

# STATE OF ALASKA

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June 30, 1994

John M. Morehead  
Director  
National Park Service  
2525 Gambell Street  
Anchorage, AK 99503

Dear Mr. *Jack* Morehead:

The State of Alaska has reviewed the draft Development Concept Plan and Environmental Impact Statement for the Brooks River area within the Katmai National Park and Preserve. This letter represents the consolidated comments of the State's resource agencies.

Brooks Camp was initially developed, not because of bears, but to support the world class recreational fishing opportunities present on the Brooks River. The Development Concept Plan clearly shifts recreational use of the river area away from recreational fishing toward bear viewing. While we recognize the value of local bear viewing opportunities, the State does not support any alternative which is biased against traditional, non-impacting, consumptive, recreational activities.

#### Alternatives

We are dismayed that this internationally recognized sport fishing opportunities along the Brooks River are being forsaken by park managers. The National Park Service (NPS) has been developing a bear viewing program which has heightened conflicts between bear viewers and recreational anglers. For example, the bear viewing platform and footbridge were placed at a key recreational fishing area. Consequently, recreational anglers are placed in direct view of people watching bears. When funds were recently available to make improvements for visitor facilities, the NPS chose not to elevate and move the location of the footbridge--the single most cause of bear/human conflicts in the area.

We urge the NPS to increase its focus on enforcement of its own and the State's regulations on food-handling and similar activities which attract bears. During the summer of 1992, the NPS inappropriately implemented a sport fishery closure, preempting State regulatory authority, rather than enforcing and citing a park visitor for violating park regulations at Brooks River. Increased enforcement, education, and limitations, particularly of photographers; as well as redesigning the bridge crossing at Brooks River and bear viewing platforms, should receive increased attention as essential projects regardless of alternative rather than "respond to problem incidents park-wide." The latter is undefined and certainly of less immediate import than enforcing existing regulations. We remain unconvinced that any alternative will realistically solve bear/human conflicts until the bear viewing platforms and river crossing are designed to reduce encounters. We support no alternative which includes the proposed reductions on sport fishing activities.

NPS must also simultaneously revise day-to-day operations to include "training" of bears, as is done through the State's highly acclaimed McNeil River bear viewing program. Such training does not affect the "natural" state of the bears; such training, along with steps to reduce unnecessary encounters, would allow visitor uses of the area to further increase without impacts to the bear population.

The bears have coexisted with recreational anglers at Brooks River for decades. We believe the bears, bear viewers, and recreational anglers can coexist at Brooks River. Instead, the orientation throughout the plan is to unnecessarily reduce fishing activities in favor of limited viewing opportunities.

#### Bristol Bay Native Corporation Views

State agencies are aware of the interests of the BBNC concerning an increased focus on day use of the park, dispersing recreational use to other areas, and shifting overnight lodging out of the vicinity of Brooks Camp. Generally the State is supportive of BBNC's observations and suggestions, with the notable exception of proposals to limit sport fishing.

Specifically, the State endorses the following concepts:

\* The plan should place greater emphasis on promoting a gateway community orientation, which is consistent with ANILCA Sections 1306 and 1307. Such an approach would provide a stronger contribution to the regions's cultural and economic health.

\* The plan should disperse visitors to other locations within the park and avoid unnecessary restrictions to visitation.

At least one new alternative should include a well-developed gateway community approach which highlights the linkages between the Brooks River area, the remainder of the park, and the surrounding region. Such an approach should specifically focus on the balance between ease of management and improving the economic well-being of the region's economy.

#### Cultural Resources

Consistent with BBNC's comments about the cultural significance of the Katmai area, the State believes that NPS should emphasize both *protection* of cultural resources and their *interpretation*. The current placement and operation of Brooks Camp facilities, for example, is both detrimental to the cultural resources and does little to direct visitor attention to the rich cultural history of this historically and archaeologically significant area. More emphasis is needed in research and interpretation in cooperation with local residents whose ancestors were the first to utilize and appreciate the significance of this area.

#### State Ownership of Navigable Waterways

The State continues to assert ownership and management jurisdiction over the beds of navigable waterways and the watercolumns throughout the Katmai National Park and Preserve. The NPS does not have the authority to manage or restrict uses of these waterways, and must approach the State with any management proposals for these areas.

#### Public and State Involvement

We request that commitments to full and active future participation by the public in general, and the State in particular, be clearly inserted up-front in the plan. Although there is a listing of all other plans for Katmai and description of their relationship to the Brooks River planning effort, there is no recognition of the role of the public and State, as required by the ANILCA, in preparation and revisions of the plan. Adoption of the General Management Plans (GMPs) for each park unit was contingent upon subsequent step-down planning efforts invoking the same public and State involvement as required of the umbrella documents (ANILCA Section 1301). It was generally understood that the original GMPs did not contain the required specifics and details, hence many commitments were made that similar public involvement would be incorporated into subsequent plans.

The State is concerned about this issue based on the track record of this DCP in the last few years. Initial alternatives prepared by the NPS were discussed in a meeting in July, 1991. As a result of this meeting, both the State and NPS concurred that additional data was necessary, and commitments were made to

cooperatively conduct further research and come up with revised alternatives. At an August 1993 briefing meeting covering the status of planning for Brooks Camp, Department of Fish and Game (DFG) representatives raised a number of specific data questions regarding research design, alternate measures to reduce bear/human encounters, and steps to resolve some of the immediate people management problems. In the time between these two meetings, our records indicate that the NPS only contacted DFG on three occasions seeking input into bear research studies and related possible activities. The consultations did not address the range of concerns previously raised by DFG and cannot be considered adequate consultation or coordination as required in ANILCA Section 1301 and reiterated in the GMP.

#### Use of the Statement for Management

We once again strongly object to application of management direction which is derived from the "Statement for Management" (page 5). The Statements for Management for each Alaska park unit were unilaterally prepared by the NPS subsequent to passage of ANILCA without the public involvement required in ANILCA Section 1301. The State strongly objected to the adoption of the decisions contained in those documents and has consistently objected to their continued inappropriate use as guidelines for management of the units. Such continued use of these documents is contrary to clear Congressional intent that the public and state be fully involved in planning decisions regarding resources.

#### Management Objectives

The State has also consistently maintained that numerous management objectives within the "Statement for Management" are in conflict with mandates of ANILCA. For example, objective #2 contains an direction which could conflict with ANILCA mandates:

Objective #2: "maintain the park and preserve as an area where brown bears can exist as naturally as possible with minimal adverse impacts from humans"

Yet ANILCA mandates the unit be managed to "protect . . . recreational features."

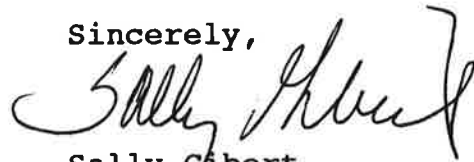
Obviously the Brooks River area has been used historically as a significant recreation area for sport fishing. The population of bears is stable or higher than in previous years. As such the population is not impacted by the sport fishing activities which continue in the area. The plan inappropriately focuses on restricting fishing-related activities and public access.

Conclusion

The State does not support any of the alternatives as currently written, and specifically opposes any alternatives which restrict sport fishing. We urge the NPS to work with the State and the public, including BBNC, to develop a new alternative, perhaps even a new draft DCP, which facilitates both existing and future types of recreational public use.

Thank you for the opportunity to comment on this plan. If you have any questions, please feel free to call this office.

Sincerely,



Sally Gibert  
State CSU Coordinator

cc:

Bill Pierce, Superintendent, Katmai NP&Pr

Harry Noah, Commissioner, Department of Natural Resources

Carl Rosier, Commissioner, Department of Fish and Game

John Sandor, Commissioner, Department of Environmental  
Conservation

Bruce Campbell, Commissioner, Department of Transportation and  
Public Facilities

Richard Burton, Commissioner, Department of Public Safety

John Katz, Governor's Office, Washington, D.C.