



February 15, 2017

Joel Hard, Acting Regional Director  
National Park Service – Alaska Regional Office  
240 West 5<sup>th</sup> Avenue  
Anchorage, AK 99501

Dear Mr. Hard:

The State of Alaska reviewed the proposed 2017 Compendia for park units in Alaska. The following comments represent the consolidated views of state resource agencies.

We appreciate the annual opportunity for state staff to meet with the Service to discuss potential use restrictions that the Service anticipates will be addressed in the upcoming year's park compendiums. These meetings are an early opportunity for a productive dialogue to explore ways to address issues identified by park staff during the year, including options that would be "less restrictive," in order to provide the public the freedom to enjoy Alaska's remote park units, while still protecting park resources.

The following comments reiterate some of the suggestions made at the fall 2016 Compendia meeting. Others respond to information made available in the 2017 proposed Compendia that was either not available for discussion during the fall meeting or reflects additional consideration by state staff, including those who did not participate in the meeting.

### **Katmai**

#### **13.1242 Brooks Camp Developed Area (BCDA): closures and restrictions**

The Brooks Falls Platform camera tripod use issue was discussed at length at the fall Compendium meeting and several suggestions were proposed for consideration, such as allowing camera tripods to be used only during certain hours of the day, or allowing their use in only specific sections of the Brooks Falls Platform (e.g., the upper deck), where they would be less likely to interfere with other users. The Compendium explains why this is an issue for the park. However, the reasons provided for why less restrictive means would not be effective appear to be additional justification for the proposed action rather than an explanation for why other less restrictive options would not be effective. We request the Service re-consider our suggestions, and if not adopted, provide an explanation in the final Compendium as to why they would not be considered effective solutions.

### **Lake Clark**

#### **2.10(d) Food storage: designated areas and methods**

We support the provision that exempts legally taken game and bait used for trapping and hunting; however, we request that legally harvested sport fish also be included in this exemption if the fish are intended for same-day consumption. In remote areas, it is common for anglers to consume fish the same day they are harvested, rather than carry them out for future consumption.

For example, Kontrashibuna Lake is approximately 17 miles from the Tanalian Trailhead, which is itself another 14 miles from the lake outlet. This is a distance that few would make carrying unprocessed fish. Requiring anglers to place fish in a Bear Resistant Container (BRC) for a few hours prior to consumption is likely to foul the BRC for the remainder of their trip. This potentially creates more of a bear attractant than keeping the fish on a stringer for a short period of time prior to consumption on or near the site of harvest. If impacts to resources in the area are documented (negative bear-human conflicts), we request that the Service work with state wildlife managers to develop reasonable requirements for storage of legally harvested sport fish.

### **13.25(a) Closures and restrictions to camping**

The Compendium cites the Richard L. Proenneke Site's listing on the National Register of Historic Places as the reason for the expanded camping closure area; however, the proposed expansion is not within the National Register Boundary. The 1.97-acre historic cabin site was listed in the National Register of Historic Places in 2007, and then the site was roughly tripled in size in 2013 (LACL GMP). The Service closed camping within the expanded area in the 2016 compendium. The 2017 Compendium proposes to roughly triple the area currently closed to camping, including the lakeshore, for approximately one-quarter mile north of the historic site boundary.

We had no objections to prior years' camping restrictions, including the closure within the National Register boundary and camping time limits, which the Service justified in previous Compendiums. However, the 2017 proposed entry does not contain enough information to support the need for the expanded closure. Since this closure could potentially displace existing camping use along the shoreline, we request the compendium provide a more complete explanation for the expanded closure and discuss how this may impact existing use and why less restrictive means would not be effective in addressing the Service's concerns. Given the incremental expansion of this closure, we encourage the Service to also consider alternative ways to address resource concerns or user conflicts in place of an area closure.

We also note that the recent 2014 Lake Clark General Management Plan Amendment (page 142) did not foresee this type of camping restriction for the life of the plan.

*Opportunities for primitive, unconfined recreation would not change under alternative B and would continue to be present throughout the wilderness area... Visitors generally would have freedom to go wherever they desired. The institution of a visitor use management system could restrict visitor behavior in certain popular wilderness areas in the future, although these types of restrictions are not expected to occur during the life of this plan. A couple of existing requirements would continue to affect wilderness visitors, including requirements to secure food from bears and other wildlife in designated areas and a time limit on camping in the Twin Lakes / Hope Creek area.*

### **13.50 Closures and restrictions**

The Compendium does not clearly identify the reasons for the proposed changes to the closure at the Chinitna Bay wildlife viewing area. It appears that only 2 of the 3 reasons for the restriction were carried forward from the 2016 Compendium, and site-specific and other relevant information regarding existing restrictions for commercial operators, was not included. It is our understanding that the revised language will align the restrictions for guided and unguided visitors at Chinitna Bay. If this is not the intent, we request an opportunity meet with the Service to gain a better understanding of the issue and discuss potential solutions.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the first name being a large, stylized 'S'.

Susan Magee  
ANILCA Program Coordinator