



STAND UP FOR KACHEMAK BAY

What's going on? Every 20 years or so the state park management plan is updated with new rules about what is allowed in the park. A public review draft of a new plan was just released, and **we have to make sure the park rules protect the things we value.**

Below are the top ten issues identified by KBCS.

- A) Find topics that are important to you.**
- B) Give specific recommendations.**
- C) Give your reasons.**



All drawings from U.S. Fish and Wildlife Service

- 1) No Heli-ski operations in Kachemak Bay State Park!**
- 2) Helicopter operators landing on Grewingk Glacier should not drop below 1500 ft until they reach the glacier, and total landings should be capped at 6 per day.**
- 3) No hatcheries for commercial harvest in the State Park.**
- 4) No recreational drone use in the park. Drone permits should only be issued for education, commercial use, research, and search and rescue.**
- 5) No bear-baiting or trapping in the State Park.**

- 6) No resource extraction for commercial purposes.
- 7) Water taxi operators and guides should be required to educate passengers on campfire protocol, leave-no-trace-ethics, wildlife etiquette, firearm safety.
- 8) No personal watercraft, airboats or hovercraft in the park.
- 9) Community dock development, seasonal docks, mooring buoys, and running lines should be encouraged over individual private permanent docks whenever possible. Docks that are falling apart should be removed.
- 10) No camping in the tsunami zone near Grewingk Glacier.

**Read the public review draft online at
<http://dnr.alaska.gov/parks/plans/kbay/kbayplan.htm>**

There is a Q&A on **Monday, October 29** from 6:30 pm – 8:30pm at the Islands and Ocean Visitor Center

Comments are due by November 16. Send to:

Kachemak Bay State Planning
550 West 7th Ave., Suite 1050
Anchorage, AK 99501
Email: monica.alvarez@alaska.gov

Please cc us on your comments or contact us with questions! kbayconservation@gmail.com

What should be allowed in the park? The basic rules come from the Alaska Constitution and state laws.

State parks are to be preserved for the **use, enjoyment, and welfare of the people** (Alaska Constitution, Article 8).

Kachemak Bay State Park was the first state park in Alaska! It was created in 1970 and is “...reserved from all uses incompatible with its primary function as a scenic park” (Alaska Statute 41.21.131). Scenic parks are defined as “relatively spacious areas of outstanding natural significance, where **major values are in their natural geological, faunal or floral characteristics...**” (Alaska Statute 41.21.990).

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1) What the Plan Says about Heli-Skiing:

Helicopter landings in support of heli-skiing operations may be authorized¹ within the Sadie-Tutka Management Unit (K-Bay Public Review Draft, p. 72).

Heli-skiing Talking Points:

No Heli-ski operations in Kachemak Bay State Park! Single use permits should continue to be issued for search and rescue, research and HEA powerline maintenance.

Heli-skiing operations constitute an “extensive introduction of artificial features or forms of recreational development that are primarily of urban character” and is prohibited by Alaska Statute 41.21.990. The proposed activity will displace current users, mountain goats, black bears, and sea ducks that are of great scenic value and to allow a select user group to drive them out or cause a decline in their numbers is inconsistent with the basic mandate of the park under Alaska Statute 41.21.990.

- 1) Heli-skiing displaces backcountry users and decreases the enjoyment of those who remain.² Local skiers report that there are up to 100 people who currently ski Grace Ridge and Sadie Peak. Escape to undeveloped mountains is an important winter activity for Alaskans of all ages, but something important changes when there are helicopters landing on the top. As one

¹ Throughout the document, “may be authorized” or “conditionally compatible” means permits will be granted under the conditions outlined.

² *Helicopter landing tours on the Juneau Icefield 2003-2007 : final environmental impact statement.* USFS, 2002 (p. 4-23).

local ski instructor put it, “As soon as heli-skiers go out there, kids are not going to want to go up.” The snow on those mountains is historically wet, so ski tracks tend to turn into ice. It doesn’t snow that often, so the ice tracks often remain uncovered for long periods of time. If helicopters are flying lots of people up and down, the mountains will be scarred with many ice trails, greatly diminishing the experience of all users and very likely driving many away. Why permit commercial heli-skiing in this front country area currently valued by local skiers, when helicopters can land anywhere? Heli-ski operations should be reserved for back-country access. Those who want to land near town to ski still have the option to land fixed-wing aircraft on Hazel and Upper Hazel Lakes.

- 2) There are goats on Sadie, and any tourist pamphlet in Homer illustrates the fact that the scenic value of the park would be enormously diminished by loss of wildlife. The park is required to by Alaska Statute 41.21.131 to protect the flora and fauna of the region, yet helicopter-supported recreation is known to contribute to declines in mountain goat populations.³ Goats have been shown not to habituate to helicopter disturbance.⁴ Why not heli-ski where there are no goats?



- 3) The basic standards for mountain goat protection recommended by ADF&G come from the Northern Wild Sheep and Goat Council’s *Position Statement on Helicopter-Supported Recreation and Mountain Goats*. This position statement recommends that mountain goat winter distribution and habitat selection be known and mapped prior to issuance of annual or multi-year heli-recreation special use permits.⁵ While ADF&G knows that mountain goats live on Sadie Peak, it does not have baselines on wintering habitat or spring kidding areas.⁶ This data is needed before a heli-ski operation permit can be considered. Helicopter activity should not occur on or near winter

³ NWSGC *Position Statement on Helicopter-Supported Recreation and Mountain Goats* by Northern Wild Sheep and Goat Council. July 9, 2004. Online at: <http://www.nwsgc.org/StatementMountainGoats.pdf>

⁴ Do Mountain Goats Habituate to Helicopter Disturbance? By Steeve Côté, Sandra Hamel, Antoine St-Louis, Julien Mainguy. *The Journal of Wildlife Management* 77(6):1244–1248; 2013.

⁵ NWSGC *Position Statement on Helicopter-Supported Recreation and Mountain Goats* by Northern Wild Sheep and Goat Council. July 9, 2004. Online at: <http://www.nwsgc.org/StatementMountainGoats.pdf>

⁶ Personal communication with ADF&G Wildlife Biologist in Homer office.

habitat between November 15 and April 30 each year.⁷ Helicopter activity should not occur on or near occupied or suspected nursery group habitats between May 1-June 15 each year.⁸

- 4) Bears will be overly impacted by this use. While there is less research on black bears, regular helicopter activity is known to adversely affect brown bears: the impact significantly interferes with normal behavior patterns such as breeding, feeding, or sheltering; the bear is likely to experience injury or decreased productivity; the bear is likely to experience disturbance with high energetic costs and no period for recovery.⁹ In the absence of any information to the contrary, it should be assumed that impacts to black bears is comparable and should be avoided.
- 5) Sea-birds and marine mammals at the bottom will be disturbed and displaced.

2) What the Plan Says about Glacier Viewing:

Helicopter operations may continue to be authorized at Grewingk Glacier during summer operations...Use of helicopters in other areas will only be permitted for park management purposes, research or in support of other authorized activities (K-Bay Public Review Draft, p. 72).

Glacier Viewing Talking Points:

Operators on Grewingk should have to apply for single-use permits. Limit total number of round-trips per-day to 6. Helicopters traveling to Grewingk should stay above 1,500 ft. until they reach the glacier.

- 1) These limitations are necessary to reduce the disturbance to statute-protected user groups who are “camping, picnicking, sightseeing, nature study, hiking, and riding” (Alaska Statute 41.21.990 particularly as the number of visitors to the park increases (the chamber of commerce expects visitation to Homer to increase by 7% by next year alone; at that rate, visitation to Homer will increase by 140% by 2038—the approximate life-span of this Management Plan),

⁷ NWSGC *Position Statement on Helicopter-Supported Recreation and Mountain Goats* by Northern Wild Sheep and Goat Council. July 9, 2004. Online at: <http://www.nwsgc.org/StatementMountainGoats.pdf>

⁸ NWSGC *Position Statement on Helicopter-Supported Recreation and Mountain Goats* by Northern Wild Sheep and Goat Council. July 9, 2004. Online at: <http://www.nwsgc.org/StatementMountainGoats.pdf>

⁹ *Guide to Effects Analysis of Helicopter Use in Grizzly Bear Habitat* by Montana/Northern Idaho Level I Terrestrial Biologists Team, 2009, pp. 7 Online at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5336905.pdf.

- 2) As the number of users increases, limitations on high-impact uses must be limited to meet standards of Alaska Statute 41.21.990 which call for protections of the fauna of the park. Helicopter activity is a disturbance to wildlife such as bears, moose and goats, and wolverines:
 - 1) Helicopter activity should not occur on or near occupied or suspected nursery group habitats between May 1-June 15 each year.¹⁰
 - 2) Research shows that regular helicopter activity can adversely affect brown bears: the impact significantly interferes with normal behavior patterns such as breeding, feeding, or sheltering; the bear is likely to experience injury or decreased productivity; the bear is likely to experience disturbance with high energetic costs and no period for recovery.¹¹ In the absence of any information to the contrary, it should be assumed that impacts to black bears is comparable and should be avoided.
 - 3) Moose populations are also disrupted by helicopter use and care should be taken with any permit to ensure that moose are not harassed: ‘Harass’ is defined by FWS as actions that are likely to “significantly disrupt normal behavior patterns which include, but are not limited to, breeding, feeding or sheltering” (50 CFR §17.3).
 - 4) The plan states that as ice recedes on Grewingk, a new location for glacier viewing may need to be selected (*K-Bay Public Review Draft*, p. 134). Conditions for any new location must account for impacts to other users and to wildlife.



Remove language permitting use of helicopter use in “other areas” for “other authorized activities” (*K-Bay Public Review Draft*, p. 72).

This is far too vague an allowance for such a high-impact activity that disturbs wildlife as well as other users (Alaska Statute 41.21.990). Specify that permits will only be issued for search and rescue, research, and HEA powerline maintenance.

¹⁰ *NWSGC Position Statement on Helicopter-Supported Recreation and Mountain Goats* by Northern Wild Sheep and Goat Council. July 9, 2004. Online at: <http://www.nwsgc.org/StatementMountainGoats.pdf>

¹¹ *Guide to Effects Analysis of Helicopter Use in Grizzly Bear Habitat* by Montana/Northern Idaho Level I Terrestrial Biologists Team, 2009, pp. 7 Online at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5336905.pdf.

3) What the Plan Says about Hatcheries:

A hatchery may only be authorized at the current site adjacent to Tutka Bay Lagoon. Net pens associated with the existing Tutka Bay hatchery may only be authorized in Tutka Bay Lagoon or Tutka Bay at a site identified and permitted by ADF&G in coordination with DPOR (K-Bay Public Review Draft, p. 98).

Hatchery Talking Points:

No hatcheries for commercial harvest in the State Park.

There have been important developments since the last plan was written : a) A great deal of research has been published showing that large-scale releases of hatchery pinks can seriously disrupt ecosystems and threaten wild populations up and down the food chain. b) No research has been conducted on the impacts of carcass dumping in the State Park. c) The pink cost-recovery hatchery in Tutka Bay has largely been a benefit to itself rather than to the public.

The cost of ecosystem damage outweigh the benefits of hatchery returns.

a) A huge amount of research, including a report to congress included here, has been published on the harm large-scale pink hatcheries can do to wild populations and ecosystems. Here is a small sample:

On competition and ecosystem impacts:

- <http://www.pnas.org/content/early/2018/05/08/1720577115>
- http://hatcheryreform.us/wp-content/uploads/2016/05/HSRG_Report-to-Congress_2015.pdf
- <http://www.pnas.org/content/111/18/E1880>
- <https://onlinelibrary.wiley.com/doi/full/10.1002/mcf2.10023>
- <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0172898>

On straying of hatchery fish into wild streams:

- <https://link.springer.com/article/10.1007/s10641-012-9975-7>
- <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0081916>
- https://www.researchgate.net/publication/5909528_An_Evaluation_of_the_Effects_of_Conservation_and_Fishery_Enhancement_Hatcheries_on_Wild_Populations_of_Salmon1

A pink salmon hatchery for commercial harvest is not appropriate in the park because of the significant likelihood that the release of approximately 55 million pink salmon fry¹² into Kachemak Bay every year (1) constitutes a “major modification of of the land and waters” as a result of competition, predation, straying, and drawing in predators that also eat wild populations. Tutka Bay Hatchery pink salmon in all likelihood significantly disrupt the natural flora and fauna of the park and cannot be permitted (Alaska Statute 41.21.990). (2) The Tutka Bay Hachery very likely reduces “areas available for public enjoyment” by reducing fitness and productivity of species that are important sources of recreation including King and Tanner crab, halibut, shrimp, herring, Pacific cod, clams, and muscles.

b) In 2017, Cook Inlet Aquaculture “disposed” of 267,913 dead fish (868,038 lbs.) in Tutka Bay, after removing their row to hatch the next year’s brood stock.¹³ The Department of Environmental Conservation (DEC) has issued a general discharge permit that set discharge standards for all hatcheries in Alaska: Alaska Department of Environmental Conservation, Devision of Water does not have a cooperative agreement with the Alaska Department of Natural Resources, Parks and Outdoor Recreation Division, to ensure that the water quality standards set by DEC are consistent with the park mandate of protecting the flora and fauna of the park. The need for such an agreement is illustrated by several key details in DEC’s general discharge permit. The permit issued is based on this finding from the Fact Sheet accompanying the draft permit:

“DEC does not have historical monitoring data from hatcheries needed to conduct a RPA [reasonable potential analysis]. The general permit requires hatcheries to monitor for several water quality parameters (TSS, SS, pH, ammonia, DO, and chlorine) to generate data for use in conducting a RPA during the next permit cycle.”¹⁴

DEC is saying here that it does not have baseline or monitoring data on water quality parameters in the state park or anywhere else in Alaska, even though salmon enhancement has been going on in Alaska since 1971. It is in this context that DEC issued a general discharge permit allowing operation as usual, and in fact, removed most numeric standards for effluent discharges that had been in place.¹⁵ Last but not least, no data is being conducted on what the Clean Water Act, section 117 calls the living resources of the site: “grasses, benthos, phytoplankton, zooplankton, fish, and shellfish.” It is not clear that the DEC is protecting the waters of Kachemak Bay State

¹² <http://ciaanet.org/data/>

¹³ “2017 Tutka Annual Report - Final Corrected” by CIIAA. Online at <http://ciaanet.org/data/>.

¹⁴ “Aquaculture Facilities in Alaska General Permit,” Alaska Department of Environmental Conservation, Permit No. AKG130000. 2017. See permit online at: <https://dec.alaska.gov/water/wastewater/seafood/>

¹⁵ “Aquaculture Facilities in Alaska General Permit,” Alaska Department of Environmental Conservation, Permit No. AKG130000. 2017.

Park. The Park has a mandate to ensure that they are. There can be no carcass dumping in the state park until DEC has assessed impacts of dumping.

Do we know exactly how the Tutka Bay Hatchery is impacting Kachemak Bay State Park? No, because DPOR and ADF&G are not studying it and probably cannot afford to study it. Should commercial pink salmon hatcheries be permitted if we don't know their impacts to the flora and fauna of Kachemak Bay State Park? Not any more, because we know too much about potential harm, and the stakes are too high. In the absence of certainty, risk must be assessed:

Risk of ecosystem damage = probability of damage x impacts of damage.

Given that we are talking about releasing on average 55 million hungry fry every year into a State Park and a Critical Habitat Area, impacts of damage are very high; the literature on commercial-scale pink salmon hatcheries make it clear that the probability of damage is high. So, the risk of significant ecosystem damage by the Tutka Bay Hatchery is high. DPOR cannot gamble on these odds because it has a mandate to make guidelines that are “directed primarily toward preserving...natural geological, faunal or floral characteristics” of the park (Alaska Statute 41.21.990). Commercial-scale pink hatcheries are known to harm wild populations and throw ecosystems out of balance, and permitting them in the park is a form of reckless endangerment that is out of step with this mandate.

c) The hatchery has not been a benefit to many people, though it has been a significant benefit to a few. By far the largest beneficiary of the hatchery is Cook Inlet Aquaculture itself. According to Cook Inlet Aquaculture's Annual Reports and ADF&G, between 1999 and 2017, *the hatchery harvested 97% of the total pink salmon harvest, and commercial common property harvesters captured 3% of the total.*¹⁶ On top of that, processing jobs aren't even staying in the US:

“An increasing portion of Alaska's harvest is gutted, headed, and frozen in state, shipped to China for further processing to fillets and other product forms, then shipped back to the U.S. or other markets for sale or further value-added processing.”¹⁷

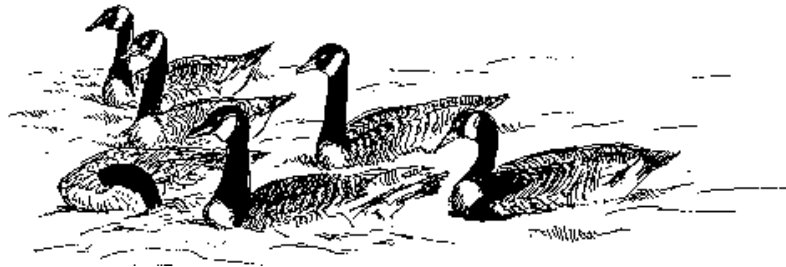
Who is this hatchery for? Why is the park taking such a large risk to its statute-protected wild flora and fauna for the benefit a few stakeholders? This is not the way to meet the mandate of preserving the park for the use, enjoyment, and welfare of the people (Alaska Constitution, Article 8).

The cost of ecosystem damage outweigh the benefits of hatchery returns. This hatchery does much more harm than good. Removing the pink cost-recovery hatchery in Tutka Bay Lagoon is

¹⁶ <http://ciaanet.org/data/> and ADF&G's "2016 Lower Cook Inlet Area Finfish Management Report," (p. 149) Online at: <http://www.adfg.alaska.gov/FedAidPDFs/FMR17-26.pdf>

¹⁷ "An Evaluation of the Tutka Bay Lagoon Salmon Hatchery for Consistency with Statewide Policies and Prescribed Management Practices," ADF&G. April 2012

consistent with ADF&G's precautionary principle from their *Policy for the management of sustainable salmon fisheries*, 5 Alaska Admin Code 39.222.



4) What the Plan Says about Drones:

Recreational drone use may be permitted if it weighs less than 55 lbs., is flown within visual line of sight, below an altitude of 400', at speeds of not more than 100 mph, during daylight, is not flown above people, and is not used to harass or otherwise come within 500' of wildlife (K-Bay Public Review Draft, p. 73).

Drone Talking Points:

No recreational permits for flying drones should be authorized in the park. Permits should only be issued for education, research, commercial-use, and public safety purposes, such as search and rescue. Operators should only be issued permits if they meet FAA requirements for operation of small unmanned aircraft under 14 C.F.R. Part 107. Permits for use should be issued in consultation with ADF&G to designate distance from wildlife based on flight path, species, and time of year, with particular concern for sensitive conditions, such as newborn young. In the absence of a specific ADF&G recommendations for a given flight path, drones should not come within 1000' of wildlife.

- 1) As Denali National Park and Preserve spokesperson said, “people don’t come to parks to see unmanned aircraft.”¹⁸ This use is in direct conflict with the enjoyment of other users who are seeking a scenic and wilderness experience. Anyone who has had a drone fly near them on a quiet beach or after they have summited a mountain knows that they are a disturbance. If anything, they reduce the “areas available for public enjoyment” (Alaska Statute 41.21.990) because they drive users away.

¹⁸ http://www.newsminer.com/news/alaska_news/drones-banned-in-national-parks/article_0c85fa3a-f919-11e3-beca-001a4bcf6878.html

- 2) Especially since park funding and enforcement are limited, drones are dangerous, and can be used harass wildlife, and invade privacy. National parks in both the US and Canada as well as numerous state parks around the country—Chugach State Park in Alaska—have recognized these concerns and banned recreational use of drones.
- 3) NOAA drone animal harassment prevention guidelines state that drones should not come within 1000’ of wildlife.¹⁹
- 4) Impacts of this new technology on wildlife are poorly understood and it is too early to issue recreational permits. The research that exists indicate that they could “have undesirable and unforeseen impacts on wildlife, the risks of which we currently have little understanding....”²⁰



5) What the Plan Says about Bear Baiting and Trapping:

Bear Baiting requires authorization and is subject to state hunting regulations (K-Bay Public Review Draft, p. 74). Trapping of furbearers for private or commercial use is allowed (K-Bay Public Review Draft, p. 84).

Talking Points on Bear Baiting and Trapping:

No bear baiting in the State Park. No trapping in the state park.

- 1) Bear baiting habituates bears to human food and is dangerous for campers, picnickers, hikers, hunters, wild-life viewers, private inholders and their property.
- 2) Trapping is inhumane to animals and poses a danger to other users. Dogs and children can get caught in traps.

6) What the plan says about Commercial Resource Extraction:

May be authorized only for government agency use (K-Bay Public Review Draft, p. 96-97).

¹⁹ <https://www.fisheries.noaa.gov/insight/viewing-marine-life>

²⁰ “Best practice for minimising unmanned aerial vehicle disturbance to wildlife in biological field research” by Jarrod Hodgson and Liam Pin Koh. *Current Biology*. 26(10). May, 2016. Online at: [https://www.cell.com/current-biology/fulltext/S0960-9822\(16\)30318-9?returnURL=https%3A%2F%2Flinkinghub.elsevier.com%2Fretrieve%2Fpii%2FS0960982216303189%3Fshowall%3Dtrue](https://www.cell.com/current-biology/fulltext/S0960-9822(16)30318-9?returnURL=https%3A%2F%2Flinkinghub.elsevier.com%2Fretrieve%2Fpii%2FS0960982216303189%3Fshowall%3Dtrue)

Talking Points on Commercial Resource Extraction:

No commercial resource extraction in the park.

Removal of timber, gravel, rocks, sand, plants or other park resources should be allowed for use by DPOR or for DPOR management purposes within the park units, as allowed on p. 100 of the Public Review Draft. No other resource extraction should be allowed.

7) What the Plan says about Trails:

A primary purpose of a plan is to recommend facility and trail development to not only meet the current recreational needs of the public, but also meet the expected potential recreational needs for the 20-year period of the plan (K-Bay Public Review Draft, p. 53).

Talking Points on Trails:

- 1) The plan should clearly prioritize maintenance of existing trails over new trail creation.**
- 2) Trail development should be accompanied by bear safety education, including signs on how to properly handle waste and food.**
- 3) Water taxi operators should be required to attend annual training and receive materials on basic park regulations that must be disseminated to passengers. Operators should be required to educate passengers on campfire protocol, leave-no-trace-ethics, wildlife etiquette, bear safety and firearm safety. The fees currently paid by these operators should go toward the cost of this program.²¹**

Enforcement and education in the park is extremely challenging as there are only two rangers. Water-taxies are a key interface with the public and should be utilized to assist in park management. It is important that both they and their passengers know basic park rules. They pay a significant amount of money into the park and that money should be used to support this program.

What the Plan Says about Glacier Spit Trails:

New trails proposed on the flats around Glacier Spit: GG-09, GG-13, NO-05 (K-Bay Public Review Draft, p. 135 and p. 15).

²¹ General Permit Stipulations for Commercial Operators, #30 Client Information, states “The permittee agrees to provide clients with information regarding rules, regulations and other information pertaining to the area and with basic safety information relative to the client's visit.”

Glacier Spit Trails Talking Points:

These trails should not be developed on Glacier Spit.

- 1) Development on Glacier spit will disrupt Kittlitz's Murrelet nesting and feeding area.²² This bird is classified as imperiled on a global level, and imperiled on a state level. It is designated as critically endangered by the ICUN Red List. It is a candidate for the Endangered Species Act. It is not appropriate for a state park meant to preserve outstanding natural features to build a trail through Kittlitz's Murrelet habitat.
- 2) These trails run through wetlands that, according to local birders, are also used by a significant number of feeding and nesting seabirds, such as Arctic and Aleutian Terns, ducks, gulls and murrelets. Loose dogs and people will drive these birds out, greatly diminishing the scenic value of the area.

8) What the plan says on Airboats, Hovercraft, and Personal Watercraft:

Allowed on salt water only. Prohibited in tidal flats or any uplands (K-Bay Public Review Draft, p. 75). Personal watercraft are not allowed in the Park.

Airboat and Hovercraft Talking Points:

Airboats and hovercraft should not be allowed in a park that is designated as scenic. We affirm that personal watercraft are inconsistent with the preservation faunal characteristics of the park.

1) They are really loud, emitting sound up to 108 dB.²³ This volume will disrupt other users and wildlife. It is well over the threshold of sensitivities of all wildlife. The sensitivities of various groups of wildlife can be summarized as follows:²⁴

- Mammals - sensitivity to -20 dB



²² "Distribution, population status and trends of Kittlitz's murrelet *Brachyramphus brevirostris* in Lower Cook Inlet and Kachemak Bay, Alaska" by Kathy J. Kuletz, Suzann G. Speckman, John F. Piatt, and E.A. Labunski. *Marine Ornithology: Journal of Seabird Research and Conservation* 39(1), pp. 85-96. 2011.

²³ <https://www.nps.gov/drto/learn/nature/upload/EVER-Noise-Source-Summary-Report-FINAL-2011-08-10a.pdf>

²⁴ https://www.fhwa.dot.gov/Environment/noise/noise_effect_on_wildlife/effects/wild04.cfm

- Birds - sensitivity at 0-10 dB
- Reptiles - sensitivity at 40-50 dB
- Amphibians - sensitivity from 10-60 dB

The noise of these vessels is not compatible with the “preservation of the natural values such as camping, picnicking, sightseeing, nature study, hiking, riding and related activities” nor does it preserve the natural “faunal characteristics” to the extent that it can be classified as a “major modification of the land, forests or waters” (Alaska Statute 41.21.990).

2) Airboats and/or hovercraft are prohibited in Afognak Island SP, Shuyak Island SP, Kodiak NWR, Denali SP (Tokositna River upstream from Pirate Lake is closed to the use of airboats between April 20 and July 10), Rocky Lake SRS, Shoup Bay State Marine Park, Kenai Fjords National Park, Russell Fiord Wilderness in the Tongass NF, Wood-Tikchik SP.²⁵

9) What the Plan Says about Docks:

Docks must be the minimum size necessary to accommodate site development characteristics and moorage. All docks will be constructed of non-polluting materials and any foam flotation used must be commercially encapsulated. Under no circumstances will a dock be authorized that facilitates a non-water dependent use (K-Bay Public Review Draft, p. 86).

Dock Talking Points:

Add the following to existing conditions: Community dock development, seasonal docks, mooring buoys, and running lines should be encouraged over individual private permanent docks whenever they can reasonably be accessed by applicant. Required flotation should be of materials which will not become waterlogged or sink when punctured. Closed cell (extruded) expanded polystyrene or equivalent material of good quality and manufactured for marine use is required and must be commercially encapsulated. For existing docks, un-encapsulated foam or other flotation will be authorized until it has either: deteriorated to the point of releasing beads; is no longer functional; or capable of supporting the structure. When any of these conditions are met, the flotation material must be replaced as if new construction.

- 1) This language on community docks is in alignment with ADF&G’s Critical Habitat Area guidelines, current case-law on water access rights, and the Parks’s exigency to protect scenic values.

²⁵ <http://www.dnr.state.ak.us/parks/boating/pdf/akboatmtrrestrictions2009.pdf>

- 2) The park must protect its scenic values by requiring that deteriorating docks be removed.
- 3) Language on extruded polystyrene is an improvement to language in the draft because it specifies the best current technology while allowing for developments in technology.

10) What the plan says about Camping:

Requires registration and payment of applicable fees at developed sites. At undeveloped sites, allowed up to 10 days at a site without authorization on all lands except camping is prohibited at Eveline SRS (K-Bay Public Review Draft, p. 76).

Talking Points on Camping:

- 1) **Facility development must be accompanied by bear safety education, including signs on how to properly handle waste and food.**
- 2) **Water taxi operators should be required to attend annual training and receive materials on basic park regulations that must be disseminated to passengers. Operators should be required to educate passengers on campfire protocol, leave-no-trace-ethics, wildlife etiquette, bear safety, and firearm safety. The fees currently paid by these operators should go toward the cost of this program.²⁶**

Enforcement and education in the park is extremely challenging as there are only two rangers. These water-taxies are a key interface with the public and should be utilized to assist in park management. It is important that both they and their passengers know basic park rules. They pay a significant amount of money into the park and that money should be used to support this program.

What the plan says about Grewingk Camping:

Grewingk Glacier Management Unit. Proposed development areas GG-03, GG-04, GG-06, GG-07 (K-Bay Public Review Draft, p. 147: Map 13).

Talking Points on Grewingk Camping:

²⁶ General Permit Stipulations for Commercial Operators, #30 Client Information, states “The permittee agrees to provide clients with information regarding rules, regulations and other information pertaining to the area and with basic safety information relative to the client's visit.”

There should be no development at the base of Grewingk Lake because of tsunami danger. Relocate GG-03, GG-04, GG-06, GG-07 upland and off of the potential avalanche zone. This issue should be described in the chapter on geology and in the Unit description (p. 131).

Ed Berg, local professor of geology and retired NPS ecologist, has studied Grewingk and states that the receding glacier presents a significant tsunami threat: the glacier “has pulled back maybe a mile-and-a-half since 1967. And it's exposed a much steeper and higher ridge, which basically it goes up to about 3,000 feet. And the angle is 45-degrees in some places.”²⁷ Berg goes on to describe the poor stability of the rock: it is “highly fractured. You can see faults running all over the place. Let's say the top of the ridge was to fall from 3,000 feet into 500 feet of water, you can imagine the size of the wave it will create.”²⁸



²⁷ “Receding Grewingk Glacier exposing rock fall, tsunami dangers” by Jay Barrett. KDLL 91.9 FM. Online at: <http://www.kdll.org/post/receding-grewingk-glacier-exposing-rock-fall-tsunami-dangers#stream/0>

²⁸ “Receding Grewingk Glacier exposing rock fall, tsunami dangers” by Jay Barrett. KDLL 91.9 FM. Online at: <http://www.kdll.org/post/receding-grewingk-glacier-exposing-rock-fall-tsunami-dangers#stream/0>