

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SARAH PALIN, Governor

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March 12, 2009

Ralph Moore, Superintendent
Katmai National Park & Preserve
P.O. Box 7
King Salmon, AK 99613-0007

Dear Mr. Moore:

The State of Alaska reviewed the *ATV Use by Residents of Iguigig and Kokhanok, Alaska in Katmai National Park and Preserve: A Thematic Overview* by Douglas Deur. The following comments represent the consolidated views of the State's resource agencies.

We commend the Service for compiling this valuable report and understand it will be relied upon, along with other supporting information, for future decisions about subsistence all-terrain vehicle (ATV) use in parts of the Preserve. As the Service continues this effort to study subsistence ATV use at Katmai (as well as in other park and preserve areas in Alaska) for management purposes, we request the State be included as a cooperative partner to help ensure all available subsistence use data, as well as research methodology, is jointly considered. We also offer the following observations and suggestions for your consideration.

The report represents the historic and recent use (up to 2002) of ATVs in the study area. While the number of respondents is limited, the study shows that ATVs are used extensively in the area, having rapidly supplanted dog teams as the primary mode of transportation for subsistence purposes over the last forty years. While this report serves as a snapshot of subsistence ATV use documented thus far, we caution against viewing documented use and areas of use as static. Should the abundance of subsistence resources in an area change (as is noted for the Alaska Peninsula on page 5 of the report), users should be able adjust use patterns accordingly. Areas not utilized for many years may once again become productive, while other areas may experience reductions in use. In addition, the study area is very remote, the local population small, and given ATV use in the preserve is primarily limited to seasonal use when the ground is frozen, potential impacts would likely be limited. Rather than locking in specific trails and areas at the onset, we encourage the Service to view subsistence use in this area as dynamic and to develop monitoring processes to detect potential resource damage and changing needs. This would allow continuing opportunities for subsistence appropriate for the area while ensuring adequate protection of preserve resources.

The report does not reference a key individual, John D. Nelson, who traveled the area extensively by ATV (three-wheeler). While deceased since approximately 1989, his survivors likely have knowledge of his travels and we recommend the Service document that additional historical information. We are also aware that some residents from the Village of Levelok have traditionally traveled up the Alagnak River using a combination of prop and jet driven skiffs carrying ATVs to access the Kukaklik and Nonviannuk lakes area for subsistence. Lastly, the Igiugig Native Corporation is a major land owner within the preserve. It is conceivable that local village residents could bridge Pecks Creek in winter and extend ATV use from Igiugig to corporation land at Kukaklik Lake.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Magee', written in a cursive style.

Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator