

Issues/Comments	DNR Response
<p>Negative Impacts on Wildlife:</p> <ul style="list-style-type: none"> ❖ Killer Whales ❖ Humpback Whales ❖ Grey Whales ❖ Beluga Whales ❖ Sei Whales ❖ Fin Whales ❖ Sperm Whales ❖ Right Whales ❖ Blue Whales ❖ Salmon ❖ Smolt Migration ❖ Harbor Seals ❖ Sea Otters ❖ Sea Lions <ul style="list-style-type: none"> ▪ Reproduction ❖ Sea Birds: <ul style="list-style-type: none"> ▪ Migration 	<p>Racers, like all other users, will be held to the same laws and regulations that instruct users to avoid negative contact with all wildlife. However, unlike the general boater, the racers will be educated on the various species of marine mammals and birds present in Alaskan waters and will be given strict rules to follow regarding harassment of wildlife. Each team will also be equipped with GPS units that will have off-limit zones mapped in them to include Sea Lion, Harbor Seal & Walrus haul-out(s). In addition to the GPS each racer will have a map with all wildlife sensitive locations on it, for example bird rookeries, sea lion haul-out, etc. GPS tracking devices will also be utilized and may be monitored by various agencies to assure that racers avoid the sensitive areas identified.</p>
<p>Negative Impacts on the Uplands:</p> <ul style="list-style-type: none"> ❖ Degradation of pristine/wilderness quality experience ❖ Stream bank erosion on the Kvichak ❖ Inappropriate within Wilderness Study Area 	<p>The Wilderness Study designation only applies to the Federally Managed (U.S. Forest Service) uplands and does not include the State managed waters of Prince William Sound. The racers do not plan to go to shore except for designated checkpoints unless it is an emergency. Therefore the racers will have little to no impact on uplands along the race course. Stream bank erosion along the Kvichak River occurs from not only the natural river processes but from other non-race users, the racers are no different from any other river user group other than the weight/size/displacement of Personal Water Craft (PWC) which produce a minimal wake.</p>
<p>User Conflicts:</p> <ul style="list-style-type: none"> ❖ Private ❖ Commercial: <ul style="list-style-type: none"> ▪ Fishing ▪ Tourism ❖ Subsistence 	<p>The race time was specifically scheduled to minimize conflict with other user groups.</p>
<p>Prince William Sound still in recovery from the Exxon Valdez oil spill</p>	<p>This event cannot be held responsible for the prior impacts created by the Exxon Valdez oil spill (EVOS). Currently, there are no boating restrictions as a result of EVOS.</p>

<p>Pollution:</p> <ul style="list-style-type: none"> ❖ Noise ❖ Water : <ul style="list-style-type: none"> ▪ Discharge/spillage of oil/fuel ▪ Marine Debris ❖ Uplands: <ul style="list-style-type: none"> ▪ Human waste/garbage ❖ Air 	<p><u>Noise:</u> The racers personal watercraft will not be creating noise beyond than that of any other user due to Federal Requirements on decibel (noise) requirements for PWC exhaust.</p> <p><u>Water:</u> The racers will be required to carry spill response equipment in the event of a fuel/oil spill. Racers will also be responsible for proper disposal of any waste and items generated from their vessel.</p> <p><u>Uplands:</u> Racers will be using designated checkpoints, i.e. villages and towns, who will handle waste using their already existing waste management infrastructure. Additionally racers will be educated in and practicing “Leave No Trace.”</p> <p><u>Air:</u> All entrants watercrafts will meet or exceed Federal Regulation 36 CFR §7.48(f)(3) which states that “After December 31, 2012, no one may operate a personal watercraft (PWC) that does not meet the 2006 emission standards set by the EPA for the manufacturing of two-stroke engines.”</p>
<p>Speed</p>	<p>The racers will be required to follow navigation rules as defined by the U.S. Coast Guard. Speed on the open ocean is unregulated. If speed limits are present, such in “No Wake Zones”, racers will abide or risk disqualification or other consequences.</p>
<p>Severe Weather</p>	<p>The Alaskan Wet Dog Race officials will continuously monitor the weather and will stop the race if the weather is deemed unsafe for travel.</p>
<p>Stress on and safety of potential rescuers, i.e. Coast Guard</p>	<p>The Alaskan Wet Dog Race will have over 110 safety/support vessels that will serve as rescuers if the need arises.</p>
<p>Incomplete Application</p>	<p>DNR has received a complete application based upon the application requirements.</p>
<p>Negative impacts on communities/stress on limited resources such as fuel, food, lodging, and waste facilities</p>	<p>The Alaskan Wet Dog Race has contacted each of the communities it plans to visit and it has been determined that the proper infrastructure exists to support this race.</p>
<p>Personal Watercrafts are not suited for Alaskan Waters</p>	<p>It is not the responsibility of the Department of Natural Resources to make determination of suitability. PWCs are listed in the Generally Allowed Uses for State Waters and have been used in Alaskan waters since they were marketed to the public.</p>

<p>Safety:</p> <ul style="list-style-type: none"> ❖ Participants ❖ Public ❖ Rescuers 	<p>The Alaskan Wet Dog Race will have over 110 support boats positioned at a various locations along the entire route who will be watching out for the safety of all race participants. As for the safety of the public AKWD cannot be held responsible for anyone outside of the race but precautions will be made by the race officials to inform the public of safety issues.</p>
<p>Illiamna and Kvichak still frozen during race time</p>	<p>If these locations are still inaccessible at race time then an alternate route will be determined at that time. An example that has been provided from The Alaskan Wet Dog Race is to end the race in NakNek or King Salmon just south of the Kvichak River.</p>
<p>Personal watercraft should have designated areas open to them</p>	<p>PWCs are listed in the Generally Allowed Uses for State Waters. While It is possible to designate areas that restrict access, the Department of Natural Resources has to go through a rigorous public process to restrict “Generally Allowed Uses” on State land and water.</p>
<p>Untested race course</p>	<p>The Department of Natural Resources seeks “To responsibly develop Alaska Resources by making them available for maximum use and benefit consistent with public interest.” New ideas often take an untested course.</p>
<p>Violates the Endangered Species Act</p>	<p>DNR cannot make the determination of whether or not this event violates the Endangered Species Act (ESA). Federal Agencies entrusted with enforcing the ESA were given notice of this event and an opportunity to comment. DNR did not receive comments that this was a violation of the ESA.</p>
<p>Invasive species introduced from foreign PWC</p>	<p>While DNR is not the agency responsible for regulating invasive species, the U.S. Fish and Wildlife Service (USFWS) will be inspecting all Wet Dog PWC vessels brought to Alaska, for invasive species .</p>
<p>No consultation with other agencies</p>	<p>DNR conducted a review of the event which was sent to all applicable agencies. A meeting with the U.S. Fish & wildlife Service and other agencies was conducted in January 2012 to solicit feedback.</p>
<p>Race does not require pre-qualification</p>	<p>DNR cannot dictate how the racer can participate in the event.</p>
<p>Nuka Passage is closed to PWC</p>	<p>We have not found any regulations restricting PWCs from Nuka Passage.</p>

Inconsistent with State Park Values (Anchor Point SRA)	This permit is for the General State Water and does not include the uplands of Anchor Point SRA.
Not in the best interest of the State of Alaska	The Department of Natural Resources seeks “To responsibly develop Alaska Resources by making them available for maximum use and benefit consistent with public interest.” This decision (the best interest of the State of Alaska) will be determined by the State of Alaska, Department of Natural Resources, Division of Mining Land and Water.
Lack of ability to communicate with other PWC and other users	Each racer will have multiple ways to communicate will each other and other users to include a satellite phone and marine radio.
Fuel availability	DNR is only considering the permit for an event on State managed waters and not with how the racers will be acquiring fuel.
Racer compliance to rules and oversight	Each racers watercraft will be equipped with ION Earths Satellite Radio Transceiver (SRT) set to transmit every 9-12 minutes which will enable race officials to ensure that racers do not enter off-limit areas.
Lack of expertise in conducting an event of this type	DNR cannot determine whether a business has the proper credentials to operate.
No set race course	The Alaskan Wet Dog Race has submitted a race course.
Lack of enforcement personnel to protect natural resources	DNR cannot control the amount of enforcement personnel.
Would result in a “take” as defined by MMPA	DNR cannot enforce a Federal Code. This event will be monitored by the appropriate Federal Agencies entrusted with enforcing the MMPA who will make that determination and hold the violator accountable if a taking occurs.