

Kachemak Bay State Park and State Wilderness Park Management Plan

Intent-to-Adopt Issue Response Summary

This Issue Response Summary (IRS) for the Intent-to-Adopt (ITA) version of the Plan is not inclusive of all the comments DNR received during this ITA phase of the process. This ITA IRS only covers new issues that were not previously addressed in the PRD IRS.

Subject	Issue Summary	Response	Recommended Revision
Technical Corrections – Plan Wide	Make all appropriate technical and factual corrections to the Plan, including but not limited to grammatical corrections, clarifications, corrections to acreage and other quantitative figures, statutory references, minor changes to map labels or trail tracks, etc. These corrections will not affect Plan policy.	Concur.	Change as suggested.
General – Editorial Comments	Many editorial comments were submitted to change language in the plan to improve readability or to add or delete details or background information in the plan that do not directly inform management intent or decisions.	Change plan as appropriate to address grammatical edits and add more background information.	Change as suggested.
General – Shellfish Nurseries	A good state plan should incorporate ways to utilize and require more science and to facilitate increased dialogue among state and federal agencies, NGOs and stakeholders in general.	Concur.	None.
General – Pollution	Pollutants from road and storm drains, boats, and human traffic may pollute wild fish nurseries as well as introduce invasives and lead to algal blooms.	The plan is not a regulatory document that controls the discharge of pollutants.	None.

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General –Soundscape	A resolution from the Kachemak Bay Citizens Advisory Board on preserving soundscape was submitted as a comment. The resolution requests the following be added to the plan: Affirmation of the natural soundscape’s high value and need for protection; Only permitting operators with flight plans conforming to Northern Wild Sheep and Goat Council (NWSGC) and Helicopter Association International (HAI) recommendations; and Recognize specific provisions for rotary winged aircraft operators, including avoidance of trails and certain developments, flight free zones, annual flight caps, higher altitude flight, avoidance of noise-sensitive areas, and flight free time periods.	The plan includes objectives to limit noise and light disturbances in KBSP and KBSWP. DPOR may consider nominating KBSP and KBSWP for Quiet Parks International awards: https://www.quietparks.org/quiet-parks-international-award	Add language where appropriate stating that DPOR may consider working toward nominating the parks for an award from Quiet Parks Int’l or other organization that celebrates quiet parks.
General – Kachemak Watershed Collaborative	DPOR should join the Kachemak Watershed Collaborative (KWC) being proposed by the Chugach Resources Regional Commissioner (CRRC). The KWC would research the impacts of climate change and development on salmon populations; implement restoration projects; work to protect salmon streams within the watershed; and work to secure water supplies for local communities.	Concur.	None.
Chapter 1: Introduction – Regional Characteristics and Planning Area Overview (Page 1)	On page 1, line 23, change 1993 to 1974.	Concur.	Change as suggested.
Chapter 1: Introduction – Regional Characteristics and Planning Area Overview (Page 1)	On page 2, line 18 change “conserving” to “preserving.”	Conserve means: “To prevent land, water or other natural resources from being damaged or destroyed.” It is therefore appropriately used in this sentence.	None.

Subject	Issue Summary	Response	Recommended Revision
Chapter 1: Introduction – Land Acquisition (Page 1)	In 1993, \$7.5 million of EVOS money was used to acquire 23,701 acres of private holdings – this land was subsequently added to the park. Information on this should be included in the plan.	Concur.	Add to the Land Acquisition section in Chapter 1 and the EVOS section in Chapter 4 information on the 23,701 acres of private inholdings acquired in 1993 with EVOS and SOA monies.
Chapter 1: Introduction – Add Classification of Park System Units (Page 2)	Add a heading Classification of Park System Units explaining the definition, purposes, goals and policies of the three different types of park units within the management plan: State Park and State Wilderness Park; State Recreation Area; and State Recreation Site (covered on pages 7, 10, and 11 respectively of the Statewide Framework).	There are no State Recreation Areas in the parks. The purposes for the other types of park units are discussed on pages 7-8. Chapter 3 provides area-wide goals as well as by park unit. Chapter 5 provides management intent for each park unit.	None.
Chapter 1: Introduction – State Park Purpose (Page 7)	On Page 7, line 11 add after 1970’s: “using constitutional authority of Article VIII Section 7 to “provide for the acquisition of sites, objects, and areas of natural beauty or of historic, cultural, recreational, or scientific value.”	Concur.	The constitutional authority will be noted and the reference footnoted.

Subject	Issue Summary	Response	Recommended Revision
Chapter 2: Natural & Cultural Resources – General – Species Decline (Starting on Page 11)	The collapse of shrimp, herring, crab, hardshell clams, razor clams, and salmon populations in Kachemak Bay due to mismanagement should be noted in the plan. The state should prioritize participation in the Habitat Focus Area effort led by NOAA to help restore these species.	ADF&G manages aquatic species in the state of Alaska, including those found in state park waters. The collapse of certain species is not necessarily due to mismanagement. The decrease in shrimp populations corresponded with an increase in fish populations and attributed to the Pacific Decadal Oscillation, a cyclic climatic event that affects ocean temperature. Increased sea otter population has kept shellfish populations at low levels. Lower Cook Inlet salmon returns have been generally stable in recent years as evidenced by consistent commercial and personal use harvests, as well as adequate escapement in monitored salmon populations. ADF&G participates in discussions with NOAA as well as other agencies, or universities regarding the health of the Kachemak Bay ecosystem.	None.
Chapter 2: Natural & Cultural Resources – Hydrography (Page 15)	28-foot high tide and –5.9-foot low tide equals 33.9 feet exchange of water.	15.8 feet is the <i>average</i> tidal range. 28 feet is an extreme high tide.	Insert “average” before tidal on P. 15, line 20 and line 26. Insert “Extreme” before “Low tide” on p. 20, line 22.

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Chapter 2: Natural & Cultural Resources – Climate (Page 15-16)	There is no mention of climate change in the climate section on pages 15-16. No mention of dryer weather leading to more forest fires.	There is a section on climate change starting on Page 50.	None.
Chapter 2: Natural & Cultural Resources – Communities Southwest of KBSP (Page 28)	Add “and fishing” after “tourist” on line 34.	Concur.	Add “and fishing” after “tourist” on Page 28, line 34.
Chapter 3: Goals & Objectives – General – Natural Soundscape (Starting on Page 31)	The Goals and Objectives Chapter should include intent to teach the public about the natural soundscape.	Concur. Several Objectives in this chapter promote this suggestion, such as the Area-wide Objective to “Promote education designed to encourage a better understanding of the park’s natural and cultural features.”	None.
Chapter 3: Goals & Objectives – Area-wide Goals and Objectives (Page 31)	On Page 31, line 21 add “leave no trace” before “use and stewardship.”	Responsible use implies “leave no trace” principles.	None.
Chapter 3: Goals & Objectives – Area-wide Goals and Objectives (Page 31)	On line 24 reword this objective (after “solitude,”) to read: “quiet, and natural environment integrity, of the geological, faunal, and floral characteristics that make up the scenic beauty.”	Concur.	Change as suggested.
Chapter 3: Goals & Objectives – Area-wide Goals and Objectives (Page 31)	On line 25 reword this objective (after “parks”) to read: “dynamic ecosystems, food web interactions, and natural and cultural features.”	Concur.	Change as suggested.

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Chapter 3: Goals and Objectives – KBSP Goals (Page 32-33)	There is no mention in any of the four KBSP goals of protecting and preserving our natural resources. Add this to Goal one or as an additional objective.	Concur.	Replace “land and water” in Goal 1 with “natural resources.”
Chapter 3: Goals and Objectives – KBSP Goals (Page 32-33)	Support area-wide goals and objectives on expanding recreational opportunities including proposed ADA trails, docks and PUCs.	Concur.	None.
Chapter 3: Goals and Objectives – (Page 32, line 30)	Add to Goal 1: “Objective 1-5 Limit noise, water, air, and light disturbances to preserve the scenic value of the park.”	Objective 2-4 on P. 33 is very similar and makes this addition unnecessary.	None.
Chapter 3: Goals and Objectives – Objective 2-2 (Page 33, line 37)	Support interpretive and educational outreach programs, especially at Eveline, Chugachik Island, Cottonwood Creek beach site, and Kayak Beach.	Concur.	None.
Chapter 3: Goals and Objectives – Objective 2-4 (Page 33, line 4)	Change Objective 2-4 to read “Minimize harmful disturbances such as noise, water, air, and visual pollution.” Signage should be minimal and consistent.	Water and air pollution are more appropriately considered under the resource protection goal, whereas this objective falls under the recreational use and enjoyment goal.	None.
Chapter 3: Goals and Objectives – Objective 4-1 (Page 33, lines 22-23)	With the Disposal issue in mind, language should be added here stating that all commercial operations within KBSP are permitted concessions, and as such all facilities are owned by the State of Alaska. These operators should be subject to regular reviews to ensure no unlawful disposals are occurring.	Not all commercial activities occurring within KBSP are disposals of an interest in state park lands. The objective will be changed to clarify that the reference to commercial operators is to those providing recreational opportunities.	Add “recreation” after word “commercial.”

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Chapter 3: Goals and Objectives – Objective 1-2 (Page 33, line 40-41)	Eliminate Objective 1.2 on Page 33, line 40.	This provision is not meant to limit research and monitoring in general, but only meant to limit as much as practicable any negative impacts of these activities.	None.
Chapter 3: Goals and Objectives – Objective 1-4 (Page 34, line 3)	Change Objective 1-4 to read “Limit noise, water, air, and light disturbances ...”	The suggestion does not add meaningfully to the scope of disturbances to be minimized.	None.
Chapter 4: Park Use & Issues – General (Starting on Page 35)	Add information on the designation of the Critical Habitat Area and other areas of Kachemak Bay as part of the Western Hemisphere Shorebird Reserve Network (WHSRN).	Concur.	Change as suggested using information from whsrn.org .
Chapter 4: Park Use & Issues – General (Starting on Page 35)	Add “increasing sound, water, air and light pollution” as an Issue.	There is a section in Chapter 2 that describes the effects of human use on the environment that would be better in Chapter 4.	Move the section “Effects of Human Use on the Environment” to Chapter 4.
Chapter 4: Park Use & Issues – General (Starting on Page 35)	Add Coastal Erosion as a park issue.	Information on coastal erosion is included in the Climate Change section on P. 50.	None.
Chapter 4: Park Use & Issues – Park Visitor Activities (Page 37)	Add Solitude or Experience Nature as an activity.	The data in Figure 1: Park Visitor Activities is derived from a 2014 questionnaire.	None.
Chapter 4: Park Use & Issues – PWC (Page 39, line 14)	Change language since ADF&G has now rescinded regulation banning PWCs.	Concur.	Change as suggested.

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Chapter 4: Park Use & Issues – Disposals (Page 41)	In the Disposals section, it reads: “the Alaska Supreme Court in <i>SOP, Inc. v. Alaska</i> held that a ‘non-revocable ATV 40 permit’ created an easement and thus constituted an unconstitutional disposal of legislatively designated lands. Given the SOP decision, the state must ensure its agreements and permits do not result in impermissible disposals of state park lands.” This should not be a factor in deeming the TBLH a Disposal because the agreement between ADF&G and CIAA is revocable at will by the Project Director, ADF&G, by written notice. That transferring TBLH to CIAA was also referenced in the agreement should not be a factor either, since this was explored many years ago and determined to not be allowed.	The functionally irrevocable test does not hinge on the agreement’s language. Instead, courts review the facts to determine whether the agreement will realistically be revoked. There are three facts that suggest the agreement between CIAA and ADF&G to operate the TBLH is a functionally irrevocable agreement and thus represents an unconstitutional disposal of state park lands: 1. The hatchery has extensive infrastructure and its operational expenses are funded through cost recovery; 2. TBLH is a disturbance of state park lands and will have a long-term effect on the park’s land and waters; and 3. ADCCED, in a letter, has requested that CIAA continue to operate the hatchery to ensure a return on their investment in TBLH. These facts suggest the ADF&G-CIAA agreement is functionally irrevocable and therefore an impermissible disposal of state park lands.	Language will be added to the Disposals section further explaining why TBLH represents a disposal of park lands.
Chapter 4: Park Use & Issues – Disposals (Page 41)	Granting leases within the parks in light of the Disposal legal issue should be more clearly and fully explained.	Concur. Under the Alaska Constitution, state park lands cannot be leased.	The Disposal section will be augmented to further explain this topic.

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Chapter 4: Park Use & Issues – Tutka Bay Lagoon Hatchery (Page 42)	The 2019 CIAA net pen permit application was a renewal and recommended by ADF&G. This project was NOT an increase in production as some have reported; it merely moves some portion of rearing for the lagoon to the bay to increase efficiency and the net pens would only be in the bay from March to mid-May. The second 2019 permit was for a continuation of carcass disposal in a previously approved zone in use since the hatchery first operated. These disposals are spread over a large area of Tutka Bay and over a period of time.	Concur, in part. In 2017, DNR permitted CIAA to relocate net pens from Tutka Bay Lagoon to Tutka Bay for two years. The rest of the comment is correct.	None.
Chapter 4: Park Use & Issues – Tutka Bay Lagoon Hatchery (Page 42, lines 16-18)	TBLH was constructed in 1976, not 1975. Also, reword next two sentences to read: ADF&G’s FRED Division, using general funds, operated the TBLH hatchery for 16 years as a state managed hatchery. In 1991, ADF&G contracted with Cook Inlet Aquaculture Association (CIAA) to operate the hatchery, activating cost recovery to fund operations and in 1994, CIAA took over operations while the state retained ownership of the facility.	Concur.	Change as suggested.
Chapter 4: Park Use & Issues – Add New Issue: TBLH Impacts on Food Web (Page 43)	Add new issue: TBLH – Ecosystem Food Web Impacts.	The intricacies of interrelated food web impacts are beyond the scope and purposes of this plan. ADF&G is responsible for overseeing TBLH and ensuring the hatchery does not negatively impact the food web.	None.
Chapter 4: Park Use & Issues – Add New Issue: Fish Predator Control Programs for Artificial Propagation (Page 43)	Add New Issue: Fish Predator Control Programs for Artificial Propagation. Park resources must be protected from predator control programs designed for artificially propagated species. A Tutka Lagoon Predator Control Study should be conducted.	ADF&G, not DPOR, manages fish and game resources within the parks.	None.

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Chapter 4: Park Use & Issues – DPOR Facilities & Trails (Page 44, line 5)	Due to high use of the area and of the facility (when staffed by a volunteer), the Halibut Cove Lagoon Ranger Station should stay in place even after a new Park Ranger facility is constructed at another site. Kayak Beach would be a good place for the new Ranger Station, since this site was already disturbed by the rock quarry.	Staffing the ranger station is logistically difficult, expensive, and inefficient at its current location. The plan calls for the ranger station to be repurposed (see P. 144). If the ranger station is relocated it will likely be to the north side of the bay where it will be more easily accessible to staff and park visitors.	None.
Chapter 4: Park Use & Issues – Invasive Terrestrial Plants (Page 46, lines 42-44)	Orange Hawkweed, pushki, and dandelions have been found at Eveline.	The section is not meant to be a comprehensive catalog of invasive plants in the region. The plan already says that Orange Hawkweed is common in Homer and that dandelions are present in all park units near Homer. Pushki (cow parsnip) is native to Alaska and not considered an invasive plant.	None.
Chapter 4: Park Use & Issues – Aquatic Invasives (Page 47, line 33)	Float planes landing in remote lakes can be a vector for spreading <i>Elodea</i> .	Concur.	Add similar language to this section.

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Chapter 4: Park Use & Issues – Aquatic Invasives – Add Subsection: Stray Hatchery Salmon (Page 47)	Add a Subsection on the issue and negative effects of stray hatchery salmon.	Straying is mentioned in the section on TBLH in this chapter. DPOR does not manage fish resources. Homer ADF&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.	None.
Chapter 4: Park Use & Issues – Land and Water Conservation Fund (Page 48, line 32)	Explain more how LWCF is involved. How can EVOS Trustee Council purchased land be subject to LWCF?	The boundary for the LWCF lands is included on a map that is mutually agreed to by the State and NPS. All lands within the KBSP were included with this map.	None.
Chapter 4: Park Use & Issues – Climate Change (Page 50)	DPOR should stress the need for best practices on all facets of climate change to help re-establish the lost biodiversity in the park’s marine waters.	The plan already includes management direction in response to climate change in numerous locations; for example, on p. 139 the siting of the proposed Public Use Cabin GG-06 “high enough above the lake to mitigate the danger from an avalanche-induced surface wave.”	None.

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Chapter 4: Park Use & Issues – Climate Change (Page 50)	The plan underestimated the rate and impact of climate change. Please add more information on the effects of climate change, including descriptions of tree lines rising; snowpack diminishment; increased fire risk; the threat of increased CO2 in park waters to salmon; unprecedented seabird and marine mammal die-offs, and spruce bark beetle activity; reduced crab survival; sea star wasting disease; and increased species decline due to ocean acidification.	The section on climate change is appropriate as written to provide background information for management decisions. The plan is not a scientific study that exhaustively delineates the effects of climate change.	None.
Chapter 4: Park Use & Issues – Add Issue: Soundscape Guideline Plan (Page 50)	Add an Issue: Soundscape Guideline Plan.	The plan already includes goals on limiting noise. However, DPOR will consider nominating KBSP and KBSWP for Quiet Parks International awards: https://www.quietparks.org/quiet-parks-international-award	Add language where appropriate stating that DPOR will consider working toward nominating the parks for an award from Quiet Parks Int'l or other organization that celebrates quiet parks.
Chapter 4: Park Use & Issues – Add Issue: Soundscape Guideline Plan (Page 50)	DPOR should create guidelines for education and further research into this topic using recommendations from credible local, national, and international organizations.	Concur.	None.
Chapter 5: Area-wide Management Direction and Guidelines – General – Docks	DPOR should develop a plan to inspect degraded private and commercial docks and give notice to dock owners that they will be financially liable if they do not take action to prevent dock debris from polluting park waters.	The plan's requirement for commercially encapsulated foam is intended to reduce refuse in park waters. 11 AAC 12.050 does not allow a person to bring refuse or waste into the park.	None.

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Chapter 5: Areawide Management Direction – Management Intents (Page 53-57)	Agree with management intents listed in Chapter 5 for all the park units. Regarding the State Recreation Sites, strongly approve of the intent to improve park and outhouse facilities and to provide accessible terra access and trails at Eveline, enhance parking and add camping and PUCs at Diamond Creek, and recognize the unique natural resources of Overlook Park.	Concur.	None.
Chapter 5: Areawide Management Direction – Overarching Management Intent (Page 54, lines 13-17)	Support DPOR including America’s Great Outdoors Act and LWCF funding as part of a sustainable plan to fund KBSP.	Concur.	None.
Chapter 5: Areawide Management Direction – Recreational Development Zone (Page 57)	Zones cannot be changed to Recreational Zone (more intense development) without sideboards for the preservation of KBSP’s outstanding natural features without contradicting AS 41.21.990. Glacier Spit, Tutka Bay Lagoon, and China Poot Bay all should remain Natural Zones.	The frontcountry areas of Halibut Cove Lagoon, China Poot Lake, China Poot Bay, and Tutka Bay Lagoon have been zoned recreational development because of the accessibility and high level of use.	None.

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Chapter 5: Areawide Management Direction – Recreational Development Zone (Page 57, line 28)	There should be no Recreational Development Zones in KBSP on the south side of Kachemak Bay. There is no development plan for any of the three zones – such a plan should be presented to the public before these zones are considered. There are no roads, railroads, airstrips, high standard trails or dedicated boat anchorage in KBSP on the south side of the bay. So why are these areas in the Recreational Development Zone if they don't fit the Purpose and Characteristics as defined in the Framework?	Recreational Zones reflect the higher level of use in these areas and the management intent to provide for that use. The large majority of the visitation and recreational development in KBSP is on the south side of the bay. For areas to be zoned Recreational Development, they do not have to include all the accessibility features mentioned on p. 17 of the Statewide Framework.	None.
Chapter 5: Areawide Management Direction – Recreational Development Zone (Page 57, line 28)	There should be no Recreational Development Zones in KBSWP.	There are no Recreational Zones in KBSWP.	None.
Chapter 5: Areawide Management Direction – Recreational Development Zone (Page 58, line 3)	Commercial lodges or resorts in the Recreational Development Zone do not have unit management or site development plans – the Statewide Framework says they should.	This plan doesn't recommend development of any commercial lodges or resorts and there are currently none on park lands. Should DPOR want to develop a facility like this in the future, a site development plan would be required.	None.

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Chapter 5: Areawide Management Direction – Natural and Wilderness Zones (Page 58-60)	Wilderness Zones should remain undiminished. Alpine areas should be zoned as Wilderness.	The Wilderness Zone was not diminished. Some Natural Zone was changed to Recreational Zone. There is no reason to automatically define alpine areas as Wilderness Zone.	None.
Chapter 5: Areawide Management Direction – Natural Zone (Page 58, lines 24-26)	There should be a Natural Zone buffer along Ratone Road and Elmers Way.	The Recreational Development Zone bordering these roads is appropriate here due to the planned trail and facility development and the convenient access.	None.
Chapter 5: Areawide Management Direction – Natural Zone – Application Areas (Page 59, lines 10-15)	All of Cottonwood Eastland should be zoned Natural except for the area being considered for an ILMA.	Recreational Zones are appropriate to accommodate a higher level of use, consistent with the management intent for this area. The plan includes proposed trails and facilities for Cottonwood Eastland to provide more road-based recreational opportunities in KBSP on the north side of the bay.	None.

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Chapter 5: Areawide Management Direction – Wilderness Zone (Page 59-60)	The use of certain equipment, including aircraft, 10 horsepower motorboats, chainsaws and bicycles should not be allowed in the Wilderness Zone. Congress has banned these activities in wilderness areas. These activities would diminish important benefits of wilderness areas. Allowing these contradicts the definition of a wilderness park (AS 41.21.990), and Objective 1-4 under Goal 1 on page 34 of the plan: “Limit noise and light disturbances to preserve the wilderness character of the park.”	Congress has no management authority over Alaska’s state parks. The State Park Framework provides exceptions for aircraft landings in the Wilderness Zone under certain conditions and the plan reflects that guidance. The plan recommends very limited expansion of biking and motorized boating; however, this will require regulation changes. The use of chainsaws is allowed consistent with 11 AAC 12.170.	None.
Chapter 5: Areawide Management Direction – Wilderness Zone (Page 59-60)	Hunting, bear baiting, and trapping should be incompatible in the Wilderness Zone.	These activities are allowed and managed by ADF&G.	None.
Guideline Table – Public Uses – Fixed Wing Aircraft (Private) (Page 66)	Oppose aircraft landings on Wosnesenski Lake – this would negatively impact people using multiple trails in the area.	Wosnesenski Lake is partially in KBSP and partially in the Kenai National Wildlife Refuge (KNWR). Aircraft landings are allowed and occurring on the KNWR portion. The plan recommendation seeks to enhance access and provide consistent management of this lake.	None.

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Guideline Table – Public Uses – Fixed Wing Aircraft (Private) (Page 66)	Floatplanes should be cleaned after landing in waters where aquatic invasives are present.	Concur.	None.
Guideline Table – Public Uses – Rotary Winged Aircraft (Private) (Page 67)	Helicopters should not be allowed to land in KBSWP.	The plan mirrors the current regulation (11 AAC 20.210) that allows these landings on saltwater and saltwater beaches.	None.
Guideline Table – Public Uses – UAVs (Page 68)	DPOR says they only have authority to say where UAVs can land, not fly. Yet the plan shows that despite this limitation, DPOR has the authority to deem UAVs incompatible in all zones except the Natural Zone. UAVs should also be incompatible in the Natural Zone because violations cannot be realistically enforced and the potential for harassment of people and wildlife is great.	As with all aircraft, DPOR can only manage the use on state park land. UAV use would require a permit from DPOR. FAA manages the airspace. Harassment of people and wildlife by UAVs is not permitted by law.	None.
Guideline Table – Public Uses – UAVs (Page 68)	Maximum allowed altitude of flight (400 feet) is lower than minimum allowed altitude that is illegal to be over an animal – seems pointless.	The plan says “come within 500’ of wildlife” which could occur at any altitude. The plan, however, should use “above ground level,” instead of “altitude.”	Change “below an altitude of 400’” to “below 400 feet above ground level” in the Natural Zone.
Guideline Table – Public Uses – UAVs (Page 68)	How will the drone pilot know the UAV is not above people when it is out of sight of the operator? Also, it will be very difficult to know if a UAV strays from the compatible Recreational Zone into an incompatible zone.	The guidelines for UAV use in the plan are taken from the Code of Federal Regulations 14 CFR Part 107. Per federal regulations, non-commercial drone pilots must keep the UAV within line of sight at all times.	None.

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<p>Guideline Table – Public Uses –Hunting – Guided Ducks (Page 69)</p>	<p>Harvest limit of 18 sea ducks per day for 107 days is not sustainable considering the estimated 90% decline in populations. Guided duck hunts should have greater scrutiny and include provision mandating hunting be more than ½ mile from any development or vessel.</p>	<p>The Board of Game through Fish and Game regulations manages hunting within the park. DPOR and this management plan do not. DPOR, however, does have the authority to regulate conduct within the park to ensure the safety of park users. In May 2022, 11 AAC 20.100 was repealed and 11 AAC 12.190 was amended to bar discharge of a weapon in the parks within ¼ mile of a developed facility instead of within a ½ mile.</p>	<p>None.</p>
<p>Guideline Table – Public Uses – Hunting (Page 69)</p>	<p>There should be no hunting in the Natural Zone. Various minimum allowable distances for the discharge of a firearm from a developed facility or trail were suggested.</p>	<p>The Board of Game through Fish and Game regulations manages hunting within the park. DPOR and this management plan do not. DPOR, however, does have the authority to regulate conduct within the park to ensure the safety of park users. In May 2022, 11 AAC 20.100 was repealed and 11 AAC 12.190 was amended to bar discharge of a weapon in the parks within ¼ mile of a developed facility instead of within a ½ mile.</p>	<p>None.</p>

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Guideline Table – Public Uses – Bear Baiting (Page 69)	Various minimum allowable distances for setting up a bear station from a developed facility or trail were suggested.	ADF&G regulations prohibit setting up a bait station within one mile of any developed facilities. Stations are also not allowed within ¼ mile of a publicly maintained road or trail.	None.
Guideline Table – Public Uses – Hunting and Fishing and Archery (Page 69)	Regulations were changed by repealing 11 AAC 20.100 and altering 11 AAC 12.190 in May 2022 to disallow discharge of a weapon in the parks within ¼ mile of a developed facility instead of within ½ mile.	Concur.	Change language for these two public uses to conform with the May 2022 regulation changes.
Guideline Table – Public Uses – Trapping (Page 69)	Various minimum allowable distances for trapping from a developed facility or trail were suggested.	Trapping within all zones of the parks is managed by ADF&G and not by DPOR or the management plan. There are no State trapping regulations concerning setbacks from trails, trailheads, campgrounds, or other developed facilities in Kachemak Bay.	None.

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Guideline Table – Public Uses – Bicycles (Non-motorized) (Page 70)	E-bikes should be prohibited in the Wilderness Zone since they are a motorized use.	OC-106 (Port Dick Byway P. E-65) is the only proposed trail in the Wilderness zone that would allow any form of bicycling. Per 11 AAC 12.115 (active May 2022) park users can ride a class-1 electric bicycle on any trail open to regular bicycles. However, another regulation change will be required for use of a regular bicycle or an e-bike on OC-106.	None.
Guideline Table – Public Uses – Bicycles (Non-motorized) (Page 70)	Include a sunset clause that may curtail bicycle use in the Grewingk Glacier and Outer Coast units if there are complaints.	The plan recommends a Designed Use of Bicycle on certain trails in the Grewingk Glacier unit and the Outer Coast unit; however, a regulation change would be required to allow the use.	None.
Guideline Table – Public Uses – Motorized Boating (Page 71)	Phase-in a horsepower to weight limit on motorized boats in Kachemak Bay to limit petroleum waste and noise and turbulence pollution.	Most of Kachemak Bay is not in KBSP and all types of boats and motors are already being used in Kachemak Bay.	None.
Guideline Table – Public Uses – Motorized Boating (Page 71)	No motorized boats should be allowed on any fresh water within the parks.	This use is already allowed under 11 AAC 20.115 on China Poot Lake, Hazelle Lake or Petrof Lake in KBSP.	None.

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table – Public Uses – Motorized Boating (Page 71)</p>	<p>No motorized boats should be allowed on Upper Hazel Lake – the Wilderness Zone needs special protection from noise pollution. If motorized boating is allowed on Upper Hazel Lake, such use should be limited to electric motors up to 10 horsepower. Gas motors should not be authorized.</p>	<p>The plan calls for changing 11 AAC 20.215 to allow boats and aircraft on Upper Hazel Lake to improve hunter access. Because the use of aircraft on the lake is being considered, boats are also being considered but not limited to electric motors.</p>	<p>None.</p>
<p>Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)</p>	<p>PWCs shouldn’t be allowed because they have a higher rate of collision than any other type of boat according to the US Coast Guard (2008) and the National Transportation Safety Board (1998). PWCs travelling at high speed may collide with small watercraft, driftnets, or debris, especially in conditions that limit visibility.</p> <p>PWC Riders often rent PWCs and are ill-trained. In 1998 (or Mangione et al. 2013), the National Transportation Safety Board reports that over 80% of boaters and PWC users have never received any type of boating instruction; and the American Red Cross in 1991 reported that PWC use is highest among boaters with little or no experience. PWC users are more likely to not be familiar with the unique maritime dangers of Kachemak Bay, including the fast-changing weather and currents.</p> <p>Technology has improved the performance of PWCs over the years, but modern PWCs are faster, louder, more dangerous and make bigger waves than the lower horsepower PWCs that were banned years ago. According to US Boat in 2020, even in current models PWCs can take up to 300 feet to stop from 60mph and generally cannot be steered without using the throttle, as most lack rudders. Compared to traditional boats, PWCs are less safe in rough seas; are not able to carry all the safety equipment necessary to survive emergencies.</p>	<p>Current DPOR regulations bar PWC use within both KBSP and KBSWP. See 11 AAC 20.115(b) and 11 AAC 20.215(b). Those regulations are not and cannot be amended by this management plan. Instead, amending these regulations will require compliance with the Administrative Procedures Act; which includes a robust public process. If DPOR elects to amend its regulations on PWCs, this comment can be resubmitted by the commenter in the context of that Administrative Procedures Act process.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)</p>	<p>PWC riders often travel in groups, which increases noise, dangers, and disturbances to wildlife and habitat. PWC riders also tend to linger in an area longer than regular boats which usually move right through – this tendency increases disturbance to wildlife. PWCs are a risk to marine wildlife because they do not emit long distance low frequency sounds that serve as a warning. PWCs negatively impact wildlife by interrupting normal behavior; causing alarm or flight; contributing to loss of habitat; decreasing reproductivity; interfering with movement; directly killing animals; changing community structure; and causing nest abandonment. PWCs could be particularly disruptive to seals at numerous haul-out areas in Kachemak Bay. PWCs have also been proven harmful to fish. Another reason to not allow PWCs is that in 1995 much of KBSP was included in the Western Hemisphere Shorebird Reserve Network, whose mission is to conserve shorebirds and their habitat across the Americas. DNR should evaluate PWCs impact on shorebirds and other birds and establish exclusion zones before permitting PWCs. Allowing PWCs would also spell disaster for the annual Shorebird Festival and its attendant tourism activity.</p>	<p>Current DPOR regulations bar PWC use within both KBSP and KBSWP. See 11 AAC 20.115(b) and 11 AAC 20.215(b). Those regulations are not and cannot be amended by this management plan. Instead, amending these regulations will require compliance with the Administrative Procedures Act; which includes a robust public process. If DPOR elects to amend its regulations on PWCs, this comment can be resubmitted by the commenter in the context of that Administrative Procedures Act process.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	PWCs have a lower draft than traditional boats and could potentially causing far more damage to beaches and intertidal areas. They can easily travel up shallow rivers, disturbing or even colliding with harbor seals during pupping and rearing in the Fox River in May and June. PWCs should not be used on lakes where they may introduce <i>Elodea</i> .	Current DPOR regulations bar PWC use within both KBSP and KBSWP. See 11 AAC 20.115(b) and 11 AAC 20.215(b). Those regulations are not and cannot be amended by this management plan. Instead, amending these regulations will require compliance with the Administrative Procedures Act; which includes a robust public process. If DPOR elects to amend its regulations on PWCs, this comment can be resubmitted by the commenter in the context of that Administrative Procedures Act process.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	PWC’s combustion engines add to the problem of climate change.	Many allowed activities in the park (or means of accessing the park) involve the use of combustion engines. A strong legal challenge could be made should DPOR single out a particular use.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	Allowing PWCs is contrary to Objective 2.4 on page 33 “Develop strategies to minimize harmful disturbances such as noise and light.” Due to PWC operators’ erratic moves and ability to become airborne, the sound is variable – louder when out of the water and when accelerating for turns and spins. PWCs also slap the water, creating more noise. These erratic movements and variable noises are especially disturbing to wildlife and persons. An airborne PWC is about as loud as an in-water PWC 8 times closer, or as 32 identical in-water PWCs at the same distance. Even without being airborne, PWC noise is not muffled under water like outboard or inboard boat motors.	Many allowed uses cause noise within the parks. Objective 2.4 speaks to developing strategies to minimize the noise that occur. The Objective is not intended to single out a particular use to achieve this end.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	The park’s one ranger cannot possible enforce PWCs following all boating rules, laws, speeds, common courtesies, and non-harassment.	It is incumbent upon users to know the rules and follow them, just like with any other restricted activity.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	<p>PWCs conflict with the aesthetic, recreational, and habitat protection purposes for which KBSP and KBSWP were designated by the Alaska Legislature and with the park’s definition in AS 41.21.990. Biodiversity, natural features, and health of the environment are all vital to the park’s scenic value.</p> <p>The KBCHA was created “to protect and preserve habitat areas especially crucial to the perpetuation of fish and wildlife, and to restrict all other uses not compatible with that primary purpose.” Allowing PWC use will conflict with the statutory (AS 16.20.500) goals of the KBFRFCHA to protect fish and wildlife; and to maintain and enhance public use of fish, wildlife, and critical habitat area waters.</p>	Current DPOR regulations bar PWC use within both KBSP and KBSWP. See 11 AAC 20.115(b) and 11 AAC 20.215(b). Those regulations are not and cannot be amended by this management plan. Instead, amending these regulations will require compliance with the Administrative Procedures Act; which includes a robust public process. If DPOR elects to amend its regulations on PWCs, this comment can be resubmitted by the commenter in the context of that Administrative Procedures Act process.	None.

Subject	Issue Summary	Response	Recommended Revision
Personal Watercraft (PWC) (Page 72)	In 2001, a robust public process deemed PWCs incompatible with the parks. In 2017, ADF&G determined that based on a review of information available since the 2001 PWC ban, no new information warrants rescinding the ban -- in fact, new information reinforces the concerns supporting the ban.	Current DPOR regulations bar PWC use within both KBSP and KBSWP. See 11 AAC 20.115(b) and 11 AAC 20.215(b). Those regulations are not and cannot be amended by this management plan. Instead, amending these regulations will require compliance with the Administrative Procedures Act; which includes a robust public process. If DPOR elects to amend its regulations on PWCs, this comment can be resubmitted by the commenter in the context of that Administrative Procedures Act process.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	PWCs accessing Water Trail campsites will create user group conflicts. PWCs would negatively affect those using the bay to subsist for food.	Any watercraft that can access a water trail campsite could potentially create a user group conflict. This issue isn't unique to PWCs.	None.

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)</p>	<p>About 20 years ago in Maui, PWCs were allowed to operate in a marine sanctuary, but users were restricted to a limited, had to stay at least ¼ mile offshore, and could ride for one hour maximum. Strict and heavy regulation is only way to keep PWCs from harming a fragile marine environment such as Kachemak Bay. Some jurisdictions require licenses, education and carrying certain equipment; limit use to daylight hours, restrict age of operation, designate certain corridors, and possibly GPS tracking and identification devices for PWC use. Will all PWC users be required to have prior operational experience; wear dry suits and PFDs; and have marine radios and running lights? How does USCG feel about allowing PWCs?</p> <p>Because the science is clear that PWCs are more harmful to wildlife and their habitats than traditional boats, PWCs are banned or restricted in most national parks and national marine sanctuaries and in numerous state protected areas in Alaska.</p>	<p>Current DPOR regulations bar PWC use within both KBSP and KBSWP. See 11 AAC 20.115(b) and 11 AAC 20.215(b). Those regulations are not and cannot be amended by this management plan. Instead, amending these regulations will require compliance with the Administrative Procedures Act; which includes a robust public process. If DPOR elects to amend its regulations on PWCs, this comment can be resubmitted by the commenter in the context of that Administrative Procedures Act process.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	A PWC ban is supported by state and federal wildlife scientists as well as the majority of the public. I only know of one local person who supports PWC’s in Kachemak Bay – supporters must be from Anchorage, the Mat Su valley, Kenai, Soldotna or other places. The recent ADF&G decision to reverse the ban is not based on their own biologists recommendations or on comments from the public – it’s based on the desire of special interests. It is well documented that the decision to remove the ban was made before the public process began – the outcome was a foregone conclusion. Review the detailed annotated bibliographies compiled and reviewed by ADF&G staff in 2017 and 2000.	Current DPOR regulations bar PWC use within both KBSP and KBSWP. See 11 AAC 20.115(b) and 11 AAC 20.215(b). Those regulations are not and cannot be amended by this management plan. Instead, amending these regulations will require compliance with the Administrative Procedures Act; which includes a robust public process. If DPOR elects to amend its regulations on PWCs, this comment can be resubmitted by the commenter in the context of that Administrative Procedures Act process.	None.
Guideline Table – Public Uses – Personal Watercraft (PWC) (Page 72)	Define personal watercraft.	11 AAC 21.290 (14) defines Personal Watercraft as a vessel less than 16 feet long; propelled by a water-jet pump; and designed to be operated by a person sitting, standing, or kneeling on the vessel rather than inside it.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Public Uses – Off Road Vehicles (Page 76)	Snowmachines and ATVs should be incompatible in all zones within KBSP. There are no existing roads or plans to build any.	Snowmachines and ATVs are restricted in KBSP by 11 AAC 12.020 that states that vehicles may not be operated in a state park except on a road or in a parking area. The only areas with roads or parking areas are in the recreational development and natural zones in the plan.	None.
Guideline Table – Public Uses – Access by Wheelchairs (Page 76)	ADA access by wheelchairs should include battery-powered wheelchairs. Quadriplegics with these devices should have access to beaches and trails on both sides of the bay.	Concur. Entry on Power Driven Mobility Devices will be updated to include the south side of the bay.	Delete “on the north side of the bay” in the Recreational and Natural Zones. Clarify that the Description includes battery powered wheelchairs.
Guideline Table – Public Uses – Horses, Pack Animals (Page 77)	Horses should only be fed weed-free hay.	The plan will be changed to address this.	Add language encouraging the use of weed-free hay.
Guideline Table – Commercial Uses – General (Page 86)	Commercial operators should be required to complete annual training on best practices and legal restrictions related to approaching wildlife, invasive species, and impacts of jet engines on marine life in shallow waters.	Concur. These types of requirements are best addressed during the permitting process.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Commercial Uses – General (Page 86)	The plan should have limits on how many of each type of commercial operator can be permitted.	The amount and type of commercial activity was considered during the planning process. The plan’s guidance reflects the levels deemed appropriate. Limiting by type of activity is not appropriate because some activities are de minimis.	None.
Guideline Table – Public Uses – Fixed Wing Aircraft (Commercial) (Page 86)	Floatplanes should be cleaned after landing in waters where aquatic invasives are present.	Concur.	None.
Guideline Table – Commercial Uses – Rotary Winged Aircraft (Commercial) (Page 87)	Helicopters should not be allowed to land in KBSWP.	11 AAC 20.210 allows aircraft (including helicopters) to land on saltwater and saltwater beaches in KBSWP.	None.
Guideline Table – Commercial Uses – Rotary Winged Aircraft (Commercial) (Page 87)	Before issuing permits in 2021, DPOR should determine if there is adequate landing area remaining at the toe of Grewingk Glacier within KBSP. Due to the glacier’s continued retreat, the toe of the glacier may now be in KBSWP, where helicopter landings are not allowed.	Landings will only be authorized within KBSP, regardless of the glacier’s retreat.	None.
Guideline Table – Commercial Uses – Commercial Fishing (Page 90)	All KBSP and KBSWP waters should be designated a State Marine Sanctuary and closed to commercial fishing to restore fisheries to past abundance levels. The Outer Coast should also be closed to sport fishing.	ADF&G, not DPOR, manages fish and game resources, including the management of commercial fishing and sport fishing.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table – Commercial Uses – Commercial Fishing (Page 90)	Split Commercial Fishing into two categories: Fishing on Healthy Populations and Fishing on Depleted or Declining Populations. The former category would be compatible; the latter would be conditionally compatible subject to 11 AAC 12.335 if a consultation process was initiated between DNR and ADF&G “to work with each other on issue regarding management of fish populations and harvest.”	ADF&G and the Board of Fish manage these resources and are required to do so according to Article 8, Section 4 (Sustained Yield) of the Alaska Constitution.	None.
Guideline Table – Commercial Uses – Guiding & Outfitting (Page 94)	Change description in Use, Activity, Facility column to read: “Licensed big game hunting, small game hunting including waterfowl, fishing charters ... “ and in the Recreational, Natural, and Wilderness Zone columns: “...subject to 11 AAC 12.335 and to conditions that mitigate use conflicts and protect park resources.”	Concur.	Change as suggested.
Guideline Table – Commercial Uses – Add New Activity: Guiding & Outfitting Depleted or Declining Population Harvest (Page 94)	Add New Activity: Guiding & Outfitting Depleted or Declining Population Harvest that is conditionally compatible subject to 11 AAC 12.335 if a consultation process was initiated between DNR and ADF&G “to work with each other on issue regarding management of fish populations and harvest.”	DPOR does not manage fish and game resources in the parks. Therefore, this type of change is not appropriate for the park plan. ADF&G and the Board of Game manage these resources. Under the Alaska Constitution and various laws, all replenishable resources in Alaska are required to be maintained on a sustained yield principle.	None.
Guideline Table – Resource Management Activities – Fire Management (Page 98)	Add to end of Zone descriptions: ... subject to wildlife and bird breeding and rearing seasons (i.e. birds in nests) and the State of Alaska Interagency Forest Ecology Study Team.	Consideration of these factors is already part of the process for conducting this type of fire management activity.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 104)	Why are oyster farms in Kachemak Bay allowed in this plan, but the TBLH is not?	There are no oyster farms within the park. Page 90 of the plan indicates mariculture and aquaculture as incompatible in park waters.	None.
Guideline Table: Resource Management Activities – Fisheries Enhancement -- Hatchery (Page 104)	Besides TBLH, CIAA operates and manages three other hatcheries. These other hatcheries contribute to commercial, sports and personal use harvests. CIAA also conducts projects in the Mat-Su watershed, and Kamishak Bay with a focus on salmon habitat rehabilitation and protection, as well as rejuvenation of salmon streams that have suffered from geologic deterioration. CIAA also assists ADF&G with managing sockeye systems on the Kenai Peninsula. Closing TBLH will harm the whole organism that is CIAA, with negative effects far beyond elimination of the immediate benefits the hatchery provides. If TBLH closes, the personal use dipnet and sport fisheries at China Poot (sockeye), Hazel Lake, Tutka Lagoon, Resurrection Bay (sockeye & silvers), and other places where the public (including senior citizens) can harvest will close. If cost recovery at TBLH ceases, all the other projects CIAA supports will be at risk of closure or reduction. Trail Lakes & Port Graham hatcheries (and all their related projects) may also cease operation. Examples of projects supported by these hatcheries include: Resurrection Bay/Bear Lake sockeye and Coho enhancement projects, including Seward silver salmon (raised at Trail Lakes Hatchery), Coho enhancement at the Fishing Hole in Homer, many northern Cook Inlet stocking projects, and many invasive species eradication projects. CIAA also helps fund eradication of pike and <i>Elodea</i> in places far from the hatchery. CIAA operates a salmon stocking project at Hidden Lake. CIAA is also involved in habitat restoration projects, such as northern pike and <i>Elodea</i> remediation, flow control structures on lakes, beaver dam remediation, and general fish habitat education. Closing TBLH would eliminate sport and commercial salmon fishing in almost all Kachemak Bay.	This management plan provides management direction through a set of policies and recommendations based on the park’s enabling legislation, state law, and DNR policies. The management plan helps guide park management when it evaluates permitting activities, authorizing facilities’ uses, and authorizing trail development. In doing so, certain conduct will be deemed incompatible if it is inconsistent with the legislative mandate that the park be managed as a “scenic park” or by considering other informative state law such as disposal. Under this framework and considering specific facts related to the TBLH, the plan correctly finds the TBLH is incompatible within the park.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)	There is no evidence presented showing that TBLH harms KBSP’s resources or its visitors’ enjoyment in any way. Rather, TBLH has enhanced many visitors park experiences as people enjoy seeing how the hatchery operates and learning about its history. TBLH does not meaningfully detract from the Park’s scenic value. While TBLH has a small footprint and is not visible unless one travels up a narrow channel, Tutka Bay has 20 private inholdings, many with easily seen structures that could be considered an eyesore.	TBLH is incompatible for several reasons including it is likely an impermissible disposal of state park lands, it’s incompatible with the Legislature’s mandate that KBSP be managed as a scenic park, and DNR lacked authority to enter into an ILMA for ADF&G to manage KBSP lands and waters for this purpose.	The footnote on Page 104 will be augmented to further reflect why TBLH is considered incompatible in KBSP.
Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)	DPOR should continue to evaluate the issue of compatibility and land disposal with CIAA, ADF&G, and legal counsel before the current CIAA operating agreement expires in 2031. More information should be provided to justify the incompatible finding for each park zone. DPOR should also further evaluate the potential impact to the personal use fishery at China Poot and other public uses the hatchery benefits within the park before making a final determination of compatibility.	TBLH is incompatible for several reasons including it is likely an impermissible disposal of state park lands, it’s incompatible with the Legislature’s mandate that KBSP be managed as a scenic park, and DNR lacked authority to enter into an ILMA for ADF&G to manage KBSP lands and waters for this purpose.	The footnote on Page 104 will be augmented to further reflect why TBLH is considered incompatible in KBSP. Additionally, the disposal section on page 41 of the ITA will be augmented.
Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)	CIAA should be issued a permit to allow carcass dumping. Carcass disposal has not been scientifically proven to harm life in Tutka Bay. Rather, all along the Pacific coast, carcasses have been proven essential to returning nutrients back to the watershed.	KBSP must be managed as a scenic park which means different values and considerations are used when determining whether to issue a permit under 11 AAC 18.	None.

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>Substantial public funding has contributed to maintaining TBLH. Between 2010 and 2013 \$1,507,000 of legislative grants were spent on renovations. With public funds and interests so heavily invested in TBLH, it seems irresponsible to suddenly abandon the infrastructure. If TBLH’s area has a different land use plan in the future, there will be millions of dollars of investments that must be addressed. Is there a plan to compensate those that have invested millions in this facility? If the hatchery is forced to close, there must be a plan to reimburse these investments. The cost of restoring the site back to its natural state during these times of limited state funding should also be considered.</p>	<p>CIAA and ADF&G’s agreement for CIAA to operate the TBLH likely constitutes a functionally irrevocable agreement and thus an impermissible disposal of state park land because of: (1) the financial investment in the hatchery; and (2) the need for the hatchery to continue to operate as necessary to ensure a fiscal return on CIAA’s loans.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>Closing TBLH will lead to an economic and environmental domino effect that will devastate the entire fishery from Kodiak, Cook Inlet, and Prince William Sound by starving fisheries of salmon stock and causing industry infighting.</p> <p>Many of the 11,500 workers employed by the commercial fishing industry in Southcentral Alaska would be negatively impacted by TBLH ceasing operations. Pink and sockeye commercial fisheries, permit holders, fish processor jobs and revenue, fish transportation services, fishing guides, water taxis, deck hands, boat work businesses, marine surveyors, fish-filleting businesses on the Homer Spit, and other fish-related businesses and services would also suffer.</p> <p>Closing TBLH would increase poverty and negatively impact the local and regional economy in the following ways: 25 jobs would be directly eliminated; fewer in-state tourists would come to dipnet at China Poot and grocery stores, fuel stations, charters, hotels, B&Bs, and vacation rentals would all suffer with less salmon; state and city fish landing taxes, wharfage and tax fees in Homer and Seward, and crane and ice sales at the city fish dock in Homer would all decrease.</p> <p>TBLH provides income and fish for many people in Homer, Port Graham, Seldovia, the Kenai Peninsula, and beyond. Loss of the hatchery would be especially painfully during years with low natural returns. TBLH and CIAA contribute harvest opportunity to 483 drift gillnet permit holders, 17 purse seine holders, and 506 set gillnet permit holders by contributing over 25 million pounds harvested annually and roughly \$31.8 million in ex-vessel value; TBLH and CIAA also contribute over 26,000 sockeye to the annually to sport fisherman on the Kenai Peninsula and Lower Cook Inlet. According to a 2018 McDowell Group study, TBLH and CIAA also contributed nearly 1500 sockeye to the personal use and subsistence harvest affecting Homer and Seldovia.</p>	<p>This management plan provides management direction through a set of policies and recommendations based on the park’s enabling legislation, state law, and DNR policies. The management plan helps guide park management when it evaluates permitting activities, authorizing facilities’ uses, and authorizing trail development. In doing so, certain conduct will be deemed incompatible if it is inconsistent with the legislative mandate that the park be managed as a “scenic park” or by considering other informative state law such as disposal. Under this framework and considering specific facts related to the TBLH, the plan correctly finds the TBLH is incompatible within the park.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>TBLH has been in its current location since 1975 (before KBSP existed), first operated by ADF&G and then operated by CIAA since 1991 – the hatchery has a good track record. TBLH was permitted originally as being compatible with state parks mandate and guaranteed to remain within the park. DPOR permits this hatchery and then decides to pull the rug out from under them? To arbitrarily deem it incompatible at this time is not only political, but patently illegal and employing flimsy fabricated reasoning – it is not being done for scientific reasons either. The board that proposed this closure should be replaced with non-biased people who can see the whole issue and are not biased against hatcheries. To adopt the extreme position that hatcheries and parks cannot co-exist is a short-sighted, narrow position, considering the overall good the hatchery provides to the economy and to feeding people. KBSP is nice to look at, but it does not provide for people on so many levels like TBLH does.</p>	<p>CIAA and ADF&G’s agreement for CIAA to operate the TBLH likely constitutes a functionally irrevocable agreement and thus an impermissible disposal of state park land because of: (1) the financial investment in the hatchery; and (2) the need for the hatchery to continue to operate as necessary to ensure a fiscal return on CIAA’s loans.</p>	<p>None.</p>
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>The Alaska salmon hatchery program is one of the most successful public-private partnership models in Alaska’s history and this should be acknowledged in the plan.</p>	<p>ADF&G manages hatchery programs. As a result, the salmon hatchery program’s successes do not need to be acknowledged in this plan.</p>	<p>None.</p>
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>Resolutions to provide easements or contractual resolutions to allow for continued operations at TBLH should be considered by DNR and ADF&G.</p>	<p>Because there are numerous legal problems surrounding the TBLH – it constitutes a disposal, the hatchery is inconsistent with a scenic park, and the hatchery operation relies on an impermissible ILMA – a legislative solution is required for the TBLH to continue to operate.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)	DNR closing TBLH would set a very negative precedent for all Alaskan hatcheries. Hatchery programs in Prince William Sound, Kodiak and Southeast Alaska will be at risk. Will the state continue to finance hatchery improvements within State Parks? Will fishermen and hatchery associations continue to invest in hatcheries that may be closed by the State through an incompatibility determination?	CIAA and ADF&G’s agreement for CIAA to operate the TBLH likely constitutes a functionally irrevocable agreement and thus an impermissible disposal of state park land because of: (1) the financial investment in the hatchery; and (2) the need for the hatchery to continue to operate as necessary to ensure a fiscal return on CIAA’s loans.	None.

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>TBLH operates at no cost to the state, paid for by a tax on commercial fishermen which effectively subsidizes the sport/subsistence/personal use fisheries. The push to close TBLH is politically motivated by Kenai sport fish organizations. It is suspicious and convenient that Ricky Gease, former director of Kenai River Sportfishing Assn., will be making the final call on this issue as Director of State Parks, with an assist from Governor Dunleavy. DNR’s position that “legal issues” are the driving force behind the proposal to close TBLH and not Director Gease has not withstood scrutiny in the court of public opinion and would not in a court of law; If the state moves forward based on these legal concerns it could face legal issues of its own. If these legal issues are based in fact, TBLH’s permitting cycle could be reduced and the cost recovery model adjusted without forcing the facility to close.</p>	<p>This management plan provides management direction through a set of policies and recommendations based on the park’s enabling legislation, state law, and DNR policies. The management plan helps guide park management when it evaluates permitting activities, authorizing facilities’ uses, and authorizing trail development. In doing so, certain conduct will be deemed incompatible if it is inconsistent with the legislative mandate that the park be managed as a “scenic park” or by considering other informative state law such as disposal. Under this framework and considering specific facts related to the TBLH, the plan correctly finds the TBLH is incompatible within the park.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>The hatchery should remain operating. Fishery enhancement projects are not permitted by DF&G if they are anticipated to cause a significant negative impact on natural production. Hatcheries in Alaska are highly regulated by the state, using the most scientific, current, and effective practices to produce salmon for all user groups without harming wild stocks. Hatcheries provide important support for the ever-expanding marine mammals that so bountifully inhabit our waters.</p>	<p>This management plan provides management direction through a set of policies and recommendations based on the park’s enabling legislation, state law, and DNR policies. The management plan helps guide park management when it evaluates permitting activities, authorizing facilities’ uses, and authorizing trail development. In doing so, certain conduct will be deemed incompatible if it is inconsistent with the legislative mandate that the park be managed as a “scenic park” or by considering other informative state law such as disposal. Under this framework and considering specific facts related to the TBLH, the plan correctly finds the TBLH is incompatible within the park.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>The commercial fishing and seafood processing industry in Cook Inlet recently suffered significant economic loss due to the closure by the Dunleavy Administration of commercial fishing in waters within Cook Inlet under federal control. Closing TBLH now, for purely political reasons, during a particularly vulnerable time for these industries will further damage regional fisheries.</p>	<p>This management plan provides management direction through a set of policies and recommendations based on the park’s enabling legislation, state law, and DNR policies. The management plan helps guide park management when it evaluates permitting activities, authorizing facilities’ uses, and authorizing trail development. In doing so, certain conduct will be deemed incompatible if it is inconsistent with the legislative mandate that the park be managed as a “scenic park” or by considering other informative state law such as disposal. Under this framework and considering specific facts related to the TBLH, the plan correctly finds the TBLH is incompatible within the park.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>Closing TBLH makes no economic sense. CIAA has invested millions in improving its hatchery operations (including TBLH) and secured much of this investment with loans through the State of Alaska’s Fisheries Enhancement Revolving Loan Fund administered by the Alaska Department of Commerce.</p>	<p>This management plan provides management direction through a set of policies and recommendations based on the park’s enabling legislation, state law, and DNR policies. The management plan helps guide park management when it evaluates permitting activities, authorizing facilities’ uses, and authorizing trail development. In doing so, certain conduct will be deemed incompatible if it is inconsistent with the legislative mandate that the park be managed as a “scenic park” or by considering other informative state law such as disposal. Under this framework and considering specific facts related to the TBLH, the plan correctly finds the TBLH is incompatible within the park.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>Regarding the China Poot personal use fishery: TBLH has a serious IHNV disease problem. Trail Lake Hatchery, where these fish are incubated and then trucked, has IHNV as well as bacterial kidney disease issues. If fish could be determined to be disease-free, Dingle-Johnson funding plus a Sockeye stamp (similar to a King stamp) could pay for the 100,000 smolt for this fishery. It is confusing for the recreational user when money from TBLH pink salmon “cost recovery” is used for this personal use fishery. This 100,000-sockeye recreational fishery is of a vastly smaller magnitude than 125 million pinks.</p>	<p>ADF&G pathology lab monitors fish health at all aquaculture facilities in the state. Trail Lakes sources its water directly from deep underground aquifers. Given the purity of this water, IHN virus outbreaks occur rarely at this facility. Given that these fish are harvested in an Alaskan-only fishery, federal Dingle-Johnson monies could not be used to pay for the smolt as suggested. Consequently, the proposal of using “sockeye stamps” to fund CIAA sockeye production would not be feasible for most Alaska residents.</p>	<p>None.</p>
<p>Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)</p>	<p>TBLH does not have sufficient water supply to produce 100 million fish. If they did, the impact on other fisheries would be substantial (crab, oysters, shrimp).</p>	<p>There is no evidence that salmon hatcheries substantially impact crab or shrimp populations. Oysters are passive filter feeders raised in cages in very select areas and would definitely not be impacted by salmon migration routes.</p>	<p>None.</p>

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)	Agree that because TBLH is incompatible with park purposes, it should be phased out and its facilities repurposed for public use, but it should happen sooner than 2031. Even considering negative economic impacts, it is in the best interest of the Kachemak Bay area to close TBLH.	Because there are numerous legal problems surrounding the TBLH – it constitutes a disposal, the hatchery is inconsistent with a scenic park, and the hatchery operation relies on an impermissible ILMA – a legislative solution is required for the TBLH to continue to operate. The specific date of 2031 – the date when the CIAA-ADF&G agreement ends – will be removed from the plan.	The plan will be amended to recognize the need for a legislative solution and will no longer identify 2031 as the date when the hatchery will close.
Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)	TBLH is contributing to the loss of Chinook, Coho, and other salmon habitat already occurring due to climate change by increasing opportunities for Pinks to replace less resilient species.	There is no evidence that “...pinks are replacing less resilient species”. The five north Pacific salmon species are adapted to occupy significantly different niches in the ocean ecosystem.	None.

Subject	Issue Summary	Response	Recommended Revision
Guideline Table: Resource Management Activities – Fisheries Enhancement – Hatchery (Page 104)	Chapter 4, p. 43 includes comments regarding low contributions to the common property fishery and reflects the lack of understanding on how regional aquaculture associations (RAA's) operate. CIAA is managed by a Board of stakeholders who make the decisions regarding cost recovery to fund projects and investments for the future. There are stakeholders who have made the decision to forego present economic gain to provide for a greater potential in the future and invest in projects that will provide salmon for all stakeholders within the region. It has not been uncommon for some RAA's to require high cost recovery amounts at the beginning of projects which ultimately results in reduced amounts as programs mature. CIAA is undergoing the task of developing two hatchery programs simultaneously in both Tutka and Port Graham. As programs and projects mature the reliance on cost recovery diminishes.	Language on page 43 is provided to convey the diversity of comments the public provided during the plan process on hatchery operations. It is not intended to reflect an in depth understanding of CIAA's operations or inner workings.	None.
Chapter 6: Unit Specific Management – ADA accessible trails	There are great opportunities for ADA accessible trail development at Cottonwood Eastland, Eveline, and Diamond Creek units.	Concur.	None.
Chapter 6: Unit Specific Management – General – Yurts (Starting Page 107)	Approve of phasing out yurts and replacing with PUCs.	Concur.	None.
Chapter 6: Unit Specific Management – Eveline – Current Uses (Page 111)	Under current uses, mention the popular snowshoe trail. Also, mention that boardwalks provide dry trails except for a couple wet spots.	Concur.	Change as suggested.

Subject	Issue Summary	Response	Recommended Revision
Chapter 6: Unit Specific Management – Eveline – Management Intent (Page 111)	Support enhanced ADA accessibility at Eveline.	Concur.	None.
Chapter 6: Unit Specific Management – Diamond Creek – Facility Recommendations (Pages 116-117)	Support all proposed facility recommendations.	Concur.	None.
Cottonwood Eastland Unit – Neighboring Parcel (Starting Page 125)	In the Cottonwood Eastland area, DPOR should acquire and add to the park the two adjoining private parcels totaling approximately 8 acres situated between Eastland Creek and Falls Creek and southwest of development zone CE-06.	These parcels are surrounded by state parkland and acquiring them is something DPOR may consider in the future.	None.
Cottonwood Eastland Unit – Unit Description (Page 125)	Clarify this section: The text says 6 parcels are state owned land administered as part of KBSP. One of these parcels provides access to East End Road near Eastland Creek. Also, on line 22 it says East End Road provides direct access – until the ILMA is approved, this is not true. There is no parking.	An ILMA is not needed for a parcel of general state land to provide access. The ILMA is desired to better enhance access opportunities at this location. The section will be reworked to better clarify the parcels being discussed.	Rework paragraph as described in response.
Cottonwood Eastland Unit – Management Intent (Page 125, lines 37-43)	Support all stated Management Intent for Cottonwood Eastland.	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Cottonwood Eastland – Special Management Considerations – ILMA (Page 126)	Support the proposed ILMA to provide access to this area. Maybe DPOR could help homeowners pay for any additional maintenance costs for Elmers Way due to increased traffic.	Maintaining roads outside of state park areas is not the responsibility of DPOR. DPOR is not funded for nor does it have the expertise to manage local road maintenance.	None.
Cottonwood Eastland – Special Management Considerations – Cottonwood Creek (Page 126)	Historically, beach campfires have ignited coal seams in Cottonwood Eastland that burned for several weeks – best management practices should be applied to avoid this.	A new Special Management Consideration will address this.	Add a Special Management Consideration warning users to be careful to avoid igniting coal seam fires in this area.
Cottonwood Eastland – Special Management Considerations – Cottonwood Creek (Page 126)	Cottonwood Creek is a cultural zone like Chugachik Island – use similar wording here as on page 132 lines 6-13. Also, the MOU already exists between Friends of KBSP and DPOR.	There are various cultural sites throughout the parks; however, the site on Chugachik is very significant and as such is zoned Cultural. Chapter 2 of the plan recognizes these cultural sites. DPOR currently does not have an MOU with Friends of KBSP to manage either the Chugachik Island campsite or the Cottonwood Creek campsite.	Add a Special Management Consideration stating that there are cultural sites near Cottonwood Creek.
Cottonwood Eastland – Facility Recommendations (Pages 126-127)	Support all facility recommendations, but especially CE-01 (campground).	Concur.	None.

Subject	Issue Summary	Response	Recommended Revision
Cottonwood Eastland – Facility Recommendations – CE-5 (Page 127)	Relocate proposed PUC CE-05 to reduce conflict with local residents.	Concur. The development nodes depicted in plan are generalized and precise location will be determined during the site planning phase.	Add language stating that final site planning for CE-05 should seek to minimize conflict with nearby residents.
Cottonwood Eastland – Map 11 (Page 129)	What is the white square at Eastland Creek? Is this a mistake and meant to represent the smaller private inholding near the mouth of Eastland Creek? There is also no tent platform at the Cottonwood Creek campsite as indicated.	Concur there is no tent platform. The “white square” is a 40-acre privately owned parcel. However, the 6-acre private parcel at the mouth of Eastland Creek was mistakenly depicted on Map 11 as part of KBSP.	Standardize map legends by changing “tent platform” to “camp site.” Show the parcel at the mouth of Eastland Creek as private land on Map 11, Map E-3.1, and Map E-3.2.
Northern Unit – Facility Recommendations (Page 133)	Support all facility recommendations for this unit.	Concur.	None.
Grewingk Glacier – Special Management Considerations (Page 138)	Danger of possible landslide at Grewingk Lake has not been sufficiently highlighted. Information on this area in Chapter 6 should be reviewed by SOA legal counsel to determine state’s exposure to lawsuits. In addition to notice of surface wave danger posted at the lake, there should also be warning signs at relevant trailheads and informational signage at the lake.	The plan indicates the risk of a surface wave. Park users recreate at their own risk.	None.

Subject	Issue Summary	Response	Recommended Revision
China Poot - Halibut Cove – Special Management Considerations (Page 144)	Page 144 add under Special Management Considerations – Halibut Cove Lagoon. Add language indicating that Halibut Cove Lagoon has a narrow and shallow outlet channel that limits flushing and water turnover. Boat access is tide dependent.	Concur.	Change as suggested.
China Poot - Halibut Cove – Special Management Considerations (Page 144)	In 2012, DPOR denied a permit request to rear pink salmon fry at this location. Humpy Creek should be protected from straying due to enhancement operations. Management should be cautious and guard against nutrient and contaminant loading to prevent dissolved oxygen impairment.	DPOR does not manage fish resources. Homer ADF&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.	None.
China Poot - Halibut Cove – Existing Facilities (Page 144)	Page 144, line 39, delete salmon hatchery and insert: “small-scale estuarine rearing and research facility with original objectives to study fish disease, develop brood stocks of Chinook and coho, and conduct feasibility research on pink and sockeye estuarine and lake short-term rearing and development sport fisheries. Located in a productive shrimp rearing lagoon.”	Halibut Cove Lagoon was a pink salmon remote release site for over a decade. The facility, during the short period of time when it was operating was a general salmon aquaculture facility operated by the FRED Division.	None.

Subject	Issue Summary	Response	Recommended Revision
China Poot - Halibut Cove – Facility Recommendations (Page 147)	Add notation that Public Use Cabin HC-09 will replace existing yurt.	Concur.	Change as suggested.
China Poot - Halibut Cove – Facility Recommendations – PUCs (Pages 147-148)	Support the PUCs in the Facility Recommendations, especially HC-10 and HC-11. Also support a bridge or hand tram (HC-13) over Halibut Creek. I would like to see a boardwalk to a hardened campsite and accessible latrine at the beach by Haystack Rock. It is tide-dependent, but close to Homer.	No campsite, boardwalk, or latrine is planned for the beach by Haystack Rock, but a planned nearby PUC (HC-09) would include a latrine.	None.
Sadie - Tutka Management Unit – Special Management Considerations (Page 152)	The head of Tutka Bay should be preserved from development as a pristine wilderness area to protect traditional hunting and trapping activities. Developments bring restrictions for firearm discharge, effectively eliminating duck and bear hunting in the area.	The plan calls for limited development in this area. Also, the Wilderness Park is very close to the head of Tutka Bay and is zoned Wilderness.	None.
Sadie – Tutka – Special Management Considerations – Campsite at Kayak Beach (Page 152)	An MOU between DPOR and Friends of KBSP already exists for Kayak Beach.	Until now, DPOR has managed this use by issuing special use permits. DPOR is, however, working on developing this MOU.	None.
Sadie – Tutka – Special Management Considerations – Tutka Bay Lagoon Hatchery (Page 152)	Retaining certain hatchery structures to be used as a group camp facility would harm the natural state of the park more than the hatchery continuing to operate.	The relatively small amount that this will increase recreational usage in the area will not impact the park as much as a large industrial operation.	None.

Subject	Issue Summary	Response	Recommended Revision
Sadie – Tutka – Special Management Considerations – Tutka Bay Lagoon Hatchery (Page 152)	Agree that because TBLH is incompatible with park purposes, it should be phased out and its facilities repurposed for public use, but it should happen sooner than 2031. Even considering negative economic impacts, it is in the best interest of the Kachemak Bay area to close TBLH.	This section of the plan will be revised and the language related to the phase out will be replaced to reference the disposal issues related to TBLH’s operations; the incompatibility with the Legislature’s mandate that KBSP be managed as a scenic park; and that DNR lacked the authority to enter into an ILMA with ADF&G to manage KBSP lands and waters for the operation of TBLH. The section will acknowledge steps for addressing the issue absent a legislative solution.	Change as suggested in response and add the following: “Absent a legislative solution, legally TBLH operations will need to end. If TBLH operations do end, the various state agencies will need to address the following: how to restore the site; what structures should be retained on the site; and future plans and uses for the site.”
Sadie – Tutka – Facility Recommendations – ST-16 (Page 155)	The proposed PUC is much too near two private holdings and homes and would result in park user/private landowner conflicts. Siting the PUC here is against language (under Area-wide Goals and Objectives) that recreational opportunities should be expanded in a manner “appropriate to the setting” (P. 32, lines 1-3) and Objective 2-3 that recreational uses need to be managed to avoid conflict (P. 33, lines 1-3). Elsewhere the plan recognizes the need to respect private property rights; that the potential for conflict exists between users, DPOR, and private landowners; and that recreational facilities should be sited and designed to accommodate recreational uses while also minimizing impacts to neighboring private land. The Special Management Considerations for Sadie-Tutka Unit commit DPOR to minimize the impact to private properties to the maximum extent practicable (P. 152, lines 11-15.) The PUC could alternatively be sited across Tutka Bay on a large parcel of state land.	The general location of this PUC is sited to maximize recreational opportunities for park visitors. The development nodes depicted in plan are generalized and precise location will be determined during the site planning phase.	Add language stating that final site planning for ST-16 should seek to minimize conflict with nearby residents.

Subject	Issue Summary	Response	Recommended Revision
Sadie – Tutka – Facility Recommendations – ST-16 and ST-17 (Page 155)	Connecting electricity to these cabins would be very expensive for very small benefit. Maybe into solar chargers instead.	The plan states that electricity may be an option for these PUCs. The feasibility will be determined at a later date.	None.
Sadie – Tutka – Facility Recommendations – ST-19 (Page 155)	The facility could be used as a group camp, but also as an educational and research area.	Concur.	Add language incorporating the suggestion.
Sadie - Tutka – Facility Recommendations (Page 155)	Add ST-20 Saddle Trail Dock to Facility Recommendations.	Concur.	Change as suggested.
Sadie – Tutka – Facility Recommendations (Page 155)	Designate additional day picnic areas in Sadie Cove and Tutka Bay to create concentric ½ mile rings of developed facilities.	Picnicking is available throughout the area without the need for DPOR to designate/ maintain picnic facilities.	None.
Outer Coast – Current Uses (Page 159)	The Tutka Alpine Traverse trailhead has good floatplane access and probably good boat anchorage – this should be added to “Current Uses” at the bottom of page 159.	Concur.	Insert at p.160, line 13: “Float planes drop off and pick up hunters and Tutka Alpine Traverse hikers at Taylor Bay.”
Outer Coast – Special Management Considerations – 3-sided Shelters (Page 161)	3-sided shelters should not be considered due to mosquitoes, limited weather protection, and that most hikers bring tents. If you can pitch a tent in a 3-sided shelter or if there would be bunks to sleep on, this should be clarified.	The 3-sided shelters are an alternative to a tent platform that provides more protection from weather than a platform alone would.	None.

Subject	Issue Summary	Response	Recommended Revision
Chapter 7: Implementation – Phasing (Page 167, lines 12-13)	Utilize AOGA, LWCF, and Pittman-Robinson funds to start the implementation process immediately upon adoption of the plan.	Concur.	None.
Chapter 7: Implementation – Phasing (Page 167)	Cottonwood Eastland parking, trailhead, trails, and PUC should be priority. As well as coastal PUCs in the Northern Unit.	Concur, in part.	Add Cottonwood Eastland facility recommendations as the first priority on Page 167.
Chapter 7: Implementation – Recommended Staffing (Page 170)	Add a grant writer position to write and administer grants for the parks to fund the 12 part-time positions that plan recommends adding, and to fund new PUCs and trails and trail maintenance.	Concur.	Add a volunteer grant writer position to the Recommended Staffing section.
Chapter 7: Implementation – Recommended Staffing (Page 170)	Support all staffing recommendations.	Concur.	None.
Chapter 7: Implementation – Recommended Staffing (Page 170)	On P. 170, line 5, change underlined heading to read: “Upgrade Seasonal Park Specialist to a twelve-month Park Specialist position.”	Concur. This will better meet Park management needs.	Change as suggested.
Appendices: General – List of Depleted Species (Starting on Page A-1)	A comprehensive list of all depleted commercially harvested marine species should be included in the plan.	ADF&G manages fish and game resources in the parks. The list suggested would not help inform DPOR’s park management.	None.

Subject	Issue Summary	Response	Recommended Revision
Appendices: General (Starting on Page A-1)	Replace Appendix C (Mammal List) and Appendix D (Bird List) with Appendices C, D, and E – Geological, Faunal, and Floral Characteristics respectively. Include NERR list of links with these appendices. Add MOU between the University’s Alaska Center for Conservation Science and ADNR-DPOR concerning Kachemak Bay Estuarine Research (signed 1.6.21) to the Cooperative Agreement Appendix.	There are too many MOUs to include them all in the Plan. The appendices will be revised based on the comment.	Add an Appendix on Flora. Augment Appendices C & D with information from Kachemak Bay National Estuarine Research Reserve.
Appendix B: Glossary – Add Definition (Starting Page B-1)	Add Definition. Natural Resources: Earth’s natural resources at found in nature and include light, air, water, plants, animals, and soil. Renewable resources – such as sunlight, water, and air – cannot be used up. But human activities such as hunting, logging, building, and polluting can severely impact or deplete these resources.	The definition of Natural Resources is self-evident and therefore not needed.	None.
Appendix B: Glossary – Add Definition (Starting Page B-1)	Add Definition of Natural Soundscapes: Natural sounds, or the sounds of nature, are the opposite of human-made sounds, such as traffic, industrial, and recreational noise. US Congress and the National Park Service consider “natural quiet” as essential resource that needs to be protected.	Concur. A modified definition of Natural Soundscape will be added.	Add definition: Natural Soundscape is the aggregate of all the natural sounds that occur in parks together with the physical capacity for transmitting natural sounds. Natural sounds occur within and beyond the range of sounds that a human can perceive and can be transmitted thru air, water, or solid materials.

Subject	Issue Summary	Response	Recommended Revision
Appendix B: Glossary (Starting Page B-1)	Add definitions for: Conserve, Preserve, Scenic Value, Solitude, Scenic Beauty, Wilderness, Scenic Vistas, Scenic Character, Recreational Experiences, Primitive, and Noise.	These definitions are either self-evident or generally understood by those fluent in the English language.	None.
Appendix E: Trail Plan – Trial Classification System (Page E-12, line 31)	Snow trail should include snowshoe trails as well as classic and skate ski trails.	Trails designed for snowshoe use are not recommended for development in this plan. However, snowshoe use is not precluded on any of the snow trails.	None.
Appendix E: Trail Plan – Eveline Unit Trails (Page E-35 to E-37)	The snow trails are basically the same as the terra trails. EV-203 and EV-204 in the southern portion of the unit should be eliminated.	The Forest Service defines a Snow Trail as “A trail that has a surface consisting predominantly of snow or ice and that is designed and managed to accommodate use on that surface.” Even if they occupy the same geographic trail tread, snow trails and terra trails have different management purposes and different design parameters and as such must be managed separately.	None.
Appendix E: Trail Plan – CE-112 (Page E-44)	Historically, the beach from Homer to Fox River is used by ORVs so access to the Beach Campsite and Cottonwood/Eastland should be allowed.	ORV use is not permitted by regulation in the park. This use on the beach is not allowed above mean high water.	None.
Appendix E: Trail Plan – Maps E-3.1 and E-3.2 (Pages E-45 and E-47)	What is the white square at Eastland Creek?	This is privately owned property.	None.

Subject	Issue Summary	Response	Recommended Revision
Appendix E: Trail Plan – Northern Unit (Pages E-49-50)	Change ID # of trail NO-105 to NO-105a and change NO-108 to NO-105b.	Concur. These changes are to clarify that both segments are part of the Emerald Lake Loop.	Change as suggested.
Appendix E: Trail Plan – Northern Unit (Page E-50)	Change Designed Use of NO-110 (Mallard-Emerald Connector) from Bicycle to Hiker-Pedestrian and Managed Use from Bicycle; Hiker to Hiker.	Concur. This trail segment’s terrain is not suitable for bicycling.	Change as suggested.
Appendix E: Trail Plan – Grewingk Glacier Unit (Page E-53)	Change the Designed Use for .1 mile trail GG-103b (Grewingk Tram Spur) from Hiker-Pedestrian to Bicycle and Managed Use from Hiker to Bicycle; Hiker. This will allow bicycle use to connect between trails GG103a and NO-108 (ID# NO-108 is changing per this IRS to NO-105b).	Concur.	Change as suggested.
Appendix E: Trail Plan – Grewingk Glacier Unit (Page E-53-54)	Change GG-102 (Glacier Lake) and GG-107 (Saddle) from class 3 to class 4. This higher class will be more appropriate for the relatively high level of use on these trails.	Concur.	Change as suggested.
Appendix E: Trail Plan – Grewingk Glacier Unit (Starting on Page E-55)	Support proposed trails at Grewingk Glacier Unit. Access to the trail system from Right Beach would be good.	Concur.	None.
Appendix E: Trail Plan – Sadie Tutka Unit (Page E-61)	Change Trail Class for ST-102 (Sadie Knob) and ST-103 (South Eldred) from Class 2 to Class 3.	Concur. Class 3 is more appropriate considering the current condition and the level of use on these trails.	Change as suggested.
Appendix E: Trail Plan – Sadie – Tutka Unit (Page E-62)	Change trail ST-109 (Tutka Lagoon) from an Existing trail to a New/Proposed trail.	Concur.	Change as suggested.

Subject	Issue Summary	Response	Recommended Revision
Appendix E: Trail Plan – Outer Coast Unit – Tutka Alpine Traverse (Page E-65)	Tutka Alpine Traverse (OC-103) should be called Tutka Backdoor Trail. Tutka Ascent (OC-101) is another new, not commonly used name for part of the Tutka Backdoor Trail.	Trails are usually given geographic names that describe their location or attributes. Furthermore, the names ascribed to trails in the plan do not officially “name” these trails. The Tutka Ascent and the Tutka Alpine Traverse had to be separated in the Trail Plan to allow for trail segment differentiation. The common name suggested is already mentioned on Page 36 and on Page E-65.	On Page 36, insert “Tutka” in front of “Backdoor.”
Appendix E: Trail Plan – Water Trail – Map E-9 (Page E-71)	During the next 20 years there is potential for a beach trail/water trail extension connecting Captain Cook Recreation Site to Kenai, Kasilof, Clam Gulch, Ninilchik, Anchor Point, and Diamond Creek to the Homer Spit.	Concur.	None.
Appendix F – DNR/DF&G Critical Habitat Area Cooperative Agreement (F-1)	The Cooperative Agreement makes it clear DPOR has the responsibility and authority to ensure that ADF&G regulations are a good fit for the park.	The Cooperative Agreement is structured so both agencies have the requirement of consulting with each other on major policies and decisions which apply to waters that are both within KBSP and the Critical Habitat Area.	None.