



March 6, 2013

Eric Veach, Superintendent
Katmai National Park and Preserve
240 West 5th Avenue, Room 114
Anchorage, AK 99501

Dear Mr. Veach:

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

Angler Access

In response to the State's comment regarding angler access to the Brooks River area, the Service states "*It is not the intent of the NPS to limit or inhibit angler access to Brooks River.*" We appreciate the clarification but are concerned the FEIS retains statements that appear inconsistent with that intent. We support the commitment to retain unrestricted angler access as referenced in the "Transportation, Access and Circulation" discussion for alternative four, the preferred alternative.

*Angler access would continue to be provided **without restriction**. The unmaintained social trails to the oxbow area of the river and along the north bank would be unaffected. After the discontinued maintenance of the trail through the Corner, it would become an unmaintained social trail like the others. Anglers would also continue to cross the bridge frequently to gain access to the south bank and the upper portion of the river above the falls.* (Emphasis added; page 231.)

However, in contrast, other statements throughout the plan suggest that angler access will be restricted, either by infrastructure or management practices. For example:

- For all action alternatives, the north end of the bridge would only provide emergency access via ladder, unlike the south end of the bridge which would include a ramp whose secondary purpose "*would be to provide anglers and other visitors access to the south bank of the Brooks River*" (page 27, Emergency Ladders/Ramps).
- For all action alternatives, "*The construction of an elevated boardwalk and bridge would direct all human traffic away from the area known as the Corner*" (page 27, Habitat Restoration Area).
- For all action alternatives, "*the Corner and the trail from the lodge to the Corner would be rehabilitated and restored*" (page 27, Habitat Restoration Area).
- For alternatives 2, 4, and 5 the Corner would exist as "*an undisturbed and buffered area for bear resting or movement near the river mouth.*" (Page 55, Table 4)

The FEIS does not describe how trails in the Corner area would be both restored and remain in use as social trails. Restoration typically implies a temporary closure, at minimum, to foot traffic on social trails. Also, because the boardwalk/bridge would not include a ramp to access the popular fishing spot on the north bank, we question the accuracy of the statement, “*The quality of anglers’ experience would also be enhanced by the unimpeded access provided by the raised travel corridor*” (page 230).

In recognition of “*world-class sportfishing opportunities*” (see page 10), and consistent with language found on page 231, we request the Record of Decision clarify that angler access will not be affected by the bridge and walkway, except during construction; human free areas are neither proposed nor implemented as a part of this EIS; and trails accessing “the Corner” and north bank will remain open as unmaintained social trails available for angler access during and after restoration of the area.

Brooks Camp Relocation

As noted in our scoping comments, the State has long advocated for and strongly supports replacing the existing floating bridge at Brooks River with a permanent structure to reduce negative bear/human interactions and avoid potential habitat damage to stream banks. Constructing a bridge that will not, for the most part, be shared by bears and humans will reduce the possibility of negative bear/human encounters and improve pedestrian flow in the area.

Decisions recommended by this FEIS to permanently maintain the existing floatplane access to Brooks Camp at Naknek Lake and to construct a permanent, pile-supported bridge and boardwalks significantly modify the 1996 Development Concept Plan (DCP). Considering the original DCP proposed a south-side access point, the proposed complex encompassing the north and south sides of the river has different impacts than the alternatives evaluated in the original DCP or in this FEIS.

The FEIS indicates that regardless of subsequent changes to the DCP, the Service still intends to implement portions of the original DCP (i.e. moving Brooks Camp and visitor use limits). Currently, visitors walk easily between Brooks Camp, floatplane access, the viewing platforms, fishing access points, and the camping area. If the Camp is relocated, pedestrians would either share the road with frequent vehicle shuttles or be forced to ride in a vehicle to access certain points of interest, which would significantly alter the visitor experience. Before further implementing portions of the original DCP that would dramatically alter the visitor experience in the Brooks River area, we recommend the Service work with the State and the public to revisit these earlier decisions in the context of the subsequent revisions to the original DCP.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

/ss/

Susan Magee
ANILCA Program Coordinator

cc: Brooks Merrell, NPS Alaska Region

