

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR ANILCA IMPLEMENTATION PROGRAM

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May 13, 2003

Rob Arnberger  
Regional Director, National Park Service  
2525 Gambell Street, Room 107  
Anchorage, Alaska 99503

Dear Mr. Arnberger:

This letter follows up on the preparation, public review, and revision of the National Park Service Compendia for the 2003 season. First, the State of Alaska commends the regional office and numerous park staff that contributed to this season's major compendia overhaul. Second, we request a single additional compendium modification before summer 2003 is in full swing.

Before discussing our current request, we must applaud the region's implementation of the new annual compendium public review process, along with the ongoing parallel work to appropriately use federal rulemaking procedures called for in ANILCA. Since the 1980's we have advocated for these critical steps so we appreciate seeing them move forward under your leadership. The depth of the Service's commitment is amply illustrated by the many hours of deliberation with the State and other interested parties, the complex internal coordination efforts required to improve consistency among the different park units, and the sheer number of individual revisions made since Fall 2002. Both the State and the NPS understood at the outset that it would not be possible to completely resolve all issues with one winter's work, but overall we are very pleased with the outcome. As you know, we are already working on a much smaller list of issues to raise next Fall in the context of scoping for the 2004 compendia, or to pursue via the new draft regulations at 36 CFR Part 13.

One issue remains serious enough that we urge a remedy for the 2003 season. In particular we seek to eliminate or modify the Katmai Compendium 7-day camping limit at 13.30(d)(2). Currently this provision is manifested as a seasonal (June 1 to September 1) 7-day camping limit per site within 3 miles of the Katmai coast, after which the camp must be moved at least one mile. We believe the short-term camping limit is problematic for the following reasons:

- The 14-day camping limit adopted this winter by other parks (and for most of Katmai) adequately addresses the problem of long term squatters or unethical guides hoarding good sites;
- A 14-day limit is consistent with the rules for state lands (including tidelands and state-owned gravel bars along navigable waterbodies), thus facilitating public awareness, compliance, and enforcement;

- In more lightly-used areas a 7-day limit is unnecessarily restrictive;
- The 7-day limit is not cost effective for guides who frequently host clients for slightly longer periods, or for those independent campers who may need a chartered boat or plane to move camp;
- Food and camping gear are more vulnerable to bears when a camp is being moved.

The latter safety concern is particularly notable along the Katmai coast. A well equipped camp, complete with electric fence to prevent undesirable bear/human encounters, is not easily moved in one trip. It may take two or three trips – on foot, by boat or small plane. During the transition, perishable or scented food or other belongings are more vulnerable to bears at one or both locations. The risks, disruption, and expense associated with moving a camp for a few more days will discourage those who may have already planned a 9, 10, or 12-day trip for 2003.

We appreciate that Katmai’s 7-day limit has been reduced from the entire unit to a three mile strip along the coast. We also appreciate that the Compendium Preamble says the park “will further review options” regarding the 7-day limit. We encourage this review as soon as possible to come up with an alternative for the 2003 season. We propose extension of the 14-day limit throughout Katmai – at least for the 2003 season. If there are immediate compelling reasons to consider a shorter time limit in more narrowly-defined locations for specific reasons, then formal rulemaking in combination with short term compendium measures should be considered following consultation with affected stakeholders (e.g. Katmai coast guides) and the State.

Thank you for your continued consideration of Katmai’s 7-day camping limit. And thank you for your sincere efforts to improve the process and content of both the 2003 compendia and upcoming Part 13 regulations for Alaska. Please contact me if you have any questions or wish to discuss this issue further.

Sincerely,

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Sally Gibert  
State ANILCA Coordinator

cc: Vic Knox, NPS Regional Office  
Deb Liggett, Superintendent, Katmai National Park and Preserve