



## Lake Clark National Park and Preserve Coastal Management Plan Public Comment Summary Report

July 2024





## CONTENTS

Executive Summary .....	1
Correspondence Analysis.....	2
Definition of Terms.....	5
Comment Summary .....	6
Valued Experiences at the Park.....	7
Safety .....	7
Minimum Bear-Viewing Distance .....	7
Aviation Safety.....	7
Guided Tours .....	7
Bear Viewing Best Practices.....	8
Transportation .....	8
Boats .....	8
Off-Highway Vehicle Restrictions.....	8
Commercial Services .....	8
Staffing and Funding .....	9
Facilities.....	9
Outhouses .....	9
Bear-Viewing Platforms.....	9
Fishing Platforms.....	10
Air Strips.....	10
Cultural Resources .....	10
Natural Resources .....	10
Climate Change.....	10
Closing the Salt Sedge Meadows .....	11
Additional Considerations and Planning Efforts.....	11
State of Alaska Communication.....	11

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## EXECUTIVE SUMMARY

From April 2 through May 6, 2024, the National Park Service (NPS) held a public comment period to receive feedback on key issues and potential management options to improve visitor experiences and resource protection for the Lake Clark National Park and Preserve coast.

To inform the public of the potential management options under consideration, a newsletter was made available to the public on April 2, 2024, that described the project purpose, key issues, and potential management strategies. The newsletter was available on the project website, (<https://parkplanning.nps.gov/LACLcoast>) and was shared via a news release, email, Facebook, and the park's website (<https://www.nps.gov/lac>).

In addition to the newsletter, NPS staff hosted two virtual public meetings on April 18, 2024, to provide interested members of the public an opportunity to learn more about the planning effort and to share their ideas. A total of 19 people attended the two public meetings. The first meeting was recorded and made available for public viewing on YouTube (<https://www.youtube.com/watch?v=jajWOMJDfEI>).

The National Park Service received 63 correspondences submitted to the project website or by mail during the comment period. This report provides an overview of the correspondences received and a summary of public comments, grouped by thematic topics.

## CORRESPONDENCE ANALYSIS

The National Park Service collected public comments on the key issues and potential management options to improve visitor experiences and resource protection on the Lake Clark coast. An interdisciplinary team of NPS personnel read every correspondence received and analyzed the comments. Analysis identified common themes expressed by multiple commenters, as well as viewpoints that were expressed only once. Collectively, the content of the comments, rather than the number of times a comment was received, will be used to inform the Lake Clark National Park and Preserve Coastal Management Plan.

During the public comment period, the National Park Service received 65 individual correspondences on the Planning, Environment & Public Comment (PEPC) website, via email, or through mail correspondence. Comments were received from 26 states and 2 foreign countries. Table 1 displays the geographic distribution of public comments that were submitted. This comment report summarizes all public comments received during this comment period.

**Table 1. Geographic Distribution of Correspondences**

Location	Number of Correspondences
Alaska	20
Arizona	1
California	3
Colorado	3
Connecticut	1
Florida	1
Georgia	1
Hawaii	2
Idaho	1
Indiana	1
Iowa	1
Maryland	1
Michigan	2
Missouri	1
Montana	3

Location	Number of Correspondences
Nevada	1
New Hampshire	1
New Jersey	2
New Mexico	1
New York	4
North Carolina	1
Ohio	1
Tennessee	4
Texas	1
Wisconsin	1
Wyoming	1
Australia	1
New Zealand	1
Unknown	3

In addition to general public comments, the National Park Service received letters from official representatives of the following agencies and organizations:

- State of Alaska
- Alaska Magazine and Wild Departures
- Alaska Photo Adventures
- Alaska Photo Tours
- Alaska Sportsman's Lodge
- Australian Koala Foundation
- Bear Viewing Association
- Bear Head Photography
- Cardinal Photo

- Cook Inletkeeper
- Kachemak Bay Conservation Society
- National Parks Conservation Association
- Natural Exposures Invitational Photo Tours
- North Wild
- Silver Salmon Creek Lodge
- Simsbury Camera Club
- Spotlight Photo Safaris
- Tom Bol Photo Workshops
- West Wind Inc. DBA Alaska Homestead Lodge



## DEFINITION OF TERMS

The following definitions are used for the associated terms in this document.

**Correspondence**—the entire document received from a commenter. Correspondence can take the form of a letter, a written comment form, a note card, or any other written communication on the plan to the park.

**Comment**—a portion of text in a correspondence that addresses a single subject or issue. Comments can include information such as an expression of support or opposition to the use of draft strategy, a suggestion for a potential management strategy, or additional data regarding existing conditions or key issues.

**Comment summary** —a description of a group of comments that are focused on a common subject. Comment summaries combine similar comments.

## COMMENT SUMMARY

The following categories represent major concepts and unique perspectives identified by members of the public.

- Valued experiences at the park
- Safety
  - Minimum bear-viewing distance
  - Aviation safety
  - Guided tours
  - Bear-viewing best practices
- Transportation
  - Boats
  - Off-highway vehicle (OHV) restrictions
- Commercial services
- Staffing and funding
- Facilities
  - Outhouses
  - Bear-viewing platforms
  - Fishing platforms
  - Air strips
- Cultural resources
- Natural resources
  - Climate change
  - Closing the salt sedge meadows
- Additional considerations and planning efforts
- State of Alaska communication

## **VALUED EXPERIENCES AT THE PARK**

Commenters shared a range of experiences they most value about Lake Clark, including:

- diverse recreational opportunities including photography, off-highway vehicle use, and immersing oneself in remote wilderness landscapes;
- highly natural landscapes along the coast with areas such as the salt sedge meadow and limited built structures; and
- unique habitats of roaming bears, fish, clams, and sedges that are protected for future generations to experience.

## **SAFETY**

### **Minimum Bear-Viewing Distance**

The topic of establishing a minimum distance between visitors and bears drew mixed opinions from commenters. Some felt that such a regulation is unnecessary and impractical, especially in areas like Silver Salmon Creek, where bears roam freely. They emphasized that their experiences working with knowledgeable guides have made bear-viewing safe and nonintrusive. One commenter remarked, “I have had many experiences with this and have not once felt in danger or that the bears minded me or my group, the guides at [the lodge] are great and respectful to the bears, this minimum distance is not necessary in my opinion.” A different commenter recommended collaborating with the Bear Viewing Association in research on bear-human interactions and bear-bear interactions to better understand bear behavior. One commenter pointed out that bears’ roaming nature makes enforcing a set distance challenging and suggested that respectful interaction facilitated by guides is sufficient for safety.

### **Aviation Safety**

Commenters highlighted the need for improved aviation guidelines to protect sensitive coastal areas. One commenter emphasized the importance of engaging pilots in discussions about maintaining appropriate altitudes over these areas. Another commentor suggested, “Increase aviation safety by using aircraft tracking systems and aviation reporting; facilitate conversations among pilots about best practices in the area.” They noted that current practices, in which some aircraft fly too low, pose potential disturbances to wildlife and the environment. Ensuring pilots adhere to higher altitude requirements was seen as crucial for mitigating these impacts.

### **Guided Tours**

Commenters emphasized the important role that guides serve in ensuring safe and respectful bear viewing. One commenter stated, “Currently everyone who is in the area is guided, and being with a guide makes sure the standard of bear viewing practices is followed, and guides don’t want to stress the bears because they may leave...” Other commenters stressed the importance of requiring trained and knowledgeable guides for all groups entering protected areas. They argued that experienced guides are essential for managing bear proximity and providing a safe viewing experience without stressing the animals. Some of these commenters

suggested adopting practices from other parks, where qualified guides are mandatory, rather than relying on viewing platforms that bears may or may not frequent.

### **Bear Viewing Best Practices**

Updating best practices for bear viewing garnered strong support, with commenters advocating guidelines that incorporate the Bear Viewing Association's ten golden rules, as well as recent research on bear-human interactions. Several commenters suggested that collaborating with commercial operators to manage the number of groups allowed at one time was a critical step. One commenter believed otherwise, stating, "This is not a viable solution because bears in the Silver Salmon area range far and wide. They often move between many food-viable ecosystems that include the salt sedge meadows, berry patches, razor clam beds at low tide, and fishing for salmon later in the summer." Commenters also appreciated the efforts of park rangers in advising campers on safety measures, such as the use of bear fences, and suggested these efforts be continued and expanded to ensure visitor and wildlife safety.

## **TRANSPORTATION**

### **Boats**

Commenters emphasized that licensed boat captains are responsible, capable, and respectful and therefore do not require additional oversight from the National Park Service. They suggested that partnering with Alaska Marine or similar entities would create unnecessary bureaucracy and confusion, as these experienced operators already possess the necessary skills to manage their vessels in tidal and coastal conditions.

### **Off-Highway Vehicle Restrictions**

Commenters generally opposed further restrictions on OHVs such as all-terrain vehicles (ATVs), highlighting their essential role in accessing the extensive coastline at Silver Salmon Creek. One commentor specifically emphasized that ATVs are crucial for moving guests to wildlife viewing spots and for the daily operations and maintenance of lodges, including transporting supplies and accessing charter boats. Commenters noted that previous limitations on ATV pathways already reduced access significantly and suggested that bears do not appear to be negatively impacted by these vehicles. They felt that additional restrictions would unnecessarily hinder both the local economy and visitors' ability to closely observe wildlife; one commenter said, "Further, reduction of off-road pathways, as proposed, adversely impacts accessibility to Silver Salmon Creek for business operators and visitors to this part of Lake Clark National Park and Preserve. Having routinely visited [the lodge] for thirty-three years, further restricting access will unnecessarily impact this Lodge's business." This commenter suggested that users could help maintain trails to minimize any environmental impact.

## **COMMERCIAL SERVICES**

Commenters acknowledged the important role of commercial operators in providing access to remote coastal areas. Many commenters supported limiting the number of commercial use

authorization holders, implementing concession contracts, and/or limiting the number of day use visitors. They stated these types of limits would:

- increase incentives for operators to prioritize resource preservation,
- help mitigate the current issue of unlimited day trippers and unsafe/high number of visitors in bear habitat, and
- maintain the safety of visitors and transportation and therefore help support the local economy.

One commenter suggested that the number of permits issued should be flexible throughout the season to reflect any significant change in bear count, acknowledging that bears use certain areas more heavily during different times of year based on food source availability.

Other commenters expressed concern that implementing a permit system or concession contract to manage visitation would drive up costs to potential customers and lead to a more exclusive experience affordable to a smaller subset of visitors. One commenter expressed concern that limiting the number of planes would drive prices up, when prices are already high. This commenter suggested limiting group sizes to 10 individuals (the capacity of an Otter plane) instead of limiting the number of planes allowed to land in certain areas.

## **STAFFING AND FUNDING**

Several commenters noted that staff limitations and inadequate amenities at various sites could impact the ability to manage these areas effectively. One commenter suggested that “sites with inadequate staff and amenities should have a lower visitor capacity” to ensure proper oversight and maintain the safety and quality of the visitor experience.

## **FACILITIES**

### **Outhouses**

Many commenters agreed on the need for additional outhouses, especially to address human waste concerns. However, some commenters did not see the need for additional outhouses and expressed that additional facilities could result in larger crowds and cause further impacts to bears. Some advocated for targeted solutions such as portable toilets rather than widespread outhouse installation.

### **Bear-Viewing Platforms**

Most commenters opposed the construction of bear-viewing platforms, citing concerns about disrupting the roaming behavior of bears, detracting from the wilderness experience, and the difficulty of maintaining structures. They emphasized that bears in the area move across various ecosystems and that static platforms would not be an effective way to enhance the visitor experience. Some commenters were interested in better understanding the rationale for proposing bear-viewing platforms. Other commenters suggested that viewing platforms would be a good idea if they were large enough to comfortably accommodate groups.

## **Fishing Platforms**

Commenters expressed strong opposition to fishing platforms due to the dynamic nature of Silver Salmon Creek, including tidal influences and unpredictable weather patterns. One commenter suggested that “Within a few years, the fishing platform could easily be left either totally dry and isolated from the creek or underwater, where a raging outgoing tide would destroy it. It also would create a negative visual effect for visitors seeking to experience a remote wilderness location.” They argued that such platforms would be impractical and visually unappealing and could negatively impact both fishing experiences and the natural aesthetics of the area.

## **Air Strips**

While some commenters considered constructing one or more new airstrips an unrealistic and unnecessary addition, others were open to the proposal if it meant improved accessibility.

## **CULTURAL RESOURCES**

Commenters expressed support for monitoring cultural resource sites and increasing the use of Indigenous place names within Lake Clark National Park and Preserve. They emphasized the importance of preserving and honoring the area’s rich cultural heritage, which spans more than 10,000 years. This sentiment reflects a commitment to recognizing and protecting the diverse cultural resources present within the park.

## **NATURAL RESOURCES**

Commenters highlighted the importance of responsible stewardship of natural resources within Lake Clark National Park and Preserve. They emphasized the need for experienced guides to accompany visitors, ensure safety, and minimize stress to wildlife. Other commenters mentioned the need to address illegal commercial fishing practices alongside the mining operation as a crucial challenge facing the park. Protecting the natural environment was identified as crucial, with a focus on preserving resources for future generations.

## **Climate Change**

Commenters highlighted the significant impacts of climate change on bear and fish populations, as well as on the natural landscape. They emphasized the importance of additional research to understand these impacts better, especially along the coast, and supported the park in forming new partnerships for this purpose. Commenters also suggested using innovative approaches, such as the Resist-Accept-Direct framework and marine mammal monitoring, to manage and mitigate the effects of climate change. Furthermore, they recommended considering that some areas may be altered by excessive storms and rainfall and may no longer be sustainable for bears or visitors.

## **Closing the Salt Sedge Meadows**

Commenters generally opposed the idea of closing the salt sedge meadows to protect habitat and reduce bear disturbance, suggesting that such closures would significantly hinder bear viewing and photography opportunities. They noted that bears spend much of their time in these meadows, particularly in June and July, and that interactions with bears at close distances are a unique and valuable aspect of the Silver Salmon Creek experience. They shared that closure of the meadows would preclude the availability of this treasured visitor experience. While some supported temporary closures for revegetation on a case-by-case basis, they did not see current impacts that would warrant closing the entire meadow area. One commenter stated that, “If a smaller isolated area needs re-generation, we'd be supportive of identifying it and seeking appropriate solutions. However, most bear viewing in the salt meadows is done from the trail that skirts the edge of the habitat. Almost none of the trails run directly through salt meadow habitat.” Commenters emphasized that the bear population appears to be healthy and well fed and that any necessary habitat protection could be achieved through targeted, rather than blanket, closures.

## **ADDITIONAL CONSIDERATIONS AND PLANNING EFFORTS**

Commenters raised significant concerns about the potential impacts of the Johnson Tract Mine on Lake Clark National Park and Preserve. They emphasized that the environmental consequences of this project pose the most substantial danger to the park and its resources. Despite its absence from the park's proposal, commenters highlighted the mine's potential threats to bears, salmon, beluga whales, and overall ecosystem health. Additionally, there were requests for cooperation with the State of Alaska regarding beach and tidelands access, as well as suggestions to work with NOAA and other organizations to protect the coastline's health.

## **STATE OF ALASKA COMMUNICATION**

The State of Alaska asserts that the National Park Service is prohibited from managing eligible wilderness as designated wilderness per the Alaska National Interest Lands Conservation Act (ANILCA) section 1317(c), despite NPS policy directing the National Park Service to manage eligible wilderness as designated wilderness. The State requested that the park refer to the park purpose as written in ANILCA section 201(7)(a) and suggested specific changes to the NPS stated park purpose. The State requested examples of past and current conflicts related to the stated issue of increase in coastal visitors. The State requested that the plan recognizes the State's authority to manage, control, and regulate fish and wildlife populations, including for subsistence purposes, and to clarify in the plan that any potential issuance of concession permits under NPS authority would not indirectly allocate fish and wildlife nor detract from subsistence rights protected by the Federal Subsistence Management Program. The State recommended to coordinate with the Federal Aviation Administration regarding park overflights, as the National Park Service has no regulatory authority over air space. The State looks forward to continued coordination and ensuring that the plan is aligned with ANILCA provisions, specifically those related to access for subsistence and traditional activities. The State reminded the National Park Service that the Alaska Department of Natural Resources has management authority for state lands, including land, water, tidelands, and shorelands of navigable waters within the state.

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under US administration.



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