



August 20, 2012

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

Re: Brooks River Visitor Access Draft Environmental Impact Statement

Dear Mr. Moore,

The State of Alaska reviewed the National Park Service (Service) Brooks River Visitor Access Draft Environmental Impact Statement (DEIS) for Katmai National Park and Preserve. The following comments represent the consolidated views of the State's resource agencies.

Consistent with our scoping comments, we strongly support a permanent structure that places the walkway above the floodplain and reduces negative bear/human interactions, minimizes habitat damage to stream banks, and improves visitor access. The construction mitigation measures described in the plan should help minimize impacts to park resources and visitors. In particular, we support the Service's proposal to schedule construction activities to ensure the least possible disturbance to resources and visitor experience. We also endorse the Service's intention to rehabilitate the river banks using native vegetation and natural materials.

Angler Access

We emphasize that sport fishing was the original visitor draw to the Brooks River, before the area became a bear viewing destination. As the DEIS states, the Brooks River provides world-class sport fishing opportunities. The State strongly supports continued uninhibited access to the Brooks River for fishing.

Though the DEIS states that angler access would continue to be provided without restriction, it does not describe angler access in detail, nor is angler access easily identified on the diagrams. Other statements in the DEIS suggest that general access, including angler access, will eventually be restricted in the area referred to as "the Corner." For example:

"... the Corner would be rehabilitated and restored and its use would be reserved primarily for bears." (Page 27)

“The elevated bridge and boardwalk system would direct all human traffic away from the Corner.” (Page 46)

“. . . an undisturbed and buffered area for bear resting or movement near the river mouth (i.e., the Corner area)...” (Page 53)

To alleviate the impression that the new elevated bridge and viewing platforms are the only areas people may travel and that access may be reduced or eliminated from the Corner, we request the final EIS clearly identify angler access.

In addition, the current barge landing, barge landing access road, and the trail to the Corner, which the Service proposes to remove and restore to natural conditions, are areas used by anglers to access the Brooks River. One unintended consequence of restoring these areas to natural conditions may be reduced sight distance for anglers en route to fishing spots. We request the Service consider how best to maintain angler access to these areas while minimizing social trails and the potential for negative human-bear encounters.

Similarly, we encourage the Service to accommodate the traditional red fish fishery during construction, and to consider and minimize impacts to the fishery. According to the *Actions Common to All Action Alternatives*, the work is largely scheduled for late fall, when the red fish fishery takes place, and early spring to avoid peak bear and visitor periods. We suggest contacting participants to discuss ways to reduce impacts to the fishery well in advance of construction.

While we recognize the Service does not consider this a subsistence fishery under Title VIII of ANILCA, the authorized red fish fishery takes place at the mouth of the Brooks River within the project area. The final EIS should specifically describe the anticipated effects, both during and after construction, of the viewing platforms, elevated bridge, and relocation of the barge access road on the red fish fishery. Currently, the draft EIS only makes generic statements about subsistence in general within the preserve, while briefly mentioning that the red fish fishery occurs.

Brooks Camp Relocation

While we are aware the alternatives in this plan were *“developed through an interdisciplinary team process that included tiering from earlier plans, including the 1996 Brooks River Area Development Concept Plan [DCP],”* and the scope of the project is limited to the barge landing and associated access road along with an elevated bridge and boardwalk system, these proposals significantly modify the decisions reached in the 1996 DCP, and raise new issues that are not sufficiently addressed in this EIS. For example, the visitor’s center and day use facilities on the north side of the river would be retained, and visitors would continue to disembark from floatplanes at the current northern location. The preferred alternative would establish additional permanent infrastructure on both sides of the Brooks River mouth. Therefore we are

commenting on the effects this plan, if enacted, would have on the proposed long-term relocation of Brooks Camp.

First and foremost, the area north of the river is already disturbed and would be permanently connected to the south side via the proposed elevated walkway and bridge. Moving the camp while maintaining the visitor contact station at its current location, and building the new infrastructure would result in a sprawling complex over a mile long, as well as necessitate a vehicle shuttle system for visitors. Currently, visitors walk easily between Brooks Camp and the viewing platforms, whereas if the Camp is relocated, pedestrians would share the road with frequent vehicle shuttles, or be forced to ride in a vehicle to access the viewing platforms, which would significantly alter the visitor experience. Secondly, we question the wisdom of spending millions of dollars to relocate a functional lodge and cabins, especially given the current federal budgetary deficit.

More specifically, we request the Service leave the campground in its existing location. The campground's proximity to Naknek Lake provides a breezier, less buggy, more enjoyable camping experience. The campground's separation from the lodge buildings and its setting along a smaller trail add to the camper's rustic experience. Additionally, its location adjacent to the start of the Dumpling Mountain trail is especially convenient considering campers often must relocate from the campground to camp along the trail if the campground is at capacity. The campground does not require significant infrastructure, and what infrastructure is needed is already in place.

Fish Habitat Permits

We request the Service contact the Alaska Department of Fish and Game, Anchorage Regional Habitat Biologist, Mike Daigneault, for assistance acquiring the required fish habitat permit for work below ordinary high water within Brooks River and Naknek Lake. Please note fish habitat permits may also be needed for water withdrawal and winter activities on ice, such as winter roads or fords.

PAGE SPECIFIC COMMENTS

Page 5, Map 1. Please note that all islands within 5 miles of the mainland are included in the park. The water and submerged lands seaward of the coasts, beyond the mean high tide line, are not included. We request this be depicted on the map.

Page 24, Alternative 1 (No Action). We note that the Service could improve the streambank conditions near the floating bridge and the Corner regardless of the alternative chosen. It would be possible to retain the floating bridge while also rehabilitating the streambank.

Page 36, Barge Landing and Access Road. We request the final EIS include a smaller scale map depicting the proposed barge landing site and elevated bridge/walkway in relation to the current Brooks Camp site, Beaver Pond, the Beaver Pond terrace proposed development site, and the mouth of the Brooks River.

Page 66 and 67, brown bear activity. While we agree that brown bear activity has increased in the vicinity, we disagree with the characterization of this increase. Specifically, bear hunting did not end due to “*increased NPS presence*” – it was Congress that ended brown bear hunting in Katmai National Park. Additionally, we request modification of the last sentence. As currently written, this conclusion implies that the increasing trend in brown bear activity may be due to protections from hunting. Based on the list of potential factors discussed in this paragraph, the final EIS should at least acknowledge that this increase may be due to a combination of factors. In fact, a case could be made that the brown bear population has been high for well over the last decade, and that any recent increases in brown bear densities at Brook’s Camp are attributed to a change in bear distribution resulting from a change in the strength of fish runs and habituation to people.

Page 209, Ethnographic Resources, Alternative 4. Alternative 4 includes a barge landing and access road which would surround the parcel owned by the heirs of Palakia Melgenak on two sides. The EIS states the “*Service would consult with the heirs to identify their concerns about the project work and to seek ways to avoid affecting their land rights.*” We suggest this consultation be conducted as early in the planning stage as possible, in order to be a good neighbor as well as to assure ANILCA section 1110(b) access rights during and after construction.

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
Glen Yankus, NPS