



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

ANILCA Implementation Program

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August 2, 2012

Mr. Ralph Moore, Superintendent
Katmai National Park & Preserve
National Park Service
P.O. Box 7
King Salmon, AK 99613

Re: Hunting Guide Concessions in Katmai National Preserve Environmental Assessment

Dear Mr. Moore,

The State of Alaska reviewed the National Park Service (Service) *Hunting Guide Concessions in Katmai National Preserve Environmental Assessment* (EA). These comments represent the consolidated views of the State's resource agencies.

We find the EA thoroughly examines the different subsistence, recreational, and business activities surrounding brown bears and other wildlife species that utilize Katmai National Preserve (Preserve) in the context of concessions management, and that the analysis is complete and appropriate. In addition, we concur with, and strongly support, the assessment that, "*hunting guide services are a necessary and appropriate visitor service in Katmai National Preserve.*"

The State supports appropriate opportunities for resident and non-resident hunters to harvest brown bears, and other wildlife species, on the Preserve as directed by Congress in Sections 203 and 1313 of the Alaska National Interest Lands Conservation Act (ANILCA). We further support economic opportunities for local and regional businesses. Alternative C is most consistent with the continuation of these activities.

The Alaska Department of Fish and Game (ADF&G) has no biological concerns regarding either action alternative. Please note, however, that brown bear harvest by guided hunters is an important part of ADF&G's overall management strategy. Should ADF&G identify conservation concerns regarding brown bears in Game Management Unit (GMU) 9, the State would advocate for appropriate regulatory changes. Furthermore, ADF&G has the ability to close the registration hunt by emergency order in-season, or prior to the hunting season, if necessary. These decisions would be based on harvest indices, population trends, and harvest levels, among other parameters.

PAGE SPECIFIC COMMENTS

Page 2-1, 2.2 Alternative A – No Guided Hunting Contracts Awarded (No Action). While we concur “*this alternative provides a baseline for evaluating the effects of the two action alternatives,*” Section 1313 of ANILCA requires that the taking of wildlife for sport purposes shall be allowed under applicable State (and Federal) law. As such, not providing guide opportunities would eliminate a clear and express use in the Preserve for most non-residents and all foreign nationals.

Page 2-2, 2.3 Elements Common to All Action Alternatives, second bullet. Section 1316(a) of ANILCA provides for the use of tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to the taking of fish and wildlife. As currently written, it is unclear whether tent platforms, shelters, and other temporary facilities and equipment are included as “camping equipment.” Since ANILCA indicates the Secretary shall permit these uses, we request that the errata sheet expand the list of allowed temporary facilities to include more than just “*tents and associated camping equipment.*”

Page 2-6, Table 2.2, Alternative 2, Brown Bears. We are unaware of any formal commitment to “*institute regulatory changes including in-season registration permits and a single fall hunt season.*” First and foremost, ADF&G does not make regulatory changes, it only informs those changes. The Alaska Board of Game is responsible for the State’s regulatory framework for game management within the State of Alaska. Secondly, any action(s) taken by ADF&G would not be based solely on “*population productivity*” or “*hunter effort,*” but rather, as stated above in our general comments, would be based on harvest indices and levels and population trends, among other parameters.

Page 3-9, first full paragraph, second sentence. It is important to understand that while the percentage of male bears harvested has increased from 67 percent to 69 percent, this increase is not biologically significant and falls within ADF&G management objectives.

Page 3-25, first full paragraph, first sentence. We request the errata sheet correct the statement that the Preserve was established to protect “healthy” populations of wildlife species. To be consistent with Section 202(2) of ANILCA and this EA’s Purpose and Need, the word “healthy” should be deleted from this statement.

Page 4-11, 4.4.1.1 Brown Bears, Direct and Indirect Effects. The data that supports an increase in the observation of bears in family groups come from different types of surveys completed in different areas and at different times of year, making extrapolation to other areas problematic. In particular, most of the earlier surveys were done in part or entirely within Katmai National Park where bear harvest is not permitted. Therefore, the reported increase in proportions of bears in family groups may be questionable given the disparate data sources and relatively small number of data points. Indices can be problematic even when data are collected following identical protocols over several years. Please note the authors who proposed this metric for gauging harvest pressure concede it may only provide “*a crude index to the rate of exploitation.*” (Sellers & Aumiller 1994).

Based on the above discussion, the State is uncomfortable with basing any decision point on a single survey or possibly a change in distribution that does not reflect an actual change in the “bear population.” As documented at McNeil River State Game Sanctuary, there can be drastic changes in bear composition observed at the falls, largely due to changes in bear distribution and abundance of salmon. Changes in bear-use and composition at McNeil were primarily driven by the strength of salmon runs in adjacent systems, i.e., strong runs pull bears away while weaker runs pull bears in. Therefore we recommend the errata sheet indicate that further evaluation may be needed if the percent of bears in family groups exceeds 70 percent for more than three consecutive years.

This comment also applies on page 4-18 where the language is similar.

Page 4-13, Conclusion, first sentence. Given that the brown bear hunt on the Preserve is only open every other regulatory year, it is inaccurate to state that Alternative B “*is expected to result in up to 25 guided bear hunters each regulatory year.*”

Page 4-19, second paragraph, last sentence. Recognizing that the Service intends to work cooperatively with ADF&G should any conservation issues arise on the Preserve, and to be consistent with the remainder of the EA, we request the errata sheet correct this sentence by replacing it with language similar to that used elsewhere in the plan that describes the course of action to be taken should a conservation issue arise: “. . . *then the State, NPS, or both may need to take appropriate action to assure the conservation of moose in the Preserve.*”

TECHNICAL CORRECTIONS

Page 2-6, Table 2.2, Moose calf:cow ratios. While ADF&G monitors trends in observed moose calf:cow ratios, formal guidelines (management objectives) for moose calf:cow ratios do not exist for GMU 9C.

Page 3-10 3.2.2.2 Population History and Page 3-12 Figure 3.9, Moose trend area surveys. All moose surveys of the Branch trend area prior to 1994 were done by ADF&G, not the Service. Additionally, the numbers of moose observed during trend area surveys are *not* population sizes; therefore, stating that “*in 2010 populations had dropped to below 100 moose*” is inaccurate, as is the caption under Figure 3.9, which refers to trend area counts as “*Population numbers.*”

Page 3-19, 3.3.2 Federal Subsistence and State Hunting Regulations, Registration permit caribou hunt. The state caribou hunt referenced, RC504, does not occur on Preserve lands.

Pages 3-20 and 3-21, Table 3.5, Summary of hunting regulations. Under state regulations for residents, season dates for moose do not run to September 30 in the fall. This should read September 15. Additionally, the moose hunting season for the portion of GMU 9C not draining into the Naknek River is missing from the table.

Page 4-6, Table 4.2, Subsistence brown bear hunt. There is no subsistence brown bear hunt in GMU 9C under state hunting regulations.

Page 4-8, Table 4.4, Brown bear harvest. The brown bear harvest numbers in this table do not reflect what ADF&G provided to the Service. Please refer to the enclosed table.

Thank you for the opportunity to comment. If you have questions, please contact me at (907) 334-2563.

Sincerely,



Nina Brudie
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator
Lisa Fox, National Park Service

ALASKA DEPARTMENT OF FISH AND GAME HARVEST DATA

Brown bear harvest in subunit 9C (1990-2010).

Regulatory Year	Hunter Harvest			Total
	Male	Female	Unknown	
1990	6	2	1	9
1991	17	8	0	25
1992	12	2	0	14
1993	23	8	0	31
1994	7	4	0	11
1995	14	7	0	21
1996	10	5	0	15
1997	14	4	0	18
1998	10	2	0	12
1999	22	7	0	29
2000	10	2	0	12
2001	30	13	0	43
2002	11	2	0	13
2003	46	9	0	55
2004	12	4	0	16
2005	27	13	0	40
2006	4	3	1	8
2007	31	16	0	47
2008	10	1	0	11
2009	10	7	0	17
2010	2	4	1	7
AVERAGE	16	6	0	22