

Chugach State Park Management Plan

Public Review Draft

Issue Response Summary

CHAPTER 2: PARK GOALS and OBJECTIVES

Subject	Issue Summary	Response	Recommended Revision
General	Two of the objectives are to “provide a wide variety of recreation facilities...” and to “design and construct sustainable park facilities...” These objectives are not only inconsistent with the park’s enabling legislation; they are inconsistent with a later objective on the same page to “minimize the impact of human presence... especially in fragile and wilderness areas.” While it is true that the enabling legislation permitted construction of “necessary facilities,” those facilities cannot be constructed if they conflict with the other purposes for establishing the park. Examples where plan is not consistent include: 1)Public Use Cabins, Yurts and Shelters are permitted in all areas, but permanent or semi-permanent structures are incompatible with wilderness and the natural areas of the park; 2)the Glen Alps connector road and trailheads proposal which will bring more people to sub-alpine and alpine areas that are very fragile and already overused and trampled. While it may be true that more and more people want to go to Glen Alps, it is not the responsibility of park management to get every visitor’s car where visitors want to go. The plan elevates human needs and desires over resource protection despite enabling legislation that clearly favors park resources. This plan should be a resource protection plan, not a recreational development plan.	This is a management plan for the park that has to provide management direction including that for facility development. Resource protection is important and is balanced with all of the park purposes. The plan goals and objectives supplement the park purposes and establish values to be used in making management decisions.	None
Plan is Skewed Toward Development over Resource Protection	In this plan the protection of park resources is discussed only in terms of the resource value to recreation or water supply. It is clear that the park cannot protect the resources within its boundaries without first understanding and protecting ecosystem function- this includes individual species and their habitats, and the natural processes that maintain them. There is no mention of habitat or connectivity of essential movement corridors.	The primary purpose of the plan is to provide a land use plan that allows for optimum recreational use of the area while protecting the natural and cultural resources, to provide a consistent set of principles and policies for park management, and a listing of development projects to facilitate future funding requests and project phasing. Ecosystem functions were evaluated and considered in the development of the plan in consultation with ADF&G, and will continue to be evaluated at the project level should the proposals in the plan move forward.	None

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General- Park Values	The vision for the park should be the same as it was for the group that worked so hard and long for its creation and the legislation that created it. That vision is a Park that is largely in its natural state. It is a place where scenery, wildlife, solitude, and quiet are the primary features. That does not mean that there should not be any development of facilities, but facilities must be very limited. The plan reads more like a development plan than a management plan. Trying to accommodate every possible user, build every possible facility, and allow every activity. The management goal should be to manage the Park as a park, to preserve its inherent values, and to avoid construction and management practices that are inconsistent with the goals for the Park.	The plan was developed consistent with the park's enabling legislation. This management plan recognizes the need for wild areas and as listed in the enabling legislation, the eastern part of the park is the wilderness zone, the central park is the Natural Environment zone and the periphery is the Recreational Development Zone. This plan spends more time focusing on the management of the Recreational Development Zone since it is where most of the use occurs and developments exist. This plan is not a list of projects that will be completed on any timeframe, but rather a guideline for how to proceed as use increases and funding becomes available over the 20 year plan window.	None
General- park resources	The goals say nothing about the value of park resources and the state's commitment to protecting park resources. Emphasis needs to be placed on resource protection. Recreation is listed as the first set of goals and objectives. While this not a priority list, I believe recreation should be second to resources to clarify resource protection is the most important goal and objective.	There is a Resource Goal and a series of objectives given aimed at protecting and promoting the park's resources. The goals are not listed in priority order and each of the goals has equal weight and importance.	None
General- Add Education Goal	There is a notable absence of an Education Goal, which could include objectives such as: <ul style="list-style-type: none"> - Developing informative kiosks at trailhead facilities that inform users about resources, safety issues and leave-no-trace principles - Provide educational opportunities through partnerships with other agencies, organizations, and school groups. - Promote bear education among park users through interpretive signs and materials, presentations and classes on how to be Bear Aware. 	These education principles are already captured under the existing goals and similar objectives.	None

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Recreation Goal	As written this goal sounds as though tennis courts and ball fields are as appropriate as a hiking trail. In fact Chugach is best suited to individual pursuits such as hiking, rock climbing, photography, wildlife viewing, picnicking, and camping. The goal implies that any kind and amount of activity is apparently acceptable without acknowledging that the park's resources are impacted by human use and the adverse impacts must be managed, controlled or prohibited by policies and management practice. Rewrite the goal to read: Provide recreational opportunities and complementary facilities <u>that enable users to experience and enjoy the park setting while protecting the park and limiting the impacts on the natural setting.</u>	The park currently contains tennis courts and ball fields as well as hiking trails. While the natural setting is the predominant experience most visitors are familiar with, there still exists a responsibility to maintain and support the other recreational activities that occur within the park. The plan as a whole promotes outdoor setting protection and activities but also recognizes the other activities present within the park. The listed goals supplement park purposes and work in concert with the guidelines within the plan to provide the management direction.	None
Recreation Goal- Add 4 th Objective	Would like to see a fourth objective added to Recreation Goals: Provide opportunities for wilderness experiences including solitude, physical and mental challenge, inspiration and primitive recreational opportunities.	These sentiments are already captured under the Resource Goal and objectives.	None
Recreation Goal-1 st Objective, wording change	Suggest changing the wording of the first objective to: Provide a variety of recreation facilities <u>and opportunities with consideration for varying levels of capabilities or equitably distributed for all capabilities.</u> I do not believe that all areas are multi-use and that facilities are as important as opportunities. The park should be managed to maximize the outdoor recreation opportunities for users.	Concur	Change objective 1 to read as follows: Provide a variety of recreation facilities <u>and opportunities equitably distributed for all capabilities.</u>

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Resource Goal	The wording of the goal implies that protection of resources is only done to support ‘visitor experiences and understanding’. The goal should be reworded to specifically cite protection of the water supply because it is one of the five primary purposes for the creation of the park and watershed protection is acknowledged as the “highest land and water resources management goal” in the AWWU/CSP Cooperative Agreement. Accordingly, the goal could be “Protect park resources to provide a satisfactory water supply, allow for diverse visitor experiences and the understanding of the unique features of Chugach State Park” with a supporting objective, “Plan and manage park uses and facilities so as to protect water quality and supply”.	The goals listed in the plan are meant to be used along with park purposes to establish values that aid in making management decisions. Protection of the water supply is one aspect that along with all the other park purposes and goals needs consideration when making management decisions. To clarify, the AWWU/CSP Cooperative Agreement states that DNR will manage Ship Creek and Eklutna Lake Valley watersheds with watershed protection as the highest land and water resource goal. This statement does not apply to the entire park. The management intent statements for the Ship Creek and Eklutna management units reflect this element. Additionally, the plan recognizes the value of the water supply and goes a step further by carrying the same sentiment forward in the Hillside unit’s management intent.	None
Resource Goal	Reword the goal and objectives to better reflect enabling legislation and put more emphasis on the park’s inherent wild resources and values and less emphasis on visitor experiences. It seems to imply that the resource goal is tied inextricably to the visitor experience. This is more appropriate as a recreation goal rather than a resource goal.	This text supplements park purposes described in the enabling legislation. In accomplishing the resource objectives stated, the visitor experience is promoted. The “Diverse Visitor Experience” is not always about recreation. The Park resources are a part of the unique features and their understanding does not in itself constitute recreation.	None
Resource Goal, Second Objective	The second objective reflects one of the statutory mandates for creating the park; it needs to stand by itself and does not fit under the goal as stated. It is not part of the visitor’s experience or understanding.	Water is a natural resource and should be in this section. Protecting the water supply can be a part of the visitor’s experience and understanding.	None
Resource Goal, Third Objective	The third objective fails to meet the mandate of the enabling legislation which requires managers to provide for the public display of local wildlife. We urge the Division to insist that wildlife in the park be managed by ADF&G for park purposes.	This objective supplements park purposes described in the enabling legislation. Additionally the objective encourages wildlife viewing.	None

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Resource Goal, Fourth Objective	The fourth objective appears to be the only reference to the wilderness aspect of the park as stated in the enabling legislation. We object to the wording that substitutes “minimize” for “protect” because it understates the statutory mandate “to protect the existing wilderness characteristics.”	The complete statutory reference in the enabling legislation is “to protect the existing wilderness characteristics of the easterly interior area.” The objective listed in the plan is meant to apply to the entire park not just the easterly interior area as the enabling legislation mandates. Additionally, the objectives supplement and do not replace the enabling legislation.	None
Resource Goal, last objective- wilderness	The last objective should be altered to include the words “in the periphery of the park” to reflect that wilderness in the center of the park does not need an expansion of recreation, as that would likely detract from the wilderness character. This addition would better reflect the enabling legislation.	The park’s enabling legislation states “to protect the wilderness characteristics of the easterly interior area”, and then goes on to stipulate that the eastern area of the park should be operated as wilderness. The suggested language conflicts with the enabling legislation that does not refer to the center of the park as wilderness.	None
Resource Goal- wilderness preservation	Please include natural silence and wilderness preservation as resource goals. These seem to reflect the original intent of the park and should be emphasized.	The park’s enabling legislation includes the purposes for which the park was established. The goals and objectives listed in the plan supplement the park purposes.	None
Resource goal- objective	The 1980 plan included an objective that is missing from this draft: “To minimize the impact of human presence, particularly in wilderness and fragile areas.” Consider adding this language.	A similar objective (4 th) is already provided under the resource goal.	None
Access Goal	Change the wording of the goal to add “to the periphery” in front of Chugach State Park to clarify that the intent is not to become completely accessible. To preserve wilderness, it is necessary to limit ease of access. This distinction in access should be clarified as a goal, not just an objective.	Not all parts of the park are to be managed as wilderness. Creating and maintaining trails and trail easements to areas other than the periphery is a goal that enhances the intent in the enabling legislation for the park.	None
Access Goal	The access goal “for the benefit of all Alaskans and visitors” is overly broad which the second objective appears to acknowledge with its reference to “balance”. It may be that certain access points will need to be shut down when over-capacity. In the absence of what constitutes being out of balance (amount of resource damage, adverse visitor experience) we fail to see how this objective can be met.	The goal seeks to highlight the importance of access to Alaskans and visitors. The benefit of enhanced access does not imply that it is always to maximize access points.	None

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Access Objectives	<p>We recommend new access objectives be added to recognize and address adjacent land use plans, concerns of nearby property owners and neighbors, and improvements and maintenance of existing roadways that serve the new access sites. New objectives:</p> <ol style="list-style-type: none"> 1- Site selection, design and operation of new access points should address and mitigate the impacts the new access site and facility improvements may have on adjacent lands, neighborhood needs, and the existing roads serving these new access points. 2- Explore possible alternative acquisition methods, management scenarios, and administrative agreements for new access points and related facilities with the Municipality of Anchorage in conjunction with the Municipality's Parks and Districts Plans. 3- Explore the use of partnerships between the State and the Municipality and, if appropriate, with private entities to pursue joint funding for new acquisitions and development of future park access and facility projects. 	<p>These objectives are too specific for the park's management plan and are more appropriate for the Chugach Access Plan, a plan whose purpose is to provide a long term vision for the establishment of access to the park. The Chugach Access Plan inventories secured access areas and provides guidance for securing future access including the type of access and frequency. Refer to the Chugach Access Plan for more information.</p>	None

CHAPTER 3: NATURAL and CULTURAL RESOURCES

Subject	Issue Summary	Response	Recommended Revision
Chapter 3: Natural and Cultural Resources (page 11)	Paragraph one states, “Natural and cultural resource implications were considered...” How were these considerations made? What specialists/documents were consulted?	A bibliography of sources used is included as an Appendix in the plan. In addition, as with all planning efforts, agency review was conducted and various stakeholder meetings and focus groups were held to learn more about user trends and resources. Refer to the introduction chapter for a description of the planning effort and the bibliography for more information.	None
Hydrology Section (page 12)	The first sentence of this section should be deleted and Eklutna and Eagle rivers added to the list of streams in the following sentence since Eklutna River is now more like a small stream than a major river and the flow of Eagle River is perhaps equal to Bird Creek.	This is true only because of the dam on the Eklutna River. The first sentence in this section is still accurate and this section in the plan is included to provide hydrological perspective because the Eklutna drainage is so important within the park.	None
Hydrology Section (page 12)	AWWU recommends updating the percentage in the second paragraph to- Eklutna and Ship Creek watersheds presently provide 93% of the total water to the municipal water supply and this approximate percentage is expected for the foreseeable future.	Concur.	The percentage will be changed to reflect AWWU’s recommendation.
Hydrology Section (page 12)	AWWU recommends rewording the fourth sentence in the second paragraph to read: “Drainage from the CSP Hillside Unit, primarily from the Campbell Creek watershed, recharges aquifers under Anchorage used for drinking water supply.”	Concur.	The fourth sentence will be reworded as suggested by AWWU.
Bore Tide Section (page 14)	There is no mention of wind in this section and bore tides occur because of strong wind pushing against the inflowing tide.	A bore tide occurs because of Cook Inlet’s configuration and large range in tide that force rapid rising tide waters to form a tidal flood with an abrupt raised front. Wind may be a factor in the height of the bore tide but this tide would still occur without the presence of wind because of the factors described above.	None

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Fish and Wildlife Section (page 17)	I believe Eklutna Lake had anadromous sockeye salmon before the first dam was built on Eklutna River. There is a remnant population of land-locked sockeye salmon in the lake.	Dolly Varden and Rainbow Trout are the most abundant fish in the lake with some Kokanee (landlocked sockeye) still present. Currently, only portions of Thunderbird Creek and those portions of the Eklutna River downstream of the confluence with Thunderbird Creek are listed in the Anadromous Waters Catalog. Species found within the park (not broken out into drainages) are found in Appendix D.	None
Fish and Wildlife Section (page 16)	The tone throughout the document is biased with regard to wildlife. For example, why not say Alaska is well known for its abundance of wildlife and many residents and visitors come to the park expressly to view wildlife, etc..., instead of stating in the very first sentence of this section that mammals are not abundant, etc. Is that statement even true?	The sentence simply conveys that while Alaska is not known for it's abundance of mammal species; most of the species of mammals found in Alaska can be seen in the park. This is meant to provide simple facts in the chapter providing information about the park's natural history and convey the importance of the park for wildlife viewing.	None
Sport Fishery Enhancement Section (page 18)	Salmon were released at the Eklutna Hatchery, not Eklutna Lake.	Fish and Game uses Eklutna Lake as the location reference and the plan indicates the hatchery in which the individual species came from for this location.	None
Iditarod Trail Section (page 26)	The third sentence in the second paragraph should be replaced with: "The Crow Pass section (28 miles) of the Iditarod Trail was restored to recreational hiking by the Susitna Girl Scouts in 1974/1975 as a bi-centennial celebration of our Country's 200 th anniversary. That led to the 1978 Congressional designation of the Iditarod Trail as a National Historic Trail, still today the only Alaskan trail with this designation."	Concur in part.	The third sentence in the second paragraph should be replaced with: "The Crow Pass section (28 miles) of the Iditarod Trail was restored to recreational hiking by the Susitna Girl Scouts in 1974/1975 as a bi-centennial celebration of our Country's 200 th anniversary."

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Iditarod Trail Section (page 26) & Eagle River Planning Unit (pages 88-90)	<p>The plan provides little recognition of the historic role of the Iditarod Trail in the Park in general and the Eagle River Greenbelt in particular, provides no recognition of the State of Alaska’s agreement to help protect and improve the historic Iditarod Trail, and no recognition of the opportunities and potential benefits to be gained by a collaborative effort with other agency and non-governmental partners for the development of the ERGB Trail as part of the Iditarod National Historic Trail System.</p> <p>The plan and subsidiary documents should: 1) identify those trails and/or areas within CSP (entire ERGB, Crow Pass-ER trail, Indian Pass-Ship Creek trail, Turnagain Arm trail, Bird to Gird path), as eligible for certification as part of the INHT System; 2)request certification from the BLM for inclusion of eligible segments, including trailheads, within CSP; 3)install prominently and frequently the official INHT insignia at certified trailheads and trail segments; 4)adopt the INHT interagency interpretive graphic standards and work with INHT partners to develop INHT direction signs and interpretive panels on the trail and trailheads; 5)place a high priority on leveraging funding and/or resources for, and continue to undertake efforts to develop a co-located ERGB trail/INHT generally between the ERNC and ERCG near the Glen Hwy; 6) expand and enhance collaborative partnership efforts with volunteers interested in developing and maintaining CSP trails, including the ERGB trail.</p>	The plan does not go into this level of detail but it does provide information regarding the Iditarod Trail in the natural and cultural resources chapter (Chapter 3). Much of the information provided is more appropriately incorporated into the park’s trail plan that does give more specific recommendations related to trails.	<p>Add an entry to recognize the Memorandum of Agreement between the State and the Bureau of Land Management regarding the Iditarod Trail to the agreements section of Chapter 5 of the plan.</p> <p>Incorporate the remaining more detailed recommendations into an Iditarod Trail section of the park’s trail plan document.</p>

CHAPTER 4: PARK USE and ISSUES

Subject	Issue Summary	Response	Recommended Revision
Recreational Use and Trends Section- Activities and Trends (page 29)	Mountain biking is not listed in the draft as a recreational use of the park and should be since in terms of sheer numbers, there are likely more bikers than those who participate in some of the listed activities.	Concur.	Biking will be added to the list of activities occurring within the park.
Recreational Use and Trends Section- Activities and Trends (page 29)	Winter biking is not listed in the draft as a recreational use of the park and should be.	Concur.	Biking will be added to the list of activities occurring within the park.
Recreational Use and Trends Section- Recreation User Conflicts (page 30)	Modify the last sentence at the end of paragraph two to include balancing user demands while maintaining the tenets of CSP like preserving and protecting areas and wildlife. For example, add “and continuing to support CSP’s primary purposes of protecting areas of scenic value, providing areas for the public display of local wildlife, and protecting existing wilderness characteristics.”	This section of the plan merely describes the issues related to recreation user conflicts within the park. The policy direction and recommendations to address the subjects in the “Issues” chapter are found in chapters 5 & 6 of the plan.	None
Land Management- Land Status (page 31)	This section discusses the difficulty in tracking and managing land management agreements and resources, but does not identify what is being done to address this difficulty.	This section is in a chapter of the plan that describes park uses and issues. The first sentence in the chapter indicates that the recommendations found in chapters 5 & 6 address many of the issues. Chapter 5 provides detailed guidance on the various management agreements as well as recommendations for supplementing park resources.	None
Land Management- Land and Water Conservation Fund (page 31)	The plan states that the park is a LWCF unit, and thus any action such as a loss of parkland or utility infrastructures has to be mitigated. But, no mitigation has occurred for the taking of gravel from the Bird Creek parking lot. The plan needs to explicitly state that any expansion of the Seward Highway or other infrastructure development must have DNR oversight to ensure any impacts are properly mitigated as required by law. The history of the park on this subject is not great.	Chapter 5 of the plan does include language providing guidance regarding LWCF conversions. The section in the ‘Park Uses and Issues’ chapter is meant to provide background information for things addressed by the recommendations made in Chapters 5 & 6.	None
Resource Management- Land Management, Military (page 33)	“Fort Richardson” is now called Joint Base Elmendorf-Richardson.	Concur. Fort Richardson will be changed throughout the document to Joint Base Elmendorf-Richardson (JBER).	Fort Richardson will be changed throughout the document to Joint Base Elmendorf-Richardson (JBER).

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Resource Management-Fish & Wildlife Management (page 33)	We recommend a re-write of this section because the tone is immediately negative in the discussion about wildlife management.	This interpretation is a matter of perspective. The section provides background information on issues within the park and balancing recreation with wildlife management is a challenging issue.	None
Resource Management-Fish & Wildlife Management (page 33)	The plan states, “Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife.” What is the source for this statement? What data was used to come to that conclusion?	While no specifically directed study was done on the subject, plenty of information was provided during scoping including focus groups, stakeholder meetings, and input from a variety of users that support the visitor use patterns that occur in the park.	None
Resource Management-Fish & Wildlife Management (page 33)	We disagree with the plan’s interpretation of the results from the public opinion survey conducted by the ADF&G. We recommend that DPOR delete this sentence. If not, then the plan needs to more explicitly reference the study and should be modified by listing the conditions.	Concur in part. Since the text regarding the ADF&G study caused concern and is not necessary, the 3 sentences discussing it will be eliminated from this section.	Remove references to and discussion of ADF&G’s 2009 study regarding Anchorage resident’s opinions on bear and moose populations from the issues section of the plan.
Resource Management-Fish & Wildlife Management (pages 33-34)	Request trapping not be allowed within at least 500 feet of an existing/established trail.	Trapping within the park is not regulated by the park or the management plan but rather by the Board of Game through Fish and Game regulations.	None
Resource Management-Fish & Wildlife Management (pages 33-34)	The plan should emphasize increased wildlife management and consumptive uses. Historically, CSP management policy has emphasized other uses and such imbalance has led to the detriment of local wildlife populations, lost resource use of wildlife, and increased threat to human safety. Although some access and opportunity for hunting is provided, more balance should be demonstrated. Safety of park users and municipal residents would likely increase with expanded, well-managed hunting on park land.	The plan cannot provide management direction for something the Division of Parks and Outdoor Recreation does not manage. The Boards of Game and Fish determine harvest levels and limitations to harvest methods and means within the park.	None

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Resource Management-Fish & Wildlife Management (page 34)	I disagree with the statement “Recognizing the desire for park users to view fish and wildlife, the park has had to react by building facilities commensurate with the demand and appropriate to the setting.” The park never “has” to build facilities commensurate with demand. It is still a choice. Additionally, planners and park personnel are more aware of the dangers and limitations of building facilities and trails in certain areas and therefore it is incumbent upon them to make choices that will, to the best of their ability, protect the unsuspecting, and unknowing, public.	While no facility “has” to be constructed, there are situations that occur where facility development helps protect park resources by concentrating use in areas designed to handle the impact and away from more unstable areas. The Division has in fact had to react in this way to protect resources within the park that were being damaged due to extreme use or pressures that may not otherwise naturally exist as illustrated by the Bird Creek example given in the plan.	None
Resource Management-Fish & Wildlife Management (page 34)	The statement: “...fishing has become popular and the potential for bear-human interaction has increased” is incorrect. Please revise as follow, “...fishing has become popular and bear-human interactions have increased.” As the popularity of fishing has increased in the area, so have bear-human interactions and the potential for a mauling.	Any area that bears frequent or concentrate in because of fish presence introduces an increased potential for interaction though interactions may not always occur.	None
Resource Management-Fish & Wildlife Management (page 34)	DNR should avoid establishing new and/or improving trails/access in areas frequented by brown bears for two reasons: 1) creating a high risk for bear-human interaction may make the state liable for enhancing access for recreational activities through an area with a well-known hazard; and 2) when trail users in Alaska perceive a greater-than-normal threat from wildlife many carry firearms; this results in more dead bears and discharging firearms on trails may also cause collateral human injuries or deaths.	There are inherent risks to all types of recreation and bear encounters can occur anywhere within the park. The management plan does not provide trail recommendations or details on trail design and management because those details are found in the park trail plan. See the trail plan for more information regarding park trails.	None

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Resource Management- Fish & Wildlife Management (page 34)	We question the accuracy of the statement in the plan on page 34 that states the ADF&G is responsible for the management of fish and game resources within the park. Handing over wildlife management authority to ADF&G is an equivocation on the part of DPOR and we ask for more leadership by park managers to be more proactive and assertive about ensuring the park fulfills its stated goal: to provide areas for the public display of local wildlife. Adverse impacts caused by ADF&G actions must be anticipated and avoided, examples of consequences that should have been anticipated and avoided include: the destruction of the Indian trails due to opening hunting in Ship Creek; the problems associated with allowing trapping next to busy trailheads and trails; the degradation of remote lake shorelines resulting from lake stocking.	The Department of Natural Resources does not manage fish and wildlife in the state. That authority rests entirely within the Department of Fish and Game (ADF&G). The legislature did not change which entity managed fish and game resources when it established the park, they only clarified that ADF&G cooperate to manage these resources consistent with park purposes. Additionally, it is important to recognize that hunting, trapping and fishing are all legitimate activities occurring within the park. The plan provides a framework for managing the variety of recreational activities within the park while protecting park resources.	None
Resource Management- Watershed Protection (page 34)	Correct the typo in the third paragraph, second sentence to read: "Anchorage Water and Wastewater Utility".	Concur. It is appropriate to revise the plan to correct the typographical error in this section.	The Watershed Protection section will be revised to replace Alaska Water and Wastewater Utility with Anchorage Water and Wastewater Utility.
Resource Management- Vegetation Management (page 35)	While the park is a place for all users to recreate, it is worth noting that horses increase the spread of invasive plant species and noxious weeds.	The spread of invasive plant species can occur from all uses within the park.	None
Funding Section- Fees (page 35)	User fees should be eliminated or minimized because they are too burdensome on park staff and their collection does not benefit users or the park itself. Fees that directly benefit the park itself would be more palatable.	The legislature has directed the Division of Parks and Outdoor Recreation to collect fees to support park operations. All fees collected in the park are redirected to the Division's budget.	None
General- Park Hazards (pages 36-37)	We suggest adding to the paragraph regarding encounters with wildlife: "At least half of the 12 people killed or injured by bears in CSP were within 100 yards of salmon spawning streams. Salmon-spawning streams represent a minute portion of the entire park; however the odds of surprising a brown bear near a salmon-spawning stream are relatively high."	Concur in part. It is appropriate to add that there is increased risk of encountering bears along fish bearing streams.	Language regarding increased risk of negative bear-human encounters near a fish bearing stream will be added to the hazards section of the issues chapter.

CHAPTER 5: AREAWIDE MANAGEMENT DIRECTION and GUIDELINES

Subject	Issue Summary	Response	Recommended Revision
Major Disconnect between Plans Goals and Objectives (Chp 2) and Three Land Use Designation Zones (Chp 5)	The plan claims that “these zones are established where soils, slopes, drainage, and vegetation can support commensurate or more intensive recreational activities,” it is clear from the zone map that no such analysis was performed. Rather, the zone boundaries appear to be based solely on distance from CSP’s boundary. I can assure you that not all lands along the park’s western boundary are equally suitable for “intensive recreational activities”. While the park’s enabling legislation provides guidance for general location of the zones, it did not provide detail; thus DNR has the discretion to base these boundaries on biophysical factors as well as social needs. Please re-evaluate the actual suitability of park land for the three broad land use zones based on the objectives listed on p.9 and factors enumerated on p.39, not on horizontal distance from a political boundary. E.g. Re-assess the current Rec Zone based on objectives like the need to minimize impacts to fragile areas (wetlands, stream corridors, alpine, etc.) and the need for sustainable facility design.	More detailed site planning occurs with development projects that account for the suitability of the specific location and not all locations are suitable for every project. The Recreation Development zone designates the general area that these developments may occur but subsequent site planning determines where within the zone a particular proposal may be best suited to minimize impacts and provide for sustainable facilities.	None
Entire Park should be Designated Wilderness and Improve Trail Access	The entire park should be designated wilderness. Don’t cut it in pieces or diminish the wilderness character by commercial or other development such as lodges, power development or resource extraction. The park should however spend more money on new and existing trail development to open up new access to new areas and diminish erosion issues.	The legislature did not designate this park as a wilderness park but rather directed that only a portion, the eastern area of the park, be operated as a wilderness area. Because there are developments such as dams, and other commercial infrastructure already within the park, the recommendations in the plan serve to guide managers on these topics especially as technology and needs change in order to protect park resources.	None

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Oppose Use of Natural Instead of Scenic for the Middle Areas of the Park	I don't know when the language of the enabling legislation for the middle area- "scenic" was changed to "natural" but I object to this change. To use "natural" for this part of the park implies that the recreation zone is not to be managed as a natural area but is open to all kinds of development. I do not believe that was the intent of the legislation. I request that you drop "natural" and return to the term "scenic".	This use of "natural" in place of "scenic" was employed in the 1980 version of the park plan and is also used in the Alaska State Park System <u>Statewide Framework (June 1982)</u> . The term "natural" has the same context and meaning as intended with the "scenic" term used in the enabling legislation. The terminology was used to avoid confusion between plan versions and to stay consistent with existing DPOR policy documents.	Add a footnote to clarify that the use of the term "natural" is meant to coincide with what is described as "scenic" in the enabling legislation.
Define Wilderness	Alaska State Park (ASP) wilderness definition and designation needs continuity with traditional wilderness user's expectations, other government entity definitions and the historical perceptive of wilderness designation. It was concern over keeping some areas free of logging, human influence and devoid of motorized use that this term was to be exclusively used to define. I strongly endorse that these delineations also define wilderness areas of ASPs, including the wilderness of CSP.	The definition of wilderness used in this plan derives from the Alaska State Park System <u>Statewide Framework (June 1982)</u> and is also consistent with the definition used in past planning efforts. Additionally, the definition is similar to other government entity definitions in Alaska.	None

Subject	Issue Summary	Response	Recommended Revision
Define Wilderness	<p>Often the more specific a plan gets, for instance management guidelines, the more it contradicts its own general goals. For instance many uses allowed (either explicitly or by administrative permission) in the wilderness zone are not compatible with traditional definitions of wilderness. For instance: aircraft landing, military use, alternative power sources, improved campsite facilities, timber sales, fire suppression/mitigation, Snowmobile use for research, and use of motorized equipment.</p> <p>The State’s definition of “wilderness” differs from federal definitions, but many of the allowed activities listed in Chapter 5’s Guidelines tables under Wilderness still fall far outside of what anyone would consider wilderness, and are certainly not compatible with existing uses. Include a definition of wilderness in the Glossary, it should focus on natural attributes of wilderness, then the benefits to humans. Also include the wilderness attributes such as healthy ecosystems, clean water, and minimal human impact.</p> <p>The plan is even in direct conflict with the vision of wilderness as stated on page 41, “no human-made improvements should be provided except...rudimentary trails, bridges and signage”, by allowing so many incompatible uses. We recommend that the planners make the plan comply with the purposes of the wilderness zone.</p>	<p>Wilderness as applied to this park is described in Chapter 5 of the plan. The information provided in this chapter is derived from the Division’s Alaska State Park System Statewide Framework (June 1982) which standardizes the language used and provides for the land designation system that is employed in the units of the state park system. The activities that may be permitted in the wilderness area are consistent with the definition in the Statewide Framework and what may be expected in other wilderness areas in Alaska. Provisions for allowing certain uses for public safety or resource protection are allowed in wilderness.</p>	None

Subject	Issue Summary	Response	Recommended Revision
Land Use Designations: Land Removed from Wilderness Designation; Should Not Adapt to Current Use But Rather Manage Use Consistent with Zone Objectives (pages 39-43)	<p>The plan proposes one major change from the original Master Plan to the application of zones in the park. It removes the Crow Pass trail corridor from the wilderness zone. This change does not represent a large amount of acreage but it is significant in that it splits the wilderness zone from one contiguous area into two smaller units. Also, this removal could serve as a precedent for future removal of other areas from wilderness. I am concerned that this could be the beginning of an incremental loss of the wilderness zone. In another 20 years planners may see increased use in other drainages and they will be removed one at a time from this higher level of protection. The idea of zones is not to adapt them to current use but to manage use so that it conforms to the zone objectives. Removing areas from zones that don't conform to the objectives of the zone defeats the purpose of zoning. Clearly this trail has been mismanaged despite its designation as being in the wilderness zone.</p> <p>Any reduction in wilderness be (equally) compensated with an addition of wilderness in areas not currently zoned as wilderness. The plan should also include a provision that any future land removed from wilderness be replaced with lands of similar quality and size (provision of no net loss). The quality and character should be well defined as to better maintain it. This management should not change to meet the use patterns; rather the park should implement and follow rules in accordance with the land's zoning.</p>	<p>Part of any planning process involves an evaluation of how to apply land use designations. In this case the park's enabling legislation also provides direction on applying land use designations by indicating that the eastern area of the park shall be operated as wilderness, which the application in this plan far exceeds the area described in the enabling legislation. The analysis for the revision of this plan showed that it was inappropriate to apply a wilderness designation to a portion of the park where this designation had previously been applied in the 1980 plan. The removal of the Crow Pass trail in the plan does reflect a change and conscious decision to manage this trail more aggressively consistent with its original use (pre-park) and the use it experiences now. Wilderness and scenic area as applied in this plan far exceeds what is described in the enabling legislation. No equalization is necessary or appropriate.</p>	None
Crow Pass Trail Corridor Removed from Wilderness	<p>It must be made clear that "trail corridor" means the trail tread way itself and those facilities located along the trail, now and in the future, and not the surrounding park land.</p> <p>If this change in land use designation is made, it is critical to describe the natural zone along the trail as the area including the current trail and up to 75 feet wide, but not including the current river corridor. In no way should the river itself be managed as anything other than wilderness above Icicle Creek.</p>	<p>This plan designates the trail and a 75 foot buffer either side of the trail as a Natural Zone. The surrounding land upriver of Icicle Creek will continue to be managed as the wilderness zone. Patterns of use and resource conditions are factors considered when determining management direction. In this case, a decision has been made to remove the trail corridor from wilderness because the intent is to manage and maintain the trail corridor to a standard that is not consistent with the application of a wilderness designation.</p>	None

Subject	Issue Summary	Response	Recommended Revision
Land Use Designations	I suggest that the area between Rapids Camp and Icicle Creek along the river corridor be managed as wilderness rather than natural to minimize the impacts of Snowmobiles in this rugged area of the river during winter.	Snowmobiles are restricted by regulation and not by the land use designation. Changing the corridor to natural does not effect where snowmobiles can go.	None
Land Use Designations	The plan should identify all changes in land use designation. It is difficult to compare the hand drawn maps of the original plan to the GIS maps of the revised plan. It is difficult to evaluate how changes will affect the park when it is unclear where and why changes are occurring. Please do not erode away the wilderness of the park in order to satisfy the increasing demand for providing services that benefit only a small user group while impacting a resource used by the remainder of the public. The planning team should anticipate future conflicts with the community where such changes are occurring but are not obvious in the plan.	The only change that was made to the land use designations is a natural zone that is being applied to the Crow Pass Trail corridor. The plan articulates this application on page 40.	None
Heavy Emphasis on Development Which is Not Compatible with Wilderness Character of Park	Plan seems to place heavy emphasis on development of structures and roads. “Build” and “develop” seem to be the key words in the plan, which are concepts not compatible to the wilderness character of the park. Infrastructure (parking lots, etc.) development should only be on the periphery of the park and the park’s wilderness values need to be left intact.	The park’s enabling legislations stipulates that the eastern area of the park is to be managed to protect the wilderness characteristics and not the entire park. There are other values for which the park was created that the plan acknowledges through its various recommendations. The plan provides for the management of the park but also provides a vision for the type of facilities that are appropriate. The majority of the development recommendations are made for the front country portions of the park. Those made for other areas of the park are largely made for safety reasons or resource protection. This plan revision does not contain a dramatic increase in facilities or development recommendations and aims to make recommendations that strike a balance while understanding what may be needed in the future to enhance recreation and protect park resources.	None
Keep Ship Creek Valley as Wilderness	Keep the continued classification of the Ship Creek valley as wilderness. Besides watershed issues the valley is the lone intact valley easily accessible that is a wilderness zone. The popularity of the Arctic to Indian route attests to its great wilderness qualities.	The Ship Creek drainage is within the wilderness zone in the plan.	None

Subject	Issue Summary	Response	Recommended Revision
Modify Wilderness Zone in Peters Creek Valley	The arbitrary state of the wilderness zone in the Peters Creek valley should be moved to a few miles from the trailhead. The current boundary is unenforceable and is often ignored by Snowmobilers.	Illegal Snowmobile use is a Park Operational issue and is beyond the scope of his plan.	None
Modify Wilderness Purpose & Characteristics Section (page 41)	Revise the wilderness zone to allow for existing public use huts on the Eklutna Traverse and their continued maintenance.	The existing huts and their continued maintenance are allowed in the wilderness zone since they provide for public safety and resource protection.	None
Modify Wilderness Purpose & Characteristics Section (page 41)	Eliminate “In these areas...” Change sentence to eliminate rudimentary, replace with classified trails, well designed bridges, and necessary signing. This sentence is not consistent with the environment zone matrix and should be reworded to include Public Use Cabins, shelters and yurts which are determined compatible within park wilderness.	The language used in the plan is consistent with the guidance in the Statewide Framework. Additionally, the description in the plan (page 41) already defers to park regulation and references tables 5.1-5.5 for guidance.	See tables 5.1 – 5.5 for updates to the activities.
Re-iterate Need for Extra Caution When Developing Around Eklutna Lake Which is in Recreation Development Zone	Eklutna Lake is in the recreation development zone and these areas have the highest potential for water quality threats. When the park was originally divided into the land use area Ship Creek was the major drinking water source and the protection afforded by wilderness designation was appropriate. Now Eklutna Lake is a major water source, but designated recreation development thus it is important to add language to this section reiterating the importance of carefully evaluating and planning prior to developing the various facilities described on pages 80-81 around the lakeside and consulting with AWWU in order to prevent impacts to the water supply. Best Management Practices should be incorporated in planning and managing these developments.	The management intent language for the Eklutna-Peters Creek Planning Unit highlights the importance of protecting the watershed properties and drinking waters sources.	None

Subject	Issue Summary	Response	Recommended Revision
Chapter 5 Guidelines for Activities and Facilities Stray from Park's Enabling Legislation	Aside from the statement on page 1 "the primary purposes of this plan are to...provide a consistent set of principles and policies for park management", the plan seems to provide too many permits "at the discretion of park management." While it is important to ensure the plan does not remove all power from park staff, it is also incumbent upon planners to create a plan that supports park staff and creates specific guidelines that enable "consistency." A consistent set of principles and policies outlined in this plan gives user groups, potential concessionaires, and park staff specific guidelines for park use. Having a strongly worded plan takes the burden for approving/disapproving permit requests off of an already over-tasked park staff and places it in the, publicly vetted, plan itself.	Permitting has always been at the discretion of park management using the conditions of Special use permits as listed in 11 AAC18.025(c) in order to protect the land. The plan provides more of a publically vetted framework than ever existed before and guidance for the various zones so that park managers have more structure beyond that provided in regulation.	None
Chapter 5 Guidelines for Activities and Facilities Stray from Park's Enabling Legislation	The management intent in Chapter 5 strays from the enabling legislation that created CSP. One egregious example (page 55, table 5.4) would allow the same level of campsites, cabins, picnic tables, etc. in all three zones. Clearly, the zones are set up to have gradations of development; therefore, the wilderness zone should allow only minimal recreation shelter/picnic/interpretive development, and only by special review with public.	For the wilderness zone these developments are allowed only for public safety and resource protection consistent with the wilderness zone purpose and characteristics (see pg. 40 of the plan for a description of wilderness) and the park's enabling legislation.	None
Chapter 5 Guidelines for Activities and Facilities	I disagree with the plan's interpretation of activities that can occur in Recreation Development, Natural, and Wilderness areas. I would like to see this section of the plan to show greater consideration of how the park can be managed in ways that reflect the land use designation. The purpose of having different zones is to insure a range of management levels and thus, follow a diversity of user experiences. I would suggest that the plan include more explicit language for these zones, such as "Use of minimally intrusive techniques" which would then be explicitly defined in the plan. E.g., research activities, ecological monitoring and inventories in wilderness and natural areas should be done using minimally intrusive techniques, and thus should not include permanent structures or the landing of aircraft, overflights of fixed wing aircraft should be minimized, and helicopters not permitted.	Concur in part. This plan guides how the park should be managed over the next 20 years. These guidelines are meant to allow a certain amount of flexibility since park use, equipment and technology changes over time and park staff needs the flexibility to adapt to changes over time. However, after more evaluation, some descriptions were modified to clarify the intent of what may be authorized. Many of the activities mentioned in wilderness areas are needed for public safety resource protection, research, or park management.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.

Subject	Issue Summary	Response	Recommended Revision
Chapter 5 Guidelines for Activities and Facilities	We recommend a total re-write and evaluation of allowed uses in the wilderness zone, since this part of the plan is not acceptable and violates the intention of the wilderness zone by allowing numerous incompatible uses. The plan seems to be inconsistent with the statement on page 41 that “no human-made improvements should be allowed...” by listing many activities and facilities as allowed.	The rest of text on page 41 describes that for resource protection or public safety certain activities may occur in wilderness. The tables in plan are consistent with the information on page 41.	See above
Chapter 5 Guidelines for Activities and Facilities (pages 45 - 58)	The fourteen page list of management actions and activities must be scrubbed free of activities that conflict with the park goals and that are not consistent with the park’s enabling legislation. Examples include: the use of poisons and chemicals; allowing commercial power development and lodges; building cabins and yurts in wilderness, and the list goes on and on. Please reevaluate- The issue is not whether the described activities might be desirable. The issue is whether the activities are permitted in the park given its carefully crafted enabling legislation.	The activities listed are permissible only under certain conditions listed in the plan and are not generalized as the comment suggests. However, after further evaluation, some of the descriptions were modified to clarify the intent of what may be authorized. Additionally, many of the activities and facilities (commercial power, lodges, and cabins in wilderness) already exist in the park and the matrix provides guidance for how to consider adjustments to these activities in the future consistent with the park’s enabling legislation.	See above
Chapter 5 Guidelines for Activities and Facilities-Resource Management (page 45)	The plan should establish a way to make the requirement that ADF&G coordinate and notify the park staff of activities they conduct not only within the park but also adjacent to the park more binding. It is important that ADF&G coordinate with and notify the park staff of activities they conduct near the park that affect park resources in order to make sure it is consistent with the park purposes. For example, last winter ADF&G developed a plan and eradicated most of the wolves in the Ship Creek Pack, the only wolf pack whose territory is primarily within the park and is not known to be trapped or hunted, without coordinating or even informing staff.	The requirement for ADF&G coordination applies to lands within the park boundary only.	None
Chapter 5 Guidelines for Activities and Facilities-Resource Management (page 45)	The plan indicates that ADF&G does not need permits to conduct its activities in the park even though this contradicts park statute that requires ADF&G cooperate with DNR and this is opening the door for activities such as motorized use by ADF&G without DNR approval.	The plan says that “a permit <u>may</u> not always be required.” Cooperation can still occur without the requirement of obtaining a permit.	None

Subject	Issue Summary	Response	Recommended Revision
Chapter 5: Guidelines for Activities and Facilities Within Land-Use Designations in CSP- Introductory Paragraph for Tables (pages 45, 49, 54, 55, & 57)	A number of the listed activities and facilities have potential impacts to water quality and thus water supply. Therefore, AWWU recommends that the following statement be added to the introductory paragraph preceding each of the five tables: “The activities and facilities noted as “compatible” in the following table are only compatible and permissible if the activity or facility does not compromise the use of waters of CSP for public water supply.”	Park purposes as well as the park’s natural and cultural resources, including potential impacts to water quality, were considered when making the recommendations in the tables. The requested statement addition is not needed because the permitting decisions already require that the enabling legislation is considered and these values are incorporated in the table recommendations.	None
Table 5.1: Resource Management- Research, Monitoring, and Management Studies (page 46)	Add to the Natural and Wilderness zone columns: “Installations supporting research will be strongly discouraged. Existing installations in Wilderness or Natural areas will be removed or re-located if they are not necessary for public safety or to minimize adverse impact on the area’s resources.” Installations are an intrusion on the park purpose of “protecting areas of unique and exceptional scenic value” and are incompatible with the purpose of the wilderness zone: “In these areas no human-made improvements should be provided except for the most rudimentary trails, bridges and signing. Developments or other improvements...impact on the area’s resources.” Installations are not compatible with the remote, self-reliant type of wilderness recreation provided for in these areas. They are also incompatible with the purpose of the Natural zone: “Natural Environment Zones may be relatively undeveloped and minimally disturbed... provide for moderate level of convenience.” Structures, regardless of their importance or usefulness, should be discouraged not “encouraged” in both of these zones.	As stated in the plan, the guidance for the types of developments and activities in the various zones within the park comes from the Division’s Alaska State Park System <u>Statewide Framework (June 1982)</u> . A medium level of activity is encouraged in the Natural Zone to provide for the safety of visitors and a moderate level of convenience. In the Wilderness Zone, there should be no man-made conveniences unless there is a significant threat to public safety or to reduce adverse impacts on area resources. Access within the Wilderness Zone is restricted except for certain situations including those allowed by law and authorized research projects.	None
Table 5.1: Resource Management- Research, Monitoring, and Management Studies (page 46)	The standards should be more restrictive for Wilderness than the other two zones. The “disturbance” of natural resources, use of aircraft, and the construction of temporary or semi-permanent structures all seems at odds with the Wilderness zone’s intent and values. I would ask that these not apply to the Wilderness zone.	As stated in the plan, the guidance for the types of developments and activities in the various zones within the park comes from the Division’s Alaska State Park System <u>Statewide Framework (June 1982)</u> . The activities described in the tables can be authorized for certain conditions consistent with the wilderness zone guidelines. However, after further evaluation, some of the descriptions were modified to clarify the intent of what may be authorized.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See tables 5.1 – 5.5 for the changes.

Subject	Issue Summary	Response	Recommended Revision
Table 5.1: Resource Management- Research, Monitoring, and Management Studies (page 46)	A master list of structures, temporary or semi-permanent, should be kept to ensure: 1) there is no duplication of effort, 2) the structure is removed after the permit expires or when it is no longer needed, and 3) no area is overloaded with structures.	Concur	None
Table 5.1: Resource Management- Fisheries Enhancement (page 46)	End fish stocking in places like Rabbit and Symphony lakes that are considerably off the road system. While stocking fish along the Seward Highway may be fine, it is not OK at remote lakes. The stocking of Symphony Lake has caused significant damage/degradation to the lake shore by fishermen and women, and Rabbit Lake will follow when stocking starts there. These adverse impacts must be anticipated and avoided. ADF&G needs to cooperate with Parks to insure that fish management “is consistent with park purposes”.	Rabbit and Symphony lakes were previously stocked and have not been stocked by ADFG for some time. ADFG worked with DPOR staff on these stocking efforts to provide a recreational fishing opportunity away from the normal areas along roadbeds. This activity is compatible with park values, and is addressed in Table 5.2.	None
Table 5.1: Resource Management- Fisheries Enhancement (page 46)	Providing for fishing opportunities within a wilderness zone should be encouraged not deemed incompatible when fishing is one of America’s most valued family recreational activities to get people outdoors. If a lake or river system can biologically support a high value sport fish species then allow for it.	Concur in part; fishing is encouraged in wilderness areas in the park provided there is a natural or restored population of fish.	None
Table 5.1: Resource Management- Fisheries Restoration (page 46)	The construction of fish ladders, fish passages, fish stocking, and lake fertilization all are incompatible with the Wilderness zone and I can’t see how or why state park managers would allow such activities there. Also, the construction of fish ladders and passages within the Natural zone is incompatible.	It is currently incompatible in Wilderness areas, and any activities in Natural zones would need to be compliant with state fisheries statutes.	None
Table 5.1: Resource Management- Wildlife Habitat Manipulation (page 47)	Mechanical manipulation should not be compatible within a wilderness designation of the park whether a permit is issued or not. Allowing wide scale dozing or cutting to restore a young plant succession should not be allowed. Also, such activities as “prescribed burning” are not compatible.	Fire is a natural event that allows nutrients back into the ecosystem. Management ignited fires can restore areas to a natural state and reduce hazardous conditions, activities that are consistent with wilderness as described on page 40. Manipulation in wilderness may be employed for public safety or resource protection purposes.	None

Subject	Issue Summary	Response	Recommended Revision
Table 5.1: Resource Management- Tree Felling and/or Timber Sales (page 47)	“Wildlife habitat manipulation” and the cutting of trees and especially the sale of timber both seem highly incompatible with the wilderness zone. I don’t see how either could be “compatible for park management.” What sort of management is that, consistent with wilderness values and priorities? Also, I oppose it because it would involve motorized means to get the timber out in order for commercial interests to be involved.	The definition of wilderness (page 40) allows for cutting trees for certain reasons including public safety or to minimize adverse impacts on area resources. This entry will be modified in the plan to split out commercial timber sales from this category and redefine the activity to clarify the intent.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.
Table 5.1: Resource Management- Tree Felling and/or Timber Sales (page 47)	I would ask that timber sales not be allowed in any of the park’s zones except the incidental felling for trail construction, since opposition to proposed timber sales helped to launch the grassroots movement that eventually led to the creation of CSP. Therefore, how could it be compatible?	The plan as written caused confusion with the inclusion of the term commercial timber sales in this subcategory when the definition was intended to address timber felling and removal. The plan language will be modified to clarify that this entry was not intended to address timber sales.	See above
Table 5.1: Resource Management- Pest and Disease Control (page 47)	How is the use of “poisons or chemicals” consistent with the legislative goal “to protect and supply a satisfactory water supply for the use of the people”? This is another example of how the plan is not consistent with the enabling legislation. I would argue that the “use of poisons or chemicals” is incompatible within all zones. Please reevaluate- while this activity might be desirable, the issue is whether this activity is permitted in the park given the carefully crafted enabling legislation.	Concur in part, the plan stipulates that pest control is not compatible except to control species not indigenous to the area. This is also in keeping with the direction in the Alaska State Park System <u>Statewide Framework (June 1982)</u> for wilderness.	Language will be added to the plan to the plan that any measure taken will account for protection of the water supply.
Table 5.1: Resource Management- Fire Suppression and Mitigation (page 47)	I don’t see how these could be “in keeping with park purposes” within the wilderness zone.	Fire is a natural event that allows nutrients back into the ecosystem. If timing and weather are cooperative, controlled burns can happen more safely than wildfires such as the Eklutna fire in 2011. Fire suppression may be needed in the wilderness zone on a case by case basis to protect certain resources or for public safety.	None
Table 5.1: Resource Management- Storm Water Drainage (page 48)	Storm water drainage should not be compatible in the Recreation Development zone. The standard for drainage should be the same in all parts of the park in order that pollution originating outside the park does not encroach incrementally inside the park boundary.	Concur	This use will be changed to incompatible in the table.

Subject	Issue Summary	Response	Recommended Revision
Table 5.2: Public Uses (page 49)	We find it curious that the plan starts this section with the statement: “Special park permits are required for activities that are not compatible as defined by statute or regulation...” We must ask the question why would park managers issue permits for activities that are not compatible or not recognized as “lawful recreation”? We recommend clarification (further explain and give examples) or deletion of this statement.	The statement as written is confusing. Permits can be issued for activities that are limited by regulation using the procedures in 11 AAC 18.025.	The statement will be rewritten to clarify when special park use permits may be issued.
Table 5.2: Public Uses- Motorized Boats (page 49)	I can’t imagine how or why motorized boats would be needed for “park management purposes and research” in any of the zones. It seems motorized boats should be incompatible except, as noted, where necessary for emergency rescue.	There are a number of instances where the use of a motorized boats have been needed over the years and the table guidelines provide limitations by zone on how the use may be authorized if needed.	None
Table 5.2: Public Uses- Land-Based Motorized Vehicles (page 50)	I wonder how or why motorized vehicles would be allowed in any zone “in support of authorized or other permitted activities”. This statement seems way too broad and should be clarified.	Concur in part.	In support of authorized or other permitted activities – Add “where there is a park benefit...”
Table 5.2: Public Uses- Motorized Vehicles & Snowmobiles (page50)	Motorized vehicles (Snowmobiles) should not be permitted in the Powerline valley because they cause too much of a conflict with the many users of that corridor.	Snowmobiles are considered a compatible recreation activity in this multi-use area of the park. See the trail plan for trail etiquette information and recommendations.	None
Table 5.2: Public Uses- Snowmobiles (page50)	We object to the broad and vague authorization which would allow snowmobiles in the wilderness if use was in support of “authorized or other permitted activities”. What sort of permitted activities would be allowed in the wilderness zone that requires Snowmobiles? For example, doesn’t this mean that Snowmobiles engaged in trapping or hunting could go into the wilderness on their machines? Also, what sorts of research or management activities (except emergency rescue) are necessary that require Snowmobiles in this zone? We suggest that this statement be clarified. Park management and researchers should be held to the same standards as the public. They should only be allowed by park staff in emergency situations.	Concur in part. The plan language will be modified to add the threshold of providing a park benefit prior to permitting this activity in the wilderness zone. At times the efficiency provided by allowing a one-time use of a snowmobile provides greater resource protection and therefore a park benefit than frequent trips by other means. The occurrence for permitting this activity is very infrequent.	Add “where there is a park benefit...” to the conditions for permitting in the wilderness zone.

Subject	Issue Summary	Response	Recommended Revision
Table 5.2: Public Uses- Bicycles (page 50)	Bicycles are not compatible in wilderness and should be prohibited in areas designated wilderness. They tear up the terrain much more than human feet and are mechanical devices which do not belong in an area managed for its wilderness qualities and where man is expected to be on foot. Also, since there are few, if any, hardened paths or old roads in the wilderness area, any bicycle use in wet weather will cause resource damage which DPOR would be unaware of since rangers don't patrol the wilderness.	Concur in part. The intent was never to allow summer use of bicycles in the wilderness consistent with park regulation.	The plan language will be modified to specify that bicycle use may be authorized in the wilderness zone by permit during the winter when there is adequate snow cover or when conditions are adequate to protect underlying park resources.
Table 5.2: Public Uses- Bicycles (page 50)	Change 11 AAC 20.040 to 11 AAC 20.050.	Concur. The plan will be revised to correct the typographical error in the Recreation Development column.	The bicycles regulation reference in the Recreation Development column will be revised to replace 11 AAC 20.040 with 11 AAC 20.050.
Table 5.2: Public Uses- Bicycles (page 50)	Winter biking does not appear to be identified and it needs to be included as a compatible public use since there has been a significant increase in the popularity of this activity and the park can help provide for this increased demand by addressing this activity's distinct requirements in providing appropriate bicycle facilities.	Bicycles are addressed in regulation and a winter bike still meets the definition of "bicycle." Winter use is currently being evaluated for possible regulation changes in a separate process.	None
Table 5.2: Public Uses- Bicycles (page 50)	Despite the recent small concessions made to change the regulations regarding biking in CSP, the plan is essentially maintaining the status quo of the old plan written over 25 years ago when biking as a sport was in its infancy. It is still restricting mountain biking to trails allowed under the former plan which offers no expanded area to mountain bikers whose numbers are rapidly growing. The plan is still lumping biking in the category of Snowmobiles which regulations describes various service areas and thresholds of snow depth. Mountain biking is non-motorized and bears a lesser impact in winter than Snowmobiles and with modern bike designs they leave very little imprints on the snow or subsurface vegetation.	This is an issue that is addressed in the trail plan and not the overall management plan. There are a number of recommendations made in that plan to expand areas for bicycles but any change would require a regulatory change to effect.	None

Subject	Issue Summary	Response	Recommended Revision
Table 5.2: Public Uses- Use of Weapons (page 50)	Allowing firearms only for lawful hunting or trapping disallows the carry of firearms for personal protection within the park. Better define compatible uses by including firearms for personal protection. Need to add that they may be carried and used for personal protection as provided in state law.	The language in the plan refers to the “use” of a weapon as defined in regulation.	None
Table 5.2: Public Uses- Use of Weapons (page 50)	Close to hunting the drainages of the Middle Fork of Campbell Creek, the South Fork of Campbell Creek, and Rabbit Creek, and an extensive area adjoining the Seward Highway, since far too many visitors go to these areas to have hunting be at all compatible.	The board of game controls hunting regulation in and around the park. Because of the high public use in these areas, there are additional stipulations associated with this limited permit hunt.	None
Table 5.2: Public Uses- Trapping (page 51)	Trapping within Chugach State Park is not compatible with the park purposes, especially wildlife viewing and safety. The plan needs to call for an end to trapping in the Park. Wolverine is one target species and there are so few in the park that it doesn’t make sense to allow trapping of them.	Trapping within the park is not regulated by the park or the management plan but rather by the Board of Game through Fish and Game regulations.	None
Table 5.2: Public Uses- Trapping (page 51)	The plan should include new management guidelines that address the conflicts and dangers that trapping poses to park visitors and their dogs. Traps should not be allowed anywhere close to trails, trappers should be required to identify areas where they are trapping, and traps that pose the greatest danger to dogs should be prohibited (e.g.- conibear traps).	Trapping within the park is not regulated by the park or the management plan but rather by the Board of Game through Fish and Game regulations. These regulations already contain requirements for marking traplines and distance from trails.	None
Table 5.2: Public Uses- Motorized Equipment (page 51)	Motorized equipment is not compatible in wilderness and should be prohibited in areas designated wilderness.	Concur, the plan states that motorized equipment is only compatible in the wilderness zone for certain administrative uses.	None
Table 5.2: Public Uses- Motorized Equipment (page 51)	Motorized equipment should only be allowed in wilderness if necessary for park management purposes.	Entries in this portion of the plan address public uses, not administrative uses.	None

Subject	Issue Summary	Response	Recommended Revision
Table 5.2: Public Uses- Motorized Equipment (page 51)	The use of generators, etc in the natural and wilderness areas is another example of how the plan is not consistent with the enabling legislation and conflicts with the park goals. Please reevaluate- while this activity might be desirable, the issue is whether this activity is permitted in the park given the carefully crafted enabling legislation.	The guidance for the types of activities in the various zones within the park comes from the Division's Alaska State Park System <u>Statewide Framework (June 1982)</u> . Some activities may be authorized for certain conditions consistent with the wilderness zone guidelines and the parks enabling legislation. However, after further evaluation, some of the descriptions were modified to clarify the intent of what may be authorized.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.
Table 5.2: Public Uses- Campfires (page 51)	Campfires are not compatible in wilderness and should be prohibited in areas designated wilderness.	Campfires are sometimes required for public safety and are allowed in the places described in regulation (11 AAC 20.035) or by permit as described in the plan.	The language will be clarified in the table to eliminate “if associated with hunting, education or training” as a requirement for permitting.
Table 5.2: Public Uses- Campfires (page 51)	Allow for warming fires during winter recreation in all land use designations.	Warming fires are allowed as described in regulation (11 AAC 20.035) or by permit as described in the plan.	None
Table 5.2: Public Uses- Campfires (page 51)	Why are they allowed by permit for “hunting, education or training” but not allowed for other strictly recreational activities? Why specifically those activities? Why hunting and not skiing or backpacking? This makes no sense and needs to be revised. Campfires should be compatible as described in regulation, or if by permit in other areas provided the fire danger is low, safe fire practices are used, and there is no resource damage.	Concur	The language will be clarified in the table to eliminate “if associated with hunting, education or training” as a requirement for permitting.
Table 5.2: Public Uses- Rock Climbing (page 51)	What is the definition of a permanent rock anchor?	A definition will be added to the glossary of the plan.	A definition will be added to the glossary of the plan.
Table 5.2: Public Uses- Rock Climbing (page 51)	I do not think permanent rock anchors should be allowed in wilderness, but in pre-determined locations such as in the recreation development zone along Turnagain Arm they are already there and are unobtrusive therefore they should be allowed.	The use of rock anchors is allowed in the park, one simply cannot leave rock anchors/fixtures in place after use.	None
Permanent Rock Anchors	An outright ban of permanent rock anchors, as proposed in the plan, would be detrimental to climbing throughout the park and would do little to enhance anyone's “wilderness experience” while jets fly over head. When managed properly, fixed anchors are a non-issue in wilderness or wilderness-quality lands. I expect few people visit the park	The plan does not propose to ban the use of rock anchors in the park but rather limits leaving them in place permanently. Additionally, the State is not dictating how climbers might mitigate risks. As with any activity in the park, it is done at a user's own risk and users can decide how to mitigate the risks as long	None

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	<p>for a wilderness experience. This prohibition goes against common climbing management process in the US. Due to the poor rock quality in the park, permanent rock anchors are a necessity and may provide the only means of a safe descent off peaks and climbing areas. Fixed anchors can reduce natural resource impacts by eliminating the need to use trees and vegetation as anchor points and rappel stations. Due to their small size and camouflage against rock, permanent rock anchors provide little to no visual impact for other user groups. Permanent rock anchors are seen as compatible uses on federal lands and state parks across the country. The elimination of rock anchors would severely limit the sport of rock and ice climbing. I do not think it is in the best interest of the State of Alaska to dictate how climbers mitigate the risks of climbing. If the state simply says climb at your own risk, then the state isn't liable for any injuries suffered by climbers. However, if the state mandates that climbers can only use certain methods to mitigate the risks of climbing, they open themselves to a tremendous amount of liability. Many agencies play no active role in fixed anchor management and others set guidelines or establish permitting process for installing and/or replacing fixed anchors. For risk management and administrative reasons, most land managers do not get involved with actually installing or paying for fixed anchors. There are many models that may be appropriate for the park. A local or national organization could apply for a special use permit with the park to manage anchor replacement much like the geo-caching process in place now. Park management could address the issue by developing a climbing management plan that addresses current regulations, protects the natural environment and allows fixed anchor use as appropriate for climbing within different management areas of the park. In lieu of a separate planning process dealing with permanent rock anchors and climbing, request that the language in the plan prohibiting permanent rock anchors be removed.</p>	<p>as it is consistent with existing laws and regulations established to protect the state's interests.</p>	

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Table 5.2: Public Uses- Dog Sledding (page 52)	Dog sledding is not compatible in the Recreation Development area because of safety issues and conflicts resulting from a dog sled team moving on the same trails and in the same area as the many human recreationists.	The park trails are managed for multiple uses and dogs are compatible.	None
Table 5.2: Public Uses- Recreational Gold Panning (page 52)	I don't believe that recreational gold panning should be allowed in the wilderness zone, especially if shoveling is allowed. Seems at odds with protecting wilderness values and resources. Who's to say how much shoveling is OK?	The restrictions in regulation (11 AAC 20.045) were crafted to protect the natural setting while providing a recreational opportunity.	None
Table 5.2: Public Uses- Horses and Pack Animals (page 52)	In order to protect park values for all users, the plan should specifically designate trails for horses, not, as the plan indicates now, opening the park to horse use unless otherwise prohibited.	The use of horses and other pack animals is restricted by regulation and not the plan. Equestrian use is a traditional use. Horses have long been considered compatible in wilderness and other areas to allow access to these areas by non-motorized means. Only sensitive trails at certain times of year are closed to protect the resource.	None
Table 5.2: Public Uses- Horses and Pack Animals (page 52)	The plan should recommend a change in the regulation regarding pack animals/"pack and saddle" or horse use in the park and until such a revised regulation is put in place, the park staff should ban horses on all alpine trails and on trails that are narrow and do not have a hardened base. And just saying that this issue is addressed by regulation is too simplistic. The regulation is outdated and until revised, the issue of horses inside the park needs to be addressed some way in the park plans.	The regulation was recently updated and gives park staff the ability to close trails to protect them from resource damage.	None
Table 5.2: Public Uses- Horses and Pack Animals (page 52)	Why are horses, mules, and burros allowed without a permit by llamas are not?	Llamas are not currently defined as pack animals in regulations and as a result require a permit. A regulation change is being considered to address this issue.	None
Table 5.2: Public Uses- Horses and Pack Animals (page 52)	Horses and pack animals are a source of introduction for non-native species, which is identified as not-compatible with park purposes. Education and management of feed and waste from pack animals is essential in heavier use areas where exposure of soil may facilitate establishment of non-native plants. The plans should identify mechanisms for insuring that horse/pack animals use does not unnecessarily degrade natural resources.	All users are a potential source for the introduction of non-native species into the park. Park staff is working on an educational program to help inform users of the spread of invasive species.	None

Subject	Issue Summary	Response	Recommended Revision
Table 5.2: Public Uses-Pets (page 53)	The pet rules are insufficient. There are already areas such as Flattop Trail where free-roaming dogs are a safety hazard; and the dogs waste problem is a health hazard at most trailheads in the Hillside Unit. Add language to apply to all three zones: “pets may be banned or required to be on a leash in any area of the park where they pose harm to wildlife, water quality and waterbodies, or to other natural resources of the park; or a threat to human safety and enjoyment of the natural setting.”	Restrictions on pets are handled through a separate regulatory process, not this plan. The plan mirrors existing restrictions found in regulations. See 11 AAC 20.60 and 11 AAC 12.130 for information on where and how pets are restricted in the park.	None
Table 5.2: Public Uses-Pets (page 53)	Glad to see that the plan does not propose changes to existing rules regarding pets because it is important not to put unnecessary restrictions on pets and pet owners.	Restrictions on pets are handled through a separate regulatory process, not this plan. The plan mirrors the existing restrictions found in regulations. See 11 AAC 20.60 and 11 AAC 12.130 for information on where and how pets are restricted in the park.	None
Table 5.2: Public Uses-Pets (page 53)	Off leash dogs are incompatible in Wildlife Viewing Areas and should be banned from all of the areas.	11 AAC 12.130 applies to pets in all State park units.	
Table 5.2: Public Uses-Fixed-Wing Landing (page 53)	The statement “compatible by permit for park management purposes and research” seems overly broad. What kind of park management and research requires plane landings?	Work in remote areas to maintain cabins and park infrastructure are more efficiently accomplished by aircraft and often better protects park resources than repeated trips by other means that can adversely impact terrain.	None
Table 5.2: Public Uses-Aircraft Landing (page 53)	Aircraft landings are not compatible in wilderness and should be prohibited in areas designated wilderness.	Aircraft landings in the wilderness are generally prohibited but there are circumstances where this use may be authorized.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.
Table 5.2: Public Uses-Use of Aircraft (page 53)	The use of aircraft in the park should not be allowed except for very specifically stated reasons: search and rescue, research, park maintenance, and MCA hut maintenance. It is preferred that no motorized use occurs in the wilderness zone, therefore exceptions should be made on a case by case basis but only after all non-motorized options have been carefully evaluated first. The possibility of having undefined permitted aircraft use by superintendent permission opens the door for abuse by motor happy administrators.	Concur	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.

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Table 5.2: Public Uses- Helicopter Landings (page 53)	The statement under wilderness “compatible by permit in support of park management activities or for research...” seems odd and overly broad. What sort of management or research activity would be allowed that doesn’t benefit the park? Please clarify.	There are various research projects (scientific but not related to recreation or ecology) that may not benefit the park and in fact could be deleterious. The plan language is intended to provide some operational level flexibility while assuring that only those projects that have a park benefit will be considered.	None
Table 5.2: Public Uses- Geo-caching (page 53)	Geo-caching in any physical form should not be allowed in any part of the park. The act of purposefully leaving items in the park is against the wilderness character of the park and is litter and creates erosion. All caches should be removed and geo-caching limited to virtual caches only.	Geo-caching is not permitted in the wilderness zone of the park and can be authorized by permit in other areas with the restrictions described in the plan.	None
Table 5.3: Other Uses- Outdoor and/or Military Training, Drills, or Exercises (page 54)	This type of use is not compatible in the wilderness zone any time since the park’s legislative directive is to “protect the existing wilderness characteristics.”	The plan provides criteria for allowing this activity in wilderness. Some types of training could be considered compatible particularly if it furthers the values of physical and mental challenge.	None
Table 5.3: Other Uses- Outdoor and/or Military Training, Drills, or Exercises (page 54)	Military training that does not have a negative environmental impact, and could have a positive effect on other park users, etc. is allowed in the wilderness zone. Tactical/armed military training (those that could involve weapons and combat) should be prohibited in the wilderness zone, since those operations are not a compatible use since the very act of tactical/maneuver training is counter to the purpose of the wilderness.	Small group tactical drills, survival training, etc are activities that in embody the wilderness values of self reliance, physical and mental challenge and therefore fit within this zone of the park. The discharge of firearms is still restricted by regulation and will be clarified in the plan.	Include language that clarifies that this training is subject to park regulations regarding the discharge of firearms.
Trail Widening & Grooming	Trail widening/grooming should be kept to an absolute minimum to preserve the nature of the park.	Concur. See the trail plan for more information on trail standards.	None
Table 5.3: Other Uses- Organized Events (page 54)	We do not believe organized events belong in the wilderness area and moreover, in the absence of a state statutory or regulatory definition of “wilderness”, we question how DPOR can judge whether a proposed event is “consistent with the values of the area.”	Large group activities such as a volunteer trail or group hiking events would need a permit and are compatible with wilderness values.	None
Table 5.4: Facilities	Facilities should not be permitted in wilderness areas of the park and pre-existing facilities should be maintained “using minimally intrusive means.”	Any facilities placed in the wilderness area are for public safety.	None

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Table 5.4: Facilities-Improved Campsites (page 55)	Change “and/or” to “and” to clarify that only DPOR and not the public can develop a campsite.	The plan language will be altered to clarify that the unauthorized public cannot maintain or develop campsites.	Change the plan language to clarify that the activity is compatible as developed, permitted or concessioned by DPOR.
Table 5.4: Facilities-Improved Campsites (page 55)	This sort of facility seems clearly incompatible with the wilderness zone and the explanation given makes no sense. How would tent platforms, picnic tables, interpretive displays, etc. protect wilderness resources or avoid wildlife conflicts? This needs to be changed, in accordance with the more general wilderness zone philosophy that “no human-made improvements should be provided except for the most rudimentary...” This type of facility undercuts the value of the wilderness, such as primitive recreational opportunities, as set forth in the Purpose & Characteristics section.	Improving campsites in the wilderness zone would only be done for public safety, resource protection or to avoid conflicts with wildlife consistent with the definition of wilderness on pg. 40.	None
Table 5.4: Facilities-Improved Campsites (page 55)	I think all campgrounds in the park should have noise hours (like 8-10am and 5-7pm) when generators are allowed instead of select quiet hours only at night. Often generators run for hours straight at campgrounds, detracting from the silence many park users expect when camping. Designated noise hours preserve silence while allowing RVers to charge up their electronic needs. This type of policy change is happening at select campgrounds in the lower 48, and it is thoughtful and compromising between users.	This is a recommendation that is very specific and is best handled at the operational level.	None
Table 5.4: Facilities-Trails (page 55)	Oppose any new trail development along salmon streams and recommend that the management and trail plans include a general statement opposing trail development along salmon streams.	This plan does not make recommendations for trail design or alignment. See the park’s trail plan for more guidance on the subject.	None
Table 5.4: Facilities-Public Use Cabins, Yurts, and Shelters (page 55)	Add huts and redefine “small” as defined by person capacity to a maximum of 20 person capacity. These would be allowed with all land use designations and a location determined by a public process.	Huts are intended to fit in this category and no maximum capacity will be defined in this plan to allow site specific flexibility.	None

Subject	Issue Summary	Response	Recommended Revision
Table 5.4: Facilities- Public Use Cabins, Yurts, and Shelters (page 55)	We recommend that the hut system concept be considered as part of the long-range management planning for the park and suggest that the plan more clearly address and incorporated it. The plan is not particularly clear regarding development in the backcountry or wilderness or the concept of huts that generally are constructed larger than standard PUCs and linked as a hut-to-hut system. The terrain and snow pack in the park is more conducive to a workable hut system that would connect one drainage to another than virtually any other place within 100 mile radius of Anchorage. If the State of Alaska truly would like a world-class system in Alaska, CSP would be the ideal location. The park should have a short, one to two nights, hut to hut loop traverse available for older hikers unable to carry heavy backpacks. The Arctic to Indian, Indian to Bird, or Girdwood to Eagle River traverses would be great.	A hut system concept was not flushed out during this planning effort but is not precluded in the future as long as hut placement and management is consistent with park purposes and the management intent in the plan.	None
Table 5.4: Facilities- Public Use Cabins, Yurts, and Shelters (page 55)	The plan should call for no more huts, especially in the wilderness zone: the MCA huts predated the park's creation. We also object to the vague language allowing huts, yurts, and improved facilities. This theoretically allows a European style, catered hut in the wilderness zone.	Additional cabins are not compatible in alpine vegetated areas, which make up much of the wilderness zone. More PUCs and Yurts in areas closer to the recreational development and natural Zones will allow for more people to overnight in the park.	None
Table 5.4: Facilities- Public Use Cabins (page 55)	Oppose a hut system in the park as it is not compatible with the wilderness character of the park.	Public Use Cabins are a popular recreation resource throughout the park and are provided in wilderness for safety or in order to reduce adverse impacts to area resources consistent with the guidance in the Alaska State Park System <u>Statewide Framework (June 1982)</u> .	None
Table 5.4: Facilities- Public Use Cabins (page 55)	Allowing the construction of Cabins, Yurts and Shelters in the natural and wilderness areas should not be permitted because they conflict with plan objectives, park values and goals, and are not consistent with the enabling legislation-construct "necessary facilities". Permanent and semi-permanent structures are incompatible with the natural and wilderness areas. Please reevaluate. While this type of facility might be desirable, the issue is whether this activity is permitted/consistent with the enabling legislation.	The enabling legislation doesn't contain this language or intent. Such structures already exist in these zones and have since before the park's creation. Additional facilities have been built and there is room for more while maintaining the user experience. Many areas of the park have no structures.	None

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Table 5.4: Facilities-Visitor Information Facilities and Signage (page 55)	Oppose signs in the wilderness, they are not appropriate.	The Plan states only directional and informational signs are compatible.	None
Table 5.4: Facilities-Trails (page 55)	There should be no developed trails in wilderness unless the level or resource use gets so high that there are impacts (such as the footpath to the 'ball field').	Concur. The Little O'Malley and Ballfield areas are in the recreational development zone and not the wilderness zone.	None
Table 5.4: Facilities-Boat Launch Sites (page 55)	The construction of "access sites" or boat launches are not compatible in wilderness and should be prohibited in areas designated wilderness since they contradict the wilderness values and the statement that "no human-made improvements..." Formal established sites are unnecessary.	These areas would be formalized in the wilderness zone only if needed to protect area resources in keeping with the guidance for the wilderness zone.	None
Table 5.4: Facilities-Roads and Driveways (page 56)	Roads and driveways for access to private land should be further restricted. In the recreation area, add to the current proposed language "compatible by permit only if there is no other physical access" and "...will not unduly affect park resources and only if designed to have the minimum impact to the park and the public users." This type of development is not compatible in the natural area/zone either.	The guidance provided in the plan derives from statute (AS 41.21.024) and incorporates these concepts.	None
Table 5.4: Facilities-Alternative Power Development (page 56)	As written, any individual or neighborhood could install towers or dams provided there was some small benefit to the park. This use should have a higher threshold for approval in the recreation development zone. Add the language "only if there is no intrusive impact that compromises recreation quality, and if there is substantial benefit in the form of necessary facilities for public recreation, as stated in the enabling legislation." This type of use is not compatible in the natural area.	Concur in part. The plan language will be modified to clarify that new alternative power development may be employed when it is primarily for park use and that it is incompatible for commercial or exclusive private use.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.
Table 5.4: Facilities-Alternative Power Development (page 56)	This development within a natural area of the park allows for significant defacing of the natural landscape and park values. Would a park benefit include a revenue stream from a wind or hydro development project within a natural area of the park? If so, I strongly disagree with this proposed management direction. Limit this to only the Recreation Land-use designation.	The plan language will be modified to clarify that new alternative power development may be employed when it is primarily for park use and that it is incompatible for commercial (revenue stream) or exclusive private use.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.

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Table 5.4: Facilities- Alternative Power Development (page 56)	Hydroelectric is not appropriate inside the park.	Some hydroelectric already exists within the park (Eklutna Lake) and was established prior to the park being designated. The entry in the table caused some confusion and has been modified to clarify when new alternative power development may be employed.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.
No Bridges or Structures Should be Built	Development of bridges, etc. should not occur as they are counter to the wilderness character of the park.	Bridges may be allowed in these areas to protect streambanks and facilitate access however are not intended to be used in the eastern area of the park that is operated as wilderness consistent with the enabling legislation.	None
No New Kiosks, Interpretative Sites, or Overlooks Should be Developed	Development of kiosks, interpretive sites, and overlooks should be avoided as these structures quickly become outdated and irrelevant. Current maps should be installed in existing kiosks but no new kiosks should be built.	Interpretative signs can enhance the user experience and kiosks provide useful information.	None
Edit Commercial Uses Section (page 57)	Update to reflect there is no longer an Alaska Coastal Management Program (ACMP).	Concur	The reference to ACMP will be removed from the plan.
Edit Commercial Uses Section (page 57)	“These activities usually must be limited in number...” is confusing. Delete “usually” in the second sentence in the second paragraph.	Concur	Change to “...are usually limited in number...”
Edit Commercial Uses Section (page 57)	<p>Since page 32 states that all of CSP is considered an LWCF protected area and is subject to the programs provisions, etc., shouldn't this be referenced in this section, especially for Commercial Power Development and Resource Extraction areas?</p> <p>Also, cost should not be a consideration if it is for commercial use. I understand the need for supporting a developed area, but also understand that there are typically viable alternatives available.</p>	Existing regulations and plan language address this sufficiently.	None

Subject	Issue Summary	Response	Recommended Revision
Commercial Uses Section (page 57-58)	There is not criteria listed for commercial uses, and it appears that it is at the discretion of one person, the park supervisor, to determine if an activity is compatible or not. There needs to be a more defined process, and the public should have access to the permits, receive notice and an opportunity to comment on permits prior to their issuance. The current case-by-case evaluation process is inconsistent and lacks objectivity.	The process is in place and defined in regulation is sufficient. See 11 AAC 18.025 (c), 11 AAC 18.030, and 11 AAC 18.040 for the required criteria.	None
Commercial Uses Section (page 57-58)	We do not agree that hunting guides and ATV tours be allowable uses inside the park.	Hunting is a legal activity in the park and ATV use is allowed in some areas by regulation. Commercial activities that occur within these areas are compatible if the criteria for a permit are met.	None
Commercial Uses Section (page 57-58)	Prior to issuing permits, the plan states that a determination must be made that the park will not be adversely affected. We recommend additional criteria be added that the permitted use will not negatively impact water quality and quantity, harm or disrupt wildlife or alter the wilderness qualities of the park.	Consideration of these items is already part of the decision process defined in regulation. See 11 AAC 18.025 (c), 11 AAC 18.030, and 11 AAC 18.040 for more information.	None
Table 5.5: Commercial Uses- Commercial Lodges or Resorts (page 57)	We cannot identify a location where it would be appropriate for a commercial lodge or resort. If the park wants to open up the park to this kind of business activity, that should trigger a separate public process. Its inclusion in this plan should not automatically give license to commercial development.	Commercial authorizations of this type require a considerable decision making process required by regulation. The plan is the appropriate vehicle for providing guidance for where and if these types of authorizations are appropriate in the park. Note: There are already commercial entities operating these types of facilities in the park such as the Eagle River Nature Center and the Arctic Valley Ski Area.	None
Table 5.5: Commercial Uses- Commercial Power Development (page 58)	Allowing commercial power development in the park is another example of how the plan is not consistent with the enabling legislation and conflicts with the park goals. Please reevaluate- while this activity might be desirable, the issue is whether this activity is permitted in the park given the carefully crafted enabling legislation.	After further evaluation, some of the descriptions were modified to clarify the intent of what may be authorized. Additionally, many of the activities and facilities predate the park and exist within the park boundary (transmission lines in Powerline pass area, aqueduct in Eklutna Lake and the Eklutna power plant). The matrix provides guidance for how to consider adjustments to these activities in the future consistent with the park's enabling legislation.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.

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Table 5.5: Commercial Uses- Commercial Power Development (page 58)	Power development is not compatible in wilderness and should be prohibited in areas designated wilderness.	Concur	None
Table 5.5: Commercial Uses- Resource Extraction (page 58)	Resource extraction for commercial use should not be allowed in any zone because it is inherently incompatible with protection of the park's natural resources and it does not meet any of the five purposes of the enabling language for CSP. It also creates a huge impact on the quality of the park and visitor experience.	Sometimes when an area is being developed, the contractor can aid in the development by clearing the area. It is in situations like these that this section was intended for.	None
Table 5.5: Commercial Uses- Resource Extraction by State Parks (page 58)	Resource extraction by state parks for use in the park should be stated as incompatible in the natural and wilderness zones, because it does not meet either the primary purposes nor any of the park goals and objectives in Chapter 2, and particularly violates the objectives to protect the natural and cultural features, and to minimize the impact of human presence.	There are situations when extracting material locally for a project rather than bringing it in by other means is not only more efficient but also provides greater resource protection to the park as a whole.	None
Table 5.5: Commercial Uses- Resource Extraction by State Parks (page 58)	Extraction of park resources should be only for stabilization, safety or scientific purpose and should not be allowed within any land-use designation if the park benefit is for revenue generation and this should be so stated within the plan.	Concur	None
Table 5.5: Commercial Uses- Utilities, Transmission Lines, and Pipelines (page 58)	Please clarify what "viable alternative" means. It should state that cost is not a consideration. Also suggest that any existing above-ground line should be removed.	After further evaluation, the description was modified for this entry to clarify the intent of what may be authorized.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.
Table 5.5: Commercial Uses- Utilities, Transmission Lines, and Pipelines (page 58)	New tower height should be restricted to 50 feet. All new and existing towers must be required to co-locate on a single tower and new tower development would be prohibited along ridge tops. New tower development should not be allowed within Natural land use designations.	After further evaluation, some of the descriptions were modified to clarify the intent of what may be authorized.	After further evaluation, some of the activities described in the plan were modified to better clarify the types of activities to be authorized in each zone. See table 5.1 – 5.5 for the changes.

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Table 5.5: Commercial Uses- Utilities, Transmission Lines, and Pipelines (page 58)	I support utility transmission lines, pipelines and any other energy or fuel transportation or transmission through the park only if commercial permits, land use permits or commercial leases provide sufficient fee payments to the park.	The utilities and transmission lines through the park predate its creation and are valid existing rights.	None
Vegetation Management- Re-Vegetation (page 60)	Invasive plants are widespread across developed areas in Anchorage and are very pervasive in our parks especially along roads, trails, and natural stream corridors. The more action that park managers, contractors, and visitors take now, the easier it will be to reduce and limit the damaging impacts of invasive plants on parks. Please modify the section to include the following: 1)Re-vegetation efforts (and all trail building and developments) requiring introduced materials should purchase certified weed-free products (seed mixes, mulch, topsoil, and gravel) when available. In the absence of certified weed-free products, Alaska produced materials are generally superior (lower invasive weeds risk) than seed, mulch, soil, and gravel products from the lower 48. 2)New/rerouted trails, re-vegetated areas, and other landscaped developments should be monitored for invasive plants for two or more years after project completion. Follow up weed monitoring should be specified in contracted landscaping work.	This section provides generalized guidance related to noxious weeds. The trail plan addresses revegetation along trails more specifically.	None

Subject	Issue Summary	Response	Recommended Revision
Vegetation Management- Invasive & Noxious Plants (page 60)	Please modify the section to include the following: 1)State Park and contractor owned equipment should be cleaned prior to (any non-emergency) work in vegetated areas to reduce the opportunity for hitchhiking noxious weed seeds. This should be a stipulation for contracted services. Inspection of equipment prior to work is recommended. 2)More public education on the threats posed by invasive plants (seeds hitchhiking on boots, clothing, and pets) and boot brushes should be a part of public information available at major trailheads. 3)Chemical herbicides should be among the tools available to park managers in the event of a large and/or difficult to control infestation of invasive weeds (in the event that preventative measures and manual control are not effective). Temporary impact of a correctly chosen and carefully applied herbicide is ultimately less than the long-term and spreading ecological impact of many invasive weed species.	This section provides guidelines for needed work and the more detailed tasks are determined at the operational level and not in this plan. Herbicide use for noxious weed control is listed on table 5.1 (pg 47)	None
Vegetation Management- Invasive & Noxious Plants (page 60)	The plan contradicts itself regarding management of invasive species by being dictated by the state Agriculture Department's policies. The plan should put the park, as guided by it legislative mandates, first and not be dictated by other government agencies activities.	The Division of Agriculture, using their expertise, developed guidelines on invasive weed and pest management for the state. The management plan merely defers to that expertise for best management practices and does not compromise park purposes in doing so.	None

Subject	Issue Summary	Response	Recommended Revision
Fish and Wildlife Management-Coordination with the Department of Fish & Game (page 61)	DNR needs to assume responsibility as the lead agency in “control, development, and maintenance” of the land and water of CSP as described in AS41.21.121, with the ADF&G advising and cooperating toward that end. I find it odd that over the years CSP managers and its advisory board have had to lobby against such activities like the Hillside hunt before the Board of Game, a group who have no knowledge of this area or its significance to local residents and whom have given ADF&G the mandate to manage its resources for the maximum sustainable harvest. This mandate has been to maximize hunting opportunities above and beyond what ADF&G’s mission was at the time the park was created, further tipping the balance within the agency in favor of consumptive uses. This mandate is incompatible with the many and varied uses of the park and it is time DNR take the power provided to it in statute for the purpose of preserving the nature of the park as originally intended. Please remove the statement in the plan giving ADF&G (and as a practical matter, that means the BOG) responsibility for the management of fish and game resources in the park since that could set a dangerous precedent with their new mandate. The park should use its statutory authority to prohibit the discharge of firearms in the park and the plan should prohibit hunting, trapping, and fish stocking altogether, as these are contrary to the highest value of the park for the most non-consumptive users. Citing a cooperative role as per the statute would be more appropriate and consistent with the legislature’s intent when creating the park.	ADF&G is the statutory manager of fish and wildlife resources in the state and is required by statute to cooperate with DPOR on activities within the park. The plan already cites the cooperative role needed to manage resources within the park. Consumptive uses (fishing, hunting) are valid recreational uses within the park.	None

Subject	Issue Summary	Response	Recommended Revision
Fish and Wildlife Management-Coordination with the Department of Fish & Game (page 61)	Hunting and commercial trapping are not compatible uses in areas on the park's "periphery" which are designated in the enabling legislation as recreation areas, and in fact are heavily used for recreation. AS41.21.123 states that DNR shall designate by regulation..., incompatible uses within CSP and that those incompatible uses designated are prohibited or restricted... It is evident that the plan must be revised in regard to allowing the Board of Game or ADF&G to make decisions regarding wildlife management in the park. The closing and opening of areas to hunting should be a decision of the DPOR under the park's statutory authorities. The ADG&F biologists have expertise, and should be consulted. The abdication of management authority by the DPOR is inappropriate.	DPOR does not have the authority to manage fish and game or regulate hunting or trapping. DPOR through regulation has restricted or prohibited activities within the park for which they have the authority to manage.	None
Fish and Wildlife Management-Coordination with the Department of Fish & Game (page 61)	ADF&G has created some problems, and some opportunities, in the park by stocking lakes and streams without consulting with the park. This has lead to degradation of resources along the shore of Symphony Lake and numerous bear/human encounters at Bird Creek. We recommend State Parks assert its authority to manage any activity, including fish stocking, which adversely affects the park in order to protect park resources.	ADF&G is the statutory manager of fish and wildlife resources in the state and is required by statute to cooperate with DPOR on activities within the park. Consumptive uses (fishing, hunting) are valid recreational uses within the park.	None
Fish and Wildlife Management (page 61)	Include a statement, Park managers or designee will review fish and game management proposals and make comments for the public record regarding old, new or changed fish and wildlife management regulations effecting fish and wildlife resources within the park.	DPOR as well as the citizen's advisory board already review and comment on fish and game management proposals affecting the park.	None
Fish and Wildlife Management (page 61)	We would like to see language included in the plan that states that the DPOR will close portions of the park to hunting under certain circumstances. The criteria should be clear and should include the impact of hunting on the public display of wildlife in areas heavily visited by park users. We suggest the DPOR close the popular destinations such as the Middle and South Forks of Campbell Creek, Rabbit Creek and areas along the Seward Highway to hunting.	The park does not regulate hunting and can only close areas or regulate means if there is a public safety concern.	None

Subject	Issue Summary	Response	Recommended Revision
Fish and Wildlife Management (page 61)	While the ADF&G has designated special management areas where hunting and trapping are restricted, for instance the Eagle River Management Area, these special management areas are not included in the plan, but instead appear in the appendix. Those existing special management areas should be described in the plan, and approved as distinct wildlife management areas.	Those special management areas correlate with distinct fish and game regulations. DPOR does not manage fish or game and therefore only provides the appendix map so the public can understand how those units overlay the park units.	None
Fish and Wildlife Management- Wildlife Viewing Areas (page 61)	Include a statement, no hunting designations within the park will be collaboratively considered with ADF&G when wildlife populations are significantly limited due to winter kill, disease, predation or human causes.	ADF&G is the statutory manager of fish and wildlife resources in the state and is required by statute to cooperate with DPOR on activities within the park. Consumptive uses (fishing, hunting) are valid recreational uses within the park.	None
Fish and Wildlife Management- Wildlife Viewing Areas (page 61)	The Anchorage Hillside portion of CSP is a world-class wildlife viewing area and I would like to see this area designated as a wildlife viewing area only, where the park establishes the priority that hunting and trapping not be allowed. This is a small area relative to the park as a whole and it is the most easily accessible to both local residents as well as tourists and it is earning a reputation as a destination for travelers to photograph wildlife, especially during the annual fall moose rut. When the park was established, the legislature gave the park the power to provide areas for the public display of wildlife and the Anchorage Hillside is just such a place.	These areas were specifically reopened for very limited and highly restricted hunting (antler-less moose) by regulation several years ago. This hunt occurs well after the fall moose rut.	None
Fish and Wildlife Management and/or Infrastructure Development and Management (page 62)	Bear-safe food storage needs to be addressed in the campground plans. The park has expressed interest in using them, but additional money from the state would be needed for cleaning them and dealing with garbage.	Food storage at campgrounds is addressed for each campground in the unit specific recommendations of the plan. See chapter 6.	None
Infrastructure Development and Management (page 62)	This statement is neither clear nor definitive enough regarding the need for mechanisms to be in place for ADOT to maintain public roadways within the park. One state Department can't require another state Department to take on additional work. This is required of the State Legislature. This includes building both access routes (such as the Glen Alps connector road) and maintaining developed parking lots during all seasons.	The park's enabling legislation specifies that DOT is responsible for the maintenance of the existing roads within the park boundary.	None

Subject	Issue Summary	Response	Recommended Revision
Infrastructure Development and Management (page 62)	The State spends millions of dollars annually to promote safe travel on the State owned roads that include the Seward and Old Glenn Highways, Knik River, Eagle River, Eklutna Lake, Hiland, and Crow Creek Roads, and several lower hillside roads prior to the park proper. The site selection process for proposed trailheads, other improvements, and their driveways must consider safety, sight distance, capacity, and other factors in their access designs and budgets. ADOT/PF's driveway permit process is an important part of the site plan process to assess traffic impacts and if necessary a Traffic Impact Analysis will be required.	Concur	None
Infrastructure Development and Management (page 62)	Whatever projects evolve from consideration park managers should always plan to incorporate pedestrian pathway development in conjunction with state or municipal roadway improvements within or adjacent to the park.	Concur. See the Access and Trails plans for more information.	None
Infrastructure Development and Management (page 62)	The plan should recommend that park campgrounds are designed to have separated areas for RV and areas for tent.	The plan provides a general framework and guidance for future park activities and does not go into this level of detail. This recommendation should be made during site design planning.	None
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64-66)	Support the Boundary Adjustment Package and any other park additions to improve the integrity of the park. There are a considerable number of inholdings and park management agreement areas (pages 67-70) in the park that should be reduced and the property annexed fully into the park and resolved by a concerted effort of DNR staff, the congressional delegation and appropriate federal agencies.	Concur	None
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64-66)	CSP should expedite arrangements with the MOA's HLB and the state's MHT staff to secure access through lands in the Potter Valley and Bear Valley areas, including potentially trading parcels to provide the best access and/or trailhead locations. This should be done before development in these areas makes land trades and such more difficult and expensive.	Concur, these lands are described as a priority in the management plan and described in the access plan.	None

Subject	Issue Summary	Response	Recommended Revision
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64-66)	The plan should identify the acquisition of the T13NR2W Seward Meridian Sections 31-33 as very high priorities for acquisition, as they provide direct connectivity between MOA Far North Bicentennial Park and CSP and provide for enhanced and dispersed access for N and NE Anchorage residents. The plan should recommend further investigation.	The identified lands are military lands and as such, are not addressed in this portion of the plan because they are not available for acquisition.	None
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64)	Add a proposal to acquire excess military land adjacent or within the park as military land is disposed of; specially the land adjacent to Arctic Valley Road, lower Ship Creek, Snow Hawk valley, and the Long Lake/North Fork Campbell Creek.	The way military land will be distributed if excised has been determined already through the North Anchorage Land Agreement.	None
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64)	We ask that the plan address the Snow Hawk Valley, specifically its future should be considered if all or portions of Ft Richardson were to be turned over to the state. This valley should be included in the park. Also, military activities in the valley should coordinate with State Parks to ensure visitor safety.	The identified lands are military lands and as such, are not addressed in this portion of the plan because they are not available for acquisition. The way military land will be distributed if excised has been determined already through the North Anchorage Land Agreement.	None
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64)	Add a proposal to acquire the private parcel below Glen Alps (west of Anchorage Overlook) to be used for additional parking lot development and future trail access.	This land is outside the park boundary which poses additional management challenges which is why the plan vision is to address access issues in this area within the park boundary.	None
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64)	The DNR should secure park acquisitions in Bird Creek Valley from the municipality and the Girdwood Valley from USFS.	Concur in part. Bird Creek Valley is already addressed in the plan. Refer to the access plan for more information on Girdwood Valley.	None

Subject	Issue Summary	Response	Recommended Revision
Proposed Park Additions, Land Acquisitions, and Boundary Adjustments (page 64)	While acquiring land to facilitate access to Ram Valley might be an ideal solution to the access problem, the cost associated with purchasing and developing the land, matched with local opposition to park visitor impacts will continually push such a solution in to the future. A more attainable solution to the access problem at Ram Valley lies in developing a trailhead and trail from Eagle River Road near Falling Water Creek, on and across park land. The terrain provides the opportunity for sustainable trail development at a fraction of the cost of battling our way through land acquisition and facility development in the subdivision.	Concur that access acquisition to the Ram Valley is a priority. Refer to the trail and access plans for more information about this area.	None
Management Agreements (pages 68 and 71)	Page 71 “Management Agreement”: consolidate management of entire Bird to Girdwood bike path in DPOR is the same issue as stated on page 68.	One is a maintenance certification agreement and one is a recommendation for a new management agreement.	None
Management Agreements (page 68)	Does the “Maintenance Certification, Bird Point to Girdwood Bike Pathway” commit the park to finding resources for repaving, when it becomes necessary? If so, that would have an adverse impact on the park’s budget.	No	None
Management Agreements-Recommendations for New Management Agreements (pages 71-72)	The listed recommendations for the new agreements should be pursued with due speed and be accomplished as a high Department priority.	Agreements take time to coordinate and will be pursued as staff time permits.	None
Management Agreements-Recommendations for New Management Agreements (page 71)	Question the impact of dissolving the agreement with DMLW that enables maintenance of the California Creek Trailhead. It should ensure that access and parking are maintained there. Unless there’s some assurance that “other entities” will maintain access, this is an undesirable step. It is the only access to that end of California Ridge.	The area is outside of the park boundary and local organizations have expressed an interest and are better suited to maintain and develop the facility for area residents. See the Access Plan for more information.	None
Management and Staffing Efficiencies (page 72)	Add Maintenance and Construction seasonal positions under staffing needs.	This is already captured in the plan.	None

Subject	Issue Summary	Response	Recommended Revision
Management and Staffing Efficiencies (page72)	We question why this plan does not include the “staffing analysis” suggested. Using “several” to identify needed ranger staffing demonstrates why this information should have been gathered and analyzed during the planning process.	Information was gathered based on past staffing levels and an analysis of organizational changes over the years. The plan recommends adding positions to address the identified outstanding needs but if only some of the positions are established, future analysis can determine how best to allocate resources for the identified needs.	None
Management and Staffing Efficiencies (page74)	CSP does need to have access to aircraft patrols, but owning an aircraft and having a pilot on staff is certain to bring budgetary and administrative challenges. It is perhaps better to have an item in the budget to contract an aircraft as needed.	The plan doesn’t specify that CSP should own the aircraft, only that one should be readily available.	None
Management and Staffing Efficiencies- Visitation Trends (page74)	The plan states: “Accurate assessment of park visitation patterns and recreational use...is necessary to accurately project future demand, and match commensurate facilities and services...” Why wasn’t this data gathered during the planning process? Or was this data gathered for this plan, and if so, why wasn’t it referenced and how accurate was it? If the data wasn’t collected, how can this plan guide management decisions for 20 years when DPOR lacks the basic data to inform managers as to how people use the park today and trends for future years?	Basic visitation information exists for the various trailheads serving the park and was used in the development of the plan. The plan recommends improving data collection methods for more precise measuring of visitor numbers.	None
More Emphasis on Staff and Outreach Education and Less on Development	More emphasis should be placed on funding backcountry rangers and outreach educational activities, instead of more physical development.	The plan calls for additional staff for these purposes. See page 73 of the plan.	None
More Ranger Presence	Would like to see some management of overused areas like Rabbit Valley via backcountry ranger presence.	Concur. See the recommendations for staffing listed on Pg 73.	None
Bury Powerlines and Rename Powerline Trail and Pass	Has burying the powerline through the park been considered? It would certainly improve the aesthetics. And maybe renaming “Powerline Trail and Powerline Pass” to more traditional names.	The powerline is on an easement that predates the park managed by Chugach Electric Association and as a result it is their decision on how best to manage the line.	None

Subject	Issue Summary	Response	Recommended Revision
Oppose Large Regional Trailheads; Support Small Trailheads	Oppose the development of “large regional trailheads” as advocated in the plan, because this leads to crowds and a miserable user experience whereas currently crowds and noise can still be avoided by the dedicated user. Limit large trailheads and development to improving those trailheads already in existence (Glen Alps, Bird Creek, South Fork Eagle River, etc.) Small access points are incredibly valuable to the park and to the user experience.	The plan calls for only one new regional trailhead near the McHugh Complex mirroring the recommendation in the MOA’s Hillside District Plan and recognizing the diversity of opportunities available nearby. The plan seeks to provide a variety of experiences for park users with a range of trailhead sizes.	None
Local Management of Access Possibilities	The plan should address the potential for private/local management of individual access points which could reduce both operational costs and neighborhood opposition. The Park could specify that all, or a substantial portion, of the parking fees generated at a particular access point be retained by the local road service area to be expended on trailhead and road maintenance, litter pickup, and policing. This could have the effect of reducing neighborhood opposition to access development insofar as local residents could see some benefit being accrued to the neighborhood, instead of simply more traffic using the local roads.	Access management is addressed in the Chugach Access Plan in more detail than the management plan. The user fees are only collected at major trailheads and only partially support the costs of managing the park.	None
Park Needs to Provide Local Service Areas Funding for Road Maintenance	Parks would be seen as more of a “good neighbor” in residential areas adjacent to developed access points if Parks had a means of helping defray the cost of local road maintenance, year around. Parks should work diligently with the Legislature to gain this commitment. Local road service areas should not bear the entire burden of traffic increased by the Park’s access points.	Road maintenance is the responsibility (depending on the area) of DOT&PF, MOA general service area or various road service areas. DPOR is not funded for nor does it have the expertise to manage local road maintenance.	None
New Section with Guidelines for Contracts	Add a section or subsection for addressing the management of park facilities, the provision of services and management of contracts for providing park operations and development by both for profit and non-profit entities. There are currently few guidelines other than existing regulations, statutes or contracts that guide managers on when it is appropriate to contract out park operations, services or development projects to the outside sources.	The park plan is not the appropriate vehicle for addressing an issue that has Division-wide impact. These types of policies should be developed at the Division level.	None

CHAPTER 6: MANAGEMENT of EACH UNIT

Subject	Issue Summary	Response	Recommended Revision
Project prioritization and cost estimates	Project recommendations in the plan need to be prioritized in order of relative importance so that appropriate decisions can be made in the annual budgeting process. The absence of realistic (relative) cost estimates of proposed projects- particularly the Glen Alps connector road proposal- is a significant deficiency of the plan, which prevents reasonable evaluation of the pros and cons of specific projects. There is a real danger that the Plan's primary focus on a mega-project like Glen Alps, could diminish important opportunities for numerous smaller access improvement projects that are equally important and much more feasible to accomplish in the short-term.	Priorities often change as time passes, this method also allows managers flexibility in choosing projects based on need and/or demand. Additionally, the projects do not have cost estimates as costs and best practices for construction techniques may change in the future and these figures have not provided usable insight in the long term. These types of considerations are made in the site/project planning level.	None
Chapter 6 Should Discuss Municipal Plans Related to CSP and Access	Recommend that Chapter 6 include a discussion of the Hillside District Plan, Anchorage 2020 and the municipal parks plans and, at a minimum, address policies and elements outlined in those plans related to the value and importance of establishing pedestrian and public connections to CSP at most of the MOA-Park interface.	DPOR continuously works in cooperation with MOA, but policies of MOA plans on non-state land are beyond the scope of this plan.	None

Eklutna-Peters Creek

Subject	Issue Summary	Response	Recommended Revision
Special Management Considerations-Watershed Management (page 77)	Reword the first sentence of the paragraph to read: “Eklutna Lake is the major source...” from “Eklutna Lake is one of the major sources”.	Concur	The requested wording change will be made.
Special Management Considerations-Eklutna/Whiteout Traverse Mountaineering Huts (page 78)	The plan states that the Mountaineering Club of Alaska (MCA) performs annual maintenance on the huts. The MCA performs regular, routine maintenance of these huts, but due to costs, budget constraints, and volunteer availability, the maintenance cannot be deemed annual. Also, because of MCAs involvement in maintaining these huts, and because access to these huts can be seasonally restricted, and because the traveling public has come to rely on these huts for their safety, it is recommended that the MCA be provided a minimum of two years notice prior to the removal of these huts or prior to not allowing the MCA to do construction on a damaged hut.	It is appropriate to modify the language in the Eklutna/Whiteout Traverse Mountaineering Huts-Special Management Considerations section to more accurately represent the hut’s maintenance schedule as well as to modify the stated timetable for prior notification of hut removal or refusal to perform hut repairs.	The plan will be modified to replace the language stating that the MCA performs annual maintenance with language stating that they perform regular, routine maintenance. Also, the Eklutna/Whiteout Traverse Mountaineering Huts Special Management Considerations section language will state that the MCA will be provided adequate prior notification of hut removal or denial to perform hut repairs.

Subject	Issue Summary	Response	Recommended Revision
Eklutna/Whiteout Traverse Mountaineering Huts (page 78)	The MCA objects to the sentence: “They must remain open to all glacier travelers on the traverse and must be shared by groups” because as written, the language could lead one to conclude that there is no charge for the use of these huts and it cannot be the intent of DNR that the MCA should expend substantial funds to maintain these huts with no means of recovering its expenses. In addition to the cost of hut upkeep, the club helps protect the Eklutna watershed by providing barrels for human waste and pays for its disposal. The need for helicopter time to access the huts for some of the maintenance is a significant contributor to the total cost. At present the funds to maintain the traverse huts are raised by club dues and fees from other activities that the club sponsors. The club does not have a reservation and billing system that would allow charging on a per-use basis. There is already widespread use of the huts by non-club members who do not contribute. In order for the club to continue to maintain the huts in good condition and to protect the environment, an adequate source of funding must be made available. By adopting a policy clearly stating that the huts are not available free of charge, DNR will help to realize this objective. Please reword the paragraph.	The plan acknowledges the work that MCA does to maintain the huts. DNR appreciates the good work that MCA has done maintaining the huts but cannot limit use of the huts to club members without a competitive commercial use permit or concession contract in place.	None
Eklutna Lake Boat Access (18)	We do not support improvements to the boat launch ramp, please delete proposal. The current ‘walk your boat down’ facility enforces the motorized limits and a regular ramp will require more enforcement by already limited staff resources.	Due to changes in the lake levels, the recommendation for upgrading the boat launch/retrieval is needed in order to provide a safer, more accessible, and more reliable access facility. This lake is only open to the use of electric trolling motors. Internal combustion engines are prohibited.	None
Bold Ridge Backcountry Campsite (20)	If this site is developed, it should be for hike-in only users and kept out of the two valleys north of Bold Ridge. This trail is steep and has blind corners where a collision between a mountain biker and hiker is probable.	Concur. The plan depicts the campsite along the Bold ridge and trail and not in the valley.	None

Subject	Issue Summary	Response	Recommended Revision
Bold Ridge & West Side Eklutna Lake Backcountry Campsite (20 & 23)	We recommend providing permanent bear proof food storage containers at all hardened campsites within the park to help ensure the safety of campers and bears. Please consider making this a requirement to reduce human/bear conflicts and food conditioning of bears.	The plan recommends that all of the large, heavily used campgrounds be equipped with animal-resistant food storage areas; however, due to the primitive nature of the backcountry campsites and the desire to preserve this experience, the plan only recommends providing the minimal amenities. If the need for some type of animal resistant food storage arises at one of the primitive campsites, the park has the ability to employ measures to help protect the public and decrease negative wildlife-human interactions as stated in Chapter 5 in the Fish and Wildlife Management section.	None
West Side Eklutna Lake Public Use Cabins & Backcountry Campsites (22 & 23)	The cabins and campsites should be accessed only by lake travelers- canoe/kayak in the summer and XC ski/snowmobile/snowshoers in the winter. No trail access on the west side will ensure that the pristine and remote features of the planned facilities remain unchanged.	Concur in part. The cabins and primitive campsites will be primarily accessed via the lake; however, the park's trail plan proposes a Class 2 trail designed for hikers that parallels the lake on the south side.	None
South End & West Side Eklutna Lake Public Use Cabins (22) & West Side Eklutna Lake Backcountry Campsites (23)	I oppose building these public use cabins, because I like to see the park stay in a natural state and consider these proposed structures to be incompatible with the natural state. I am also opposed to construction of any trail into this area which would be open to motorized use at any time of the year.	The Eklutna lake area is located in the Natural Environmental Zone and not the Wilderness Zone. Both improved campsites and Public Use Cabins are compatible uses in this land use designation.	None

Subject	Issue Summary	Response	Recommended Revision
Peters Creek Valley Public Use Cabin (27)	The Eklutna and Eagle River valleys have PUCs and this plan proposes additional ones in those valleys. Building a PUC in this valley is ill-advised and incompatible with the natural state of the area. To provide the full range of experiences in the northern part of the park, we think the park needs to make Peters Creek a cabin-free valley. Putting a cabin out past 6-mile would completely change the character of the area and we ought to maintain this valley in a natural undeveloped condition. It is one of the few easily accessible valleys without that kind of traffic. Installing the cabin would significantly change the character of the area and the cabin would only provide a service for those lucky enough to get a reservation while disrupting the backcountry hiking experience of others. The Plan also discusses the increasing burden of fee collection places on staff and yet DPOR is proposing to place a new fee cabin that will increase the fee collection and maintenance work burden on staff. If the cabin is built in the future, it should not be built until the right of way/private land issues have been resolved.	This plan provides recommendations and guidance for future use and is not a list of specific projects to be completed. The majority of the Peters Creek drainage is located in the Natural Environmental Zone and not the Wilderness Zone. Public Use Cabins are compatible uses in this land use designation. Public use cabins are not compatible in alpine vegetated areas and would not be able to be built beyond the lower reaches of the drainage. The Chugach Access plan addresses the right of way concern with information on acquiring land adjacent to the current trailhead to improve access and parking and to secure access on the main trail segment.	None
Ptarmigan Valley Access	State Parks needs to reassert the public's right to use the old trail off Jasmine Road that leads to the Ptarmigan Creek valley. It is a more desirable summer trail than the newer snowmobile trail leading from the Ptarmigan Trailhead off the Old Glenn. There is a history of traditional use on this original Ptarmigan Creek trail and it is up to the State Park to fight for it even though the State lost the case in Rabbit Creek valley.	This is an important access point that has provided traditional access to this valley; therefore, guidance for securing public access to the park at this site is included in the Chugach Access Plan.	None
Hunter Creek Access	Comment was received supporting access to Chugach State Park from the end of Knik River Road- Hunter Creek- which has been a conflict area for decades.	Refer to the Chugach Access Plan for guidance on the options for establishing and reserving access to this area.	None
Add Bike Lane Along Eklutna Lake Road	Add a bike lane to the access road to Eklutna Lake.	The Eklutna Lake Road is managed by DOT and much of the road traverses private property. Additionally, the road is narrow and has limited opportunities to widen it sufficiently to accommodate a bike lane.	None
Add Access to Thunder Bird Ridge from Eklutna Lake Spillway	Comment was received supporting access and trail to Thunder Bird ridge from Eklutna Lake Spillway be added to the plan.	Trail development and management are beyond the scope of this plan and are addressed in the park's trail management plan.	None

Subject	Issue Summary	Response	Recommended Revision
Culvert on Eklutna Lake an Obstacle to Fish Passage	There is a perched culvert at the east end of Eklutna Lake that may be blocking the passage of resident fish and, by Alaska Statute, may need to be repaired. Coordination with the Habitat Division of the ADFG will be required to evaluate the stream for presence of fish and culvert replacement or repair.	This is a situation that if present, is handled at the operational level and not by the management plan.	None
Year-round Eklutna Lake Loop Trail	Comment was received proposing a year-round trail on the west side of the lake to create a loop around the lake. It would create a better experience for all users (motorized and non-motorized) and would permit better access to the proposed PUCs and campsites (ID 22-23).	The park's trail management plan includes a proposal for a pedestrian trail that parallels the lake.	None
Prohibit Snowmobiles on the Eklutna Lake	Do not allow Snowmobiles on the lake. The park has banned aircraft landings and motorboats on the lake for concerns about fuel spills and impacts on the drinking water supply. We see the same risk with Snowmobiles: one group breaking through the ice would be a potentially significant fuel spill, not to mention the potential human tragedy.	Current park regulations allow snowmobile use on the lake. Any changes to park regulations go through a separate regulatory process. However, it is appropriate to add language to the plan to gather more information and evaluate snowmobile use on the lake.	The Special Management Considerations portion of the plan will be modified to include language about gathering information and evaluating the level of snowmobile use on the lake surface.
Do Not Increase Days Open to ATV Use	Do not increase the number of days existing roads are open to ATV use in this planning unit.	The changes you suggested would be handled through a separate regulatory process, not this plan.	None
Eliminate Development Zone on South Side of Eklutna Lake	Eliminate the "development" zone on the south side of the lake. This would have significant management implications and detrimental effects on wildlife, and therefore wildlife viewing. And any development such as cabins will require or demand motorized access. With no trail around the lake this would probably mean motorboats.	The south side of the lake is in the Natural Zone and the facilities proposed are appropriate for that designation.	None
Knik Glacier Area	Access and trailheads to the Knik Glacier area should be recommended, since this beautiful area is currently difficult for most people to get to. Purchase an easement or private property if necessary.	The Knik Glacier area is outside of Chugach State Park and within the Knik River Public Use Area. Refer to the DNR Knik River Public Use Area Management Plan.	None

Eagle River

Subject	Issue Summary	Response	Recommended Revision
Eagle River Planning Unit Objectives (pages 87-89)	The canoe trail is no longer listed as an objective in this management unit. I feel that this trail should be restored to the current plan and that management of this unit for river access and river-based exploration is an important part of the park objectives. There is no other river in the park that affords wide ranging river access and this should be recognized. Also, the description of the Eagle River Greenbelt should be modified to include that access to the greenbelt is also achieved by the Eagle River Canoe Trail.	Concur in part. The 1980's plan did not include the canoe trail as a unit objective, but as a proposal. The current draft management plan does not include the Eagle River canoe trail as a proposal because the park's trail management plan covers all of the park's trail system which includes the Eagle River water trail.	The final plan will include additional language regarding the importance of access to and along the river corridor under the Eagle River Unit's Special Management Considerations section.
Lions Club Community Park (Pages 66 & 69)	Comments were received requesting that Lions Park remain as it is today. Do not transfer Lions Park to the Municipality of Anchorage. The park is an important community asset and provides youth and families a place to recreate year round and provides an avenue for the Club to fundraise for things that benefit the community. Some Eagle River residents have noted that the Lions Club has managed the park quite well and for over 40 years. The Club and volunteers have worked hard to maintain and build the park and facilities for the benefit of the community and many organizations. Trading the Lions Park would not only cause irreparable harm to the Lions Club and park users, but it would also be detrimental to the park itself and the community. Consider giving the Club a 50-99 year lease so we don't have to fight every few years to maintain this property. This is not the first time the Lions Club has had to address a possible trade of the park to the MOA. But the community and club have and continue to support keeping the park under the control of the ER Lions.	The area referred to as the Lions Club community park is part of Chugach State Park. The Lions Club manages the land under permit and does not have a lease. A lease cannot be given to the Lions Club because the area is part of Chugach State Park, which was set aside as a special purpose site by the legislature. Special purpose sites are withdrawn from the public domain and therefore are not available for multiple purpose use or disposal. Leases are disposals of interest in land that cannot be achieved at this site. Language in the plan suggesting a trade of this site to another entity will be dropped.	Drop language in the plan that suggests trading lands to another entity such as the Municipality of Anchorage.

Subject	Issue Summary	Response	Recommended Revision
Edit Existing Facilities Table (page 91)	Remove the “X” under Ballfield/other (i.e. playground, dump station), since there are none of these at the Nature Center.	This was applied to the Nature Center because there are facilities there that are not listed elsewhere in the table so the “other” was meant to apply in this instance. It is appropriate to modify the table labeling for better clarification.	The Existing Facilities tables for each planning unit will be modified in the final plan to substitute the table column label from “Ballfield/Other (i.e. playground, dump...” to “Other (e.g. ballfield, playgrounds, dump...” for clarification and to help minimize confusion.
Wallace Homestead Acquisition & Exchange	The Wallace Homestead above Skyline Drive and nestled within the CSP is available for purchase and would be an excellent addition to the Park. It would be an opportunity to work with the Municipality to work an exchange whereby the Municipality purchases the land and then trades it for Lions Park. Lions Park is more similar to other park lands operated by the Muni and the Homestead is more similar to lands managed by the State.	The Wallace Homestead parcel will be added to the acquisition section of the final plan.	The Proposed Park Additions, Land Acquisitions, and Boundary Adjustment section of the plan will be modified to include an additional proposal for the Wallace Homestead property.
Baldy & Bear Mountain Trails	The trails at Mt. Baldy, Mile High Pass, and Mt. Eklutna and Bear Mountain are some of the most heavily used trails on the north end of the park and need to be developed into proper trails to address erosion, steep grades, and the heavy use levels received by the public and school groups. Careful planning and support from local businesses and perhaps community councils could help to create safer and aesthetically pleasing trails. Also, building latrines at these trailheads seems excessive. It appears most people using the trailhead just park their car and start hiking- I don’t see the need for latrines.	Concur in part. The three trails listed are all included in the park’s Trail Plan which addresses development and management of the park’s trail system. Amenities, such as latrines, are often needed at heavily used trailheads in order to minimize resource degradation, litter and sanitation issues.	None
Black Tail Rocks Trail and Access	Please add the trail to Black Tail Rocks to the plan. It uses the same trailhead as Mt. Baldy but is much less steep (see 55 Ways to the Wilderness).	Concur; however trail development and management are beyond the scope of this plan and are addressed in the park’s Trail Plan. The Black Tail Rocks-Ptarmigan Trail, linking the Mount Baldy summit to Black Tail Rocks, is included in the trail plan.	None

Subject	Issue Summary	Response	Recommended Revision
Meadow Creek Trailhead (31)	Support proposal, but with some concern. The trail is currently closed to motorized use and horses; however, locals ride horses on the trail and use Snowmobiles and ATVs to clear the trail of brush. The Meadow Creek watershed is a drinking water source and therefore should continue to be closed. And mountain biking should not be allowed on the trail now or in the future either. How does CSP plan to effectively enforce existing regulations and any new ones which result from increased trail use due to developing a trailhead?	The initial portion of the trail currently traverses private property before reaching the park boundary. While the state has no control over the management or development of this portion of trail, the segment that is located within Chugach State Park is addressed in the park's trail management plan. Currently the portion of the drainage that is located within the park is closed to bicycles, motorized and equestrian use by park regulations. There is a separate process promulgating changes to regulations. Enforcement of park regulations is handled at the park's operational level.	None
Mile Hi Trailhead (32)	More permanent "No Horses" signs need to be placed at the trail leading from the cell tower and on the north side of Mile-Hi pass above Meadow Creek.	The Management Plan does not provide this level of specificity; this is done at the park's operational level.	None
Mile Hi Trailhead (32)	Even though there is a staffing issue with CSP, an effective and ongoing effort to suppress illegal campfires at the pass and on top of the ridges must be a priority for this area.	This is an enforcement issue that is handled at the park's operational level, not in the management plan.	None
North Fork Eagle River Trailhead/River Access (33)	Reconsider whether any money should be expended upgrading this site in light of the statement that the river has changed course and the area is less desirable as a launch site.	This developed site already provides important year-round access to the Greenbelt and the river, but it is currently underutilized and could provide additional recreational opportunities to other user groups with some enhancements like the addition of picnic shelters and area interpretation.	None
North Fork Eagle River Trailhead/River Access (33)	With minimal modifications, this site could provide additional camping opportunities in the Eagle River valley.	Concur. The plan will be modified to include the addition of language that the DPOR may evaluate the feasibility of accommodating camping opportunities at this site in the future.	The proposal for the North Fork Eagle River Trailhead will be modified to include language about evaluating the feasibility of accommodating camping opportunities in the future.

Subject	Issue Summary	Response	Recommended Revision
Eagle River Road (34) & Access to Ram Valley from Falling Water Creek Trailhead (36)	Support plan recommendations. Specifically, we believe that there is a good opportunity to obtain access directly up to Ram Valley from a small parking lot trailhead at ID 36 Falling Water Creek Trailhead or in this vicinity (ID 34), where the park property touches ER Road. A contoured, sustainable pedestrian trail could be constructed entirely on the state park land from a state maintained highway for far less cost and long term problems with the neighborhood. Parking at this location would eliminate the current problems and concerns from local residents with parking at Mariah Rd. Modify the plan to include that these trailheads not only provide scenic views and wildlife viewing, but also should be the launching point for a new legal trail to access Ram Valley. This trail should also be added to the Trails Plan. Access to this valley should be a top priority.	Concur. Both the Chugach Access Plan and park's Trail Plan were modified to include an access point and sustainable trail in this area for access to Ram Valley. It is appropriate to add additional language to the Justification section of these proposals to better clarify that access from the Eagle River Road in this area is desired and important in providing legal access to Ram Valley.	The Justification sections of these proposals will be modified in the final plan to include additional language regarding the importance of developing a trailhead in this area to provide legal access to Ram Valley.
Ram Valley Access/Trailhead (35)	<p>Comments were received urging DNR to assertively pursue public access to the Ram Valley Trail and development of a trailhead including adequate parking, signing, and a toilet. Resolution of the current access issues is a priority.</p> <p>Access is a major problem in the ER area. Currently there is no legal access between the Mile High parking area to the ERNC. All that is needed at Ram Valley is a legal parking area and an agreement for users to access the valley. I do not support the current idea to follow the powerline easement from ER Road to Ram Valley.</p>	Concur in part. Legal public access to the park is especially challenging in the Eagle River valley; therefore, Park Access is highlighted in the Management Intent for the Eagle River Planning Unit (ERPU) as well as a Special Management Consideration with added emphasis on Ram Valley access. The plan also includes a proposal for acquiring land near the Ram Valley area in the Proposed Park Additions, Land Acquisitions, and Boundary Adjustments section and there is a proposal for the development of a trailhead in this area included in the Facility Recommendations section of the ERPU. Both refer to the Chugach Access Plan for guidance on the options for establishing and reserving legal access to this important valley.	None

Subject	Issue Summary	Response	Recommended Revision
Eagle River Nature Center (ERNC) (37) (pages 89 and 93)	Substitute “master site development plan has been agreed through public process” for “is already underway” since State Parks already completed a public process which accepted a master plan for the new facility and trails. This should be noted in the management plan so it doesn’t have to be revisited in the future. Also, it would be good to describe FERNC’s role in more detail (such as: they have managed the ERNC and 10 miles of trails since 1996; they provide interpretive education for school children and the public and have filled a void in CSP’s educational mission/component; they received a 25-year concession contract from the DNR Commissioner in 2005; and the community and CSP has benefited greatly from the efforts of FERNC, etc.).	Concur. It is appropriate to modify the language in the proposal’s Justification section to acknowledge that the separate public process regarding upgrades to the Nature Center has been completed and a master site development plan accepted. Also, minor modifications will be made to the description of the Eagle River Nature Center under the Special Management Considerations.	The Justification section of this proposal will be modified in the final plan to acknowledge that the separate public process regarding upgrades to the Nature Center has been completed and a master site development plan has been approved. Also, the Eagle River Nature Center section under the Special Management Considerations for this planning unit will be modified to include additional language regarding the importance of the role FERNC plays in providing services in the Eagle River valley.
ERNC (37) (pages 89 and 93)	We ask that the language on page 89 be reworded to be clearer. The ERNC is under a concession, meaning that in the future, unless otherwise stipulated in the plan, a large company like Princess Tours could theoretically bid for the concession and “expand”. Though unlikely, the vague wording in the plan leaves something like this a possibility.	While it is true that a large company could in the future bid for a contract for a concession facility like the Nature Center, all such contracts are subject to the terms agreed upon by the DPOR and the concessionaire in addition to being subject to existing state law, regulations, and policies which require that the contract is consistent with the park’s purposes and the management intent for the planning unit.	None
ERNC (37)	Comment was received opposing a new building because the ERNC is great as is.	The ERNC is great and provides an important service to park visitors; however, as stated in the plan, the popularity of the Nature Center has led to explore options for future upgrades and expansion of the Center’s facilities and associated parking. The ERNC was originally a lodge and not an educational facility and it is in need of major repairs to continue operation.	None

Subject	Issue Summary	Response	Recommended Revision
Crow Pass Trail Backcountry Campsites (39)	Do not enhance campsites along the Iditarod/Crow Pass Trail, especially in the wilderness zone. This would take away many of the very aspects that make this trail a challenging and invigorating experience. In addition to degrading the wilderness character of an area, enhanced campsites are typically a focal point of trash, human waste, wildlife issues, and resource damage.	Backcountry campsites already exist along this heavily used and popular trail. As stated in the plan, the addition of minimal upgrades will help to reduce resource impacts.	None
Crow Pass Trail Backcountry Campsites (39)	I support the plan recommendations and suggest the inclusion of pit toilets near some of these campsites.	Concur; the DPOR will evaluate the possibility of installing sanitation facilities in the future at some of the locations.	The proposal will be modified to include additional language that sanitation facilities may be appropriate in the future at some sites.
Add Additional Trailhead at VFW Road/ER North Side Access	Provide a small-to-medium size trailhead on the north side of the river near VFW Road, with adequate parking and an information kiosk, to provide access and connectivity between the trails along the river and the central community of ER. The current pullout in this area is too small for the current and proposed use levels. Ideally, the trailhead should be relocated into the forested area away from Meadow Creek.	This area is outside of the park boundary and there is a small pullout there that is used to access the park. The Chugach Access Plan makes recommendations for this site.	None
ER Group Campground (41)	Comments were received in support of the proposed redesign and development of the group camping area. The planned group camp area in the ERCG should also include adequate trailhead parking, picnic tables, information kiosk and toilet to serve as a day use area and a primary trailhead for the trails in the area. Include a large pavilion for use by schools as an outdoor classroom and gathering place for the public.	Concur. It is appropriate to modify the language for this proposal to better clarify that the area is also intended to provide visitors with day use opportunities.	The Justification section of the plan will be modified to clarify that this area is also be available for day use activities.
Add Additional Trailhead at Hesterberg Road	Winter parking area should be developed near the road gate on upper Hesterberg Road, to provide adequate parking for skiers using the campground roads and trails during the winter months.	An access point at this location as well as site recommendations will be included in the Chugach Access Plan.	None
Add Additional Trailhead at Gruening Middle School Access	DNR should add an access point from Gruening Middle School/Lions Park to the plan, as this is a major community collection area and it would increase utilization of the pathway.	The Chugach Access Plan includes an access point at this location as well as site recommendations.	None

Subject	Issue Summary	Response	Recommended Revision
ER Campground Connection to Greenbelt Trail	Install a pedestrian/ski bridge and trail to connect the ER CG with the proposed ERGB pathway, establishing the key link between these recreation facilities.	Trail development and management are beyond the scope of this plan and are addressed in the park's Trail Management Plan. A proposal for the Eagle River Greenbelt Pathway is included in the Trail Plan.	None
Eagle River Greenbelt Trail/Pathway & Eagle River Greenbelt Trailhead/River Access (42)	Comments were received that support development of the proposed Eagle River (ER) Greenbelt Pathway and associated trailhead/access points between the ER Nature Center and the Glenn Highway and connecting with the ER Campground. The pathway will be a community recreation and fitness asset for decades to come and will complete an important missing segment of the Iditarod NHT. There is a real need to identify the route of this historic trail along ER Valley from the ERNC to the ER CG. The Pathway will be used by people of all ages and abilities year-round. It will contribute to economic development and the quality of life throughout the ER area.	Concur. The park's Trail Management Plan includes a proposal for the Eagle River Greenbelt Pathway which parallels the river between the Nature Center and the Glenn Highway. It is appropriate to modify this plan to include additional language identifying the segment of the Iditarod National Historic Trail that traverses the Eagle River valley in the Eagle River Greenbelt section under the Special Management Considerations for the planning unit.	The Special Management Considerations section for the Eagle River planning unit will be modified to include additional language identifying the segment of the Iditarod National Historic Trail that traverses the Eagle River valley.
Eagle River Greenbelt Trail/Pathway	Comments were received about this pathway extending to the base of the bluff (below Eagle Ridge subdivision next to Gruening School); as well as being suited for groomed cross-country skiing and bicycle use.	Trail development and management are beyond the scope of this plan and are addressed in the park's trail management plan.	None
Eagle River Greenbelt Lower Access Road Easement and Proposed Greenbelt Trail	We question when CSP gained authority to manage this easement. It seems like a conflict of interest to allow the party that has agreed to an easement through their land to manage, and in sense close off access that the easement was intended to allow and preserve. The gating policy instituted by CSP has created a disconnect with regard to the original purpose of this easement and resulted in negative affects to accessing private land. CSP has done no maintenance and the road and bridge have deteriorated. A bigger problem is the public's perception that this easement is a trail not a road and the safety issues of bikers, hikers and vehicles all using this same access. The new Plans seem to reinforce this as a trail (the ER Greenbelt Trail/Pathway) and ignore the existence of the road easement. We hope to have a dialog with the park with regard to these issues and discuss available options.	The easement is in place to provide access to lands along it and access has not been precluded. The park welcomes future dialog on options for this area.	None

Subject	Issue Summary	Response	Recommended Revision
South Fork Waterfalls Overlook (43)	Recommend that no additional parking improvements be developed at Ken Logan Circle to promote access to the South Fork area and no day use and/or viewing area be constructed at Barbara Falls. These improvements will increase the potential for adverse bear/human interactions.	As stated in the plan, this site was acquired by the park for development of a day use area and has been included as a recommendation in a number of plans. This site currently has limited parking opportunities and therefore is underutilized. The plan highlights the importance of situating and designing the site in a manner that would minimize human-wildlife conflicts and to protect sensitive areas. The Wildlife-Human Conflicts section under Special Management Considerations for this planning unit also highlights the importance of designing facilities in a fashion to mitigate wildlife concerns and issues.	None
South Fork Eagle River Trail & South Fork Valley/Headwaters Trailhead (44)	Retain the year-round non-motorized access to the South Fork Valley. The use of bicycles on the upgraded trail is not a good idea with the high numbers of off leash pets and kids and seniors on the trail.	See the Trail Plan Issue Response Summary for the changes made to the trail recommendations in the South Fork Valley.	None
South Fork Eagle River Trail	<p>I'm disappointed with the recently constructed South Fork Trail realignment from the Trailhead to Symphony Lake. Instead of incorporating the designs of the community to fix the muddy areas and retain the character of the existing trail, it was completely re-constructed and now degrades the aesthetic quality of the Valley by appearing like a road.</p> <p>Based on this experience, we are concerned that the term "sustainable trail design" is misleading and therefore should not be applied to additional trails in the South Fork Community until it can be better explained by DPOR. This concern is all the more important as DNR is moving to adopt this "sustainable trail design" policy state-wide.</p>	Trail development and management are beyond the scope of this plan and are addressed in the park's Trail Management Plan.	None
South Fork Eagle River Trail	I strongly urge DNR to remove from the Trail Plan the proposal for a Class 3 trail segment from the South Fork Trailhead to Hunter Pass.	Trail development and management are beyond the scope of this plan and are addressed in the park's Trail Management Plan.	None

Subject	Issue Summary	Response	Recommended Revision
South Fork Eagle River Trail	Concerned that the South Fork Trail was widened without a public process.	The South Fork Eagle River Valley Trail is an existing trail included in the park's adopted 1986 trail plan and any improvements or maintenance performed on a park's existing trail must comply with the Division of Parks and Outdoor Recreation's Trail Management Policy and follows the sustainable design framework.	None
South Fork Valley/ Headwaters Trailhead (44) & Harp Mountain Trailhead (45)	I favor establishing additional parking in the South Fork; this could preferably be done by acquiring additional land outside of the current park boundaries.	Refer to the Chugach Access Plan for the guidance on the options for establishing and reserving additional access to this important valley.	None
Harp Mountain Trailhead (45)	Support plan recommendation for this site. We also recommend providing access to the South Fork Valley from this location to take pressure off the South Fork Trailhead. This would require coordination with the Trails Plan, with a new trail linking trails 227 and 229.	The plan includes a proposal for developing additional trailheads in this valley (ID 44) to help disperse use and relieve pressure from the existing South Fork Trailhead and the park's trail plan will also include a proposal for Class 3 Hiker-Pedestrian loop trails linking to the existing South Fork Trail system. For additional guidance on future access opportunities in this valley refer to the Chugach Access Plan.	None
Harp Mountain Trailhead (45)	Clarify that land acquisition at Harp Mountain is to provide access to the south fork valley trail. There is already an easement for people to access Harp Mountain.	The proposal is for a small trailhead that could service both the South Fork and Harp Mountain trails. The Proposed Land Acquisitions section of the plan includes language regarding the importance of this area for access to all destinations in the South Fork valley.	None
Prohibit Snowmobiles on River Past Echo Bend	Snowmobiles should not be allowed on the river past Echo Bend. This would allow better enforcement since Snowmobiles commonly go past Icicle Creek.	Currently snowmobiles are allowed along the Eagle River water course and gravel bars downstream of the confluences of Icicle Creek and Eagle River. Any change to the regulation is done through a separate process and not this plan.	None
Trail Along Eagle River	I support the idea of extending the Crow Creek Trail past the visitor center along Eagle River all the way to the highway.	The park's trail management plan includes a proposal for the Eagle River Greenbelt Pathway which parallels the river between the Nature Center and the Glenn Highway.	None

Subject	Issue Summary	Response	Recommended Revision
Entice Visitors to Other Trailheads	More effort needs to be made to entice visitors to trailheads other than Glen Alps. Mile High and Ram Valley could all support visitation. Where is equity when a few land owners are effectively blocking access to the park by not tolerating parking spaces?	Refer to the Chugach Access Plan for additional information and options for addressing access to the park along the entire municipality/park boundary interface in order to disperse park use.	None
CSP Funding	CSP suffers from a lack of funding. A permanent trail crew for the greenbelt and Crow Pass trails need to be included in the plan. Overall, I recommend long term funding for access, permanent trail crews, trail improvements, and the ERGB project.	Concur. A proposal for technician positions for a trail crew is included in the Management and Staffing Efficiencies section of the Management Plan.	None

Ship Creek

Subject	Issue Summary	Response	Recommended Revision
Special Management Considerations- Existing Management Areas (page 98)	Because of the heavy recreational use, particularly in winter, we urge that the Ship Creek watershed be closed to trapping.	Trapping is not regulated by the park or the management plan but rather by the Board of Game through Fish and Game regulations.	None
Anchorage Ski Club's Lease (Pages 67 – 72)	The Anchorage Ski Club (ASC) lease is not included in the list of Existing Management Agreements or Recommendations for New Management Agreements. Please consider including a long term agreement between the ASC and DPOR for the continued maintenance of the roads, trailheads, trails, and facilities within Arctic Valley. The continuation of the ASC lease will allow access to Chugach State Park (CSP) at virtually no cost to the State due to the large amount of time and money expended by ASC in the maintenance of the road and facilities at Arctic Valley.	The Anchorage Ski Club lease is not included in the list of Existing Management Agreements or the Recommendations for New Management Agreements because these agreements are only agreements that are issued to the Division of Parks and Outdoor Recreation from other agencies. The list does not include agreements issued by the Division for management of facilities and thus does not include the Lions Club permit, the Eagle River Nature Center concessions contract that provide a service similar to the Anchorage Ski Club for management of certain areas of the park.	None
Arctic Valley Road (Page 97)	This section needs to be modified to add that the ASC has a contract with the U.S. Army for road maintenance, and helps pay for snowplowing in the winter. The ASC also maintains its own plow truck and plows the road in the winter when necessary. The ASC provides a critical service to help maintain access to CSP at Arctic Valley during the winter.	Concur. It is appropriate to modify the plan to include additional language regarding the agreement ASC has with the military and the work it does to maintain access to the park along Arctic Valley Road.	Modify the description on page 97 so that it acknowledges ASC's maintenance of the Arctic Valley Road and agreement with the military.
Arctic Valley Ski Area Lease Site (Page 99)	The ASC plays an important role in maintaining a premier access point for the park and CSP faces many challenges in terms of public access. Without ASC as a key player in the future of the valley, I can see the military losing interest in maintaining Arctic Valley Road, and thus a loss of access to the park. ASC's lease is a viable alternative to the parking pressures that face Glen Alps and other areas.	Concur, however after the lease expires, another type of agreement will need to be put in place for management of this area.	None
Arctic Valley Ski Area Lease Site (Page 99)	This section needs to be modified to add that the lease site also includes a trailhead, picnic shelters, toilets, a kiosk, and a tube park and coffee shop. And that the lodge has full utilities.	Concur. The description will be augmented to describe the facilities within the lease and permit site footprint.	Augment the description of the Anchorage Ski Club Lease information on page 99 of the plan to include the additional facilities within the lease and permit site.

Subject	Issue Summary	Response	Recommended Revision
Arctic Valley Ski Area Lease Site (Page 99)	<p>Disagree with the interpretations of Chapter 8, Section 7 and 8 of the Alaska Constitution. Nothing in those paragraphs precludes continuation of the ASC lease and the continuation of the ski facility even if it is a “special purpose site”.</p> <p>The land laws that will in turn affect the ASC resort need to be changed.</p>	<p>As stated in the plan, the lease has continued under the existing terms but the State is precluded from entering into a new lease agreement because it cannot dispose of property interests in special purpose sites that are withdrawn from the public domain for specific purposes. This principle is embodied in the State Constitution and not law that can simply be changed.</p>	None

Subject	Issue Summary	Response	Recommended Revision
Arctic Valley Ski Area Lease Site (Page 99)	Public comment opposing the plan’s management direction regarding the ASC/Arctic Valley Ski Area lease site was received. There was specific concern regarding the conversion to another form of authorization, such as a concession contract, once the lease expires. The concern is that the ASC won’t be able to continue operating in the same manner in which it is currently managed as a nonprofit with a volunteer-run small day use ski area that provides affordable and accessible year-round family friendly and community-minded alpine recreational opportunities for the public. Converting the lease to a revenue-sharing, short term concession contract will change the character of the ski area and will make it impossible to do long range planning, fundraising or to maintain a viable ski area similar to the small operation that is currently there. Opening to a concession raises the possibility of a much larger, for-profit corporation becoming the concessionaire, potentially dramatically altering the area’s character. A site-specific comprehensive master plan for the entire Arctic Valley area should be funded or at least include it in the list of needs within the plan. This plan could determine the best way to develop, enhance and showcase all the great recreational, historical and cultural assets of the area while protecting resources and supporting the military in achieving their training goals. The plan should include the Nike Site as part of the Arctic Valley Complex. It should also consider the development and placement of park interpretive facilities at Arctic Valley including a modest public visitor center in cooperation with the ASC (and possibly the ERNC and/or Alaska Native Heritage Center.) Arctic Valley could and should be the ‘alpine jewel’ of CSP and the plan should provide such vision.	As stated in the plan, the lease has continued under the existing terms but the State is precluded from entering into a new lease agreement because it cannot dispose of property interests in special purpose sites. Once the existing lease expires in 2022, another authorization form will be needed for an entity to operate the ski area. The plan also acknowledges that a site specific planning process will be needed to address the lease site. Given the nature of the activities at the site now, a concessions contract seems most appropriate. Under AS 41.21.027, DPOR insures that park purposes are implemented, public use is enhanced while park resources are protected, and the activity is based on the need and desire of the public. The Eagle River Nature Center is run by a non-profit entity under a concessions contract and provides a good model for success in this regard.	None

Subject	Issue Summary	Response	Recommended Revision
Anchorage Ski Club Lease Site (Page 100)	The plan refers to upgrading the area, and conducting a planning process to address how the area “can best be used.” This use of language insinuates that the Arctic Valley ski area is not the best use of park land. But this part of CSP is best used as a nonprofit ski area and the plan must reflect this fact. DNR needs to be open-minded and include a recommendation that proposes a solution to the issue of renewing a lease on lands removed from the public domain.	The plan does recommend issuing a different type of authorization for activities occurring in the area. An evaluation is a good way to see how the site can best be utilized to enhance recreation in keeping with park purposes and other statutory mandates. Using the land only for a ski area, may not be the best use of park resources. ASC has also sought to conduct this type of evaluation to better understand how to utilize the area to its potential and perhaps diversify the activities the site can offer to mitigate for years where usage has been low due to snow conditions, or mechanical issues.	None
Anchorage Ski Club and the Arctic Valley Ski Area History	The ASC and the ski area deserve to be recognized in the historical discussion in the plan. The ASC and their many volunteers have a long history of operating, developing, and maintaining the ski area in Arctic Valley and that historical participation is not currently acknowledgement in the plan. The ASC area is the only all volunteer ski area in the USA. Additionally, the Arctic Valley Ski Area is listed on the Alaska Heritage Resource Survey as a historic site and has provided the public with valuable memories.	ASC is acknowledged in the Ship Creek Planning Unit discussion located in Chapter 6 of the plan.	None
Make Arctic Valley Access a Priority	Make this area a priority for near-term trailhead access; do not wait until the lease expires instead collaborate with the Club and capitalize on the existing road and trails, and the attractions provided by the Nike Site. This alpine accessibility is comparable to Glen Alps. Upgrading this trailhead would be far more cost effective than building the new road and parking lots at Glen Alps.	The access plan provides recommendations for enhancing access at this site to provide additional alpine access and recreational opportunities. While Arctic Valley is under lease, ASC has the primary responsibility for the facilities at the site.	None
Arctic Valley Ski Area	Arctic Valley ski area should return to military management as a recreational/training area. It could be open to the public during weekends and used by the military to conduct ski training or mountain maneuvers, etc. during the week.	The military removed their portion of the ski area in 2003 due to lack of use and funding issues. The military has made no indications or expressed interest in recreational activities or pursuing the proposal in this comment.	None

Subject	Issue Summary	Response	Recommended Revision
Cooperation Between Anchorage Ski Club and Chugach State Park	The plan fails to mention that the ASC is a nonprofit organization that has goals and objectives that very closely match those of CSP. It also fails to mention any past cooperation between the ASC and CSP, and it does not mention any future cooperation. The ASC has been acting as caretakers of Arctic Valley for many decades at little or no cost to the State or taxpayers. I encourage CSP/Alaska State Parks to develop an active and ongoing supportive/collaborative relationship with the ASC per the state park mission and DPOR's 10-Year Strategic Plan (ASC specifically mentioned under Objective III on page 34), and make the cooperation a priority. The plan shows cooperation between the Nike Site and CSP which shows how CSP is willing to work with other nonprofits to enhance recreational opportunities within CSP. CSP should be equally willing to work with the ASC, also a nonprofit, to enhance recreational opportunities at Arctic Valley.	ASC operates a site in the park under lease. They are a valuable non-profit entity much like other nonprofit groups providing services within the park. CSP will continue to partner with ASC and the other non-profit partners operating within the park to encourage outdoor recreation.	None
Nike Site (Page 100 Table)	<p>Comments were received supporting the preservation and restoration of the Nike Site Summit due to its historical significance. The site provides a great opportunity for joint cultural and recreational development. It also provides an opportunity for educating the public about its role in the Cold War. It should be open to commercial tours.</p> <p>It is also important to note that the Nike Site is accessible from the ASC's trailhead, and could possibly be developed as an alternative to Glen Alps access.</p>	The plan recommends working with nonprofit groups to expand recreation and access at the Nike site.	None
Nike Site (51)	The recommendations should be expanded to turn the Nike Site into a lodge, restaurant, or hotel, much like the large hotels in Glacier National Park, with road access for management, but guests hike in. A private concessionaire could run this.	The plan recommends working with nonprofit groups to expand recreation at the Nike site. There is not much public support for the type of development you suggest in the park or at this site.	None

Subject	Issue Summary	Response	Recommended Revision
Cooperative agreement with Military	The plan should recommend a cooperative working relationship with the military for improved public park access along the Arctic Valley Road. Along with the MOA and partners, CSP could be developing the historic trails paralleling Arctic Valley Road to connect the existing Trailhead to Centennial Park in Muldoon and ultimately to FNBP via an east Muldoon trail at the boundary of JBER.	The access plan, trail plan and management plan call for working with the military to improve access, trails and other similar facilities.	None
Military Use in Ship Creek	The park should assure minimal military use in the Ship Creek area and Arctic Valley Road.	The Arctic Valley Road is on Military land and the public is permitted to use by obtaining a recreational permit from the military. The ASC has an agreement with the military for access to its lease site within the park.	None

Hillside

Subject	Issue Summary	Response	Recommended Revision
Add Wildlife Viewing and Scenic Value to Unit's Management Priorities	We agree that "wildlife viewing is a popular activity" in this unit as stated on page 103 and would add that people are also drawn here by the scenery and the opportunities for expansive views. We recommend that wildlife viewing and scenic value/scenery be added to the management intent/priorities for this planning unit since both are primary reasons people visit this area and thus needs to be emphasized.	Concur	Add "scenic viewing" to the description portion for this unit.
Special Management Considerations- Watershed Management (page 104)	AWWU recommends rewording the first sentence of the paragraph to read: "The drainages of the CSP Hillside Unit, primarily the Campbell Creek drainages, are an important watershed area..."	Concur	Reword the first sentence of the first paragraph on page 104 to read: "The drainages of the CSP Hillside Unit, primarily the Campbell Creek drainages, are an important watershed area..."
Near Point Access (60)	Expand the purpose of this trailhead so that it would open access to trails to the Dome and Knoya as well as Near Point. This would disperse users into more alpine areas and would shorten the drive for many north and central Anchorage residents, compared to other Hillside access points.	As stated in the plan, this future trailhead would provide access to the North Fork of the Campbell Creek drainage, Near Point and surrounding alpine terrain, thus does not limit the opportunity to access the Dome and Knoya Point from this site.	None
Near Point Access (60)	Comments were received opposing the location and scale of the parking facility proposed in the Draft Management Plan at the Near Point Access. The community believes that the plan's vision is not that of the local community. It was stated that the current proposal for this area represents the worst-case scenarios for the community. It seems that the intent is to develop an ever-expanding facility and trails at the top of the Stuckagain neighborhood. Safety and traffic are the primary concerns of the community, this being said, the Near Point Access should be a small pull-out style trailhead for 2-6 cars located at the end of Aletha's Mountain Way. We recommend that the "Scope/Management Objective" be modified to read: If this area is acquired by the park, establish a small trailhead <u>that may include parking for 2-6 cars and a trailhead kiosk</u> . During the site design and development process, local neighborhood concerns should be addressed.	The plan proposal is for a small parking lot. As the plan already states, the design and placement of the lot will be determined at the time of implementation through a separate site design process that will address local neighborhood concerns.	None

Subject	Issue Summary	Response	Recommended Revision
Near Point Access (60)	I support this trailhead, but it seems unlikely that a small trailhead should require a caretaker facility.	This is a possible facility addition that may be made in the future if there is a demonstrated need.	None
Near Point Access (60)- Justification	We recommend that the “Justification” be modified as follows: There are few options for nearby, legal vehicular access to the park in this area. This trailhead would provide access to the North Fork of the Campbell Creek drainage, Near Point and surrounding alpine terrain.	This trailhead does access the North Fork of Campbell Creek and does provide an access option for the underserved East Anchorage area and as such it would be inappropriate to alter the justification section as suggested.	None
Near Point Access (60) (page 105 & 107)	Site should be acquired for small local trailhead at present. The reason local resistance has been so strong regarding a trailhead at Near Point is that residents fear the “large regional trailhead” that is described on page 105 as necessary somewhere in the vicinity. This access is very important because it provides the only public access on park-owned land to N Fork Campbell Creek and Long Lake. The lake is neither depicted on the plan maps or mentioned in the narrative and should be.	Concur. The plan proposes a small parking lot at this site. Most of Long Lake lies outside the park boundary on military land. See Figure 1 in the plan for a depiction of the lake.	None
Dome Access and Trail	Negotiate with the military and private landowners to improve access to the Dome and Knoya. Currently, the trailhead squeezes between a military fence and a private gated driveway and is difficult to find. Furthermore, the rerouted trail down to the N Fork of Campbell Creek is steep, muddy and eroded. This traditional park access point was severely diminished due to missteps by the MOA and CSP and should receive top funding priority for trailhead improvements.	This trailhead and associated access trail are located outside of the park boundary and are on land owned and managed by other agencies; therefore, it is not addressed in this plan. Refer to the Chugach Access Plan for recommendations regarding this access.	None
Basher Drive Trailhead (61)	Comments were received stating that the Basher Community has consistently supported developing the Basher Trailhead as the main public access point from Basher Road to CSP. The parking lot should be developed before the Near Point Access and should be equipped with facilities required to accommodate the level of use. In addition to the latrines mentioned in the draft plan, the parking area should have either a caretaker hut or a gate operated by CSP rangers.	The plan acknowledges that the Basher Trailhead needs to be redesigned and improved to capture the majority of traffic before it enters the Stuckagain neighborhood.	None

Subject	Issue Summary	Response	Recommended Revision
Basher Drive Trailhead (61)	The plan should be modified to state that the Basher Trailhead should be a medium lot and should not exceed 30 cars.	This narrow site has some construction limitations and challenges and therefore the plan does not specify a lot size; instead the plan provides more flexibility and recommends that the site be expanded and redesigned to better accommodate parking and provide complementary amenities. The goal is to enlarge this trailhead to the largest size that is reasonably feasible in the area in order to capture the majority of park use and traffic before it enters the Stuckagain Heights neighborhood.	None
Basher Drive Trailhead (61)	Any improvements to the Basher Trailhead should include construction of a road further into the park boundary to a security-monitored parking area that is out of sight to neighborhood homes and to residential traffic on Basher Road. We strongly oppose any development of a parking lot “strip” adjacent to Basher Road. Additionally, any new lot must be built to greater safety standards than the current lot, which poses a traffic hazard because of a narrow entrance built on a blind curve at the top of a hill on a substandard road.	The plan acknowledges that this site needs to be redesigned to make better use of the area. Any future upgrades will consider ingress/egress safety and how to best accommodate visitor use.	None
Stuckagain Heights Neighborhood Access	When the draft planning documents are viewed as a whole it shows that most of the proposed access and trail development in Stuckagain Heights will take place at the Near Point Access (60) at the top of the neighborhood. This runs counter to the intent to direct most of the park traffic to the Basher Trailhead (61). In order to clearly establish the Basher Trailhead as the main access point, planners should scale back the access development proposed at the Near Point Access in this current management cycle and focus instead on improving the Basher Trailhead. When the plan is under review in the future, additional access could be evaluated.	This plan provides guidelines for the park for the next 20+ years, so long term planning is necessary. The plan recommendations are intended to be implemented in phases as funding becomes available. The specific recommendations at Near Point represent a portion of the overall vision for providing and enhancing access, trail connectivity and recreational opportunities.	None

Subject	Issue Summary	Response	Recommended Revision
Stuckagain Heights Neighborhood Access	Beyond the Basher Trailhead, additional park access points within the Stuckagain neighborhood should be developed as small, pullout-style parking areas along the existing road system. This approach satisfies the goal of providing diverse types of access points, concentrates maintenance at the main trailhead, and minimizes traffic and security issues within the residential area. This approach would also fulfill the commitment to work closely with the community.	The Access Plan is the document that primarily addresses securing and enhancing access. The Management Plan makes facility recommendations for access sites that are within the park boundary and are park owned or managed land. In the Stuckagain neighborhood, only two sites meet these criteria and are addressed in the plan. Refer to the Access Plan for additional pull-out style access recommendations.	None
Prospect Heights Trailhead (62)	The present “use beyond capacity” trailhead description is in error and should be corrected. The parking lot is not frequently at or above capacity. Parking occurs along the Prospect Drive by visitors trying to avoid fees. I don’t see why people shouldn’t be allowed to park along the public roads on those few days each year that the lot is full in lieu of clearing more forest to expand the parking when it is not necessary. Expanding the improvements at this location in the future may not be necessary; these improvements should be dropped from the plan.	While some people park on the road to avoid fees, this lot is most often full on weekends and after work hours year round. The plan recommendations also represent a 20+ year vision for accommodating visitor use and are intended to be phased in as use patterns change and funding is available. The expansion proposal at this site provides the concept for how to best accommodate increased parking at this site.	None
Prospect Heights Trailhead (62)	A sign directing visitors to the trailhead would be appropriate at the intersection of Prospect Drive and Sidorof.	Concur, but detailed signage location is too specific for the scope of this plan and is handled at the park’s operational level.	None
Prospect Heights Trailhead (62)	The proposed “winter shelter” is not needed because it would duplicate the Stevens Family facility at nearby Hilltop Ski Area and is not necessary at a location where people could just get in their cars to get warm. I am also concerned that it would become an area where people would party. This type of shelter seems more appropriate in the backcountry.	A winter shelter as applied in this plan is not proposed to be the same scale of development as the Stevens Family day lodge at Hilltop Ski Area.	Define “shelter” in the glossary of the plan.
Prospect Heights Trailhead (62)	As you intensify use in this area and improve access to the Near Point area, please consider the need to construct and maintain sustainable trails. Also, is there anything that can be done to minimize the visibility of the Wolverine Peak trail from outside of the park? Over the years it has become readily apparent from the hillside and Anchorage.	The development, upgrade, and management of the trails and trail system within the park are addressed in the park’s Trail Plan.	None

Subject	Issue Summary	Response	Recommended Revision
Upper O'Malley Trailhead (63)	Comments were received supporting this proposal for expansion and redesign of the trailhead; however not moving the trailhead further into the park since that would appear to involve considerable effort and park land, if the objective is to move it far enough into the park to screen it from the neighborhood. Also, the wildlife corridor is already encroached upon enough in this area.	Since the conservative expansion is a recommendation at this site and the neighborhood impacts are a concern, the plan recommends evaluating the feasibility of moving parking further into the park boundary recognizing that more information is needed to determine if it is desirable to do so.	None
Upper Huffman to Glen Alps (64-68)	The width of the yellow swath on the map depicting a new access road worries me. If the road is truly necessary, please minimize the width and the amount of vegetation clearing. Limiting sight distance by making the road narrow and minimizing the clearing on each side of the road could help keep people driving slower. Please delay construction of this road as long as possible by looking for other areas and ways of dispersing use.	The area shown on the map is a generalized depiction of where these upgrades are intended to occur but does not represent the total area to be cleared or developed.	None
Glen Alps Day Use Trailhead (67)	I question the wisdom of providing areas to serve groups in the already-crowded existing and proposed Glen Alps area. Why attract more people to an area of the park that is overused and that requires individuals to drive long distances to reach. Group areas and picnic pavilions are more suitable for city parks and for areas nearer main arterials such as McHugh Creek along the Seward Highway.	The plan indicates that the group area recommendation should be considered only after the access road and associated facilities have been developed to repurpose the site and compliment other facilities. This proposal is part of a greater vision for the area and not intended to be implemented until other improvements are in place.	None
Glen Alps Maintenance Compound (68)	I oppose using park land in the vicinity of Glen Alps for maintenance facilities. The park land is too valuable to be building maintenance facilities on it. The maintenance facilities should be situated outside of the park boundaries and definitely at lower elevation. Potter Maintenance Yard (82) is a much more appropriate location for a maintenance facility than in the vicinity of Glen Alps.	It is important to note that this recommendation is intended to be implemented only when the connector road is developed. There is already a maintenance area at Glen Alps and if additional facilities are developed in the future at this site, it makes sense to centralize equipment and develop more of a compound. Since the majority of the use, trail work and grooming occurs on the Hillside, it is most efficient to have equipment readily deployable for this work. This facility would supplement and not replace the Potter Maintenance Yard.	None
Rabbit Valley Trailhead (69)	Adding parking is a good idea, but building latrines seem excessive. I don't see the need for latrines, since people just park their cars and start hiking/skiing. A caretaker facility seems excessive here too.	These are possible facility additions that may be made in the future if there is a demonstrated need.	None

Subject	Issue Summary	Response	Recommended Revision
Rabbit Valley Trailhead (69)	Add upgrades to the trails from this trailhead to the plan. Erosion from informal trails is an ever-increasing problem and it is irresponsible to improve the trailhead without simultaneously hardening the trails and establishing permanent alignments.	Trail recommendations are not addressed in the park management plan. Refer to the Trail Plan to see recommendations for trails in this area.	None
Rabbit Valley Trailhead (69)	Upgrade Upper Canyon Road to resolve sight lines, narrow width, and grades, along with expanding parking at trailhead and grading and maintaining trails that access the backside of Flattop and Peak 3. Currently the road is substandard, but if improved could take pressure off Glen Alps by providing a second access point to Flattop. The trails need work to tame the spider web of trails and the erosion currently plaguing the lower slopes. This should be a priority of the intent is to disperse users in the alpine areas. Also improve signage along roads to trailhead.	Most of the length of Canyon Road is outside the park boundary and management area. The plan already contains similar proposals for trailhead upgrades at this site. Additionally, the Access Plan contains additional recommendations for upgrades and access improvements at this site.	None
Rabbit Valley Trailhead (69)	Support plan recommendations for improvements to this very popular but undeveloped access point. Such improvements will be controversial because they will have the effect of increasing traffic through a residential neighborhood. The plan should address steps that can be taken to mitigate the impacts on the adjacent neighborhood, such as upgrading the section of road in the park between the residential neighborhood and the proposed parking improvements, providing year-round maintenance and snow plowing, maintenance of the day-use only gate and/or caretaker facility, and participation in improvements and/or maintenance of the substandard access road passing through the neighborhood. Access improvements should be coupled with trail improvements designed to stop the serious erosion on Flattop, Peak 2 and 3.	The Management Plan provides recommendations and intent for land within the park boundary or managed by the park. The access plan makes recommendations for securing and enhancing access to the park and trail recommendations are addressed in the Trail Plan.	None
Rabbit Valley Trailhead (69)	This location could also include a creek valley trail with access to McHugh Peak.	The Management Plan does not address trails. See the park Trail Plan for trail recommendations.	None
Alternative Flattop Routes from Canyon Road	Other routes to Flattop need to be explored. Can the parking area at the end of Canyon Road be expanded onto park property? Can the trail to the “backside” of Flattop be established and improved?	The plan proposes enhancements to this trailhead. See the Trail Plan for trail recommendations for the area.	None

Subject	Issue Summary	Response	Recommended Revision
Improve Canyon Road and No Caretaker Cabin	Canyon Road should be improved; it's a significant safety issue given the amount of use it receives. Also, the area should be patrolled by park staff if funds were used for personnel rather than "caretaker cabins" which do little to improve the experience for the users.	Concur in part. The plan makes recommendations for enhancing the trailhead. Park staff is limited and having caretakers at trailheads has helped with area maintenance, reduce vandalism and general oversight of an area.	None
Remove Gate on Canyon Road	The Canyon Road gate should be removed; it's a significant safety issue for any user who may run into trouble and not be able to retreat to safety once the gate is locked.	The gate was installed due to public concern for the area and a request for its installation. It is no longer there.	None
Bear Valley Access & McHugh Peak Trailhead	This is a historic public park access point that was lost to private property owners due to gross oversight by the MOA and CSP and should be restored to its previous standard, especially regarding the trail. Some public access in this area has been restored, but inadequately so, with a three-space parking area and a rerouted and substandard trail that suffers from erosion. Returning lost public access points to their previous condition should be CSP's top priority.	This area is outside of the CSP boundary, but is addressed in the Chugach Access Plan.	None
Grandview Trailhead	The parking area on Snow Bear/Grandview should be improved for additional cars. The unnecessarily limited area within the cul-de-sac at the end of Honey Bear Drive designated for park access parking should be expanded consistent with retention of adequate emergency vehicle turn-around area.	This area is outside of the CSP boundary, but is addressed in the Chugach Access Plan.	None
Grandview Trailhead (Snow Bear) Ignored in Plan and Needs to be Added	The priority and policy of the plan to create opportunities for taking pressure off over-utilized trailhead like Glen Alps (page 105) is not achieved by totally ignoring several of the existing and potential access points on McHugh Peak. The existing Grandview trailhead should be improved by installing a trailhead kiosk and construction of trail improvements higher up on the northwest rib of McHugh Peak to prevent serious erosion. Additional parking spaces also need to be added. Acquire adjacent private lands for such expansion.	This area is outside of the CSP boundary, but is addressed in the Chugach Access Plan.	None
Grandview Trailhead	Should add signage along roads leading this trailhead. Currently it is difficult to find.	This area is outside of the CSP boundary, but is addressed in the Chugach Access Plan.	None
Grandview Trailhead-Illegal Signs	Something needs to be done about illegal signs posted by homeowners up in the Bear Valley/Honey Bear area.	This area is outside of the CSP boundary, but is addressed in the Chugach Access Plan.	None

Subject	Issue Summary	Response	Recommended Revision
Access off of Brewster's Road	The area mentioned in the HDP at the end of Brewster's Road in Bear Valley should be developed as a trailhead or at least arrangements should be made to set aside the land for future development. While the road may present challenges in ownership and possibly wetlands, the location and future residential development of this area make this an urgent issue. One of HLB's parcels, on a knoll, should be considered for trading purposes with the Brewster estate team in order to obtain a good parking lot and to create access at the saddle/ridge line with CSP. Policy 55 in the Anchorage 2020 Plan states that trail connections must be included in all plats and replats therefore a trail easement should be required from Brewster's Road southward towards the saddle; and a HLB land trade could be used for other needed land for a parking lot and a ridge connection.	This area is outside of the CSP boundary, but is addressed in the Chugach Access Plan.	None
McHugh Peak Trailhead (70)	Adding parking is a good idea, but building latrines seem excessive. I don't see the need for latrines, since people just park their cars and start hiking/skiing. A caretaker facility seems excessive here too.	This recommendation pairs with ones made in the Access Plan and the MOA's Hillside District Plan. The intent is to create a large regional trailhead, similar to Glen Alps in this area in the future. The facility recommendations are appropriate for the scale of the planned trailhead.	None
McHugh Peak Trailhead (70)	Add road access improvements as a prerequisite for any trailhead development. Neighborhood roads are inadequate for heavy park traffic. Also add trail development to be included as a condition for any trailhead improvements, since there are no developed trails currently and there is already erosion on the informal trails and the wet soils along Little Rabbit Creek will require protection from foot traffic.	Road improvements outside of the park boundary are beyond the purview of this plan. Refer to the access plan for more access information. Trail recommendations are made in the Trail Plan.	None
McHugh Peak Trailhead (70)	The Park should acquire the Stewart property for development of the large trailhead. There is a good access road with no development along it yet to object. The parcel is for sale and this opportunity will not last and it is hugely important as part of the solution to Glen Alps.	The plan proposes acquiring property to provide access to the McHugh complex. The Chugach Access Plan provides more detailed parcel and acquisition information.	None
Potter Creek Valley Trailhead (71)	Add trail development as a requirement for any trailhead construction. There are currently no developed trails.	New trail development is addressed in the Trail Plan.	None

Subject	Issue Summary	Response	Recommended Revision
Potter Creek Valley Trailhead (71)	There appears to be a discrepancy between where the Hillside District Plan (HDP) and this plan identify the location of a future trailhead in this area. It was determined during the HDP process that a new trailhead could not be easily located at the site shown as 71, mostly due to topography and presumed higher development costs. The HDP located the site lower down on Potter Valley Road. This discrepancy should be resolved in the final plan.	HDP Map 4.6 shows both locations to be in the same general area off of a section line.	None
Add Access to McHugh from Mount McKinley Drive or Big Mountain Drive	Comment was received supporting access to McHugh Peak from Mount McKinley Drive or Big Mountain Drive be added to the plan.	Access recommendations of this nature are addressed in the Chugach Access Plan.	None
Acquire Private Land for Trailheads Instead of Using Parkland	Wherever possible, acquire adjacent private lands for expansion of trailheads rather than using parklands.	It is inappropriate to acquire private lands for this purpose if park lands are available and suitable for a trailhead. The legislature set park lands aside for these types of park purposes.	None
Add Latrines Near the German Bridge and Upper Rabbit Creek	The plan should propose locating a latrine or pit toilet far up Powerline Pass Trail, near the German Bridge to help manage the issue of human waste in the area. Also, the upper Rabbit Creek Valley could use a latrine or toilet.	The plan recommends latrines for the Rabbit Creek Valley trailhead and will add a recommendation for additional latrines near the German Bridge.	Add a recommendation for accommodating latrines along the Powerline Pass Trail to compliment current proposals in the area should the need be demonstrated.
Rabbit Creek to McHugh Creek Trails Open to Bikes	Please open the Rabbit Creek to McHugh Creek trails to mountain bike use for a limited period (2-3 years) to evaluate the impacts of bikes before deciding to ban them completely from these trails.	Refer to the Trail Plan for trail recommendations.	None
Entice Visitors to Other Trailheads	More effort needs to be made to entice visitors to trailheads other than Glen Alps. Stuckagain, Grandview, Potter Valley could all support visitation. Near Point access needs to be restored. Where is equity when a few land owners are effectively blocking access to the park by not tolerating parking spaces?	Refer to the Chugach Access Plan for additional information and options for addressing access to the park along the entire municipality/park boundary interface in order to disperse park use.	None
More Access	More access points should be identified and opened in areas of the park convenient to East Anchorage and Eagle River, and the North side of the park to help steer pressure away from the Glen Alps/south end of the park which already has heavy use.	Concur. Park access is addressed in the Chugach Access Plan.	None

Turnagain Arm

Subject	Issue Summary	Response	Recommended Revision
Edit Seward Highway Scenic Byway Nomenclature (page 113)	The Seward Highway is a State Scenic Byway, and was a National Scenic Byway until it was awarded the All American Road status which is the highest level.	Concur. The Seward Highway was named an All-American Road as part of the National Scenic Byway program.	The plan language will be modified to clarify that the Seward Highway was designated as an All-American Road.
Modify Seward Highway Nomenclature (page 113)	The plan should also include that the Seward Highway is a highway Safety Corridor, established May 26, 2006 and the first in Alaska. The Safety Corridor designation is meant to be a temporary measure to reduce crashes until longer term improvements are made to the two lane highway. A most important goal for ADNR and ADOT/PF is to reduce the fatality and major injury rates on the highway. ADOT/PF can promote this goal by minimizing access conflicts and addressing safety and capacity of the highway.	Concur. It is appropriate to revise the plan to include the designation of the Seward Highway as a Safety Corridor.	The relevant sections in Chapter 5 and 6 of the plan will be modified to include additional language regarding the Seward Highway's designation as a Safety Corridor and the management implication associated with this designation.
Special Management Considerations- Seward Highway Reconstruction & Scenic Corridor Enhancement (page 115)	The plan states: "Any upgrades or alternations within this transportation corridor shall complement and enhance visual experiences along this route". The quarries planned at McHugh and Mile 107/Windy Corner completely contradict the above statement. The quarry at Bird Creek is a terrible eyesore. How can a quarry, no matter the size, complement and enhance the visual experience?	The Seward Highway and the Alaska Railroad rights-of-way make up a major transportation corridor along Turnagain Arm that predates the establishment of the park. In order to balance park purposes and the need to provide for the safest possible transportation corridor, the plan identifies areas along the corridor where material for road improvements could possibly be utilized if the need arises. By identifying specific areas, the park will have more control over protecting areas of high scenic and recreational value while gaining new recreational opportunities and facilities while mitigating the visual impacts.	None
Include Conceptual Design Drawings	Many of the plan recommendations for this unit are best understood when seen in connection with the concept drawings shown at the public meetings. The drawings allow better understanding of the scope and justification for the proposed improvements. They also show the choice of locating an expanded highway to preserve the higher value of uplands or the coast line. Examples are the drawings showing the highway traveling inland of Beluga Point and another one showing the highway relocated into the Arm at Windy Corner to preserve higher value sheep habitat.	The drawings are conceptual examples of ideas that have been discussed in the past but the Seward Highway corridor may be developed in a different way than is represented in them. As highway upgrades are proposed there will be more certainty to how adjacent park lands may be impacted and at that time, project details will be made available for the public to understand how the park resources will be impacted.	None

Subject	Issue Summary	Response	Recommended Revision
Chugach State Park Headquarters & Ranger Station (80)	The justification for improvements states the Seward Highway may move. Moving the highway into the inlet at Potter Section House is highly unlikely given the expense of fill and environmental considerations.	DOT's long range plan is to move the road as indicated in the Management Plan. The recommendation is made in anticipation of this change realizing it is a long term vision.	None
Oppose Enlarging Johnson Trailhead	Oppose enlarging the parking lot at the Johnson Trailhead near Potter Creek. Feel it would be more appropriate to put a pedestrian tunnel under the highway from the existing large parking lot at the Chugach State Park headquarters to add capacity to the trailhead and encourage use of facilities at the headquarters.	There is no recommendation made to enlarge the Johnson Trailhead.	None
Grunge Wall Pullout (85)	The 2004 CE for MP 105-115 Improvements indicates a north bound passing lane from milepost 112.7 to 114.2. Vehicles accelerating in the passing lane would need to be considered in the decision to encourage additional use/parking for Grunge Wall.	Concur. These considerations will be made as the recommended pullout is designed.	None
Seward Highway Climbing Pullouts (page 119)	Support the proposals for pullout improvements along the highway to facilitate rock climbing and suggest adding improvements for popular ice climbing spots too. As with the popular rock climbing spots, ice climbers currently park along the highway, posing safety concerns.	Ice Climbing, rock climbing and bouldering are popular activities that occur along the Seward Highway and the plan recommends small pullouts at a few of the most popular sites in order to minimize resource degradation and to provide safer parking off of the highway.	None
McHugh Quarry (88)	DOT/PF is designing a 600' long slow vehicle turnout lane on the mountain side of the Seward Highway at this location. Having only government vehicles access the maintenance site would reduce driveway conflicts with the future slow vehicle lane.	Concur	None
Beluga Point Scenic Overlook (89)	Please remove the wording: "while providing a safer pedestrian-highway interface" from the justification column. The separated parking lot, observation area, and the attraction of Turnagain Arm are the current and future focus for the site. Accident history does not indicate there is a strong pedestrian-highway safety concern in contrast to Windy Corner.	All site improvements have a safety component to them particularly along the busy highway.	None
Beluga Point Scenic Overlook (89)	If this proposal would involve building an overpass/underpass across the railroad tracks, it should be designed large enough for windsurfer carry their equipment.	Concur. These types of considerations are handled in the site design process.	None

Subject	Issue Summary	Response	Recommended Revision
Beluga Point Scenic Overlook (89)	Beluga Point is too small for the large scale development plans put forward in the plan and displayed at the meetings. The area and rock outcrop should not be covered up with a new complex of concrete/wooden walkways, look out posts, bathrooms, and pavilions since that would be far too extensive and a shame. I understand the railroad safety concerns and the public accessibility needs, but please scale back the recommendations/plans. Bird Point, which is a larger area, can accommodate such large developments better than Beluga Point. Also, Beluga Point has served for years as a superb viewing point as is and has historical value and should not be covered in concrete.	The plan does not recommend large scale developments at Beluga Point. It recommends enhancing the site by providing beach access and a larger parking area. Any expansions and upgrades will be done to take into account the natural and scenic values of the site.	None
McHugh Quarry (88), Rainbow Point Group Site (91), & Seward Highway Mile 107 Pullout (94)	Comments were received opposing these projects because the park should not be seen as an expendable entity just waiting to be used by someone. It is a park and deserves to be left alone. Using the park as a material site for highway maintenance is not compatible with park values, even if it would provide the park with space for a maintenance yard. The quarry at Bird Creek has not complemented or enhanced the visual experience along this route, a tenet of the plan. The quarry can be seen from across the Arm in Hope and it is an embarrassment.	This area of the park is in the recreational development zone where it is appropriate to expect a higher level of recreation convenience and enhanced access. Some of the quarry sites are within DOT's right-of-way. Additionally, safety upgrades to the highway benefit park users.	None
Rainbow Point Scenic Overlook (92), Windy Corner (95), Falls Creek Trailhead (96), The Grotto (97), and Indian Point Scenic Overlook & Trailhead (98)	Please remove the wording "safe clear zone" and "safety" from the objective and justification language. Already there is a 30+ area/ditch between the highway and the parking area. It is better to use "buffer" or "increase buffer" than safe clear zone, since "clear zone" indicates a specific engineering variable is not met, which is not true. Instead of "safety" upgrades the plan should say "highway upgrades, capacity upgrades, or highway preservation projects" to be more definite. If this proposal would involve building an overpass/underpass across the railroad tracks, it should be designed large enough for kiteboarders and windsurfers carrying their equipment.	Concur. Additionally, the overpass/underpass considerations are handled in the site design process.	The technical wording changes will be made.
Rainbow Trailhead (93)	Building latrines seems excessive and I don't see the need for them, since people seem to just park their car and start hiking.	Amenities, such as latrines, are often needed at heavily used trailheads in order to minimize resource degradation, litter and sanitation issues.	None

Subject	Issue Summary	Response	Recommended Revision
Seward Highway Mile 107 Pullout (94)	Relocating the Windy Corner trailhead to this area would likely conflict with long term plans DOT/PF has to construct a north bound passing lane between MP 107.2 and MP 108.3. This passing lane is documented in the June 2004 Categorical Exclusion Checklist. Seward Highway Safety Improvements, MP 105-115. Keeping the trailhead in the current location would be preferred over adding another driveway just prior to a passing lane.	This project is intended to occur in conjunction with the DOT highway upgrades. DNR is currently consulting with DOT on the design and project details.	None
Windy Corner Sheep Viewing Area (95)	We would like the Management Objective to include coordination with ADF&G for design and sighting of the new viewing area.	In addition to the language already included in the plan in the Chapter 5- Fish and Wildlife Management section regarding coordination with the ADF&G, it is also appropriate to include additional language in the Turnagain Arm Planning Unit's Special Management Consideration- Seward Highway Reconstruction & Scenic Corridor Enhancements section.	Add language to include consultation with ADF&G on wildlife viewing areas along the highway corridor.
Upper Indian Creek Trailhead (99)	Building latrines seems excessive and I don't see the need for them, since people seem to just park their car and start hiking/skiing.	Amenities, such as latrines, are often needed at heavily used trailheads in order to minimize resource degradation, litter and sanitation issues.	None
Indian Creek Trailhead (100)	The management objective regarding this proposal is confusing. It states that the parking lot provides access to the trail. However one has to cross the dangerous and busy Seward Highway and then walk several hundred yards along the highway and then walk approx. one mile up a side road to get to the actual Indian Creek Trailhead. Therefore, the parking lot is fine as is and the park would be better off spending time and resources elsewhere.	There is confusion in thinking that this trailhead accesses a facility already served by (99).	Reword so that it is clear that this facility accesses the Indian to Girdwood bike path and not the Powerline/Arctic Valley trails.
Bird Creek Campground & Bird Valley Public Use Cabins (101 & 102)	Delete plans to construct public use cabins at Bird Creek Campground and in Bird Creek Valley, since the cabins will be easily accessible to motorized users and thus will be subject to vandalism and misuse, thus more costly to maintain.	Cabins are already in place at this campground.	None

Subject	Issue Summary	Response	Recommended Revision
Bird Valley Public Use Cabins (102)	I oppose building this PUC, because I like to see the park stay in a natural state and this proposal is incompatible with the natural state and the park values. Also, this proposal creates massive development very near wilderness areas and would exacerbate the existing problem in that area with ATVs and Snowmobiles tearing up fragile habitat.	ATVs are only allowed on the logging roads in Bird Valley. Snowmobiles are only authorized when there is sufficient snow cover to protect the underlying vegetation. If there is unauthorized use that is an enforcement issue, not a plan issue. This area is not near the wilderness area of the park and is intended to be managed to enhance recreation including amenities such as PUCs.	None
Bird Valley Campground & Day Use Area (103)	Establishing a larger campground facility where the current Bird Creek Trailhead parking lot is now located make sense as it gets people away from the noisy highway. But CSP needs to be thinking long term and consider the maintenance cost of operating a large campground facility. The proposal makes no mention of a volunteer/caretaker cabin/shelter. This might be something to consider, especially if this will be a year-round facility as indicated in the plan.	Concur. It is appropriate to revise the plan to include locating a caretaker facility at this site.	The Scope/Management Objective section of this proposal will be modified in the final plan to include locating a caretaker facility at this site if needed.
Bird Valley Public Use Cabins & Bird Valley Campground & Day Use Area (102 & 103)	Delete the Bird Valley Campground and Day Use Area proposals or move it to the mouth of the valley on current HLB land. These proposals are for intensive development deep in the Bird Creek valley in the natural environment zone and pushed very near to the wilderness area. This will likely increase the issue of ATVs and Snowmobiles crossing into the wilderness zone in this area. This is dense brown bear habitat and there will be continual trouble with bear/human encounters. Since the main summer recreation attractions are fishing, coastal trail, etc. at the mouth, an up-valley location would generate a lot of traffic in the valley to the detriment of recreation, wildlife, and residents. Also, it would exacerbate the existing problem in that area with ATVs and Snowmobiles tearing up fragile habitat.	This area is in the Recreation Development and Natural Zones, not the Wilderness areas in the eastern portions of the park and these projects are considered a compatible use in those zones. If developed, the site design process will consider impact to resources and mitigate for potential wildlife encounters. ATVs are only allowed on the logging roads in Bird Valley. Snowmobiles are only authorized when there is sufficient snow cover to protect the underlying vegetation. If there is unauthorized use, that is an enforcement issue handled at the operational level and not this plan.	None
Oppose Camping Facilities in Unit	Camping facilities are not appropriate in the Turnagain Arm Unit. Feel they will lead to prolonged summer transient residence, fire hazard due to campfires and significant conflicts due to late night parties, trash, etc.	Camping facilities already exist within the Turnagain Arm Planning Unit at the Bird Creek Campground. Having developed campgrounds in addition to enforcing existing park regulations address many of the concerns listed.	None

Subject	Issue Summary	Response	Recommended Revision
Bird Valley Trailhead (104)	Comment was received concerning the road access through the neighborhood in Bird Valley. Currently, cars go way too fast and the existing road is not wide enough in the winter for two cars to pass next to each other and there is a hill impeding sight of oncoming cars. Also, the road, as built, may be on private property in places. The road needs to be upgraded before any additional traffic is added.	Most of the length of this road is outside the park boundary and management area. Refer to the access plan for more information on access enhancements in the area.	None
Bird Valley Trailhead (104)	Building latrines seems excessive and I don't see the need for them, since people seem to just park their car and start hiking/skiing.	Amenities, such as latrines, are often needed at heavily used trailheads in order to minimize resource degradation, litter and sanitation issues.	None
Bird Flats Scenic Overlook & Trailhead (105)	Access would be improved if the two pullouts were combined in a way that there was a reduction in access points to the highway. Having two defined access points is much preferable over four or more spots that vehicles could exit and enter the highway.	Concur, that is why the plan recommends consolidation in this area.	None
Bird Point Viewpoint & Trailhead (106)	The concept of an interpretative trail to Bird Point should be considered with caution. Many consider this a special spot with its present limited access. And while a more formal trail may allow more people to experience the Point, Parks has a history of over building its developed trails. Anything but a single track, simple trail could have major impacts on current users and natural and cultural resources. The site has been loved to death already with the recent "improvements" and any more development will destroy whatever is left that people go to see.	The plan recommendations aim to enhance the current trailhead to better handle the high use it gets and better facilitate scenic viewing.	None
Add California Creek Trailhead to the Plan	Support the establishment of a small trailhead at California Creek in Girdwood.	This area is outside of CSP but addressed in the Chugach Access Plan.	None
Add Pullout for Indianhouse Mountain to the Plan	Support developing a small pullout for Indianhouse Mountain along the Seward Highway.	There are numerous pullouts and user developed trails that originate from the Seward Highway and the plan makes recommendations for enhancements of a few in this area.	None
Support Potter to Indian Connector Trail	The Potter-Indian trail to connect with the Bird-Girdwood trail would be a very valuable addition and would help the process to link the Coastal Trail to that system. This would not intrude on the wilderness areas of the park.	Concur. The park's trail plan includes a proposal for a connector trail from Potter to Indian that parallels the Seward Highway along Turnagain Arm.	None

Subject	Issue Summary	Response	Recommended Revision
Bird Creek to Archangel Lakes Trail	Support a trail extension or re-establishment up Bird Creek to Archangel Lakes (N Fork of Bird Creek) for a loop hike from Crow Pass Trailhead via Steamroller Pass.	Trail development and management are beyond the scope of this plan and are addressed in the park's trail plan.	None
Winter Motorized Opening of Bird Creek beyond Quartz Creek	Comment was received proposing a winter time opening of the Bird Creek drainage beyond Quartz Creek to the ridgeline at the top of the drainage for snowmobiling. Bird Creek offers similar terrain as Powerline Pass by the snow conditions typically are more favorable and would enable Bird Creek to be open more often and offer better access for the snowmobiling community. Please consider changing the "wilderness" land use designation to "natural environment" during winter to allow for this use.	Snowmobiles and ATV use is allowed on trails that were the old logging roads in Bird Creek Valley. Some trail enhancements are proposed for the area in the park's trail plan. The "wilderness" designation itself does not preclude snowmobiles. Their use is restricted by regulation.	None

CHAPTER 7: IMPLEMENTATION

Subject	Issue Summary	Response	Recommended Revision
Phasing (page 127)	Recommend that the Phasing section include a table of future projects and improvements that is sorted by near term (1-5 yrs), mid term (6-10 yrs) and far term (11 yrs and beyond) for capital and site planning purposes. Near term should include continued maintenance items, but also those projects the public has identified as high priorities, such as Glen Alps.	As noted in the plan, specific project phases are not included to allow for project flexibility and allow for a broad approach to park needs.	None
Phasing (page 127)	The plan should include a process for prioritizing management actions. The plan currently identifies the highest priorities, but having a matrix that accounts for levels of funding available, popularity, uniqueness, types of recreation accommodated, land use designation, access issues, etc. will allow better implementation.	As noted in this section, management recommendations should begin immediately. Annual work plans determine phasing in a more detailed way and are the more appropriate vehicle for accounting for the type of phasing suggested in the comment.	None
Phasing & Site Planning (page 127)	The plan loosely identifies priorities and provides no cost estimates. The only hard figure cited in the entire plan is the Deferred Maintenance for park facilities within CSP. Why is the deferred maintenance not identified as a priority in the plan, ahead of “providing additional recreational opportunities” like construction of new trails or facilities? This chapter does not include a discussion of whether the public will be involved in future site planning.	Due to changing conditions and because the plan is intended to provide a long term (20 year) vision, project estimates are not included because it has proven more beneficial and realistic to estimate costs when the likelihood of development is more obvious, during site planning. The plan does not determine detailed phasing of projects like annual work plans do.	None

APPENDICES & MAPS

Subject	Issue Summary	Response	Recommended Revision
Duplicate Map & Missing Information (pages 95 & 101)	Map 6.3 “Eagle River & Ship Creek Units” is mistakenly shown twice in the plan. The map shows most of the Eagle River Unit and a small portion of the Ship Creek Unit but does not include Arctic Valley Road, the ski area, Nike Site Summit or any major features at all in that unit. Another map that shows the majority of the Ship Creek Unit is missing.	Map 6.3 is used for both the Eagle River and Ship Creek planning units. Arctic Valley road is outside of CSP. Site 50 and 51 indicate the Nike Site and the ski area. These maps show the site developments and proposed future projects.	None
Modify Anadromous Definition in the Glossary	The definition of “anadromous” should be presented in full and not by legal reference.	The definition will be expanded.	Augment the definition to include: Those waters identified in the atlas or catalog of waters important for spawning rearing or migration of anadromous fishes as provided in 5 AAC 95.011.
Modify Plan Maps	In order to make the maps easier to use and locate sites and trailheads, please add major road names and municipal parks as reference points.	Concur in part.	Add major roads adjacent to park facilities to maps.
Appendix D: Plants, Mammals, Fish and Birds of CSP	Many more plants have been identified in the park. Refer to “A Floristic Study of the Eklutna Valley, Chugach State Park, Alaska” by LuDean C. Marvin.	Concur	The reference will be added to the plan.
Appendix E: Planning Units & ADF&G Special Management Areas	The Fort Richardson Management Area no longer exists. The lands that were Ft Richardson are now incorporated into the new, larger Joint Base Elmendorf Richardson Management Area, which includes both Ft Richardson and Elmendorf Air Force Base lands.	Concur	The references in the plan will be changed as appropriate.

GENERAL COMMENTS

Subject	Issue Summary	Response	Recommended Revision
Permanent Rock Anchors	Rock climbing is a long-standing traditional use of the park dating back to the 50s. An outright ban of permanent rock anchors, as proposed in the plan, would be detrimental to climbing in the park and goes against common climbing management process in the US. Due to the poor rock quality in the park, permanent rock anchors are a necessity and may provide the only means of a safe descent off peaks and climbing areas. Fixed anchors can reduce natural resource impacts by eliminating the need to use trees and vegetation as anchor points and rappel stations. Due to their small size and camouflage against rock, permanent rock anchors provide little to no visual impact for other user groups. Permanent rock anchors are seen as compatible uses on federal lands and state parks across the country. The elimination of rock anchors would severely limit the sport of rock and ice climbing. Request that the language in the plan prohibiting permanent rock anchors be removed.	Rock anchors/fixtures can be used in the park they simply cannot be left behind and must be removed by users. Note: This activity is already restricted by regulation, 11 AAC 12.170.	None
Rock Anchors in wilderness	Rock anchors are not illegal under the wilderness act.	The wilderness act applies to certain federal areas and is not applicable in Chugach State Park nor is it germane to this issue.	None
Climbers- risk management	I do not think it is in the best interest of the State of Alaska to dictate how climbers mitigate the risks of climbing. If the state simply says climb at your own risk, then the state isn't liable for any injuries suffered by climbers. However, if the state mandates that climbers can only use certain methods to mitigate the risks of climbing, they open themselves to a tremendous amount of liability.	The State is not dictating how climbers might mitigate risks. As with any activity in the park, it is done at a user's own risk and users can decide how to mitigate the risks as long as it is consistent with existing laws and regulations established to protect the state's interests.	None

Subject	Issue Summary	Response	Recommended Revision
Rock Anchor Management	<p>Many climbers would prefer that the park simply allow climbers to self-regulate but if legitimate impacts and conflicts exist, I encourage the park to work closely with the local climbing community as well as representative local and national organizations to determine a reasonable process for allowing fixed anchor installation and replacement. Many agencies play no active role in fixed anchor management and others set guidelines or establish permitting process for installing and/or replacing fixed anchors. For risk management and administrative reasons, most land managers do not get involved with actually installing or paying for fixed anchors. There are many models that may be appropriate for the park. A local or national organization could apply for a special use permit with the park to manage anchor replacement much like the geo-caching process in place now. Park management could address the issue by developing a climbing management plan that addresses current regulations, protects the natural environment and allows fixed anchor use as appropriate for climbing within different management areas of the park.</p>	<p>Rock anchors/fixtures can be used in the park they simply cannot be left behind and must be removed by users.</p>	None
Local Population Diversity	<p>The plan should keep in mind the diversity of the population and provide additional opportunities to families who are reluctant to venture in to the park based on costs, the lack of knowledge, or the lack of exposure to outdoor recreation.</p>	<p>This plan provides a wide range of facility recommendations to speak to the diversity of recreational interests among the public. The access plan provides recommendations for enhancing and providing more convenient access to the park.</p>	None

Subject	Issue Summary	Response	Recommended Revision
Plan Lacks Development Alternatives	<p>The plans are striking in their lack of analysis of alternative means of providing the facilities needed to support desired recreational experiences. They present a single recommendation for expanding access and for the location of new facilities. It is not clear where these recommendations come from nor why alternatives were not considered, or, if they were considered, why they were rejected. Can't find in plans where user needs were assessed in light of park purposes and suitability to provide for those needs or where incompatible activities were evaluated. Nor were desired future conditions for resources or for recreational experiences described in the plans. A 30-year planning document should be based on hard data and research. If the plan incorporated such data then it should be cited and available for public review. Such data is useful in identifying which areas are truly experiencing increased visitors, etc.</p>	<p>The plan provides the information used by staff in the development of the proposals contained in chapters 5 & 6 of the draft plan. Many user groups and sources were consulted in a variety of ways to create and narrow the proposals down to the most feasible options to put forward in the plan. Chapter 1 contains a summary of the planning process, including the park's enabling legislation that provides the vision for how the park is to be operated and the steps used to gather agency and public input in the development of the proposals released in the draft plan. Chapter 3 provides a summary of the natural and cultural considerations that were analyzed in making the plan proposals. Chapter 4 contains a discussion of issues raised during the planning process. An appendix contains a bibliography with the specific sources consulted. Some sources used were inadvertently left out and will be included in the final. It is important to note that the plan is not a NEPA document analyzing impacts for a particular project. Project specific impacts are analyzed in separate site & design planning efforts.</p>	<p>Add DNR land records and case files to the bibliography.</p>
Encourage Planners to Consider Carrying Capacity	<p>Rather than try to accommodate the largest crowds that may occur on sunny weekends in summer, I encourage you to consider the carrying capacity of various park entrances and habitats, and manage for the numbers of people that can visit those places without damaging their natural qualities and, thus, users' experiences. It is not a park mandate to provide a parking space for every single person that may wish to visit the park on any given day. Carrying capacity should be considered and the monitoring requirements should also be included in the plan. Little attention is paid to traditional planning concepts such as future desired conditions, limits of acceptable change, and cumulative impacts. The plan needs to recognize that the greater the demand the more restrictions will be needed to preserve the resource. Regulations and enforcement is critical to protecting that resource.</p>	<p>Consistent with the enabling legislation, the park is to provide recreational opportunities for the people and construct the necessary facilities in those areas described in statute. The recommendations and management intent statements for the various units reflect this and provide statements of desired future conditions for each unit and activities permissible by land use designation. Note that in some areas, the intent is to manage for high visitor use.</p>	<p>None</p>

Subject	Issue Summary	Response	Recommended Revision
Plan Should Endorse Municipality's Title 21 Provision Requiring Developers to Provide Access Across Development to Park	The management plan should explicitly endorse and incorporate the policy that private land cannot block access to public land by supporting the Municipality's Title 21 rewrite requirement that access to the park be reserved. Also, CSP management should continue to work with land owners to negotiate access at current trouble areas, such as Ram Valley, Honey Bear Lane.	The management plan provides guidance for park lands. Most of the access issues lie outside of the park boundary and the park's direct control. Access related issues and guidance are addressed in the Chugach Access Plan. Refer to the access plan recommendations for more information.	None
Increasing Park Access Points	Support dispersing visitors to all areas of the park rather than concentrating them in a few places. The limited funds available should be employed to increasing and improving access to the park all the way from Girdwood to Eklutna. This is a worthy goal in order to spread access opportunities and minimize impacts.	Concur. See the access plan recommendations for more information.	None
Support Distributed Number of Trailheads/Access, but Need to Consider Impacts of Traffic and Facilities	It is important to consider the impacts of increased traffic along the routes to the various trailheads/access points as well as impacts of the recreation facilities on adjacent residential areas. Planning and funding for development of the facilities must address such off-site impacts in addition to impacts of on-site development.	Concur. CSP has worked extensively with both the Municipality and the DOT on traffic issues, both on the operational side and in the access plan.	None
Motorized Use	I appreciate that the plan doesn't significantly increase motorized use in the park, and ask that the plan clearly and definitively state there will be no expansion of motorized use in the park.	Motorized use is a legitimate recreational activity that needs to be balanced like any other type of use within the park.	None
Trails Should be Open to Biking	Backcountry trails should be officially opened to mountain biking as well as more trails in general. Mountain biking is a popular use of the park and is a legitimate use that should be embraced. Banning bikes from trails that can accommodate them is not reasonable.	The use of trails is not dealt with in the management plan but rather the park's trails plan. The trails plan does in fact make recommendations for expanding the use of bikes in the park. Refer to the trails plan for specific recommendations regarding bike use.	None

Subject	Issue Summary	Response	Recommended Revision
Oppose Bicycle Use	<p>The narrow, tree covered trails are what make a large portion of the upper hillside trail system special. Do not widen trails for bikers because it would take away the natural feeling and create hazardous hiking conditions for pedestrians and horses because many bikers travel at high speeds and display disregard when they pass hikers and appear to expect hikers to jump off the trail. It is recommended that any extension of access to bicyclists must be accompanied by much more rigor by the park to educate them about proper use of shared trails, regulate their speed and modify their expectations. Without an effective means of enforcing bike restrictions, it is almost meaningless for the CSP management or trails plan to establish them. The trail use policies in both plans should be reconsidered in light of not only each trails physical and social suitability for bicycling, but of the need for clarity and enforceability. In particular, bike access policy should be clearly posted and should not change annually.</p>	<p>Trail management and trail recommendations are handled in the park's trail plan and not the management plan. Refer to the trails plan for specific recommendations regarding bike use and trail etiquette.</p>	None
Oppose Horse Use	<p>The use of hooved pack animals should be prohibited along the Indian Valley Trail and in the South Fork of the Eagle River drainage to prevent damage to the park's resources. The damage from pack animals and the resulting erosion have decreased the value of the park's trails and required extensive effort to rebuild and maintain those trails. An easy way to use the park's limited labor resource wisely would be to prevent those activities that require labor to mitigate their destructive effects. Concerned with horses tearing up trails, especially wet trails and oppose extensive horse use in the park.</p>	<p>Park regulation, 11 AAC 20.030(a)(8), already contains provisions to address horses on the Indian Valley Trail.</p>	None

Subject	Issue Summary	Response	Recommended Revision
Horse Use and Enforcement	Horse riding has damaged the fragile soils and alpine plants in many areas above treeline. These areas should be off limits to riding at all times and signed and enforced. Shod horses should not be riding on park trails during breakup. Postholes up to a foot deep in the snow and mud have resulted each spring, rendering the trails virtually impassable for skiers, hikers and cyclists even after the surface freezes. This along with almost total absence of trail tread maintenance and drainage control is causing a rapid deterioration in trail conditions in many areas.	Trail management and upgrade recommendations are handled in the park's trail plan. Existing park regulation, 11 AAC 20.030(c) already contain provisions for restricting horse use in certain areas to protect trails and sensitive areas.	None
Maintain Existing Facilities First Before Building New Ones	Although a 60 million backlog of deferred maintenance is reported along with a pitiful number of full time employees, the plan is proposing all kinds of improvements without apparently first planning for repair of and protection of what exists. Available maintenance and development funds should be spent on enhancing and improving existing trails to protect from erosion, not to build more "caretaker" cabins, interpretive sites, or other physical structures. This will have to wait for a time when the state administration and legislature adequately support their parks.	There is not a \$60 million backlog at Chugach State Park and this plan proposes replacing or enhancing facilities or making improvements that improve sustainability over the long term. Additionally, this document is expected to be implemented over the next 20 years requiring a long term vision for future park needs. A "maintain what you have" approach does not allow the park to respond to changing trends or adequately protect park resources.	None
Caretaker Facilities	Is building caretaker facilities the only way to protect our trailheads from vandalism? I encourage the park managers to consider less costly, smaller footprint solutions.	The plan suggests caretaker facilities at certain trailhead locations because they have proven to be a good way to provide oversight and a management presence.	None
Create Partnerships To Provide Better Access to Future Funds For Park and Access Improvements and Maintenance	Since capital funding has been inconsistent for years, the State should investigate the potential of creating partnerships with the Municipality and other entities that use the park or maintain roads, trails and utilities that extend to the park since it might provide better access to future funds for park improvements, maintenance and operations.	The park currently partners with several organizations and government agencies to maximize resources and gain efficiency. Refer to the "Management Agreement" section of the plan for a list of existing and desired agreements.	None
No Trail Widening	Trail widening should not occur except when necessary to protect from erosion. Trail smoothing and "sanitizing" is not a reasonable reason to widen or otherwise destroy an existing trail.	The use of trails and trail specifications are not dealt with in the management plan but rather the park's trails plan. Refer to the park trail plan for trail design standards.	None

Subject	Issue Summary	Response	Recommended Revision
Need to Reevaluate Trail Plan Recommendations	We recommend the planners re-evaluate which trails to “upgrade” and leave the single tracks alone. After seeing the new upgrades to the South Fork Trail, we are concerned with how the other trails identified in the Trail Plan will be developed to multi-use standards. I don’t think the public could have foreseen this as a problem when reviewing and commenting on the trail plan; who would argue against “sustainable” trails. Now we think the plan is overly ambitious in its scope and not terribly judicious when it comes to recommendations for multi-use, Class 3 trails.	The use of trails and trail specifications are not dealt with in the management plan but rather the park’s trails plan. Refer to the trail plan for trail recommendations and management.	None
Three Plan Documents	We find the presentation of three separate plans dealing with the same area very confusing and frustrating. It is difficult to assess consistency among the plans and likely has added a great deal of redundancy in the process. Also, the relationship between the master plan and the access and trail plans is vague. Which is the primary document for guiding managers? Broad-based park management plans are generally prepared first in order to guide “step down” and implementation plans like the Access and Trails plans. CSP is a gem and decisions about how it is managed, how its important habitat is protected, and what recreational facilities are reasonable should be addressed in total, not piecemeal, otherwise I strongly urge the DNR to complete the management plan first since it establishes overall policy and goals.	This planning process endeavored to revise existing park plans to provide new tools for park managers and each plan explains its relationship to the other. The park’s trail plan and management have always been separate documents because they vary in their level of detail and guidance. The access plan is an upgrade of the 2002 Access Inventory and is necessarily a separate document because it is a joint document with the Municipality of Anchorage and a vision for creating connections to the park not necessarily management of the park directly. Any access proposals within the park are echoed in the management plan and all facility recommendations are in fact addressed in total in the management plan. The revision of the 3 plans was done as a concurrent, comprehensive effort to maximize staff resources and information gathering. The release of the plans was staggered in response to initial public input suggesting that dealing with all 3 at once would be too difficult to digest.	None

Subject	Issue Summary	Response	Recommended Revision
All Three Plans Need More Focus on Park Purposes	All park plans should base their goals and objectives directly on the park's enabling legislation. The Access Plan and Trails Plan don't provide this important context before presenting recommendations for expanded access and facilities. Given the challenges DNR is already facing in trying to administer the park, any request for expanded staff or facilities will have to be based on evidence of a strong relationship between the mandate provided by our Legislature and DPOR's efforts to improve park management.	All 3 plans are consistent with the park's enabling legislation. The goals and objectives listed in the management plan supplement the enabling legislation.	None
Plans Lacks Facilities Development and Maintenance Plan	All park plans recommend construction of major new facilities in the park, while acknowledging that CSP is already dealing with a major maintenance backlog and inadequate staffing. The lifecycle maintenance costs of facilities is much greater than the construction cost and it is irresponsible to propose new facilities when existing ones are proving impossible to maintain given DPOR's small budget, and without any analysis both of alternatives and of life cycle construction and maintenance for these facilities. For example, there is zero analysis of how improved access might be provided in the most cost-efficient way, e.g. by comparing upgrades to the Glen Alps access road to the construction of a new road, and the siting of any new facilities with respect to slope, aspect, and drainage.	Many of the existing park facilities are difficult to maintain because they are outdated and were not built to sustain the use they get. This plan provides direction for providing sustainable facilities to insure more efficient use of park resources into the future. The management plan provides facility proposals using a generalized analysis of an area. Subsequent, site planning processes explore the details of siting including slope, drainage requirements and cost benefits for one alternative over another.	None
Automobile access prevention	The plan needs to provide additional strategies for the "prevention" of park visitors from using personal automobiles to access trailhead facilities such as Glen Alps, and instead accentuate connections to park trails via municipal trails that reach the edge of the park. Therefore the plan should provide for the highest degree of seamless integration of MOA and CSP trails. "Intercept" parking lots at Municipal trailheads should be recommended for further investigation, along with development of necessary trails to provide for non-motorized connectivity to CSP trails.	The access plan provides guidelines for establishing alternative transportation networks. Refer to that plan for more information.	None

Subject	Issue Summary	Response	Recommended Revision
Development Impacts on Natural Resources Should Be Assessed	Every new trail and road should be assessed not just in terms of added recreation opportunity, but also in terms of impacts to water quality, wildlife habitat and habit connectivity. To simply assume that development will have no impact on habitat, wildlife movement or behavior is a dereliction of your duties as land managers.	All uses on the land are assumed to have some impact on the environment and the level of acceptable impact varies by land use designation. The plan's intent is to provide a set of guidelines for enhancing recreation while protecting resources consistent with the intent in the enabling legislation, each management unit, and the various land use designation zones.	None
No Improvements Except at Glen Alps	Additional improvements to parking facilities at anything but Glen Alps is a waste of money, since there are never enough people at any of the other trailheads to justify any kind of improvements.	With increased populations and demand for park access, a plan for the future is necessary. Many areas besides Glen Alps are currently used beyond their capacity on a regular basis as described in the plan.	None
No Additional Improvements	I encourage support for protecting existing non-consumptive uses for the park. As such, the plan should limit any and all additional "improvements". The park already has ample opportunities for recreational access, and the plan should protect existing scenic and wilderness amenities.	With increased populations and demand for park access, a plan for the future is necessary in order to protect park resources and provide recreational opportunities. The plan is meant to be implemented over the next 20 years and as such must provide a vision for future demand as well as for areas that are currently used beyond their capacity on a regular basis.	None
Citizen Participation in Planning Process	Planning processes for a citizen created park must include citizens in the process. They must be given opportunities and sufficient time to study and be a vital part of the planning.	This has been a multi-year effort with a great deal of public outreach including various focus group and stakeholder meetings, public meetings, workshops and open houses, and longer than normal comment periods to provide extensive opportunities for public involvement. The comment period lengths and number of meetings and opportunities for involvement in the process have far exceeded any agency requirement.	None
Park Management Needs to Respond to Inadequate Trail Maintenance	Park management needs to develop a response to the issue of inadequate trail maintenance, patrols and enforcement and the proliferation of informal trail, before increasing capacity and ease of access to areas of the park like the western edge with a road.	The trails plan addresses trail upgrades and maintenance needs.	None