

# STATE OF ALASKA

**SARAH PALIN, Governor**

## **ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting**

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May 15, 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 Foundation Statement for the Katmai National Park and Preserve. The following comments represent the consolidated views of the State's resource agencies.

We understand direction to prepare Foundation Statements comes from the National Park Service 2006 Management Policies and that information included in the documents will provide a basis for future planning efforts. As such, we anticipate certain information and statements will be duplicated in future planning documents. We are therefore requesting primarily technical clarifications we believe will prove beneficial in the long-term. We are available for follow-up questions or discussions if needed.

**Page 4, Significance Statements, #2:** Though Katmai National Park and Preserve may have the highest number of bears in the National Park System, it is difficult to determine if Katmai is home to the "*world's largest protected population of brown bears.*" Bear populations can be identified multiple ways, including by total number or density levels, and can fluctuate from year to year. We recommend adding the modifier "*one of*" to this sentence to make it undisputable.

**Page 9, Bear Hunting in the Preserve:** Although we recognize the term "*sport*" hunting is used in ANILCA, it is no longer used in the Alaska Department of Fish and Game (ADF&G) regulations. We request "*sport*" be removed from this sentence and offer the following revision for your consideration.

*Bear hunting in Katmai National Preserve is managed to permitted sport and subsistence bear hunting so long as a healthy bear populations is are maintained.*

**Page 4**, fourth significance statement: To avoid confusion with the Endangered Species Act, we recommend not referring to “critical” habitat. We instead recommend using the term “important” or alternatively, not modifying “habitat.”

This comment also applies on page 11, where the significance statement is repeated.

**Page 10**, Social Fabric: The term “fishery” applies to the taking of fish, which is the managed by the State. To be more consistent with the Master Memorandum of Understanding between the National Park Service and ADF&G, as well as the Significance Statement, we recommend the sentence be revised and suggest the following.

*The park protects habitat for an abundant salmon fishery that supports...*

or

*The park protects ~~the an abundant salmon fishery~~ population that supports...*

**Page 11**, Historic Homelands: As written, this statement may be confusing to the reader as travel corridors and defined territories could imply human activities. For clarity we recommend rephrasing this bullet to more clearly refer to fish and wildlife.

*The park preserves watersheds that have provided important travel corridors and ~~defined~~ territories sustaining populations of fish and wildlife through time.*

**Page 13**, Subsistence bullet: While the term “Park” may imply all of Katmai, to clarify that in addition to the park’s traditional red fish fishery, subsistence activities are also allowed in the preserve, we recommend the following revision:

*The Park and Preserve provides opportunities for local rural residents to engage in customary and traditional subsistence uses.*

**Page 15**, Ethnography and History: Because of their proximity to the Park and the river, we recommend also including South Naknek and King Salmon. In addition, while trapping is often conducted for subsistence and other purposes, the Alaska National Interest Lands Conservation Act (ANILCA) does not categorize trapping. For example, ANILCA Section 1313 refers to “*the taking of fish and wildlife for sport and subsistence purposes, and trapping shall be allowed...*” We therefore request this sentence be revised and offer the following suggestions for your consideration.

*Residents of Levelock, Igiugig, Kokhanok, King Salmon, Naknek, and South Naknek have deep connections to the river and continue subsistence hunting; and fishing, and trapping in its watershed.*

or

*Residents of Levelock, Igiugig, Kokhanok, King Salmon, Naknek, and South Naknek have deep connections to the river and continue subsistence ~~hunting,~~ fishing, and trapping activities in its watershed.*

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". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'M'.

Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator