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August 29, 1991

Mr. Alan Eliason  
Superintendent  
Katmai National Park  
and Preserve  
P.O. Box 7  
King Salmon, AK 99613-0007

Dear Mr. Eliason:

The State of Alaska has reviewed the Development Concept Plan (DCP) Workbook for the Brooks River Area within the Katmai National Park and Preserve. This letter contains the consolidated comments of the State's resource agencies.

On behalf of State agencies, thank you for the opportunity to attend the July 16 briefing on the DCP. Based on the information provided at the meeting and in the DCP itself, we conclude that this planning document neither adequately acknowledges the current, diversified uses of the area nor develops an appropriate range of alternatives to address the existing uses and competing user groups. Further, the DCP does not acknowledge State ownership of or management provisions for State land and water. We request that the NPS more comprehensively re-evaluate the scope and direction of this planning process before proceeding further.

Public Participation

Paramount to the successful completion of any planning process is appropriate public participation. Notification and opportunities for public and agency comment have not been adequate in this instance. Design of studies on wildlife, fisheries and their uses should have been formally coordinated with the State. Similarly, acquisition of data on public uses needs significant improvement. Both of these deficiencies could have been minimized had proper consultation with the State and other organizations occurred. The State looks forward to improved coordination on this project in the future.

### Clarifying the Issues

We request that NPS clarify the issues that the planning process is attempting to address. Currently, it is unclear whether NPS is most concerned with public safety issues resulting from sport fishermen and bear interactions, alterations of bear behavior resulting from those same interactions, or establishing bear watching as the priority human use. It is also important for NPS to link the issues with the purposes of the unit and show how the proposals are consistent with these purposes, including protection of recreational opportunities.

### Data Gaps

Before the NPS and the State can make an informed decision on future planning objectives and management directions for the Brooks Camp area, the following information needs to be obtained and incorporated into the planning process:

- \* Documentation of angler-days (historical, current, and estimated future). The Alaska Department of Fish and Game, Sport Fish Division, has this type of information available for the Brooks River area.
- \* Documentation of visitor-days (historical, current, and estimated future). This information may be available from concessionaires, air taxi services, tour operators, and visitor organizations. If it is incomplete, then additional surveys may be needed.
- \* Documentation of visitor characteristics, including visitor preferences and attitudes, and background information. Surveys need to be completed before resuming the planning process. The NPS cannot establish reasonable objectives for visitor use (e.g., overnight vs. day use, bear watching, sport fishing) until they know what visitors want and why. The draft Katmai: Brooks Camp Visitor Survey (1989) was intended to be a cornerstone of the DCP. This report should be finalized and/or updated and used in the DCP planning process.
- \* Documentation of bear movements and behavior. Prior to making a decision to move the lodge, adequate information about bear movements and behavior must be obtained for the existing camp area as well as alternative areas where new facilities might be constructed. Otherwise, facilities could be relocated into an area where bear impacts and/or interactions would still be problematic.

### Fishing and Bear Viewing

The Brooks River supports a historically significant sport fishery for both rainbow trout and sockeye salmon. The river supports important commercial services and recreational fishing opportunities from June through October. The area also provides internationally known bear viewing opportunities. We believe these important recreational opportunities are not mutually exclusive and should be maintained.

We request that NPS clearly define and cooperatively develop goals and objectives regarding the utilization and enjoyment of both fish and bear resources. We strongly encourage the NPS to more fully develop a wider range of alternatives for review by the public and State agencies.

We strongly object to the proposals on page 58 that would restrict fishing opportunities regardless of which management alternative is selected. The State has management authority over fish and wildlife resources. Any such NPS restrictions are inappropriate and must be pursued through the State's regulatory process (Board of Fisheries) after completion of appropriate consultation and cooperative studies. After the NPS has provided the additional information requested above, the State will reassess the specific management proposals.

### Management of State Land and Water

The plan does not adequately acknowledge State ownership of shorelands, tidelands, and watercolumns within and adjacent to the park. A section should be added to the plan that explains that the State owns and manages these lands and waters.

The area map on page 3-6 depicts the Brooks River area being within the boundary of the park. The map is misleading. Also, on September 7, 1987, the NPS amended the boundary of the Park to follow the mean high tide line. These corrections should be reflected on the maps and the boundaries redrawn.

In October 1990, the Department of Natural Resources (DNR) submitted a copy of Director's Policy File (DPF) 91-03 to both the NPS Regional Office and the superintendents of all Alaska park units, including Katmai (see attached). The DPF outlines State management guidelines for State land and water within and adjacent to the unit. DNR gave NPS the opportunity to comment on and suggest changes to this policy if necessary. NPS has made no proposals to the State to date.

To address State land and water, the State requests that NPS include a section in the DCP that clearly explains that the NPS manages uplands, and the State owns and manages shorelands,

Mr. Alan Eliason  
Katmai NPS DCP

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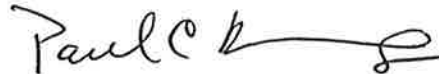
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tidelands, and watercolumns. NPS should also make it clear that any management guidelines in the DCP apply only to NPS uplands and do not apply to State land and water. The plan should include DPF 91-03 as an Appendix or separate chapter so the public knows the management guidelines that apply to State land and water.

Also, if NPS would like the State to consider modifying or refining DPF 91-03 to meet specific NPS needs, please let us know so we can consider changes to the policy.

Thank you for the opportunity to provide these comments. We look forward to hearing from you and working together on managing this important area. If you have any questions, please feel free to contact this office or the appropriate State resource agency.

Sincerely,



Paul C. Rusanowski, Ph.D.  
Director

cc: Commissioner Harold Heinze, Dept. of Natural Resources  
Commissioner Carl Rosier, Dept. of Fish and Game  
Commissioner John Sandor, Dept. of Environmental  
Conservation  
Paul Haertel, Associate Regional Director, NPS