

# STATE OF ALASKA

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267-2202

October 21, 1983

Mr. Roger Contor, Regional Director  
National Park Service  
2525 Gambell Street  
Anchorage, AK 99503

Dear Mr. Contor:

Thank you for the opportunity to review the internal draft of the Alagnak River Management Plan. The State Conservation System Unit (CSU) Contacts have provided a number of comments, primarily concerning the plan's emphasis on managing the river corridor as an extension of Katmai National Park and Preserve rather than as a Wild River.

Throughout the plan, but particularly within the management objectives section, the river corridor is referred to as a park/preserve. Legal mandates for the management of parks, preserves and wild river corridors are different. If it is the National Park Service's (NPS) intent to manage this designated river corridor in a manner different than other designated river corridors in the State, the State CSU Contacts would appreciate knowing what public participation process was used in reaching that decision.

It is inappropriate to reference the Katmai General Management Plan (GMP) as a supporting document for this plan until the GMP has undergone the required public participation and review process. The draft Bristol Bay Cooperative Management Plan (BBCMP), which includes the Alagnak River, has already undergone extensive public participation. It includes management guidelines, proposed land exchanges and other information to assist cooperative management of the areas (see attached excerpts). Reference to the BBCMP would be more appropriate than current references to the Katmai GMP. Because of these general deficiencies and those specific items listed below, we feel this plan is insufficiently detailed to be an acceptable management plan for the Alagnak River corridor.

Specific comments

- Page 2, paragraph 3 - It would assist the reader to note that specific Wild and Scenic River boundary requirements are contained in the Alaska National Interest Lands Conservation Act (ANILCA) Section 605(d).
- Page 3, paragraph 2 - The Katmai GMP is not available for public inspection, therefore, reference to this plan is inappropriate.
- Page 4, paragraph 1 - Most local people refer to the Nonvianuk-Alagnak as the "Branch" River (e.g. all Alaska Department of Fish and Game (ADF&G), Commercial Fisheries reports). It would be clearer to some readers if this name was also referenced in the plan.
- Page 4, paragraph 2 - Sloughs are important to mammals, as well as the birds and fish mentioned.
- Page 5, paragraph 2 - A more detailed vegetation description than saying the river flows "through the woods" would be appropriate.
- Page 6, Land Status - Sec. 605(d) of ANILCA states "The Secretary of the Interior shall take such action as is provided for under Section 3(b) of the Wild and Scenic Rivers Act to establish detailed boundaries and formulate detailed development and management plans within three years..." (emphasis added). There is not a description of the lands within the boundaries and the map included does not meet the requirements of ANILCA. To fulfill these requirements, a written legal description of the boundaries is necessary as has been or is being drafted for other CSU boundaries. An appendix containing those boundary descriptions, similar to that presented in Bureau of Land Management (BLM) river management plans, would be helpful.
- Page 6, Fish - The draft plan seems to over emphasize the river as a major producer of rainbow trout and salmon. Specifically, the statement that the Alagnak River may be a significant producer of sockeye salmon. In 1963, the escapement was truly "significant;" however, over the next 20 years the river could not be considered a "significant contribution to the Kvichak's production." (See attached Table.) The river is important, but should not be awarded the status of a "significant" producer. Similarly, in some years, Bristol Bay supports the largest and richest commercial fishery, but certainly not in every year as the draft implies.

We suggest the following language taken, in part, from the BBCMP: "The Kvichak River system, including Lake Iliamna and the Alagnak River, is the single most important source of salmon in the Bristol Bay region. The Alagnak itself is an important contributor to the sockeye salmon production of the system. This resource provides for commercial, subsistence and sport users."

As the plan notes, the Alagnak is a part of the Bristol Bay Wild Trout Area. Management criteria for the Area, listed on the attached memo, that are placed on the Alagnak are the same as for all of Bristol Bay with the exception of the requirement to use unbaited, single hook lures, and the prohibition against helicopters. These two restrictions apply to the entire Wild Trout Area of which the Alagnak is the southern boundary. According to the Annual Performance Report for Alaska Statewide Sport Fish Harvest Studies (attached), silver salmon, chum salmon, Dolly varden and grayling were more abundant in the sport's catch than were king salmon and rainbow trout in 1981. Data for 1982 can be obtained in the ADF&G office in Anchorage.

Page 6, last sentence - For clarification, more information on the subsistence fishery could be included here, or the reader could be referred to the Subsistence section on page 8.

Page 7, Wildlife - This section should be expanded to document the status of major wildlife populations. This information can be found in the BBCMP (pages 33-39).

The river system is receiving increasing sport hunting pressure each fall by persons hunting for moose by floating the river; however, it appears that this use occurred outside the period of NPS visitor use data collection. ADF&G Game Division responds to several requests for hunting information by potential "floaters" each fall. Moose and bears are a part of the "Alagnak Ecosystem" but they rarely occur in situations where persons will visit the area with the primary purpose of viewing these species. Therefore, continued sport and subsistence hunting is compatible with the primary human recreational use of the system. ADF&G has the primary responsibility for the regulation of such hunting and "protect[ion] of moose and brown bears" in the river corridor. We request that this plan acknowledge this responsibility.

Page 8, paragraph 2 - "Kakhonak" should be Kokhanok" (it is spelled incorrectly on U. S. Geological Survey maps).

Page 8, Subsistence - Alagnak is no longer an inhabited community as listed here. The section should also note that residents of Naknek, South Naknek and Clark's Point use salmon and big game from the designated river corridor.

Page 9, last paragraph - We suggest the next draft include a more detailed citation of "MacKevett, Singer, and Holloway, 1978."

Page 10, paragraph 2 - We request that the sentence stating that the area has been "largely unevaluated" for petroleum development be changed to indicate that the BBCMP rated the area as having moderate potential.

Page 11, #1 - "Kukaklet Lake" should be "Kukaklek Lake."

Page 12, Boundary Determination - Sec. 606(a)(1) of ANILCA states "the boundary of each such river shall include an average of not more than six hundred and forty acres per mile on both sides of a river..." (emphasis added), in referencing this subsection in text, the plan should include the emphasized phrase.

From the map attached, there is little consistency with the width of the corridor in relation to the text concerning the Character of the River (page 4). The text states that the Alagnak River for 6 miles from the outlet of Kukaklek Lake has a view that is open and unobstructed extending 2-4 miles from the river. The width of the corridor reflects this. However, the next 10 miles of the river form an incised channel 100-200 feet deep, limiting the view from the river. The corridor appears to be widest at this point and there is no logical explanation for this increase. The character of the river changes again near the confluence of the Nonvianuk River and for the next fifteen miles. The river becomes braided and spreads out across a flat countryside. "Views from the river are generally very confined by vegetation and flat topography," yet the corridor is 2-4 miles wide with no documented justification. For the next twelve miles, the character of the river again changes from braided to several large channels. The vegetation permits views from the river for up to a mile. The corridor width appears more consistent, but there are two or three areas of expansion with no documented explanation. While it appears that an overall formula for accountability of acreage was used, there is no logical documentation as to why the boundaries were established. There appears to be an imbalance with the corridor wider where it is adjacent to the preserve and wilderness and narrower where it moves away from Katmai. If it is the NPS's intent to have greater acreage near the preserve, we would appreciate a statement of this intention and an explanation for it.

We are concerned about the lack of acknowledgment of inholdings including discussions of NPS management guidelines or intent. Examples include: 1) The only inholdings the plan mentioned are Native Allotments and a private patent; 2) there is no mention of RS2477 rights-of-way and potential cooperative management with the State. The BLM river management plans addressed this issue in the following manner, "When rights or title are granted directly by statute, such as RS2477, these rights can only be adjudicated in the court system. However, for the purposes of carrying out the Bureau's administrative duties, a determination may be made. Such a determination will not affect the legality of an RS2477 right-of-way but would provide a basis for administrative actions such as acceptance of right-of-way applications or trespass action;". We suggest you consider addressing NPS intent in a similar manner. 3) Navigability determination will affect the ownership of the riverbed. Management agreements with

the State as to the riverbed's use might be needed or desirable. For example, mining and gravel sales do not presently occur, but could occur under State ownership; 4) the BBCMP proposal for land exchanges has not been addressed.

Page 13, paragraph 1 - ANILCA Sec. 103(b) states, "Whenever possible boundaries shall follow hydrographic divides or embrace other topographic or natural features." The plan does not comply with this section; we anticipate that your technical staff will have corrected this error prior to public distribution of the draft river management plan.

Page 15, paragraph 1 - We request that throughout this section, "park/preserve" be corrected to read "river corridor."

Page 15, paragraph 2 - Cooperative water plans in this case should involve cooperation with the State. As you are aware, Alaska Statute 46.15 requires that permits be obtained for any water rights which NPS feels are necessary to fulfill its management objectives.

Page 15, paragraph 4 - We request that the plan acknowledge that benefits for local uses and users as well as visitors are important in the management of the area.

Page 15, paragraph 5 - Objectives written for the park/preserve are not necessarily appropriate for the Alagnak river corridor. We request that specific objectives be presented for the designated wild river corridor.

Page 16, paragraph 1 - The plan should note if such permitted activities as camping, fishing and hunting are considered to be in conflict with this objective to manage the area for "minimum adverse impacts on brown bears." Also, moose and other wildlife deserve recognition, and emphasis on habitat protection, rather than species protection, would be appropriate.

Page 16, paragraph 3 & 6 - We request that the "factors basic to the area's establishment" and "the purposes of the area" be spelled out more clearly.

Page 16, paragraph 4 - The ADF&G management plans for the area, provided previously in resource recommendations for Katmai, are written to achieve the optimum sustained yields of wildlife populations, not optimum population levels. A brief description of the term "optimum population level" would be appropriate here as would acknowledgement of the NPS/ADF&G Master Memorandum of Understanding (October, 1982).

Page 16, paragraph 6 - Cooperative research efforts with State, University and private entities could be mentioned at this point.

Page 17, paragraph 1 - Although Alagnak's fish and wildlife resources are impressive, they cannot be considered "superlative" (see previous discussion of Fish on page 6).

Page 17, paragraph 2 - We request that this paragraph acknowledge that both sport and subsistence hunting are allowed in the river corridor.

Page 17, paragraph 4 - "resourve" should be "resource."

Page 17, paragraph 5 - Hunting and trapping should be listed as activities compatible with the river corridor's natural environment.

Page 18, Limitation of Use - The data collection period appears to have been outside the hunting and trapping seasons and, therefore, introduces an unacceptable bias into the plan. We request that information on these activities be included in future drafts.

Page 20, Facility Development - We request that this section be more specific, especially in paragraphs 1 and 2 on page 21. The NPS should identify campsites on public lands or easements, such as Kukaklek Lake. The wording on page 21 should be rewritten so that it does not suggest a lack of committment ("NPS máy mark the easement.")

Page 22, NPS Administrative Facilities - This section could also note that since 1955, ADF&G (or its predecessor organization) has maintained a salmon counting tower and base camp within the designated wild river corridor (note enclosed map). This project was discontinued in the mid-70's for cost efficiency. At some future time, it may become desirable to reopen this project.

This project is consistent with the Wild and Scenic River Management Guidelines adopted by the Alaska Land Use Council (November, 1982) and the BBCMP.

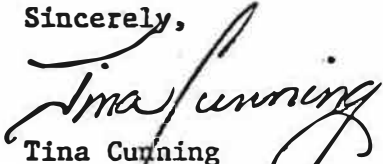
Page 23, paragraphs 1 and 2 and Page 24, paragraph 1 - Although it is stated that "no additional restrictions on sport hunting or trapping are proposed," the "Bear Management Plan" appears to preclude sport hunting of bears within the wild river corridor. We request that the status of hunting and trapping on non-preserve, non-park lands be clearly identified and cooperative management with ADF&G be acknowledged.

Wildlife research should investigate populations, not just corridor use by individual animals. Hence, the stated wildlife inventory plan may be unrealistically ambitious. We suggest that your wildlife staff pursue cooperative research planning efforts with ADF&G to help identify important regional research needs.

Page 25, paragraph 2 - Acknowledgment of the BBCMP would be appropriate. This item regarding cooperative management should also be given a higher priority.

Thank you for the opportunity to provide information and assistance at this preliminary stage of drafting the Alagnak Wild River Management Plan. Hopefully these comments will help you and your staff in revising the plan. If we can be of further assistance, please contact us.

Sincerely,



Tina Cunningham  
State CSU Assistant

cc: L. Nebel, NPS  
R. Foster, CACFA  
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Attachments