

# STATE OF ALASKA

BILL SHEFFIELD, GOVERNOR

CSU Planning Office  
333 Raspberry Road  
Anchorage, AK 99502

267-2202

*File: CSU-NPS-GLBA*

August 5, 1983

Roger Contor  
National Park Service  
2525 Gambell Street  
Anchorage, AK 99503

Dear Mr. Contor:

State Conservation System Unit (CSU) Contacts have completed their review of the Glacier Bay National Park/Preserve General Management Plan (GMP) and Environmental Assessment (EA). The following review only addresses the GMP and EA. Comments on the proposed commercial fishing and access closures in the Glacier Bay area will be addressed, for the most part, in a separate review of the proposed closure regulations.

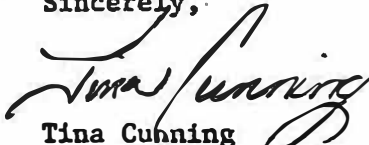
In summary, State CSU Contacts found the GMP to be similar in deficiencies to the recent Lake Clark GMP. It does not fulfill the requirements of the Alaska National Interest Land Conservation Act (ANILCA) Section 1301; it is insufficiently detailed and does not specify the National Park Service's (NPS) management intent for the area. Further, the GMP does not reference or address the State's general issues list or the Master Memorandum of Understanding (MMOU) between the NPS and the Alaska Department of Fish and Game (ADF&G). State CSU Contacts also noted that the EA provided with this plan is insufficiently detailed and that the impacts of the plan on the affected human environment warrant a complete Environmental Impact Statement (EIS).

Because of the deficiencies of this plan, the State cannot recommend any of the suggested alternatives. We recommend that the plan be withdrawn and rewritten to meet the requirements of ANILCA. Attached are the State's detailed comments on the Glacier Bay GMP/EA. Please review them and let us know if we can clarify any items for you.

August 5, 1983

We appreciate the opportunity to review this plan, as well as the cooperative planning efforts which have been recently initiated by the NPS. We offer our State CSU planning office's assistance in helping the NPS prepare its future plans for Glacier Bay and the other NPS conservation system units in Alaska.

Sincerely,



Tina Cuning  
State CSU Assistant

**Attachment**

cc: L. Parker, ALUC  
R. Foster, CACFA  
State CSU Contacts

August 5, 1983

*Excerpts from att'd  
page-specific DFG comments.*

alternatives to avoid bear/human conflicts. Such investigation could help in the development of wise regulation for park areas.

Page 18, Alternative A, Commercial Fisheries: Alternative "A" (pp. 18-21) is favored by the NPS and contains some very constructive proposals. The suggestion that the wilderness designation be removed from the Beardslee Entrance passage is particularly welcome. The approach to fish camp facilities in the Dry Bay area (pp. 18 and 37) is also acceptable. Unfortunately, Alternative "A" also contains much with which we cannot agree, including some statements which are simply incorrect. This plan results in the loss of some State resource management authority and could also result in the loss of some harvest potential. It appears that in some of its presentations to the public, the NPS may have misrepresented the ADF&G's earlier comments as being supportive of this plan.

Some fishermen do target on resources in Glacier Bay; they do not just fish there when other areas are not productive or available as implied in the plan. Crab and halibut fishermen in particular fish in Glacier Bay because catches are good. Increased effort in the crab fisheries have caused fishermen to explore new areas such as Glacier Bay.

The plan states that traditional commercial fishing methods will be permitted but states that traditional seining is limited to the Excursion Inlet area. During the late 1960's, the entire Bay was open to seining. The Excursion Inlet limitation will preclude any harvest of pink or sockeye salmon runs in the Bay if an unusually large return develops. Normally, this would not occur as the streams in this area are quite small; however, the option of opening this area now exists.

The plan seems to assume that the commercial harvest of some species in Glacier Bay would reduce the available food supply for humpback whales and work to the detriment of the whale population. We are not aware of any research which indicates that whales are dependent on food in Glacier Bay. There has never been significant harvest of shrimp, euphausids, herring, pollock, sand lance, or capelin in the Bay and the assumption that whales would be harmed by any such harvest is speculative. The NPS should refrain from permanently closing a fishery until supporting research evidence is available.

The proposal to establish a separate statistical reporting and/or registration area for Glacier Bay is both unnecessary

and unworkable. Glacier Bay is currently a separate sub-area in both the shellfish and salmon net fisheries and fishermen are requested to report their catches by sub-area. This is not an enforced requirement, however, because most vessels fish in more than one sub-area during a trip and it would be difficult to keep the catch from a particular sub-area separate until landing. Fishermen usually lump catches from the smaller sub-areas. It would be possible to provide some of the information which the NPS wants under the current system, but it would require additional enforcement effort to prevent area reporting violations. Halibut landings, however, are generally reported only by general district or by the even larger International Pacific Halibut Commission areas. The salmon troll fishery is another fishery which does not consider Glacier Bay to be a distinct sub-area. In that fishery, a sub-area designation would be of little use to area fishery managers; the salmon troll fishery is highly mobile and is usually not managed for units which are that small. Registration in and out of Glacier Bay would undoubtedly provide the best catch information in all fisheries but would cause severe enforcement and administrative problems. Fishermen are reluctant to report catches by radio because additional effort might be attracted to an area in which catches were good. Some boats would enter and leave the Bay several times during a single trip and that would complicate the reporting procedure.

As a point of interest, pages 78-79 list historic catch levels for fisheries in the park. Given the nature of the reporting problems in this area, it is difficult to determine how the catch estimates for salmon and halibut were derived.

We do not find evidence to support the proposed commercial fisheries closures in the "wilderness waters," Muir Inlet, or the west arm of Glacier Bay. Commercial fishing in the other areas should have minimal impact. Problems with sub-area catch lumping in the current reporting system were discussed earlier and these reporting patterns make it impossible to document the actual catch levels from the areas proposed for closure. We do know, however, that Tanner and king crab fishing occurs during the winter when other usage of the areas is nil. Trolling and dungeness crab fishing effort occurs in the summer months but is fairly light. The effort in the halibut fishery is concentrated but in recent years, occurs only for a very short time.

Page 21, Alternative B: This alternative still includes the "wilderness waters" commercial fisheries closures and for this reason is not totally acceptable. It also includes the

assumed closure of commercial fisheries on all species which might represent whale food and, as we noted in the comments on Alternative "A," the NPS should document the need for these closures.

Page 21, Alternative C: Alternative "C" is totally unacceptable because it proposes a total phase-out of all commercial fishing activities in Glacier Bay. Commercial fishing is a traditional use of the marine waters of the Bay and should not be considered incompatible with the management of a national park in Alaska.

Discussion of this alternative (p. 88) suggests that a natural balance would occur within Glacier Bay if commercial fisheries harvesting is eliminated there. This might be true for some shellfish populations but would not be true for salmon and halibut. Both of these populations are highly migratory and harvest would still occur in areas outside the Bay. An attempt is also made (pp. 95-96) to mitigate the economic impacts of the implementation of Alternative "C" and the "wilderness waters" closures by suggesting that the ADF&G could raise catch limits in areas outside the Bay to offset the resulting loss of resource availability. This action could not be taken without some biological impacts on and reallocation of salmon stocks bound for other areas, or without adverse impacts on stocks of other species which are already fully utilized.