

STATE OF ALASKA

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DIVISION OF GOVERNMENTAL COORDINATION

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June 16, 1988

Mr. Walter Stieglitz
Regional Director
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Dear Mr. Stieglitz:

The State of Alaska has reviewed the Environmental Assessment (EA) for Proposed Public Use Facilities in the Skilak Wildlife Recreation Area of the Kenai National Wildlife Refuge. This letter is submitted on behalf of state agencies and represents a consolidation of agency concerns and comments.

1. The state supports U.S. Fish and Wildlife Service (FWS) plans to make improvements to existing recreation facilities and develop new facilities for Kenai refuge visitors. The state urges FWS to continue to assess the need for additional services and facilities as visitation increases. We suggest that the plan reflect such a commitment on the part of the FWS.
2. Marsh Lake is a 35-acre lake which has a maximum depth of 19 feet. Although it is relatively shallow, it may be capable of overwintering stocked coho salmon. An established fish population in this lake would encourage use of the proposed trail. The state requests that the EA address the feasibility and desirability of stocking this lake.
3. Lower Ohmer Lake supports a rainbow trout population, but Alternative C does not provide for boat trailer parking at this site. Since this lake is capable of supporting a viable fishery, and participation in that fishery can be expected to increase with improved facilities, it is suggested that provisions be made for boat trailer parking.
4. The state encourages FWS to make improvements to the access at Jean and Upper Jean lakes. Jean Lake has a good population of rainbow trout, but receives limited use because of poor access. Upper Jean Lake has been stocked in prior years with coho salmon, and a viable fishery was established. However, stocking was discontinued when the FWS blocked the existing road access in the interest of public safety. The state suggests that road access be restored,

assuming that public safety concerns can be resolved. Stocking could then resume.

5. On page 19, the EA states that only Skilak and Hidden lakes support anadromous fish species. However, it should be noted that Jean Lake also supports a small population of sockeye salmon. In addition, it is incorrectly stated that Engineer Lake's fishery is produced "by stocking catchable size trout each year." This lake is annually stocked with coho salmon fingerlings.
6. All of the proposed alternatives, including Alternative C, seem not to recognize the major or unique wildlife viewing opportunities that exist for species such as moose, bald eagles, trumpeter swans, and cormorants. Additional emphasis on moose viewing, particularly at rehabilitation sites in the planning area, should be considered. Appropriate facilities may include viewing platforms, trails, and interpretive materials to help visitors view moose. In addition, increased opportunities to view wintering eagles along the Kenai River, and possibly nesting eagles from a remote outlook, should be priorities in trail and interpretive development. Trumpeter swans are also a popular species, and opportunities to enjoy their spring staging on Watson Lake, with a minimum of disturbance, should be planned for. Finally, the double-crested cormorant colony on Skilak Lake is not mentioned (although there is brief reference to a "gull colony" on the same island), and the plan should address this unique feature. We are aware of only three freshwater nesting colonies for this species in the state: Skilak Lake, Lake Louise, and Iliamna Lake.
7. Although Alternative C would significantly increase visitor use of the area, the EA provides little insight into potential wildlife-human conflicts and what can be done to alleviate them. For example, additional campground development may lead to an increase in garbage-bear problems. This issue is not addressed in the EA, but is significant enough that the FWS should consider developing a garbage treatment plan (e.g., storage in bear-proof containers and prompt removal) that will minimize such incidents. In addition, increased trail development and use, while desirable in many instances, will undoubtedly lead to more human-bear encounters, with a potential for increased defense of life and property kills. We suggest that the FWS anticipate this possibility and develop appropriate plans in order to avoid such situations. An increase in boating use will also potentially increase disturbance to wildlife, and consideration should be given to implementing measures that will minimize such disturbance. (Perhaps restricted boating zones could be established on certain areas of lakes,

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developing educational materials and warning signs at launches, etc.). Furthermore, we assume that trail layout will avoid bald eagle nest trees and other sensitive wildlife habitat features.

8. Overall, the assessment does not provide sufficient detail to explain how wildlife use the area and how the proposed development will enhance "wildlife recreation." The EA should explain in greater detail how facilities will be designed to take advantage of prime wildlife viewing areas.
9. In Table 7, "Summary of the Environmental Consequences of the Alternatives," all three alternatives indicate that a "slow increase in populations of some species" is likely. However, the EA does not state which species will exhibit this trend, and there is no reference to such a phenomenon in the text. Factors that may possibly affect wildlife populations in this area include: 1) the elimination of hunting and trapping (although it is unclear which, if any, species are below carrying capacity); 2) increased road kills (especially if Skilak Loop Road is paved and visitor use increases as outlined in Alternatives B and C); 3) the loss of approximately 40-60 acres of habitat in Alternatives B and C; and 4) the effect of moose rehabilitation areas in producing more animals.
10. The assessment does not address how Alternatives B and C will affect the state's fisheries enhancement program at Hidden Lake. The state would object to any FWS actions that might compromise the scope or effectiveness of that important program.
11. The EA should describe how planning for the Skilak Wildlife Recreation Area relates to public use planning for the refuge as a whole and individual species management planning for refuge wildlife populations.

On behalf of the State of Alaska, thank you for the opportunity to review this EA. If we can be of assistance in clarifying these comments, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan
Director



By Michelle Sydeman
CSU Coordinator

Skilak Wildlife Recreation 4
Area Environmental Assessment

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cc: Commissioner Judy Brady, DNR
Commissioner Don Collinsworth, DFG
Commissioner Dennis Kelso, DEC
Commissioner Mark Hickey, DOT/PF
Mr. Rod Swope, Office of the Governor
Land Use Advisors Committee

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Assessment

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