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April 24, 2002

Deborah O. Liggett
National Park Service
4230 University Drive, Suite 311
Anchorage, AK 99508

Dear Ms. Liggett:

Thank you for the opportunity to review the draft Alagnak River User Survey which we received on April 8, 2002. This survey was intended to support the Alagnak Wild and Scenic River Management Plan. As we have discussed, the survey was provided too late for state agencies to respond with more constructive comments. All we had time for was a cursory overview of the procedural and substantive deficiencies, which we emailed to you as requested on April 16, 2002, and include in this follow-up letter.

While we appreciate the opportunity for review, we regrettably note the survey was only days from being finalized when initially provided to us. We were not afforded an opportunity to consult on the initial development of the Study Plan (received April 12, 2002), including the overall objectives, scope, and methodology. Development of the Study Plan should have included discussion with the state about how a survey could address our respective agencies' management questions. Instead, the survey appears to have been developed in a vacuum and does not appear to serve actual management needs. While the study may address some interesting academic hypotheses, state agencies would not be able to base decisions on data from this survey, nor do we believe the results would support National Park Service (Service) management actions. We believe there is little, if any, management value in proceeding with this survey, and recommend that this survey not be conducted as presently proposed.

We understand the pursuit of a new Alagnak Wild and Scenic River Management Plan was intended to be a cooperative effort led by the Service to address public use issues along this state-owned navigable waterbody with mixed upland ownership. Under this assumption, those agencies and landowners with applicable management responsibilities and authorities would ideally be involved in the formulation of research objectives and a specific study plan and, from there, work toward developing methodology and survey questions that directly serve the management objectives. Without these steps, there is no assurance that the results of the study will be useful to either the Service or the state.

We have attached "Making a successful link between science and management through cooperation and good study design," which outlines a process designed to effectively connect research and management. These recommendations were positively discussed by federal and state representatives at the Fall 2001 River Management Society conference in September 2001. We urge use of this model in future considerations of research intended to support planning and management.

The following highlights some of the procedural and substantive problems with the Alagnak survey.

Process and coordination deficiencies

- While the proposed management plan's scope and data needs were cooperatively discussed when initiated at a meeting in January 2001, there has been no follow-up coordination. A second attachment contains a chronology of communications regarding the Alagnak River Management Plan and research intended to support the plan.
- State agencies did not participate in development or review of the study plan, methodology, or the parameters provided to the academic research team, even though the state has a number of available management tools dependent upon data and issue analysis.
- The one-week timeframe to review the survey questions was too short, and the survey was not immediately accompanied by the final study plan, making it difficult to assess how or if the survey met the stated objective(s).
- Those who designed the survey questions apparently have not considered, nor perhaps even seen, other recent Alaska-based river surveys.
- While the survey will provide some demographic data, there is no evidence the questions effectively address actual management issues.
- There is no information about or apparent reliable link to related data gathering efforts planned later this season among fall hunters and local village residents.

Content deficiencies

- No baseline questions are used that would provide comparability with other surveys already done in Alaska.
- Sampling efforts appear to be unstructured and unnecessarily inclusive to achieve a reliable sample, especially since most visitors use either guides or commercial air taxis.
- Specific known management issues, such as multiple parties camped in close proximity or displacement from good fishing holes, are not addressed.
- No connection is made between how people feel about their experiences and any measurable standards (e.g., the number of boats encountered) or resource impacts (e.g., the amount of litter observed at each campsite).
- No provision is included to attempt to gauge the acceptability of possible management actions (camping limits, human waste disposal requirements, etc.).
- Justification is missing for questions about fishing, e.g., barbless hooks, contained in questions 25-31, especially since these activities are within the jurisdiction of the Board of

Fisheries, and there has been no state consultation to evaluate existing data.¹ If the Service desires specific information on state-managed fish populations and their users' interests, this issue should first be discussed with the state to determine existing data and additional needed information to assist fishery and river management decisions.

- There appears to be no way to distinguish responses for different parts of the river, even though the issues and possible management responses are likely to vary between segments.
- Without an accurate understanding of the term "subsistence," the responses to questions #20 and #7a from visitors who are unfamiliar with what this means won't necessarily be helpful. The ANILCA Title VIII definition or other clarifying language (e.g., "for personal or family consumption") should be included.

We conclude that the survey is not an effective management tool, largely due to a lack of consultation with those either inside or outside the NPS who could connect this study to sound management. In our view, previous Service studies for the Alagnak River (e.g., regarding boat wakes and rainbow trout) were also flawed and lacked sufficient consultation. We, therefore, strongly urge appropriate consultation regarding overall planning and research objectives and methodology before proceeding with any further data gathering efforts.

We will be contacting the Regional Office to encourage development of standard procedures that, if followed statewide, could alleviate many of these problems. State agencies have witnessed numerous research and data gathering efforts around the state that have suffered from inadequate consultation and peer review. Because the Service is increasingly conducting or directly responsible for more of its park-specific research, we wish to encourage methods that will maximize effective results for studies within all park units in Alaska. Perhaps the many deficiencies associated with this survey will provide a useful illustration of the need for timely consultation.

Thank you for the opportunity to bring these important concerns to the forefront.

Sincerely,

/ss/

Sally Gibert
State CSU Coordinator

cc: Robert L. Arnberger, Regional Director, NPS
Kirk Lohman, Chief Scientist, NPS Regional Office

¹ The Alaska Department of Fish and Game manages fisheries in the Alagnak River watershed, and the Alaska Board of Fisheries establishes harvests regulations for all user groups through an extensive public proposal and decision process. Sport Fish Division conducts an annual creel census on the lower river and collects data on harvest and other parameters. The Commercial Fisheries Division and Sport Fish Division ascertain various components of salmon escapement levels, harvest levels, and health of fish populations. Several divisions are involved in managing and monitoring subsistence uses of fish.

Making a successful link between science and management through cooperation and good study design

Common Challenges for Managers

- Recognizing the demands of working with mixed jurisdictions, mandates and authorities
- Data may be unavailable or have limited applicability to management needs
- Research funding is scarce and conducting studies takes significant lead time

RECOMMENDED STEPS TO ACHIEVE A SUCCESSFUL RESEARCH/MANAGEMENT LINK:

Define the study objectives:

In consultation with all managers having applicable jurisdictions:

- identify the underlying problem or issue
- identify full spectrum of management authorities available to respond
- review previous research for applicable data
- define new data needs that directly address the issue

Achieving the best results:

- cooperatively develop a study design that meets the needs of managers
- identify lead or cooperating agency(s), funding source(s)
- consider cooperative conduct of field work
- note opportunities to piggy back related research, share transportation costs, etc.
- consider informal peer review of preliminary results
- ensure that final documentation and analysis are peer reviewable

Alagnak Wild & Scenic River Plan Revision Chronology

Chronology of actions and interagency communications (beginning 1994) associated with National Park Service planning for the Alagnak River in general, and federally-sponsored Alagnak River research specifically. Useful in assessing when additional consultation would be beneficial. (Accompanies state letter of April 24, 2002, regarding Alagnak River user survey.)

August 30, 1994 Most current signed Resource Management Plan in DGC files. Contains general references to cooperation with ADF&G, the MMOU, and data collection to support sound management decisions (page 17). Pages 93-96 covers an "Action Plan" for the Alagnak, including "formal or informal visitor use surveys," collecting information about current and historic access routes and means, and research and monitoring for a variety of natural and cultural resources.

March 10, 1998 USGS/BRD email notice to select ADF&G staff, among others, of a "Brown Bag Seminar" presenting preliminary results of BRD Alagnak rainbow trout research. ADF&G forwards to DGC, objecting to lack of consultation in design and conduct of fishery research.

March 11, 1998 Email from DGC to NPS noting ADF&G concerns about lack of coordination in the Alagnak rainbow trout research and asking for help to get the word out to BRD about the importance of early consultation with ADF&G.

March 12, 1998 USGS/BRD Brown Bag Seminar. Topic: Alagnak Rainbow Trout research. Presenter explains how BRD studies respond to NPS' request to study population substructuring, movement patterns, population assessment techniques, effects of fishing on populations. Preliminary results from the 1997 field season are summarized and volunteers are sought to help capture fish in the 1998 field season. [An ADF&G biologist assisted, starting mid-season 1998, who noted significant concerns with the methodology, e.g., poor fish handling techniques.]

July 13-16, 1998 USGS established 14 erosion monitoring sites and installed 22 erosion monitoring pins in the Alagnak, as part of a boat wake study [no prior USGS consultation with DNR as manager of the state waterway, or ADF&G Habitat division that typically participates in boat wake studies].

July 29, 1998 USGS provides summary report regarding establishment of boat wake study sites to NPS and a local ADF&G biologist, concluding with a commitment to "write a plan for subsequent erosion monitoring along the river." [never received by state.]

September 11, 1998 Informal comments provided by local ADF&G staff to NPS regarding the summary of proposal to conduct study of rainbow trout injury/mutilation and population estimates. [response date: 10-22-98]

- October 22, 1998 Meeting attended by ADF&G, NPS and BRD representatives to discuss the rainbow trout study. ADF&G is advised that their September 11 comments are noted but it is too late to modify the study. NPS references the upcoming Alagnak River plan and expresses interest in future agency cooperation and coordination.
- Summer 1999 BRD proceeds with NPS' rainbow trout research as originally designed.
- November 30, 1999 Letter from NPS Superintendent to ADF&G Commissioner (cc to DGC) inviting representatives to a preliminary scoping meeting regarding NPS intent to initiate a Comprehensive Fisheries Management Plan for the Katmai and Aniakchak park and preserve units and the Alagnak River. [ADF&G compiles questions and issues and forwards to DGC for coordinated state response - see 12-29-99.]
- December 12, 1999 Date that an ADF&G employee discovers and downloads a February, 1997 draft "Alagnak Watershed Rainbow Trout Investigations" from USGS research web site. This was apparently an early version of the study conducted during the 1999 season.
- December 29, 1999 Letter from DGC to NPS Superintendent responding to November 30 letter confirming state participation in the January 24, 2000 meeting and asking for additional information about the scope of the effort. [response date: 1-10-00]
- January 6, 2000 Local NPS staff calls local ADF&G biologist with invitation to January 24 fisheries management plan meeting.
- January 7, 2000 DGC phones NPS Superintendent re: January 24 meeting and requests November 30, 1999 Study Plan for the Alagnak River Plan (which had not yet been seen by state agencies). [response date: 1-10-00]
- January 10, 2000 Letter from NPS Superintendent to DGC clarifying NPS interests in developing the broadly defined "fisheries management plan." Requested Study Plan is electronically provided along with the letter.
- January 24, 2000 NPS convenes agency scoping meeting to address the broadly defined fisheries management plan. State representatives attending the meeting present reasons why the larger proposal is too ambitious (including insufficient state staff resources); and suggested the focus be narrowed geographically (e.g., the Alagnak watershed) and in scope (e.g., public use instead of biological fisheries issues). NPS agrees to go back to the drawing board. State summarizes current data indicating recreational and subsistence fishing are no longer increasing, countering NPS assertions that public use and related management problems have continued to increase.
- January 28, 2000 In response to DGC request at January 24 meeting, NPS provides copy of the final 1999 BRD Funding Request for a new 3-year rainbow trout catch and release study (design, methodology, and conduct) to local ADF&G biologist.

- January 31, 2000 ADF&G and FWS biologists consult and mutually agree on problems with the BRD rainbow trout catch and release study. ADF&G initiates formal review. [see 3-23-00]
- February 10, 2000 Meeting with ADF&G subsistence and sport fish staff and NPS to discuss Alagnak area subsistence studies proposed through the Federal Subsistence Office. ADF&G learns that federal subsistence studies money will fund a sport fish angler index in 2000. NPS invites local ADF&G biologist to participate in field crew training.
- March 23, 2000 ADF&G letter to BRD with comments on proposed study plan to assess effects of catch and release hooking injury on rainbow trout in the Alagnak River. Letter addresses factual errors, research design, and methodology; and provides some constructive suggestions. [BRD response date: 4-7-00]
- March 24, 2000 NPS Superintendent letter to ADF&G providing notes of January 24 meeting. Letter includes intent “to compile information from all available sources on the status and growth of fishing... fish stocks, and resource impacts...[to] serve as a basis for our formulation of draft statements of desired resource and sociological conditions for park fisheries and for identifying fishery information needs.... We would like to continue to share information with you during this process and invite your continued participation to the extent that you are able.” [The above information has not been provided, nor has ADF&G's data been sought.]
- March 29, 2000 NPS provides schedule of upcoming commercial operator meetings to local ADF&G biologist.
- April 7, 2000 Letter from BRD to ADF&G biologist responding to ADF&G concerns about the rainbow catch and release study. [Some changes were made; others not. No actual dialogue took place and substantial issues remain.]
- May 13, 2000 Anchorage Daily News article addressing NPS desire to limit users and intent to embark on a 3-year project to assess use and management of the Alagnak River.
- May 29, 2000 Local ADF&G biologist receives a courtesy copy of the final “Alagnak 2000 Angler Effort Index Study, Subsistence Fisheries Project” (the sport fish index study referenced on February 11, 2000).
- June 21, 2000 DGC emails NPS Superintendent asking for Alagnak River Plan project outline or work program per agreement at January 24 meeting. [no response]
- Summer 2000 The Alagnak sport fish angler index funded through the Federal Fisheries Office is conducted by NPS. Data is not provided to state.
- September 18, 2000 Letter from Alagnak Lodge to ADF&G inquiring about state and NPS authorities along the Alagnak River related to fisheries and public uses of the river.

- September 20, 2000 Joint response from DNR and ADF&G (State Navigability Team) to the Alagnak Lodge outlining the state's position regarding management authorities along the river.
- December 21, 2000 Letter from NPS Superintendent to DNR Commissioner outlining the NPS position regarding management authorities along the river (responding to cc of September 20, 2000 letter). The Superintendent's letter included a copy of NPS letter to the Alagnak Lodge which asserts jurisdiction of NPS regulations over the state's navigable waterway.
- January 26, 2001 Letter from DNR Commissioner responding to NPS Superintendent recommending that the NPS and state agencies set aside the jurisdictional disputes and focus on identifying issues that require management actions, then discuss cooperative solutions.
- January 30, 2001 NPS pre-scoping meeting in King Salmon with state and federal agencies and local land managers to address management of public uses along the Alagnak River. The needs and challenges associated with planning in a multi-landowner, partnership context were productively discussed.
- April 20, 2001 Public Notice of Intent to start the new Alagnak Wild and Scenic River Management Plan, intended to replace the existing 1983 river plan.
- April, 2001 NPS begins series of public scoping meetings in various local communities and in Anchorage without providing the schedule to the state in advance so affected agencies with mutual issues could attend.
- May 3, 2001 ADF&G biologist learns of early scoping meetings and emails NPS planner with concern about lack of notice to state. [Planner responds with remaining schedule and apology.]
- July 18, 2001 DGC submits state's formal scoping comments on the Alagnak plan, summarizing previous input and emphasizing the value of regular interagency meetings, cooperation in the development of research needs, and consideration of non-NPS management tools, among other topics. The letter also addresses the lack of coordination with the state regarding the boat wake study, and specifically requests a list of projects related to the plan and for cooperation in study design. [no response]
- April 8, 2002 NPS Superintendent provides State (DGC) with a draft Alagnak River user survey for one week review in order for NPS to get the final survey to OMB by April 23 for approval to conduct during the 2002 season.
- April 9, 2002 DGC asks NPS for the Alagnak River study plan and other background info needed to assess the user survey. [response dates: 4-11-02, 4-12-02]

- April 11, 2002 Lengthy conversation between NPS park staff and DGC, where NPS verbally addresses DGC's April 9 questions. NPS does not have requested user survey study plan and will ask the University of Washington contract researchers to forward one directly to the state ASAP.
- April 12, 2002 State agencies receive the "Draft Study Plan" for the Alagnak user survey.
- April 16, 2002 DGC sends Superintendent informal feedback on the user survey, essentially saying it has little value and expressing concern about the lack of consultation and coordination. [Superintendent says comments will be helpful in backing up NPS's own concerns with the survey.]
- April 24, 2002 DGC provides formal comments on the Alagnak survey, including the April 16 concerns, and recommending that the survey not go forward as planned. Letter also recommends development of standard procedures for interagency consultation during research design.
- April 26, 2002 Superintendent informs DGC that user survey has been stopped for the season, and that the state will be invited to participate in a reevaluation of the survey and study plan in the fall.