management activity.</p>	The heading is appropriate for this section of the plan.	None.

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Guideline Table: Resource Management Activities – Fisheries Enhancement (Page 103)	Please add (not necessarily on this page): “CIAA conducts a sockeye enhancement project at Leisure Lake (also known as China Poot) that involves the use of a power boat and lake fertilization. Project equipment is stored at the lake.”	The enhancement project at Leisure Lake is already acknowledged in the plan.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement (Page 103)	All applicable zones under this use heading should include the statement: May be authorized after peer-reviewed research to ensure there will be no detrimental impact on other resident species.	Concur.	Change as suggested.
Guideline Table: Resource Management Activities – Fisheries Enhancement (Page 103)	“Objectives” and “magnitudes” of salmon manipulation are missing and must be defined in the plan. Both require “standardized definition to reduce conflict of consistency and compatibility with Park statutory mandates.”	ADF&G manages fish and game resources within the park. This plan does not address salmon objectives and magnitudes – the plan provides management guidance for activities within DPOR’s purview.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement (Page 103)	Fisheries Enhancement should be “Incompatible” in the Wilderness Zone; otherwise this use is in conflict with AS 41.21.140(a) (“In order to protect and preserve this land and water for its unique and exceptional wilderness value, the park is established and shall be managed as a wilderness park”); and AS 41.21.990.140 (defining “wilderness park” as a park “where development of man-made objects will be strictly limited and depend entirely on good taste and judgment so that the wilderness values are not lost”).	Fisheries enhancement is specifically provided for in the Wilderness Park under AS 41.21.142 that allows ADF&G to engage in these activities under AS 16.05.092. Historically, some limited enhancement (e.g., sockeye salmon stocking of a small lake in Port Dick Bay) and rehabilitation (e.g., stream renovation of two Port Dick tributaries) has occurred in the Wilderness Zone.	None.

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Guideline Table: Resource Management Activities – Fisheries Enhancement (Page 103)	The draft plan opens the door for enhanced fisheries as a “conditionally compatible” use, yet it fails to provide any sideboards or specifications around where such uses will occur and what impacts they may allow. These uses conflict with the Legislature’s purposes and intent in creating the parks, and as a result, they should be disallowed moving forward.	The plan does in fact provide sideboards under which enhancement activities can occur. Such activities must occur only at existing release sites or other sites determined appropriate by ADF&G and in consultation with DPOR.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	A hatchery is permitted in Tutka Bay Lagoon and not “adjacent” to Tutka Bay Lagoon as described in Recreation Zone. Make it clear that “adjacent” means the uplands inside Tutka Bay Lagoon and not outside the Lagoon in the marine environment.	The word “facilities” will be added after hatchery to help clarify this. Also, all waters are zoned as Natural.	Add “facilities” after hatchery in the first column.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Didn’t the statute that created KBSP specifically allow commercial fishing, but not speak to allowing finfish aquaculture?	AS 41.21.131 established KBSP and states that “The land...is reserved from all uses incompatible with its primary function as a scenic park...” Neither this statute, nor AS 41.21.990 (1) (scenic park definition) mentions commercial fishing or finfish aquaculture.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	DPOR did not have the authority to permit the Tutka Bay Lagoon Hatchery in the first place. DPOR staff at the time (and during the many years since) were either poorly trained, politically motivated, or misunderstood their authority. Why is the state continuing to authorize or condone a mistake made forty years ago?	The state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	Change the plan to clarify that the state will explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.

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Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Article VIII of the Alaska Constitution is unwaveringly clear in who owns the natural resources. The state is prohibited from granting to any person or group privileged or monopolistic access to the wild fish, game, waters or lands of Alaska. The Tutka Bay Lagoon Hatchery benefits the few at the expense of everyone else and so violates this part of the constitution. The Constitution’s provision for Special Purpose Sites (Article VIII Section 7) requires “preservation for use, enjoyment, and welfare of the people.”	The state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	Change the plan to clarify that the state will explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Under AS 16.10.400 (g) the issuance of a permit is not allowed “unless the commissioner determines that the action would result in substantial public benefits and would not jeopardize natural stocks.” The Tutka Bay Lagoon Hatchery is way out of compliance with this statute: it does not provide “substantial public benefits” and does greatly “jeopardize natural stocks”.	While the hatchery provides fish to the common property sport, commercial, and personal use fisheries, the state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	Change the plan to clarify that the state will explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Under the statutory definition of a scenic park, permitted uses, “must include no major modifications, of the land forests or water.” For example, the hatchery’s brightly colored buoys degrade the scenic beauty. Any activities must be “for the purpose directed primarily toward preservation of the parks outstanding natural features and where development is minimal.” The draft guidelines appear to pre-approve release	The state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	Change the plan to clarify that the state will explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.

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	sites as compatible with the definition of a scenic park and with the plan, subject to what ADF&G (in coordination with DPOR) feels is appropriate. Where in statutes, regulations or the Constitution are compatibility clauses allowing such high volume, special-interest cost recovery pink salmon ranches?		
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Impacts of the Tutka Bay Lagoon Hatchery and net pens and associated discharges to the natural environment and effects on resident species must be clearly described. The hatchery's impacts conflict with Alaska Statutes 41.21.131, 41.21.140, and 41.21.990.	The hatchery's deleterious effect upon marine life has not been scientifically ascertained. However, the state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Regarding the Tutka Bay Lagoon Hatchery, the plan should reflect the planning policies from the Statewide Framework, for example from page 29: "Potential impacts shall be identified in order to plan for and protect State Park units from environmental quality degradation and loss of recreational opportunities."	The plan reflects the policies of the Statewide Framework. The Framework delineates general guidelines and identifies the compatibility of many public use activities for the four land use zones. The Framework directs DPOR to use this general guidance to determine more specific management direction through a management plan.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	<p>ADF&amp;G appears to be rubber stamping approval on net pens in Tutka Bay without doing their own research on hatchery salmon straying. Recent scientific research suggests that populations of pink salmon from hatcheries may be crowding out other species of salmon.</p> <p>Hatchery pinks plugged every stream on the South Kenai Peninsula last summer, some straying into waterbodies that have never had salmon. Hatchery fish are supplanting natural genomes. 11 of the 16 streams sampled in Kachemak Bay for otolith marks were contaminated with hatchery pink salmon.</p> <p>In 2016 ADF&amp;G collected otoliths and determined that 70% of straying fish come from Prince William Sound hatcheries. This makes no sense – the quality of the otolith marks made by CIAA hatcheries is questionable.</p>	<p>DPOR does not manage fish resources. Homer ADF&amp;G has been sampling index streams in the Kachemak Bay area since 2014 to see if Lower Cook Inlet (LCI) hatchery marked otoliths are present in those samples. Findings have been published annually in the LCI Annual Management Report. Identified levels of marked otoliths in samples taken from streams in LCI have shown lower than expected levels of marked otoliths outside of the hatchery special harvest area.</p>	None.
Chapter 5: Area-wide Management Direction and Guidelines – Fisheries Enhancement -- Hatchery (Page 103)	<p>The “in consultation with DPOR” language conflicts with the “may be authorized” language. DPOR and ADF&amp;G have separate permitting regimes that the Tutka Bay Lagoon Hatchery must comply with. The plan should make clear that if one agency grants a permit, that does not obligate the other agency to do so.</p>	<p>When one agency grants a permit, this does not obligate another agency to permit the use, because agencies have different permitting regimes. The “in consultation” language is meant to direct agencies to coordinate their actions.</p>	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	<p>Page 5 of the Kachemak Bay and Fox River Flats Critical Habitat Areas Management Plan (KBCHA Plan) (which includes park waters) states that “all department management decisions [in the areas] whether affecting activities undertaken by the department, other agencies or the public, will be</p>	<p>The CHA plan addresses activities within the CHA and the land-based hatchery facilities are not part of the CHA. The CHA plan guidelines only apply to the overlapping areas of certain park waters.</p>	None.

Subject	Issue Summary	Response	Recommended Revision
	<p>in accordance with [the following] goals.” Page 5 further states that these decisions will “Recognize cumulative impacts when considering effects of small incremental developments and action affecting critical habitat area resources.”</p> <p>The KBCHA Plan also states on page 7:</p> <p>“Fish and Wildlife Habitat and Population Enhancement and Rehabilitation – As appropriate, allow enhancement and rehabilitation of habitat of indigenous wildlife or fish species and enhancement of fish and wildlife populations where it furthers the management goals of [the areas], is not at the expense of existing resource values (including diversity and abundance) and doesn’t interfere with public use and enjoyment. Priority should be given to encourage rehabilitation of depleted indigenous fish and wildlife populations.”</p> <p>The decision to continue to allow the hatchery in this critical habitat areas violates all the KBCHA Plan’s provisions mentioned above.</p>		
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	<p>Reclassify the Tutka Bay hatchery as a commercial operation. When the Tutka Bay hatchery first started operations, it was meant to rehabilitate depressed stocks. At the outset, its release sizes were close to the size of the natural run. However, the release of an average of 60.6 million fish every year between 1995 and 2017 represents a shift in purpose away from rehabilitating stocks and toward industrial production. The park can no longer classify the Tutka Bay hatchery as an</p>	<p>The hatchery provides fish to the common property sport, commercial, and personal use fisheries; however, the state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park</p>	<p>Change the plan to clarify that the state will explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.</p>

Subject	Issue Summary	Response	Recommended Revision
	enhancement operation, as its purpose and scope no longer fit the Hatchery Act. Despite CIAA being classified as a private, nonprofit corporation, the hatchery is clearly a commercial operation with production for commercial harvest.	Use and Issues Chapter of the plan for additional discussion about the TBLH.	
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	The draft plan combines the expansion of net pens and the existence of the hatchery together as one issue. They should be separate issues.	The net pens are an integral part of the hatchery's operations and thus it is appropriate to consider these together.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	<p>Follow DPOR directives regarding commercial use. Before issuing permits, a determination must be made that:</p> <ul style="list-style-type: none"> <li>the park natural resources will not be adversely affected;</li> <li>the park is protected from pollution;</li> <li>public use values will be maintained and protected;</li> <li>public safety, health and welfare will not be adversely affected;</li> <li>and that the activity is consistent with planning efforts affecting the park and adopted park and local plans.</li> </ul>	All DPOR permitting requires that the procedures under 11 AAC 18 be met before approval.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Discharges into park waters are not managed and protected under park supervision in accordance with AS 41.21.990. Cooperative agreements should be formed between DNR/DPOR and agencies authorizing discharges, namely EPA, the	ADEC manages water quality. Guidelines for managing water quality is outside the scope of a DPOR management plan.	None.

Subject	Issue Summary	Response	Recommended Revision
	<p>U.S. Army Corps of Engineers, the ADEC, and ADF&amp;G.</p> <p>DEC currently permits discharges from the Tutka Bay Lagoon Hatchery. This discharge permit has no numeric limits set on effluent discharges. Furthermore, this permit only requires that receiving waters be sampled by operators once a year, at a time and location chosen by the operator, and only require the sampling of water for pH, salinity, and temperature. No data is being conducted on the grasses, benthos, phytoplankton, zooplankton, fish, and shellfish except immediately below the pens. There are no random visitations on the part of DEC to verify accurate reporting.</p>		
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Water quality monitoring should accompany the Tutka Bay Lagoon Hatchery operations. Food and excretions of fish in net pens may contain additives that harm marine life. The Tutka Bay Lagoon Hatchery should be required to restore water quality to pre-hatchery levels.	ADEC manages water quality. Guidelines for managing water quality is outside the scope of a DPOR management plan.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	The plan should acknowledge that the entire time TBLH has operated, inadequate water circulation in the Lagoon has risked violating state water quality standards. A USEPA report on the adverse water quality impacts from hatchery operations should be reviewed by DPOR and the plan should acknowledge it as a reference for future permitting purposes.	Tutka Bay Lagoon has a naturally occurring pink salmon return (20,000-25,000 fish). Often during years of high returns similar locations, (Dogfish Lagoon, English Bay River Lagoon, Ursus Lagoon, etc.) have significant levels of wild salmon carcasses associated with them as well that may also result in localized violations of state water quality standards. DPOR consults with ADF&G and considers these types of issues when permitting.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	The Tutka Bay Lagoon Hatchery has been in operation since 1976 – it is an integral part of the commercial fishing industry and benefits the entire community. The hatchery’s net pens should be allowed to be relocated to the head of Tutka Bay – the lagoon decreases the hatchery’s viability. The long coexistence of the park and the hatchery suggests they are compatible. The hatchery blends in with the environment and compliments the scenery just like oyster farms or the occasional cabin do.	The state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	When the net pens are in place, other users are unable to use those waters. When CIAA recovers salmon returning to Tutka Bay Lagoon, other park users are unable to enter the Lagoon due to concentrated recovery activity. Within all zones, the plan should clarify that use of net pen structures is an exclusive use of park waters that is incompatible with the purposes of the park and	The state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031. See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	Change the plan to clarify that the state will explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.

Subject	Issue Summary	Response	Recommended Revision
	<p>negatively impacts use and enjoyment of park waters.</p> <p>Net pens structures should be put under the Floating Facilities (Commercial) category. These structures are currently not allowed under the Kachemak Bay Critical Habitat Management Plan and must stay incompatible in all zones.</p>		
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	The net pens to imprint pink salmon fry should be limited to Tutka Bay Lagoon, which will limit production to a reasonable number. The outward move into State Park waters should be Incompatible until ADF&G and CIAA have determined through independent research the carrying capacity of fry release.	This is a question and consideration for ADF&G.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	<p>CIAA sought a permit for expansion of the Tutka Bay Lagoon Hatchery, looking for other places to release pink salmon fry, including the head of Tutka Bay. The use was initially determined incompatible, but Commissioner Mack later approved the permit. Decision-makers narrowed their review to siting the facility and did not consider the full impact of the project. If this analysis has been done, it should be included in the plan.</p> <p>Furthermore, the Commissioner said he approved the permit because no one provided information that this activity would have a harmful effect. First, DPOR originally denied the permit and most people did not know it was appealed to the Commissioner. Had they known, more information would have been forthcoming.</p>	In 2020, the Commissioner rejected CIAA's request to move the net pens to Tutka Bay, in part, because the placement of the net pens in that location would be inconsistent with the legislative intent when it created the KBSP as a "scenic park." See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	None.

Subject	Issue Summary	Response	Recommended Revision
	Secondly, shouldn't DPOR only allow development if substantial evidence exists that the activity will NOT adversely impact the park resources?		
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Science, not public input, should guide limits on fry and carcasses. Science dictates that hatchery output should have been capped years ago. Money and greed have increased hatchery fry numbers. Hatchery releases of pink salmon should be capped at 50 million; or be capped at 50% of documented natural populations.	Since 1994, Tutka Bay Lagoon Hatchery has been permitted to take for incubation up to 125 million green pink salmon eggs. From 2004-2016, TBLH releases of pink salmon have only exceeded 50 million in one year (2014, 51,298,000).  ADF&G manages fish and game resources within the park. Hatchery output limits are beyond the purview of this plan.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	The hatchery's pink salmon releases lower the productivity of other species that are important sources of recreation including King and Tanner crab, halibut, shrimp, herring, Pacific cod, clams, and mussels, and invertebrates.  Begin research on the hatchery's effects on native species and continue research when the area stabilizes after the hatchery is gone.  ADF&G should collaborate with the North Pacific Fishery Management Council to understand, within the backdrop of global climate change, the impacts of hatchery raised pink salmon on the food web.	ADF&G is not aware of any clear documentation that hatchery releases significantly lower productivity of the marine species listed. If resources are available, ADF&G could study and assess this risk, otherwise limited resources should continue to be directed toward aspects of these releases currently being evaluated. For example, the PWS/Southeast Alaska hatchery salmon project is studying genetic stock structure, straying and the effects of straying on wild salmon stocks.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	In the 26 years the CIAA has been operating the Tutka Bay Lagoon Hatchery the common property fishermen have never come close to their natural wild harvest of 1975 except for in 1995. From 1996 to 2017, an average of only 8% of returning Tutka Bay Lagoon hatchery pinks were harvested by independent fisherman. The Tutka Bay hatchery monetarily benefits the few while degrading public natural resources with no benefit to everyone else. Only a small number of fisherman profit from the hatchery.	ADF&G is not aware of any evaluation of TBLH returns that would provide an estimate of the percentage of hatchery-produced salmon caught in the commercial common property harvest.  Otolith samples taken in recent years from the Southern District commercial purse seine harvest regularly exceed 50% Tutka hatchery marked fish. In 1975 the Southern District commercial common property pink salmon harvest was 844,125. This was exceeded in 1979 with 906,000 pink salmon harvested; in 1981 with 1,386,000; in 1989 with 971,000; and in 1995 with 1,220,000.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Unharvested pinks from the hatchery outcompete native species, negatively affect water quality, lower dissolved oxygen levels, increase bacteria counts and attract seagulls.  Thousands of salmon carcasses lining the beaches and streambeds in Tutka Bay negatively impact the park experience. The head of Tutka Bay has a deep hole which traps fish carcasses, which alters the ecosystem and negatively affects wildlife.	The hatchery's deleterious effect upon marine life has not been scientifically ascertained.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Remote releases from the Tutka Bay Lagoon Hatchery should not be allowed anywhere in the park.	Currently the Tutka Bay Lagoon Hatchery is only authorized to release pink salmon in Tutka Bay Lagoon. Other remote releases of hatchery produced fish come from the Trail Lakes Hatchery.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	An Interagency Land Management Agreement (ILMA) (ADL 200098) related to the “fisheries incubation facility” in Tutka Bay has two Exhibits A and B to clarify intent. These exhibits should be added to the plan.	These exhibits are specific to the ILMA agreement and are not appropriate material to be added to a plan of this type.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	For the benefit of a few seiners, Tutka Bay Lagoon Hatchery pinks are ruining fishing for the 30 set-netters in Kachemak Bay. The cost of tendering hatchery pinks to Homer equals the total value of the fish. If the hatchery grows, fisherman could be put on daily catch limits because processors can’t meet demand. The number of hatchery pinks clogging set-nets the past few years has forced some to quit fishing early. Hatchery fish also decrease the size of wild stocks, forcing some to buy smaller mesh nets, with which in turn they catch more pinks.	The hatchery provides fish to the common property sport, commercial, and personal use fisheries; however, the state believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.  See the Park Use and Issues Chapter of the plan for additional discussion about the TBLH.	Change the plan to clarify that the state will explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	Hatchery use of any dams or other mechanical devices to entrap or divert additional water for hatchery production should not be allowed.	Water for hatchery use is taken from a shallow well adjacent to the hatchery site. No dams are involved, only a pump to lift water into a large storage tank.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	In 1990, the Legislature passed an <i>Act relating to shellfish mariculture within the Kachemak Bay State Park</i> , which found that “shellfish mariculture is a commercial activity that is generally incompatible with the purposes of state parks, and that commercial activities of this type conflict with the expressed purpose of Kachemak Bay	Hatcheries are not shellfish mariculture.	None.

Subject	Issue Summary	Response	Recommended Revision
	State Park as set out in AS 41.21.130.” Please explain of how DNR/DPOR’s determinations on hatcheries is consistent with this statement of the Alaska Legislature on shellfish mariculture. Furthermore, what is the legal justification for mariculture being “Incompatible,” while salmon hatcheries are considered “conditionally compatible”?		
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	The Alaska Supreme Court ruled in <i>SOP v. State of Alaska</i> that certain permits to private entities constitute easements, and as such are disposals of an interest in State land and against state law if within state parks. Please explain how the DNR Tutka Bay Lagoon Hatchery permits can be constitutional in light of this ruling.	DPOR does have concerns about disposal of legislatively designated lands based on <i>SOP v. State of Alaska</i> as noted in the Park Use and Issues Chapter of the plan. The state also believes the Tutka Bay Lagoon Hatchery operations are likely incompatible with park purposes. The Intent to Adopt version of the plan will recommend that the state explore a phase-out of the hatchery, to include not renewing the CIAA operating agreement in 2031.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	ADNR Commissioner Andy Mack commercially-fished with a CIAA Board Member’s son – an obvious conflict of interest in the Tutka Bay Lagoon Hatchery’s operations. ADF&G Commissioner Sam Cotton also had a conflict of interest – he resigned from the CIAA board to become Commissioner and his sons have Lower Cook Inlet Seine permits. The park planners are subject to these commissioners who are using their positions to further CIAA’s objectives regardless of abuse of power or strife caused in the public forum. This plan is being rushed	The DNR Commissioner has the authority to set priorities and deadlines for planning processes. On December 2, 2018 former DNR Commissioner Andy Mack adopted the Kachemak Bay State Park and Kachemak Bay State Wilderness Park Management Plan. On December 7, 2018 the new DNR Commissioner Corri Feige rescinded the plan, reinstating the 1995 Management Plan. An Intent to Adopt version of the Plan will be released, giving the public another chance to comment on a revised Plan.	None.

Subject	Issue Summary	Response	Recommended Revision
	because Commissioner Mack wants to sign a plan approving the Tutka Bay Lagoon Hatchery before his term ends. As a lame duck commissioner, he should instead allow the public process to go on.		
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 103)	The plan should promise that DPOR will give the public an opportunity to weigh in before DPOR makes a decision on any further CIAA permit applications.	There are regulatory procedures for authorizing activities – the plan, while providing guidance, cannot make these types of promises.	None.
Guideline Table: Resource Management Activities – Fisheries Restoration (Page 104)	Change heading to from Fisheries Restoration to Fisheries Rehabilitation.	Concur.	Change as suggested.
Guideline Table: Resource Management Activities – Fisheries Restoration (Page 104)	Change to “Incompatible” in Wilderness Zone.	In this context restoration refers to action taken to restore native fish populations, which may be necessary in the Wilderness Zone. Such action may not be undertaken unless research determines it will not negatively impact other species.	None.
Guideline Table: Resource Management Activities – Vegetation Enhancement and Restoration (Page 104)	Vegetation enhancement and restoration being disallowed (incompatible) in the Wilderness zone conflicts with AS 41.21.142 which allows ADF&G to rehabilitate streams in KBSWP.	Concur. AS 41.21.142 says that nothing in AS 41.21.140 (which created KBSWP) prohibits ADF&G from stream rehabilitation under AS 16.05.092 in the area.	Under Wilderness Zone, add after Incompatible “, except as part of stream rehabilitation performed by ADF&G under AS 16.05.092.”

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Pest and Disease Control (Page 105)	Change to “Incompatible” in Wilderness Zone.	An invasive species not indigenous to the area may need to be controlled in the Wilderness Zone.	None.

**CHAPTER 6: UNIT SPECIFIC MANAGEMENT**

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
General – Definitions	Be more specific about what the size, design and materials of huts and Public Use Cabins would be.	It is not appropriate for the plan to be so specific on public use cabin design. These specifics are normally considered during a site and facility design phase.	None.
General – Advertise Lesser Known Park Units	The parts of KBSP on the north side of Kachemak Bay are not well known. These areas and their allowed usage should be better advertised, and facilities to support year-round use should be developed.	Agreed that the parts of KBSP on the Bay's north side are not well known. Several facilities that should encourage year-round use are proposed for these areas.	None.
General – Public Mooring Buoys	Support more mooring buoys. A cooperative program with USCG should be established to increase the number of mooring buoys in the park.	Concur. DPOR should investigate working with USCG on this issue.	None.
General – Public Mooring Buoys	Please restore mooring buoys at the Saddle Trailhead and Glacier Spit. There should also be more mooring buoys at campsites. Additionally, a solid mooring buoy is more secure and safer than when many private boats use their own systems.	Public mooring buoys are encouraged in the plan.	None.
General – Public Mooring Buoys	There used to be many public mooring buoys. These were not maintained by the Park Service, forcing locals to use water taxis to access the park. As local business owners, we pay a park fee to have our own private mooring buoy to access these trails. If these permits are no longer granted, it would negatively impact our business greatly.	DPOR currently issues permits to commercial operators to install mooring buoys and has no plans to discontinue this practice.	None.

Subject	Issue Summary	Response	Recommended Revision
Chapter 6 Unit Specific Management -- Park Units on North Side of the Bay	Park units on the north side of the Bay receive much use and should have more infrastructure, maintenance, and monitoring.	Concur.	None.
Public Interaction and Education	Increase structures geared toward public interaction & education, such as amphitheaters, covered pavilions, and bunkhouses with at least a 20-person capacity.	The plan recommends construction of numerous tent platforms and public use cabins; two mountain huts; and two campgrounds. It also calls for possibly repurposing existing structures for two Group Camps that could accommodate relatively large groups.	None.
Park Facilities – Deferred Maintenance	DPOR facilities are constructed and then not properly maintained. A few years ago, DPOR had roughly \$50 million in deferred maintenance – it is likely more now. DPOR should not develop any facility until this figure is reduced to a reasonable level. Furthermore, DPOR should never develop anything without expecting to have the funding to properly manage and maintain it.	DPOR is reducing the amount of its deferred maintenance and any new facilities are designed to be more sustainable to further reduce maintenance costs. This is a long-term plan that needs to address facility needs that may arise many years in the future, regardless of current budgetary restraints.	None.
Yurts, Cabins and Trails	More yurts, state park cabins and better maintained trails.	The plan calls for new public use cabins and improved trail maintenance.	None.
Facilities Proximity to Water Sources	Many of the proposed camps and tent platforms are too close to water sources, especially at Emerald Lake.	These types of considerations are made prior to construction and in consultation with sister agencies.	None.
Park Office	A park office on the Homer Spit in summer would be good idea.	Should funding allow, DPOR will consider this possibility in the future.	None.

Subject	Issue Summary	Response	Recommended Revision
General – Park Development	Park planners should avoid pursuing development that facilitates large group activities in the park, but rather plan to develop trails and other infrastructure in a way that encourages dispersed visitation.	DPOR tries to accommodate a large diversity of recreational experiences that are available in state parks. Group activities are sometimes appropriate, if park resources can be properly protected. Some existing park facilities may be repurposed for group use.	None.
General – Park Facilities and Park fees	Plans for more cabins and tent platforms are in direct conflict with local businesses. It is unfair since the state does not have to make a profit. Also, current facilities are not in good condition – overflowing outhouses and dirty cabins. Therefore, park fees should not be raised at this time.	Limited budgets and the remoteness of the park certainly make maintaining park facilities an on-going challenge. KBSP is a public park meant to serve the public's needs, so more cabins and tent platforms, should funding for such ever materialize, are consistent with park purposes.	None.
General – PUCs and Park Fees	PUCs located close to the ocean would directly compete with local businesses that provide lodging for park visitors. Some also say that fees should be raised on local businesses using the park. How is it justified to take away business from locals while also raising fees?	PUCs are very popular, encourage outdoor recreation, and offer a different experience than that offered by private businesses. There are always requests for additional PUCs in the parks. The plan recommendation seeks to satisfy these requests and enhance use of the parks.	None.
General – Park Facilities	Proposed PUCs and trailheads at the head of bays would limit traditional hunting and trapping use in those areas. If developed, there should be exemptions to the firearm discharge minimum distance from these facilities during the spring and fall hunting seasons.	DPOR's mission is to provide recreational opportunities and PUCs are very popular with a variety of users, including hunters. 11 AAC 20.100 states that firearm discharge is prohibited within ½ miles of developed facilities for public safety reasons.	None.

Subject	Issue Summary	Response	Recommended Revision
General – Huts and Trails	The proposed huts and trails will not be cost effective; will degrade the park and the park experience of visitors; and will strain flora and displace fauna (especially goats).	DPOR's mission is to provide recreational opportunities and PUCs are very popular with a variety of users. PUCs are sited to minimize negative impact on park resources.	None.
Yurts	The Park should include the proposal from Alaskan Yurt Rental Company, LLC for yurt rental expansion program in the plan. The yurts have produced income for state parks for years. The yurts are portable, low-impact, safe, and durable. The company also has a plan for producing zero-impact composting outhouses.	This specific level of detail is not appropriate to include in the plan.	None.
Yurts	Yurts will offer safe, carefully sited, overnight shelter and reduce instances of camping in random locations where fire danger is high, or where a devastating surface wave (near Grewingk Glacier) may occur.	Concur.	None.
Tent Platforms	More tent platforms should be built throughout the Park, especially in areas that would draw campers away from heavily used beaches.	Concur. Numerous tent platforms are being proposed in the plan in various areas of the park.	None.
Useful Camping Facilities	Backpacking tents cannot be staked down on wooden platforms – small gravel pads with proper drainage would provide better tent sites. If a permanent structure is desired, a rain shelter (on posts with a slanted roof and tie points) over a gravel pad would be helpful. A campsite intended for heavier use should have a composting outhouse; a dedicated fire ring is also useful. Campsites should be at the end of a spur trail off the main trail and clearly signed.	If the level of use warrants it, tent platforms in the Outer Coast unit may be later upgraded to 3-sided shelters or PUCs.	Note in the Outer Coast unit that tent platforms may later be upgraded to 3-sided shelters or PUCs if use levels warrant.

Subject	Issue Summary	Response	Recommended Revision
Public Use Cabins	Public use cabins should be located away from main trails, on spur trails with clear signage. Cabins should be near a source of fresh water and developed to protect that water from contamination by human waste.	Concur. The plan provides general areas where siting may be appropriate, but the precise locations would be determined later after more detailed site-specific investigation.	None.
Priority Facility Construction	Park-wide construction priorities should include composting toilets, bear boxes, and kiosks with info on hazards and flora and fauna.	Concur.	None.
General – Chapter Organization	Reorganize Chapter 6 to give State Recreation Sites (SRSs) their own section: Overlook, Eveline, and Diamond Creek. They should not be called units but SRSs for clarity.	Concur, in part. The SRSs are still referred to as park units in some contexts. The 3 SRSs will be grouped together geographically from north to south, but they do not inhabit an exclusive SRS section.	Group the SRSs together geographically from north to south.
General – Chapter Organization	Order the units on north side of bay together and units on south side listed contiguously from the Northern unit through Sadie-Tutka then Outer Coast.	Concur in part. The 3 SRSs will be grouped together geographically from north to south (see above). The units in KBSP and KBSWP will be separately grouped together geographically from north to south.	Group the non-SRS units in KBSP and KBSWP geographically from north to south.
Management Units – Facility and Trail Recommendations (Page 109, line 6)	Recommend eliminating reference to “Outer Coast Management Unit” and changing it to “Kachemak Bay State Wilderness Unit” and adding “Nuka Petrof Unit” to KBSP.	The Outer Coast Management Unit includes the entirety of KBSWP, and the Nuka Island/Petrof area of KBSP. These areas have some similar geographical characteristics, are adjacent to each other, and border the Gulf of Alaska, and not Kachemak Bay. For these reasons they have been joined into one management unit.	None.

### Cottonwood Eastland Management Unit

Subject	Issue Summary	Response	Recommended Revision
Cottonwood-Eastland Unit – General – Cultural Site	The beach area at the mouth of Cottonwood Creek and the Aurora Lagoon area are also cultural sites. Regulatory and interpretive signage should be established in those locations.	Concur.	None.
Cottonwood-Eastland Unit – General – Public Use Cabin	I strongly support the development of a public use cabin in this unit.	Concur.	None.
General – Hunting and Trapping	No hunting and trapping on the north side of bay. There are many houses on the ridgetop and children and dogs within .5 miles of Cottonwood-Eastland Park at 14.5 miles East End Road and down the hill one mile. These activities occurring on this narrow strip of land will negatively impact wildlife and could be a public safety issue.	Hunting and trapping within the park are not regulated by the park or the management plan, but rather by the Board of Game through Fish and Game regulations.	None.
Cottonwood-Eastland Unit – General -- Hunting	Only bow hunting should be allowed as high-power firearms could be hazardous to nearby private property owners.	Hunting within the park is not regulated by the park or the management plan, but rather by the Board of Game through Fish and Game regulations.	None.
Cottonwood-Eastland Unit – Unit Description – Noting a Specific Public Easement	On May 25, 2012 a DPOR director's determination established a public easement within Kachemak Bay State Park to provide legal access to private property owners in Shafford Heights subdivision. (LAS 28480 – Sections 18 & 19 in Township 5 South, Range 11 West, Seward Meridian). DPOR will continue to work with landowners to permit that surveyed easement by a plan that is affordable and allows said easement to be built in	The referenced LAS is on file with the Alaska Department of Natural Resources. Landowners have proactively worked with DNR to establish this easement.	Add this information to the Cottonwood Eastland section in Chapter 6.

Subject	Issue Summary	Response	Recommended Revision
	<p>phases. This easement will not be a Kenai Borough maintained road.</p> <p>To protect access for landowners in the Shafford Heights subdivision and to guarantee access even as the easement remains undeveloped, the foregoing paragraph should be inserted in the plan in seven places.</p>		
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Page 114-115)	Justin’s Court and Elmer’s Way residents are concerned about proposed park development near our properties. The plan does not include: specific proximal, visual, and audio protections for neighboring properties; a proposal to address road maintenance on Ratone Street and Elmer’s Way; specificity as to access points and parking for proposed facilities CE-01, 02, 03, 05, 06 and 07; nor detail showing where CE-05 (public use cabin) will be and how it will be accessed. Residents do not want to see or hear visitors nor endure excess traffic on our roads. All these proposed facilities will negatively impact the neighborhood’s tranquility. The plan also does not address appropriate buffer zones, include signage denoting private property, nor provide proposals for resident’s review and comment.	<p>DPOR’s mission is to enhance recreational opportunities. The Cottonwood Eastland unit currently has no recreational facilities or trails.</p> <p>The recommendations in the plan seek to enhance opportunities in this area. Facilities and trails will be located and designed to have minimal impact to adjacent property owners.</p>	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Page 114-115)	Before developing the area, survey boundaries to delineate state park land from private land. People accessing the beach will trespass the privately-owned open spaces, because the state land’s topography is more difficult.	Should development ever occur here, DPOR will utilized signage or other means to direct people away from privately owned lands.	None.

Subject	Issue Summary	Response	Recommended Revision
Cottonwood-Eastland Unit – General	Primitive camping should not be allowed, although this may be difficult to enforce.	Camping is currently allowed throughout the parks, including in the Cottonwood-Eastland unit; with the exception that regulations prohibit camping within ½ mile of a road or a developed campground.	None.
Cottonwood-Eastland Unit – Horses (Pages 113-117)	Free ranging horses are negatively impacting the park: spreading invasives, degrading water quality, increasing erosion. Put stronger anti-grazing language in the plan.	11 AAC 20.910 disallows groups with more than 10 horses from entering any Kenai state park without a permit, tethering horses within 100 feet of fresh water, and loose herding.	Add language regarding horses in 11 AAC 20.910 to the Cottonwood Eastland section in Chapter 6.
Cottonwood-Eastland Unit – Management Intent (Page 114)	Increase development in the Cottonwood-Eastland unit to allow road access to the public, including ADA and socioeconomically limited demographics.	A campground with vehicle access and ADA accessible public use cabins are proposed for this area in the plan.	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Pages 114-115)	No new trails up Falls Creek, along the edge of the bluff, or on the beach. The bluff is eroding; and bears and moose use the area.	The precise siting of any new trails developed in this area will be designed to be sustainable and will consider the movement of wildlife.	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Pages 114-115)	Do not build a PUC in this unit. It is not needed, will interfere with traditional use patterns, and would be vandalized if constructed.	DPOR believes PUC development would add value and increase access and use of the area.	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Pages 114-115)	Three public use cabins in Cottonwood Eastland is too many.	The intent for this area is to provide a variety of recreational opportunities and PUCs are a critical component of that vision.	None.

Subject	Issue Summary	Response	Recommended Revision
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Pages 114-115)	Agree there should be improved trails, a campground, and cabins. Makes sense to develop road-accessible areas with fee-generating, self-sustaining facilities.	Concur.	None.
Cottonwood-Eastland Unit (Pages 113-115)	No campfires, due to beetle-kill and dry grass fire danger. Thinning deadfall in Cottonwood Canyon to mitigate wildfire danger would be prudent.	Open fires in KBSP are currently only allowed on non-vegetated gravel bars below timberline and on saltwater beaches. <sup>7</sup> If the proposed campground is developed in this unit, fires may be allowed in approved fire-containment structures. <sup>8</sup> As in other areas of the state, if the area is unsafe due to beetle kill the campground would be closed.	None.
Cottonwood-Eastland Unit – General – Parkland Acquisition	Add DNR parcel 18515101 (317.78 acres – mile 17 East End Road) and DNR parcel 17208007 (155.37 acres) to the park. Both parcels abut park land.	<p>The numbers referenced are Kenai Peninsula Borough (KPB) Property ID numbers, not DNR parcel numbers. Nearly half of the originally 317.78-acre parcel near mile 17 East End Road has been transferred to KPB. Another large portion of this parcel north of the road has been relinquished back to state ownership from KPB. A portion of this parcel south of the road has been retained in state ownership – DPOR is currently seeking a management agreement with DNR for this land in order to improve access to KBSP.</p> <p>The 155.37-acre parcel (ADL 27092) was conveyed to the KPB in 1966 under patent</p>	None.

<sup>7</sup> 11 AAC 20.120 Campfires

<sup>8</sup> 11 AAC 12.180 Fires

Subject	Issue Summary	Response	Recommended Revision
		#334. EVOS money was later used to return this to state ownership, with the intent of adding the parcel to KBSP. This would require legislative action that to date has not occurred. While not officially part of KBSP, DPOR has a management right with the state to manage this parcel as park land.	
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Pages 113-115)	Access should be developed at mile 16.8 East End Road, including a rentable cabin or yurt.	DPOR will pursue an Interagency Land Management Assignment for the general state land near mile 16.8 Eastend Road with the intent of developing access to the park at this location.	In the Cottonwood-Eastland section of Chapter 6, reference this potential ILMA.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Pages 113-115)	Motorized vehicles should not be allowed on any of these proposed trails.	None of the proposed trails are planned to be designed for public motorized use.	None.
Cottonwood-Eastland Unit – Snowmobiles and ORVs	Decommission road/trail at the end of Jones Road currently used by snowmachines and ORVs.	Jones Road heads south off East End Road past Ratone road. This road turns into a trail that extends into Cottonwood-Eastland unit of the park. Motorized use, including ATVs and snowmachines, are not allowed on park lands in this area.	None.
Cottonwood-Eastland Unit (Pages 114, lines 3-5)	Support the management intent for development of trails within the Recreational Development Zone of the Cottonwood-Eastland Unit.	Concur.	None.
Cottonwood-Eastland Unit –	An RV-campground and day-use parking area positioned out of sight of East End Road with	A campground is proposed for this unit that would accommodate RVs.	None.

Subject	Issue Summary	Response	Recommended Revision
Facility and Trail Recommendations (Page 114-115)	mountain-views would receive significant use. This could, however, cause traffic conflicts on often dangerous East End Road.		
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Page 114-115)	The proposed loops on the western end seem too congested and there are way too many trails proposed in the northeast corner of Cottonwood Eastland.	Cottonwood-Eastland is an under-utilized part of KBSP. These trails will help DPOR fulfill its mission of increasing recreational opportunities. Some of the proposed trails will be deleted to decongest the area. Precise siting of trails will take many location-specific factors into account, such as sightlines, terrain, vegetation and soils.	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Page 114-115)	Support development of bicycle/multi-use trails. The terrain in this area is better suited to cycling than Diamond Creek.	The plan calls for development of multi-modal trails in this area.	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Page 114-115)	Tracked vehicles should not be used in trail construction. Once the ground is scarified, many alders will take root.  Volunteer trail crews, if allowed to use powered vehicles, will likely abuse the privilege.	Trail construction may include using tracked vehicles. Depending on the trail design and location, utilizing tracked equipment may be the most cost-effective and efficient method.	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (Page 114-115)	Users should be required to maintain quiet – radios, for example, should be prohibited.	There are regulations (11 AAC 12.230) governing quiet hours in campgrounds and sleeping areas in state parks to help prevent disturbance of others.	None.
Cottonwood-Eastland Unit – Facility and Trail	Complete a study on potential impacts to this area before developing it.	DPOR has a mission to provide and enhance outdoor recreation opportunities and this may require some level of development.	None.

Subject	Issue Summary	Response	Recommended Revision
Recommendations (Page 114-115)		This is an unutilized area of the park that would provide road-based opportunities that are easily accessible compared to other areas of the park. Development is always a balance between creating new recreational opportunities and protecting park resources.	
Cottonwood-Eastland Unit – Facility and Trail Recommendations (CE-07 on Page 115)	These trails should also include snow-biking.	Should regulations allowing bicycle use be promulgated for this area, bicycle use may be allowed in the winter.	None.
Cottonwood-Eastland Unit – Facility and Trail Recommendations (CE-07 on Page 115)	Better trail access to Cottonwood Canyon should be considered.	Proposed terra trails would provide access to the beach and lower Cottonwood Creek Canyon.	None.

### Diamond Creek Management Unit

Subject	Issue Summary	Response	Recommended Revision
Existing Facilities and Trails (Page 120, lines 3-5)	The cycling club trail stops at the beach access trail and does not provide access to the beach as the current beach trail does not allow bikes.	This will be corrected. The plan expands beach access to include opportunities for bicycles.	Remove language that says that the Homer Cycling Club has constructed an out and back trail that provides access to the beach.
Existing Facilities and Trails Table (Page 120, after line 5)	The beach access trail is not improved much and has wet and muddy spots but is not in poor condition compared to other trails in the park.	Due to terrain, the beach access trail's poor condition could be dangerous and so deserves to be highlighted.	None.
Management Intent (Page 120, lines 8-12)	Support efforts to manage the Diamond Creek Unit to provide trails that enhance biking opportunities.	Concur.	None.
Management Intent (Page 120)	Any money available for the Diamond Creek area should be used for enforcement and maintenance only – no new trails, cabins, or camping facilities.	Inadequate funding for maintenance is an unfortunate reality at present. The plan is optimistic in anticipating a day when funding may be available for increased maintenance and for appropriate facility and trail development.	None.
Management Intent (Page 120)	Increase development in the Diamond Creek unit to allow road access to the public, including ADA and socioeconomically limited demographics.	There is already road access to Diamond Creek SRS. The plan recommends development of a public use cabin, a public toilet, a small campground (which may include another PUC), and a small parking area with materials storage. DPOR applies Americans Disability Act (ADA) standards and Accessibility Guidelines for Outdoor Developed Areas to all recreational	None.

Subject	Issue Summary	Response	Recommended Revision
		programs and facilities within units of the state park system.	
Special Management Considerations (Page 120, lines 28-30)	The special management considerations indicate that beach trails should have signs informing visitors of various allowed uses. Harbor seals routinely haul out on various locations along the beach. Signs should include a statement that users should avoid hauled-out harbor seals when traveling along the beach.	Concur.	Add to this section language stating that beach signage should include language directing users to avoid hauled out seals when traveling along the beach.
Facility & Trail Recommendations (Page 121)	If a parking lot on Sterling Highway is constructed, will vehicle access to the Beach Trailhead be continued? How will it be maintained? Reference FEMA trail reconstruction in 2019.	If a parking lot on the Sterling Highway is constructed vehicle access to the Beach Trailhead will not be continued. The Park Host will provide daily monitoring and cleaning of facilities. About \$1 million was requested from FEMA to reconstruct the Diamond Creek Beach Access trail after it was severely eroded by a flood event in 2013. The FEMA funding was scheduled for 2019, but subsequently pushed back indefinitely due to the November 2018 earthquake.	Add description of FEMA trail funding to the Diamond Creek section; and add description in the comment section to the Beach Access trail in the Trail Plan.
Facility & Trail Recommendations (Page 121)	Improved parking at the Sterling Highway is needed but should include a public restroom designed for increased use. Human waste is also an issue at the beach. There is possibly a better route for the beach access trail from the old subdivision road, closer to Cook Inlet, in more stable terrain. This should be investigated before spending money on upgrades to the existing trail.	The site plan will include parking and toilets. The plan suggests building a public toilet (DC-03) near the terminus of the beach access trail to further address the human waste issue. The plan already calls for a reroute of the beach access trail and precise trail locations are determined during the development process.	None.

Subject	Issue Summary	Response	Recommended Revision
Intersection between Sterling Highway and Diamond Ridge	Maybe with some input from DNR, improving this intersection could be added to the scope of the Sterling Highway MP 157-169 Rehabilitation project.	DPOR has contacted ADOT/PF regarding this issue. ADOT/PF is unable to incorporate the realignment of this intersection into the highway project.	None.
Facility & Trail Recommendations – DC-01 (Page 121)	Support, as written, moving the entrance to Diamond Creek Trail.	Concur.	None.
Facility & Trail Recommendations – DC-03 (Page 121)	Maintenance plan needs to be addressed anytime public outhouses are mentioned. Many of the outhouses in KBSP are not used because they are overflowing and disgusting. Composting toilets should be evaluated as to their effectiveness in a remote setting.	DPOR has installed a composting toilet in Halibut Cove Lagoon and is evaluating its effectiveness.	None.
Facility & Trail Recommendations – DC-04 (Page 121)	Beach Access Trail should plan for equestrian use.	The plan calls to redevelop this trail for equestrian use.	None.
Diamond Gulch Trail	The habitat accessed by Diamond Gulch Trail is unspoiled. Improving this trail will devastate the entire ecosystem.	Part of DPOR's mission is to increase recreational opportunities in the park. Development in the park is always a balance between fulfilling this goal and protecting park resources.	None.
Beach Access Trail	Support beach trail being replaced. Existing trail is highly used, often dangerous, unstable, and subject to erosion.	The beach access trail is proposed to be redeveloped.	None.
Trails and Access	Support greater access and trail development in this section, including better beach access.	Concur.	None.

### Eveline Management Unit

Subject	Issue Summary	Response	Recommended Revision
Eveline Unit – General – Public Use Cabin	I strongly support the development of a public use cabin in this unit.	DPOR does not consider the unit suitable for a public use cabin.	None.
Eveline Unit (Page 125, line 18)	Add: Eveline is renowned for its beautiful meadows and spectacular wildflowers and views.	Concur. This language is succinct and will add some context.	Add more descriptive language to Eveline section.
Eveline Unit – Facility and Trail Recommendations (EV-01) (Page 127)	Do not place a public use cabin or even a warming hut at Eveline. Eveline is a small parcel, heavily used by hikers and non-motorized winter users. Visitors to a cabin at Eveline would degrade the experience of current users by hanging out, making noise, leaving trash, having campfires and using ski trails. It would also compete with the already overcapitalized market of visitor accommodations in the area. Lastly, it would impact ski trail rerouting and development.	The area is unsuited for a public use cabin, but DPOR deems a warming shelter for winter use is appropriate. The shelter would not be available for overnight rental.	None.
Eveline Unit – General – Use Fees	At Eveline, a day use fee or even a seasonal pass would discourage use instead of increasing use. Unless the State Park system takes over all the development and maintenance from Kachemak Nordic Ski Club, I would be strongly opposed to a fee system at Eveline SRS. If a fee system should be implemented, the money raised there should be put back into that recreation site. I strongly support further improvements at Eveline SRS, the most important item being an accessible bathroom, adjacent to the parking lot, which needs State Park funding.	No day use fee for the Eveline unit is currently being proposed. The plan calls for public outhouses to be redeveloped.	None.

### Grewingk Glacier Management Unit

Subject	Issue Summary	Response	Recommended Revision
Grewingk Glacier Unit (Page 131, line 16)	Include nesting and feeding of seabirds such as Arctic Terns, as well as offshore feeding of Kittlitz's Murrelets. Onshore & offshore feeding of sea ducks, terns, murrelets. Murrelets are endangered and should be protected by the Park. Loose dogs and people will drive the birds away.	While an extensive listing of the area's bird species is not appropriate here, a sentence on nesting birds will be added.	Add language to the Grewingk Glacier section noting that visitors should be careful neither they nor their dogs disturb birds or bird nests in the area.
Grewingk Glacier Unit – Trails (Page 132)	The information in the Trail plan table on Page 41 of Appendix F should be listed on Page 132. Page 132 should include info on Appendix F.	All information on existing and proposed trails is being moved from the main body of the plan to the Trail Plan appendix to reduce duplication and to concentrate all trail information in one place.	Move information on the existing and proposed trails in all park units to the Trail Plan and add references to Trail Plan appendix where appropriate in the main plan.
Grewingk Glacier Unit – Facilities – Grewingk Hand Tram (Page 132, line 18)	Replace the hand tram with a bridge. The hand tram is not maintained, difficult to use, and a safety hazard.	The hand tram is not ideal, but it is functional and given the lack of available funds a replacement bridge is not a priority.	None.
Grewingk Glacier Unit – Land Use Zones (Page 133)	This unit should be all zoned Natural. Zoning as recreational would allow too much development and negatively impact this fragile area.	Considerably more than half the unit is zoned Natural. Given the amount of use and number of facilities, the area zoned as Recreational is appropriate.	None.
Management Intent (Page 133, lines 7-8)	Support allowing bicycles on designated trails in this unit.	Several trails in this unit are proposed to be designed or redeveloped for bicycle use.	None.
Management Intent (Page 133)	Would like to see cyclist access granted for proposed Grewingk Saddle Trail (GG-12).	DPOR has determined this trail is not appropriate for bicycle use.	None.

Subject	Issue Summary	Response	Recommended Revision
Special Management Considerations (Page 134, line 13)	Regarding the alternate landing site on adjacent land, allow it by permit only and limit the number of landings per day.	Helicopters landings are restricted to the current site at Grewingk Glacier and require a permit. This section of the plan recognizes that the site may need to move in the future as the glacier recedes.	None.
Facility and Trail Recommendations (Page 134)	Development should be very carefully sited so as not to degrade views, including making it invisible from higher terrain such as Alpine Ridge. High density, looped trails would negatively impact habitat for moose, black bear, and birds.	Development in the parks is always a balance between protecting park resources increasing recreation opportunities in the park. The viewshed is considered in trail development.	None.
Facility and Trail Recommendations – GG-02 (Page 134)	Support a dock replacing the long-lost mooring buoy at the Saddle Trailhead.	A replacement mooring buoy is proposed in this location. It is noted, however, that a dock should eventually supersede the buoy.	None.
Facility and Trail Recommendations – GG-03 (Page 134)	Proposed facilities GG-03, GG-04, GG-06 and GG-07 should not be considered here. The area is a potential surface wave zone from rockslide into Grewingk Lake.	Park users should only recreate in the park in a manner that includes a level of risk they are comfortable with. Page 134 of the Plan states that notices should be posted on the lake to inform the public of possible damaging waves in this location.	Note in the plan that the PUC proposed for the southwest upland shore of Grewingk Lake should be built high enough above the lake to mitigate the danger from an avalanche-induced surface wave.

Subject	Issue Summary	Response	Recommended Revision
Facility and Trail Recommendations – GG-06 Public Use Cabin (Page 135)	Build a community hut for large groups well above the lake level for safety.	The Public Use Cabin proposed for the southwest upland shore of Grewingk Lake will be upgraded to a larger (perhaps 24x24) cabin.	Note the PUC proposed for the southwest upland shore of Grewingk Lake will be a larger than usual PUC and that it should be built high enough above the lake to mitigate the danger from an avalanche-induced surface wave.
Facility and Trail Recommendations – GG-07 Public Use Cabin (Page 135)	Boat and equipment storage structure should be constructed away from the lake, camouflaged and not visible from Alpine Ridge Trail.	The storage structure is appropriately recommended to be located close to the lake and the terminus of Glacier Lake trail.	None.
Facility and Trail Recommendations – GG-12 Terra Trail (Page 135)	The Saddle Trail and other trails in the Grewingk Valley should be developed for cross-country skiing and snowshoeing.	All the existing and proposed (new or redeveloped) trails in this unit are suitable for snowshoeing. Most trails in this unit are also suitable for skiing but are not being designed or managed for skiing.	None.
Facility and Trail Recommendations (Page 134-135)	Designate appropriate trails in Grewingk Valley for equestrian access.	11 AAC 20.910 disallows the use of horses in Kenai state parks on “officially designated and marked hiking trails.” No dedicated equestrian trails are being proposed for this area.	None.
Facility and Trail Recommendations (Page 134-135)	Trails (including GG-09, GG-13, and NO-05) should not be developed in critical wildlife areas like Glacier Spit, especially near the nesting areas of Kittlitz’s Murrelets.	Before development, the precise siting of all trails will consider the protection of park resources such as nesting areas.	None.

Subject	Issue Summary	Response	Recommended Revision
Facility and Trail Recommendations (Page 134-136)	Support (as written) adding easier trails to take pressure off the Grewingk Lake trail.	Concur.	None.
Bicycles	Unless a bike lane is added, biking should be designated as incompatible in this heavily used area, especially on Glacier Lake Trail and Saddle Trail.	The plan recommends some trails in this area be redevelopment and designed for bicycle use.	None.
Ranger Presence	Grewingk Glacier needs watchful eyes to help with the numbers of visitors that want to experience those trails.	Existing staffing levels do not allow for frequent ranger visits to this area.	None.

### Halibut Cove – China Poot Management Unit

Subject	Issue Summary	Response	Recommended Revision
In-Holder Access	Park rules disallow me to use an Argo – I must use a hand-drawn sled for ½ mile to access my property. I cannot even use a wheeled cart.	11 AAC 12.020 mandates that no person may operate a vehicle in a state park (except on a road or parking area) unless authorized by the DPOR Director under 11 AAC 18.010 or if the vehicle is allowed as a park-specific exception under 11 AAC 20. A wheeled cart falls under the definition of a vehicle in 11 AAC 12.340 (12): “a mechanical device for carrying persons or objects over land...”	None.
Management Intent (Page 143, lines 11-13)	The Halibut Cove Ranger Station needs to be discussed and any decision on moving it be explained.	As the plan states, because of the tidal restrictions the Ranger Station is difficult to access for staff and the public and repurposing the existing facility for group use can enhance recreational opportunities.	None.
Management Intent (Page 143)	Would like to see cyclist access granted for the proposed redeveloped Wosnesenski River Trail.	The Trail Plan calls for the redeveloped Wosnesenski River Trail to be managed for hiker use. This trail was not deemed suitable or desirable for bicycle use.	None.
Land Use Zones – Recreational Development	Recreational Development zoning is not appropriate for this currently relatively quiet area that includes expansive views of undeveloped terrain. Carefully sited cabins and other facilities can be built in the current Natural Zone without compromising these qualities. The trails definitely need upgrading and maintenance.	The frontcountry areas of Halibut Cove Lagoon, China Poot Lake, and China Poot Bay have been zoned recreational development because of the accessibility and high level of use.	None.

Subject	Issue Summary	Response	Recommended Revision
Special Management Considerations (Page 144, lines 15-20)	Explain the DPOR's zoning power, as delineated in AS 41.21.025.	41.21.025 allows ADNR to adopt, under AS 44.62 (Administrative Procedure Act), zoning regulations for private property located within a state park boundary. Uses existing prior to June 25, 1976 are not affected by zoning regulations established after that date.	None.
Facility and Trail Recommendations – HC -11 Public Use Cabin (Page 145)	The proposed location of Public Use Cabin HC-11 is in a poor area for boat drop-off and pick-up. This site should also be reconsidered because it is near a private rental cabin.	Not every cabin location is designed to be directly accessed from the ocean. This location is easily accessed by foot from the ranger station and from the Saddle trailhead. This proposed site is an excellent midway point between the ranger station and Grewingk Lake and has a fresh water source.	None.
Facility and Trail Recommendations – (Page 145)	Tent platforms in China Poot on the small island just outside the personal use dipnet area would be useful. These would: help spread out use now concentrated at Kayak Beach and Right/Left Beaches; be a great asset during the terminal sockeye run; and be useful year-round as part of the water trail. Constructing these platforms would be cheaper than PUC's and could generate revenue through a reservation system.	Access to this island is difficult. This suggested location is not the best to serve water trail users and would likely only see significant use during the sockeye personal use dipnet period.	None.
Halibut Cove Lagoon Dock	Silly plastic docks are not good. Build for longevity and practicality.	Concur.	None.

### Northern Management Unit

Subject	Issue Summary	Response	Recommended Revision
Existing Facilities and Trails (Page 149, lines 29-37)	Chugachik Island campsite should be mentioned here and in the following table.	Concur.	Change as suggested.
Trails – Humpy Creek (Page 150)	Upgrade existing trail from Humpy Creek to the tram.	Concur.	None.
Land Use Zones – Cultural – (Page 151, lines 21-22)	Chugachik Island should have regulatory and interpretive signage identifying it as a cultural site.	Concur.	Change as suggested.
Facility and Trail Recommendations – NO-01 Mooring Buoy (Page 152)	NO-01 Mooring Buoy – Mallard Bay is empty at low tide.	Noted. This will be mentioned in the plan. The proposed Mooring Buoy may still be intertidally useful for some people.	Mention in an appropriate place that Mallard Bay is empty at low tide.
Facility and Trail Recommendations – NO-05 Terra Trail (Page 152)	This proposed trail location traverses a salmon spawning area frequented by brown and black bears.	Should a trail be constructed in this area, DPOR should provide appropriate signage warning of the seasonal dangers.	None.

### Outer Coast Management Unit

Subject	Issue Summary	Response	Recommended Revision
Outer Coast – General	<p>Separate Kachemak Bay State Wilderness Park Unit and Petrof-Nuka Island Unit of KBSP for clarity.</p> <p>The management areas in the plan should be modified to align with the State Park-Wilderness Park boundaries because the management requirements for the Wilderness Park are not the same as for the State Park.</p>	<p>Due to geographic similarity and proximity, the entire Kachemak Bay State Wilderness Park and the Petrof-Nuka Island Unit of KBSP are best grouped together within the Outer Coast Management Unit. The first sentence of the unit description on p. 157 notes that part of KBSP is being grouped within the Outer Coast unit, but this doesn't change the management requirements for KBSWP.</p>	None.
Outer Coast – General	<p>Add more language on the bill that added Nuka Island, Petrof, Aurora Lagoon and Cottonwood-Eastland to the park. That bill gave the university two 25-acre? parcels and specifically directed how these lands were to be managed. Has the university complied with this legislative intent? The university made one attempt circa 1991 by issuing an RFP for a wilderness lodge but did not award a bid. Herring Pete's cabins and fox farm has not been preserved. Work with the university to ascertain their plan on following the law. If they cannot perform, DNR/DPOR should return these parcels to park status and pursue the legal requirements themselves.</p>	<p>Language will be added related to the 1989 legislation that expanded KBSP and KBSWP.</p>	<p>Add language to the Outer Coast Management Unit section in Chapter 6 on the legislative intent regarding development on Nuka Island in the 1989 legislation that expanded KBSP and KBSWP.</p>

Subject	Issue Summary	Response	Recommended Revision
KBSWP – No Park Development	KBSWP should be forever managed as wilderness and have no development of any kind. This would be in keeping with the definition of a wilderness park. The enabling legislation also clearly defines the wilderness park as a wilderness zone.	All of the KBSWP uplands are in the Wilderness Zone. AS 41.21.990 (2) states that a wilderness park is an area “where development will be strictly limited and depend entirely on good taste and judgement so that the wilderness values are not lost.” This does not preclude limited and appropriate development.	None.
Existing Facilities and Trails (Page 158)	Support development of the Tutka Alpine Traverse and other proposed trails in the Outer Coast Unit.	Concur.	None.
Management Intent (Page 159 lines 8 - 13)	Delete this paragraph. Because you have cited “limited use” in the definition, there is no reason to manage “nothing.” In line 10, DPOR determines that “public use should be facilitated... to minimize and control the impacts.”  Not facilitating public use will best keep the public out of harm’s way and not impact the resource within the Wilderness Zone. DPOR should do no development, maintenance or public safety protection within the Wilderness zone.	Limited use does not mean no use, and the need for facilities to provide safety and address resource impacts are certainly present in the wilderness zone.	None.
Land Use Zones – Wilderness (Page 159, line 24)	There should be no trail or cabin development by State Parks in the Wilderness Zone.	Trails and facilities can still be appropriate in Wilderness zoned areas. Trails in this area will be developed while maintaining the wilderness and scenic character of the area. Any facilities developed will be designed to minimize visual impacts.	None.

Subject	Issue Summary	Response	Recommended Revision
Facility and Trail Recommendations (Page 160)	Tent platforms suggested in this unit should be substituted with rain shelters with a shed roof.	Concur, in part.	Add mention that if DPOR moves forward with constructing these facilities, DPOR should consider the alternative of rain shelters with shed roofs.
Facility and Trail Recommendations – OC-01 and OC-02 Mountain Huts (Page 160)	These mountain huts should not include wood stoves for heating.	Concur.	None.
Facility and Trail Recommendations	No Public Use Cabins or Patrol Cabins should be built in Port Dick or in most of the Outer Coast unit.	The plan calls for several Public Use Cabins (PUCs) in the Outer Coast unit, including one in West Arm Port Dick and one in Taylor Bay. PUCs help mitigate problems associated with undirected park use, such as: pioneering new camping sites; improperly disposed human waste; fire pit development; compacted soils; and vegetation loss. PUCs also facilitate recreation and can serve as safety cabins.	None.

Subject	Issue Summary	Response	Recommended Revision
Facility and Trail Recommendations – OC-18 Terra Trail (Page 162)	Proposed OC-18 Terra Trail should not be developed. This is a goat kidding area, includes poor terrain descending to sea level, and includes a cultural site at Gore Point.	The Terra Trail providing access to Gore Point is proposed as class two. Visitors use trails at their own risk. The trail is not envisioned to access the beach at Gore Point. ADF&G does not have good data on goats in this area, although it is likely goats are present year-round. Before the trail's route is precisely sited, protection of all park resources (especially wildlife and cultural sites) will be taken into consideration.	None.
Outer Coast – Port Dick Safety Road	A road crossing 2-3 miles of KBSWP enabling motorized access from the Seldovia area to Port Dick (paired with a boat ramp) would increase recreational opportunities and greatly decrease dangers recreationists face on the long journey around the exposed southwest corner of the Kenai Peninsula.	The wilderness zone designation serves to balance human safety with the values of solitude, physical and mental challenge, and primitive recreational opportunities.	None.

### Overlook Park Management Unit

Subject	Issue Summary	Response	Recommended Revision
Overlook Park Management Unit	Add mention of these bird species common in the park: bald eagles, ravens, several species of waterfowl, crows, gray jays, magpies, kingfisher, woodpeckers, tattlers and yellowlegs. For mammals, mention black bear, moose, coyote, muskrat and porcupine.	The plan is not meant to be an exhaustive catalogue of the region's fauna (or flora).	None.
Overlook Park Management Unit (Pages 167-168)	Specific descriptive and grammatical edits were submitted for this section.	Concur in part.	Adopt appropriate, non-policy edits.
Overlook Park Management Unit (Page 167, line 27)	Add language stating this area is eroding faster than any other beach area studied by the Kachemak Bay National Estuarine Research Reserve.	This level of detail is not needed.	None.
Overlook Park Management Unit (Page 167, line 27)	Add a line describing these rich, diverse habitats are home to a variety of wildlife such as ducks and birds, moose and bear, and small mammals. As of 2018, total bird species is 83, along with 6 land mammal species, and 2 marine mammal species.	Concur.	Add suggested language.
Overlook Park Management Unit -- Management Intent (Page 168, lines 5-6)	Support the plan's intent to re-designate Overlook Park from a State Recreation Site to a State Preserve.	Concur.	None.

### Sadie - Tutka Management Unit

Subject	Issue Summary	Response	Recommended Revision
Bird Hunting	There has been a large decline in sea ducks, especially in the Sadie Cove area at least partly due to hunting. The Park should research this issue and work toward a solution.	ADF&G manages wildlife populations.	None.
Chapter 6: Unit Specific Management – Sadie - Tutka Management Unit – Unit Description (Page 171, lines 11-13)	Language suggesting altering the physical description of the fjords and adding descriptions of their basins' circulation patterns and their biologic productivity was submitted.	Concur.	Alter the description of the fjords, adding language on their basins' circulation patterns and biologic productivity. Also describe the forest habitat as largely consists of old growth spruce/hemlock trees.
Existing Facilities and Trails – Tutka Bay Lagoon-Jakolof Trail (Page 174)	To prevent inadvertent trespass upon Seldovia Native Association land, the existing Tutka Bay Lagoon-Jakolof trail should be resurveyed, rehabilitated and have signage improved before any new trail development in the area.	The plan calls for upgrading to class 3 the portion of this trail on state park land. Most of the trail is not on KBSP land and therefore outside the purview of this plan. Signage may be added near where the trail leaves park land.	None.
Sadie - Tutka Management Unit – Management Intent (Page 174, lines 9-11)	Maintain the current language regarding the possible reversion of hatchery facilities to DPOR and the intent to repurpose the site for a group camp facility should the hatchery cease operations.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Sadie - Tutka Management Unit – Management Intent (Page 174, lines 9-11)	Support repurposing the Tutka Bay Lagoon Hatchery facilities to house a program to rehabilitate depleted species and monitor wildlife. The program could be funded by tourism at the site and should be focused on diverse species rather than raising one species for commercial harvest by a few people.	Concur.	None.
Sadie - Tutka Management Unit – Land Use Zones – Natural Zone (Page 175, lines 14-15)	Intent language here states that the area will be limited to non-motorized use. How is this consistent with allowing helicopter landings in this unit?	This intent language was deleted during a rewrite of this section. The language allowing helicopter landings in this unit was also removed.	None.
Chapter 6: Unit Specific Management – Sadie - Tutka Management Unit – Recreational Development Zone (Page 175, line 17-21)	Don't rezone Tutka Bay as a Recreational zone – it should stay zoned Natural. Tutka Bay is a rich ecosystem and is also one of the most scenic, pristine, and least developed bays in the park. Zoning should reflect an assessment of the natural resources of the area, current use patterns, as well as the purpose of the scenic park.	The zoning does reflect an assessment of the natural resources and current use patterns of the area. The only part of the Tutka Bay unit zoned as Recreational is around Tutka Bay Lagoon, reflecting the increased use of the area around the hatchery site.	None.
Chapter 6: Unit Specific Management – Sadie - Tutka Management Unit – Recreational Development Zone (Page 175, line 17-21)	Maintain the current designations of “natural zone” from the 1995 Management Plan. The plan revision recommends increasing the size of “development area” in Tutka Bay and Tutka Lagoon waters; however, expansions of these areas are not justified based on current uses. To the extent that ST-07, ST-05, ST-01, and ST-11 overlap with waters, we recommend limiting these designations to land only so that all waters	All waters in the park units will be zoned Natural. The area around Tutka Bay Lagoon is rezoned Recreational Development to reflect the increased use of the area around the hatchery site and the slightly higher concentration of facilities and trails.	None.

Subject	Issue Summary	Response	Recommended Revision
	within Tutka Bay and Tutka Lagoon remain designated as “natural zone” and thus aligns better with the designation of the waters by the legislature as Critical Habitat.		
Sadie - Tutka Management Unit – Management Intent (Page 175)	Would like to see cyclist access granted for proposed Tutka Lagoon access trail (ST-22).	This trail would be managed for hiker use, and thereby unsuitable for bicycle use.	None.
Proposed Facilities and Trails – ST-14 (Page 176)	Delete mention of proposed yurt and future cabin at Hazel Lake. For most of the tourist season, hikers cannot reach the lake due to many dangerous glacial river crossings. It’s also prohibitively expensive to reach by floatplane. This site should never be part of a trail system.	Should this tent platform ever be constructed (or ever converted to a Public Use Cabin) this facility would be important in supporting use on the proposed Coast to Coast Trail and/or on Hazel Lake. Access to Hazel Lake is achievable with bridges over rivers and sustainably designed trails on steep terrain. If bridges are not built at the same time as the trail, pack rafts allow access for the more adventurous.	None.
Proposed Facilities and Trails (Page 175-178)	This area could use some facilities, especially latrines.	Any new public use cabins will include development of nearby latrines.	None.
Proposed Facilities and Trails (Page 175-178)	Development of new trails into alpine areas will negatively impact mountain goats.	The plan seeks to enhance recreation while striking a balance between resource protection and managed public use.	None.

Subject	Issue Summary	Response	Recommended Revision
Proposed Public Use Cabins (ST-16 and ST-17) (Page 177)	The text suggests these two cabins may offer electricity. Would DPOR allow overhead lines? Could DPOR authorize such lines? If electrifying these cabins leads to HEA's electrical network providing a recreational function, then would helicopter access, trail deviations, or right-of-way amendments or relocations not constitute a conversion of use?	Electrical service for the proposed cabins is for a recreational and park purpose and therefore does not constitute a conversion of use.	None.
Proposed Facilities and Trails – ST-22 (Page 177)	The Tutka Bay Lagoon-Jakolof trail connects the Jakolof Bay area to the park along a five-foot easement across Seldovia Native Association (SNA) property. The trail from the Seldovia road system to Tutka Bay Lagoon should be moved to the easement through Seldovia Native Association land and have improved signage.	This plan only applies to management of park lands therefore moving a trail to this easement is beyond the purview of this plan. DPOR will, however, work with the Seldovia Native Association on better signage and improved trail routing.	None.

**CHAPTER 7: IMPLEMENTATION**

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
Chapter 7 – KBSP Citizen Advisory Board	State that DPOR will work with the park’s Citizen Advisory Board on a priority list for implementing the plan. Working with the CAB will give DPOR: a better connection with the user public; more eyes in the field; and greater lobbying power outside DPOR.	Concur.	Add language where appropriate stating that DPOR will consult with the park’s local advisory board on implementation of the plan.
Chapter 7 – Implementation – Project Phasing (Pages 184-185)	These are high-dollar projects that won’t realistically be funded. It is OK to have a wish list, but right now living within budgetary restraints makes more sense.	These projects are priorities should any funding become available in the future.	None.
Chapter 7 – Implementation – Project Phasing (Page 185, lines 19-22)	Comment received saying a property may be available near or in Homer to accommodate the proposed Park Operations Facility.	Noted.	None.
Chapter 7 – Implementation – Project Phasing (Page 185, Line 10)	Add: Relocate Ranger Station in Halibut Cove Lagoon to an area that is easier to access at all tides.	Concur.	Change as suggested.
Recommended Staffing	Work with Native groups, corporations, and associations to start a native hire preference program with funding from native corporations to hire a local Park Ranger, trail crews, and interpreters.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Recommended Staffing	I support additional staffing and paid crews as soon as possible. DNR should create a strong lobbying effort to the State Legislature and Governor for support of Alaska State Parks. One or two Rangers and volunteers are not enough to support the functions of the park.	It is not appropriate for DNR to create a lobbying effort.	None.
Recommended Staffing (Page 186, Line 11)	Change technician to Park Specialist.	Concur.	Change as suggested.
Recommended Staffing (Page 186, Lines 35-38)	Support creating volunteer coordinator position – volunteers are an efficient and positive way to engage the public in the responsibilities of park management.	Concur.	None.
Recommended Staffing (Page 186)	Support general staffing recommendations. Support adding two natural resource technician positions.	Concur.	None.
Recommended Staffing (Page 186)	Support a paid trail maintenance coordinator position and support creating two 4-person Alaska Conservation Corps trail crews. Similar past crews have contributed to the park while providing young Alaskans wages and work experience.	The plan calls for creating two natural resource technician positions who would each oversee a four-person Alaska Conservation Corps (ACC) trail crew funded for four months.	None.
Recommended Staffing (Page 186, line 1)	Create a full-time Interpreter, Executive Assistant, and Volunteer Coordinator position.	The plan calls for a permanent part-time Park Interpreter position and a Volunteer Coordinator position for 6 months annually.	None.
Recommended Staffing (Page 186, lines 11-18)	As written in the plan, support upgrading the existing technician position to full-time.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Recommended Staffing (Page 186)	Resource damage (including trail erosion, water pollution, litter, and social trail development) is currently occurring in numerous park locations from unmanaged visitor use. Proposed staff increases are inadequate to manage increasing visitation and protect park resources.	DPOR believes the proposed staff increases are sufficient to adequately protect park resources.	None.

## APPENDICES & MAPS

Subject	Issue Summary	Response	Recommended Revision
General – Appendices to Add	Separate appendices should be added on Marine Habitat Flora and Fauna; Estuarine Habitat Flora and Fauna; Freshwater Wetland Habitat Flora and Fauna; Freshwater Lakes Habitat Flora and Fauna; Freshwater Rivers and Streams Habitat Flora and Fauna; Freshwater Waterfall and Seeps Habitat Flora and Fauna; Terrestrial Forest Habitat Flora and Fauna; Terrestrial Subalpine Habitat Flora and Fauna; and Terrestrial Alpine Habitat Flora and Fauna.	Such appendices would go beyond the purview of the plan. The plan is not meant to be an exhaustive catalog of the area's flora and fauna.	None.
Map 1 – General Boundaries (Page 3)	The GIS road layer isn't correct. The road from Seldovia to Jakolof Bay does not follow the route shown. Half the area labeled "Kenai National Wildlife Refuge" and shown in green is actually managed by the National Park Service and should be labelled "Kenai Fjords National Park."	The road data is the best data available from ADOT/PF. The Kenai National Wildlife Refuge and the Kenai Fjords National Park will be properly labelled.	Label the Kenai National Wildlife Refuge and the Kenai Fjords National Park properly on maps 1 and 2.
Map 4 – General Habitat (Page 25)	Use a contrasting color (perhaps orange) to highlight the wetlands, which are important to bird habitat.	The freshwater wetlands are easy to see as labelled.	None.
Map 5 – Marine Mammals & Terrestrial Species (Page 29)	This map is inaccurate and makes it appear as if no two species overlap. A better depiction of wildlife and flora is needed to properly assess the impact of activities and development in the park. We need an environmental impact study before any development because the park's wildlife and flora are sensitive to human intrusion.  Because different species are managed by different agencies, maps must be drawn from	The map is based on data from ADF&G. However, this map was determined unnecessary and will be deleted.	Delete Map 5 – Marine Mammals & Terrestrial Species.

Subject	Issue Summary	Response	Recommended Revision
	different agencies. Mapped data need sources and dates. Species distribution maps should include data collected by ADF&G, the Kachemak Bay Research Reserve, NOAA and others. See: <a href="http://aknhp.uaa.alaska.edu/apps/biotics/#map?lg=5d60b854-cfd0-11e3-a3a1-00219bfe5678">http://aknhp.uaa.alaska.edu/apps/biotics/#map?lg=5d60b854-cfd0-11e3-a3a1-00219bfe5678</a> .		
Map 6 – Finfish Species (Page 33)	Significant pink, chum, and sockeye fisheries on the Outer Coast should be identified on the map and in the plan.	This map was determined unnecessary and will be deleted; however a map depicting anadromous waters will be added.	Delete Map 6 – Finfish Species; Add a map depicting anadromous waters.
Map 6 – Finfish Species (Page 33)	Add “There are 75 documented anadromous waters in Kachemak Bay and 175 anadromous waters on the Outer Coast.”	ADF&G has determined these numbers are not accurate. However, the point is mute since this map is being deleted and will be replaced with a map depicting anadromous waters.	None.
Map 7 – General Bird Habitat (Page 35)	This map is unusual in showing very specific and very general information -- actual bald eagle nests and the general habitat of other birds.	This map was determined unnecessary and will be deleted.	Delete Map 7 – General Bird Habitat.
General Bird Habitat – Map 7 (Page 35)	This map is inaccurate and makes it appear as if no two species overlap. Because different species are managed by different agencies, maps must be drawn from different agencies. Mapped data need sources and dates. Species distribution maps should include data collected by ADF&G, the Kachemak Bay Research Reserve, NOAA and others. See: <a href="http://aknhp.uaa.alaska.edu/apps/biotics/">http://aknhp.uaa.alaska.edu/apps/biotics/</a>	The bird habitat boundaries are derived from data from ADF&G. However, this map was determined unnecessary and will be deleted.	Delete Map 7 – General Bird Habitat.

Subject	Issue Summary	Response	Recommended Revision
	#map?lg=5d60b854-cfd0-11e3-a3a1-00219bfe5678.		
General Bird Habitat – Map 7 (Page 35)	DPOR should partner with Kachemak Bay Birders, Kachemak Bay Research Reserve, and US Fish and Wildlife to gather data on birds and their habitats in Kachemak Bay to flesh out bird habitats and add this information to the General Bird Habitat Map.	The bird habitat boundaries are derived from data from ADF&G. However, this map was determined unnecessary and will be deleted.	Delete Map 7 – General Bird Habitat.
General Bird Habitat – Map 7 (Page 35)	<p>Map 7 does not accurately represent the birds in the area.</p> <p>Some murre and gull species are not mentioned which are common in the bay year-round. Shore birds are found not just in Fox River Flats, but around the entire bay. Other species present but not mentioned are alcids, grebes, gulls, loons, cormorants, shearwaters, and waterfowl. There is also no depiction of a large seabird colony on Gull Island comprised of Common Murres, Black-legged Kittiwakes, Tufted Puffins, Pigeon Guillemots, Cormorants and others. Marbled Murrelets, Kittlitz's Murrelets, Arctic Terns, Wilson's Snipe are also present in the bay. Sea ducks winter in Kachemak Bay, especially Barrows Goldeneye, Black Scoter, and Surf Scoter in China Poot Bay. Numerous other locations in and adjacent to the park are heavily used by waterfowl. Please contact <a href="http://kachemakbaybirders.org">kachemakbaybirders.org</a> for help with this update.</p>	The bird habitat boundaries are derived from data from ADF&G. However, this map was determined unnecessary and will be deleted.	Delete Map 7 – General Bird Habitat.

Subject	Issue Summary	Response	Recommended Revision
Northern Management Unit – Map 15 (Page 155)	Add “Campsite at Chugachik Island & trail” on map.	Concur. The campsite will be added to this map and the trail will be added to the appropriate trail map.	Add a campsite on Chugachik Island to the unit map and the trail on Chugachik Island to the Northern unit trail map.
Outer Coast Management Unit – Map 16 (Page 164)	Map should include boundary of Kenai Fjords National Park.	Concur.	Add the boundary of Kenai Fjords National Park to appropriate maps.
Appendix A – Glossary – Add an Acronym Page	An acronym page should be located after the table of contents.	Acronyms are included in the Glossary (see Appendix A).	None.
Appendix D – Bird List	This checklist is a bit out of date for accidental and rare birds and should be updated.	Members of Kachemak Bay Birders have indicated that while some new, rare species could be added to this list and while the seasons birds are likely to be seen could have changed somewhat, the level of change from 2011 until now is not sufficient to warrant creating a new bird checklist.	None.
Appendix F – Trail Plan	Skate skiing is not included in the trail design parameters section.	Concur.	Add a page listing skate skiing trail design parameters and a page depicting skate ski trail classes.
Appendix F – Trail Plan	Edit all maps and references in the Trail Plan and updated trail names. Make any technical corrections to maps in the Trail Plan.	Concur.	Change as suggested.

<b>Subject</b>	<b>Issue Summary</b>	<b>Response</b>	<b>Recommended Revision</b>
Appendix F – Trail Plan – Table of Contents	Add a Table of Contents to the Trail Plan.	Concur.	Change as suggested.
Appendix F – Trail Plan –Water Trail	Support the continued awareness of the importance of the Kachemak Bay Water Trail.	Concur.	Add a description and a map depicting the Water Trail Route to the Trail Plan.
Appendix F – Trail Plan – Easements	In some places, proposed park trails connect to trails and/or easements on non-park land (such as at Tutka Lagoon and Port Dick). These easements should be noted on the plan's maps.	It would not be appropriate to label easements on non-park land on a map in this Park Management Plan.	None.
Appendix F – Trail Plan – Trail Sustainability	Divert usage when areas need to recover from overuse.	This is a management practice that is already employed in accordance with trail sustainability policy.	None.
Appendix F – Trail Plan	The use of educational signage, rest stops and viewing platforms will enhance trail users' experience.	Concur.	None.
Appendix F – Trail Plan	Support careful establishment of hiking and ski trails that are rustic in character, and no more than 6 feet wide.	The Trail Plan include design parameters for various types of trails. For example, Class 3 Hiker/Pedestrian trails (many of which are proposed in the plan) would have a designed tread width of 18-36 inches.	None.
Appendix F – Trail Plan – Maps	Many trails on the maps in the draft plan are historic and are no longer maintained. Trails that no longer exist should be removed from maps.	If maintenance budgets increase, these trails could be maintained in the future. Park staff posts updates on trail conditions on the internet regularly.	None.

Subject	Issue Summary	Response	Recommended Revision
Appendix F – Trail Plan	If funding is not sufficient, maintain existing trails properly rather than building more trails, particularly in the park units on the south side of the bay.	At current staffing levels, staying current on trail maintenance is a challenge. This plan document is aspirational in nature. Staffing levels will be considered before any new trail construction begins.	None.
Appendix F – Trail Plan – Implementation	The suggestion for volunteer trail maintenance is excellent. Budget restraints limit the use of professional trail crews to perform trail improvements. Trail users would gladly help maintain trails. Trails should be improved that would help spread users away from the Grewingk Glacier and Saddle Trail area to reduce human-bear encounters and enhance the wilderness experience. The Wosnesenski River trail would be a good place to start – it has good beach access with relatively safe anchorage and has the potential to connect to other areas of the park.	The trail plan calls for several trail improvements in areas near these trails that should help to disperse use and create additional recreational opportunities.	None.
Appendix F – Trail Plan	Develop a plan for maintenance of all the park trails, not just the most popular trails in the Grewingk Lake corridor.	The Trail Plan provides guidance on trail maintenance by trail class. In addition, the plan calls for increased staffing for maintenance of park trails.	None.
Appendix F – Trail Plan	DPOR should help set up a sustainable endowment fund for KBSP trail maintenance.	A state agency is unable to set up a dedicated endowment fund, due to a provision in the state’s constitution prohibiting dedicated funds. A non-profit organization may want to consider this idea.	None.
Appendix F – Trail Plan	Funding should be prioritized for proper maintenance of trails, informational kiosks, and signage.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Appendix F – Trail Plan	More trails on the north side of the bay are a good idea. Homer has few trails and these trails would be easier to access for those near the road system and easier to maintain than trails on the south side of the bay.	Concur.	None.
Appendix F – Trail Plan	Trails are growing over faster due to climate change.	Concur.	None.
Appendix F – Trail Plan (F-8, line 37)	Please explain how sign standards will vary.	Signage will range from little to no signage in the wilderness zone, to more frequent directional signage in the recreational zone.	None.
Appendix F – Trail Plan – Mooring Buoys	There should be more mooring buoys at trailheads.	Concur.	None.
Appendix F – Trail Plan – Trailhead Kiosks	Support adding kiosks to popular trailheads.	Concur.	None.
Appendix F – Trail Plan – Access – Trails	State that most of the trails are only conceptual and have not been ground-truthed.	The trail plan provides goals and trail management concepts consistent with the trail sustainability guidelines adopted by DPOR in 2009. The plan simply identifies trail standards and design parameters to be applied to general areas in park units.	None.
Appendix F – Trail Plan	The Trail Plan should not propose new or improved trails through bird nesting areas.	These types of considerations are made prior to trail construction and enhancement and in consultation with ADF&G.	None.
Appendix F – Trail Plan	Trail construction must include outhouse and trail user information boards.	This type of development is not appropriate for every trail. Standards will vary according to park zoning and trail classification.	None.

Subject	Issue Summary	Response	Recommended Revision
Appendix F – Trail Plan	Alaska State Parks could work with the Kenai National Wildlife Refuge and the Mountaineering Club of Alaska to develop a hut-to-hut hiking system linking Seldovia to Seward over the Harding Ice Field that would attract visitors from around the world.	Two mountain huts are already proposed for the Outer Coast unit. Only a small portion of the suggested hut-to-hut hiking system would be located in the parks. While an interesting idea, coordinating with federal managers to develop such a system is not a DPOR priority and largely falls outside the purview of this plan.	None.
Appendix F – Trail Plan	Trails were proposed with no regard to wildlife, especially moose, that stay in upper valleys in the summer. These are sensitive areas where easy access trails should not be developed. Trails using existing game trails is also not wise.	Park development balances preservation of park resources with DPOR's mission of increasing recreational opportunities. Impacts to wildlife are considered before development occurs in the park.	None.
Appendix F – Trail Plan. Coast to Coast Trail	The Coast to Coast trail should have a dedicated section in the plan that highlights all the trails connecting together. It should be managed as a unique feature because it crosses all the park units. The trail should also allow bikes for its entire length, or at least allow winter biking.	Concur, in part. Bicycles will not be a managed use along the entirety of the Coast to Coast trail.	Add a map that depicts the entirety of the Coast to Coast trail.
Appendix F – Trail Plan	What is a snow trail? Where is it defined? Snow trails should allow snow bikes.	The Trail Plan designates trails using a trail classification system. Under this system there are three trail types: terra, snow and water trails. There are also up to five trail classes, 1 being least and 5 being most developed. There are designed uses for trails such as Hiker/Pedestrian; Bicycle; and Cross Country Ski. See page F-10 for more information.	None.

Subject	Issue Summary	Response	Recommended Revision
Appendix F – Trail Plan. Eveline Unit (F-35)	Winter biking should be included as a managed use on all trails at Eveline.	Winter biking is not appropriate on all trails at Eveline due to the prevalence of Nordic skiing use. However, a provision will be made to allow bicycle access to surrounding areas from the Eveline trailhead.	Change the trail plan to allow winter bicycle use on a single trail from the Eveline unit trailhead to an access point for trails surrounding the Eveline unit.
Appendix F – Trail Plan	The Hazel Lake area should never be part of a trail system because for most of the tourist season hikers cannot reach the lake due to many dangerous glacial river crossings.	Hazel Lake is on the proposed Coast to Coast Trail. Access to the Hazel Lake area is achievable with bridges over rivers and sustainably designed trails on steep terrain. If bridges are not built at the same time as the trail, pack rafts allow access for the more adventurous.	None.
Appendix F – Trail Plan	Mountain bikes should not be allowed anywhere in the park unless the ground is durable enough to withstand such use. A trail out to Red Mountain is the only area I can think of that would be durable enough.	DPOR is required to comply with a trail management policy that implements a sustainable design framework. A sustainable trail is defined as a trail that conforms to its terrain and environment, can handle its intended use without serious resource degradation, and requires minimal maintenance. Trails that will allow bicycles will meet these standards.	None.
Appendix F – Trail Plan	Trail maps are hard to read and run off the page. There should be an overview of how trails connect to adjacent areas.	Concur, in part.	Improve the trail maps.

Subject	Issue Summary	Response	Recommended Revision
Appendix F – Trail Plan	Cycle trails can have great economic benefit. In 2009, the New Zealand government invested \$50 million over 3 years in mostly off-road trail development. A 2016 analysis estimated that every dollar invested returned \$3.55 annually.	Concur.	None.
Appendix G – Cooperative Agreement	The cooperative agreement is missing Page 3.	Concur.	Add page 3 to the Cooperative Agreement Appendix.
Appendix G – Cooperative Agreement	The cooperative agreement should go towards the front of the plan.	The cooperative agreement is appropriate as an appendix, near the end of the plan.	None.