FES 96-45

# Final
# Development Concept Plan
# Environmental Impact Statement

## Brooks River Area
# KATMAI
National Park and Preserve • Alaska

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Final
Development Concept Plan
Environmental Impact Statement

# BROOKS RIVER AREA

Katmai National Park and Preserve • Alaska

This *Final Development Concept Plan / Environmental Impact Statement* (final DCP/EIS) presents six alternatives for the management, use, and development of the Brooks River area, Katmai National Park. The National Park Service's proposed action (alternative 5) calls for a reorientation of management and use to more adequately preserve and interpret the area's globally significant Alaskan brown bear viewing opportunities and prime brown bear habitat, and to manage these elements as integral parts of an evolving environment that also contains nationally significant cultural resources, scenic values, and world-class sportfishing opportunities. Major features of the proposed action include removal of all National Park Service (NPS) and concession facilities north of Brooks River, designation of the north side of the river as a people-free zone, construction of new visitor facilities (ranger station/orientation center, lodge, campground, employee housing, and maintenance facility) on the Beaver Pond terrace south of the river, establishment of day use limits for the Brooks River area, recommendation of temporary closures on reaches of Brooks River during times of intense bear use, and improvement of the area's interpretive program. The environmental consequences of this proposed action would include increased protection and understanding of highly significant biological, archeological, and ethnographic resources within the park, and in the Brooks River area specifically. The visitor experience would be greatly improved by less crowding and more adequate visitor facilities and interpretation. Through an enhanced visitor experience, people would gain a better understanding of the human history of the region and local environment and the ecological relationships between salmon, bears, and humans, which might promote a desire to live in better harmony with nature, an unquantifiable but very real contribution to the quality of life. Small patches of white spruce forest would be cleared within a 98.3-acre development "zone." About 3.3 acres of disturbed land would be restored to more natural conditions by the removal of some existing facilities. No critical habitat for listed species would be negatively affected.

The alternatives under consideration, in addition to the proposed action, include a minimum requirements alternative that retains Brooks Camp facilities in their present location and constructs a management support facility south of the river in white spruce forest; an alternative similar to the proposed action that removes Brooks Camp facilities north of the river and replaces them on the Beaver Pond terrace; an alternative that removes Brooks Camp facilities north of the river and replaces them on the terrace above Iliuk Moraine south of Brooks River; and an alternative that removes and does not replace Brooks Camp facilities and establishes a day use area only along the river. A no-action alternative is also included.

The environmental consequences of the proposed action and the other alternatives were fully documented in the draft DCP/EIS and in the supplement to the draft DCP/EIS, and are re-presented with modifications in this final DCP/EIS. The public review period for the draft document ended June 30, 1994, and for the supplemental DCP/EIS on August 15, 1995. The results of public comment on the draft document are included in the final DCP/EIS. The no-action period on this final document will end 30 days after the U.S. Environmental Protection Agency has accepted the document and published a notice of availability in the *Federal Register*. For further information, contact:

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United States Department of the Interior • National Park Service • Denver Service Center

## SUMMARY

The Brooks River area in Katmai National Park contains a variety of significant natural and cultural resources, including world-class bear viewing and sportfishing opportunities and a nationally significant area of Eskimo archeological sites, as well as potentially significant ethnographic sites. The area abounds with wildlife and has a very strong attraction for anyone interested in nature observation. From Brooks Camp, the wide, sweeping panoramas across glacier carved lakes to the ragged, snowcapped volcanoes of the Aleutian Range provide the perfect background for an Alaskan wilderness experience. Visitors come primarily to watch and photograph brown bears catching migrating salmon at Brooks Falls. Others come to fish for red salmon, rainbow trout, and grayling in Brooks River. Many come to view the Valley of Ten Thousand Smokes and to contemplate the destructive and creative powers of large scale volcanism or learn about culture.

With the rapid growth of tourism in Alaska and the "discovery" of the Brooks River bear viewing experience by the tourism industry has come a phenomenal increase in day use in the last few years. The area has become so popular that existing facilities cannot accommodate visitor demands. The visitor experience has suffered from overcrowding, and serious concern has been expressed regarding the potential impacts this crowding has on the wildlife in the area, especially the local brown bear population.

This planning project began in early 1989 with a series of National Park Service (NPS) meetings between the park, Alaska Regional Office, Washington Office, and Denver Service Center that set up the internal framework for the project and assigned NPS planning team members. In July 1989 the planning team had an orientation trip to the Brooks River area and held a series of scoping meetings with park and concessions staff and Brooks River visitors to identify resource, visitor experience, and infrastructure issues that needed to be dealt with in the plan in addition to the directions given in the 1986 *General Management Plan* for Katmai National Park and Preserve. Draft alternatives were formulated in August 1989 and work ended for the year.

In August 1990 the full planning team conducted field reconnaissance of possible and suggested relocation sites for the Brooks Camp facilities. Limited project funding restricted work that year.

In late June and early July 1991 public meetings were held in Anchorage, King Salmon, and at Brooks Camp. The public was invited to comment on the major issues affecting the Brooks River area, and on the four conceptual alternatives presented in a workbook. Over 450 workbooks were distributed at the meetings or through the mail. As a result of public comment on the workbook the National Park Service changed the compliance document from an environmental assessment to an environmental impact statement, and established an interagency Bear Research Committee to review the past decade's brown bear studies at Brooks River and to advise the planning team regarding bear use along the Brooks River and elsewhere, and regarding the placement of bear viewing platforms on the river. Also, during

this time the National Park Service consulted with various federal, state, and local governments, and Native Alaskan organizations.

In July 1992 the Bear Research Committee and the planning team conducted a final field reconnaissance prior to production of a draft plan. Lack of funding limited additional work on the plan. In late 1992 and early 1993 extensive consultation was conducted with Native Alaskan groups. In August 1993 all commercial use license holders were contacted by the park and advised that use limits at Brooks Camp would be discussed in the plan.

In April 1994 the National Park Service released the *Draft Development Concept Plan / Environmental Impact Statement.* Public meetings were held in Anchorage and King Salmon in May 1994. In October 1994 work on the plan was suspended while further consultation between the park, local commercial interests, Native Alaskan organizations, and the conservation community continued. Eventually an additional alternative was crafted and presented in the May 1995 *Supplement to the Draft Development Concept Plan / Environmental Impact Statement.* Public meetings were held in July 1995 in Anchorage and King Salmon. This *Final Development Concept Plan / Environmental Impact Statement* reflects the inclusion of public and agency comments.

Key areas of controversy and issues raised by commentors on the draft and supplemental DCPs/EISs include protection of natural resources (especially bears), cultural resources, type and location of visitor services and facilities, cost of development, use limits, Brooks River temporary closures, dispersing visitors throughout the region, mode of access, business and employment opportunities for Native Alaskans, and type, emphasis, and location of interpretation.

The proposal and alternatives presented in this document address the needs to (1) ensure the continued use of the Brooks River area by bears and other wildlife, (2) reduce the extent of ongoing impacts on cultural resources, (3) provide facilities to adequately serve visitors and staff and maintain a quality visitor experience with minimum impact on critical wildlife habitats and significant cultural resources, (4) establish use limits and a monitoring program for the Brooks River area that would prevent overcrowding, (5) reduce human/bear encounters and conflicts in the area and (6) reduce habituation and food conditioning in the local bear population.

All of the alternatives, including the no-action alternative, are analyzed in this document to inform management and the public of the potential impacts of alternative approaches to addressing the issues facing the Brooks River area. The no-action alternative is described in detail to provide a basis from which the reader may respond to the issues and proposals. The other alternatives provide different development options that would respond to the above-listed needs with various levels of success. The alternatives are briefly described here.

The **No-Action Alternative** would be a continuation of existing visitation and management in the Brooks River area. No major actions would be undertaken to better preserve the resources and the Brooks River experience. Day use limits would not be established, resulting in the

continuation of rapidly increasing visitation. Visitor facilities would not be able to accommodate the increases, resulting in significant erosion of the visitor experience. Direction from the 1986 *General Management Plan* regarding reduction of human/bear conflicts and construction of a new visitor center and boardwalk/bridge over Brooks River would not be satisfied. Ongoing remediation efforts would significantly impact and influence the visitor experience and area operations around Brooks River.

**Alternative 1: Minimum Requirements** would retain Brooks Camp facilities in their present location while upgrading existing programs that protect and interpret the Brooks River area resources. Four significant structures would be added north of the river: a cooking shelter(s) at the campground, a barge dock, a new visitor center, and a boardwalk leading from camp that would connect with an elevated bridge at the narrows on Brooks River. A management support facility providing employee housing for NPS and concessions staff, an expanded maintenance area, and a research facility would be constructed along the Valley Road (Route 300) within reasonable distance from Brooks Camp. Day use limits would be established at levels somewhat below the July 1992 average to maintain high quality experiences and avoid overcrowding facilities. Overnight use limits would remain the same. By keeping all existing structures north of the river and in-filling with more facilities, cultural resources would continue to be impacted by such incremental development and eventual replacement of the existing water, sewage, electrical and fuel oil systems.

**Alternative 2: Former Proposal in the Draft DCP/EIS – Beaver Pond Terrace** would remove all facilities north of the river and relocate them on a larger scale on the terrace above Beaver Pond, south of the prime resource area. The immediate area of Brooks River would become a day use area only; overnight facilities would be on the Beaver Pond terrace, about 3/4 mile from the river. By removing facilities north of the river the local bear population would experience less disturbance and incremental impacts on cultural resources would cease. The river would be managed for quality bear viewing, wildlife photography, and sportfishing. Improvements would be made to support these activities. Day use limits would be established at levels significantly below the July 1992 average in order to allow higher overnight use at the lodge and campground. A management support facility, similar to that described in alternative 1, would be built along the Valley Road near the new public facilities. Access to the area would be primarily by floatplane, and would be east of the Beaver Pond, away from critical bear habitat.

**Alternative 3: Iliuk Moraine Terrace** would remove all facilities north of the river and relocate them on a larger scale to the terrace above Iliuk Moraine, about 2 miles south of the river, well away from the prime resource area. The immediate area of Brooks River would become a day use area managed for quality bear viewing, wildlife photography, and sportfishing as in alternative 2. Day use limits would be established at levels below the July 1992 average, but there would be higher overnight use at the lodge and campground. The distance of the developed area from the river allows slightly higher overall use levels without degrading the quality of experiences or causing overcrowding at facilities.

**Alternative 4: Day Use Area Only** would remove all facilities north of the river. No overnight facilities would be available at Brooks River. Lodging and commercial campgrounds would be provided by private enterprise in King Salmon, Naknek, and surrounding area lodges. A small, scaled-down management support facility providing employee housing, a maintenance area, and a research facility would be constructed along the Valley Road within reasonable distance from Brooks River. The immediate area of Brooks River would become a day use area managed for quality bear viewing, wildlife photography, and sportfishing as in alternatives 2 and 3. Day use limits would be established at levels somewhat below the July 1992 peaks to maintain a high quality day experience and avoid overcrowding facilities.

**Alternative 5: Proposed Action – Beaver Pond Terrace** is the proposal presented in the supplement to the draft DCP/EIS with some minor modifications. It would remove all facilities north of the river and relocate them to the terrace above Beaver Pond, south of the prime resource area. The immediate area of Brooks River would become a day use area only; overnight facilities would be on the Beaver Pond terrace, about 3/4 mile from the river. By removing facilities north of the river, the local bear population would experience less disturbance and incremental impacts on cultural resources would cease. All new structures would be sited to avoid impacts on cultural resources at the Beaver Pond terrace site. The river would be managed for quality bear viewing, wildlife photography, and sportfishing. Improvements would be made to support these activities. Lodge, campground, and day use limits would be established at levels somewhat higher than the July 1992 average to allow more people to experience the area. A management support facility, providing employee housing that would include bathrooms and cooking facilities for NPS and concession staff and an expanded maintenance area, would be built along the Valley Road near the new public facilities. All facilities would be designed and built to minimize costs as much as would be reasonable. Access to the area would be by floatplane and boat, and would be east of the Beaver Pond away from critical bear habitat. Partnerships would be emphasized to implement DCP recommendations. Efforts would be made to plan for dispersed visitor use throughout the park.

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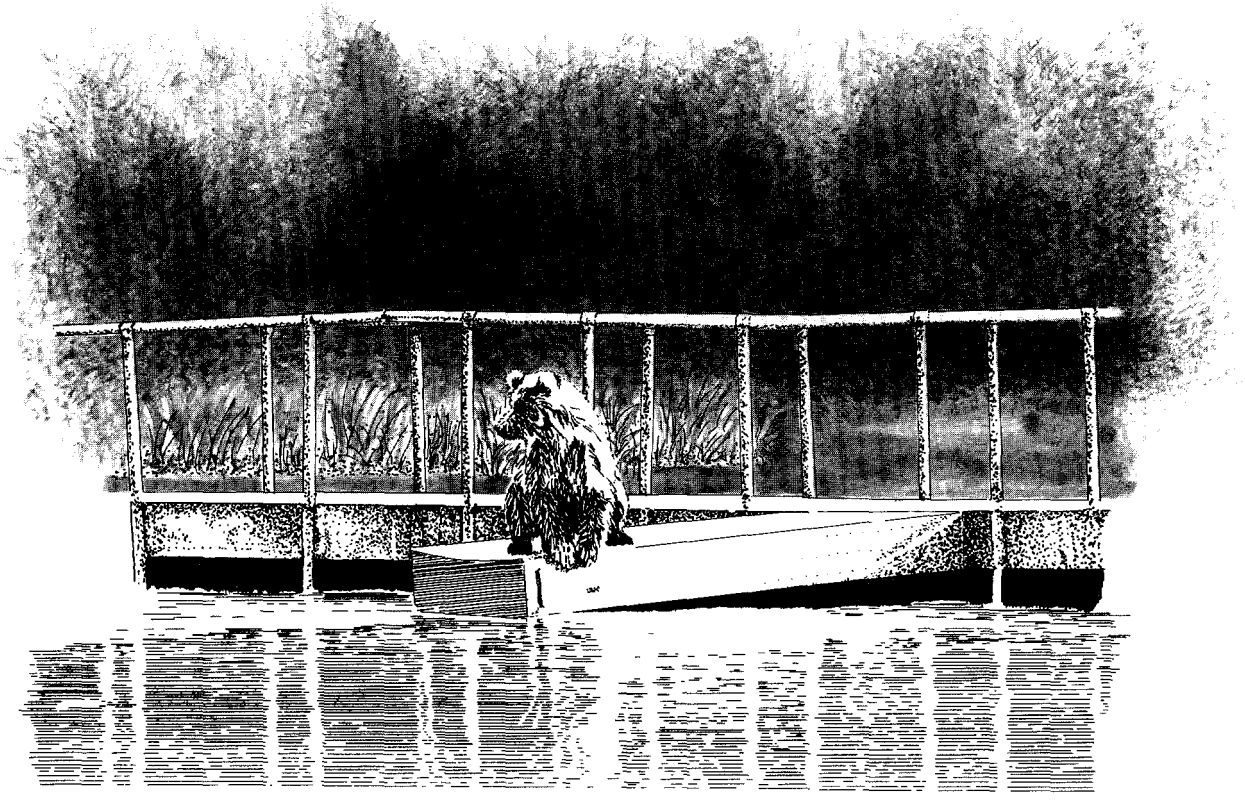
# PART ONE:
# PURPOSE OF AND NEED FOR THE PLAN



Young Bear on Floating Bridge

# INTRODUCTION

## PURPOSE AND NEED

The purpose of the development concept plan is to identify alternative strategies for the operation and location of development in the Brooks River area of Katmai National Park and Preserve. The draft alternatives were developed by following a series of planning steps that defined the area's purpose as it relates to the greater park's purpose, defined the significance of the area's resources, identified resource management objectives, described primary interpretive themes for the area, and formulated visitor experience objectives for the area. The need for a development concept plan that dealt with management issues in the Brooks River area was described and called for in the park's *General Management Plan* (NPS 1986a).

### Planning Issues Driving Need for the Plan

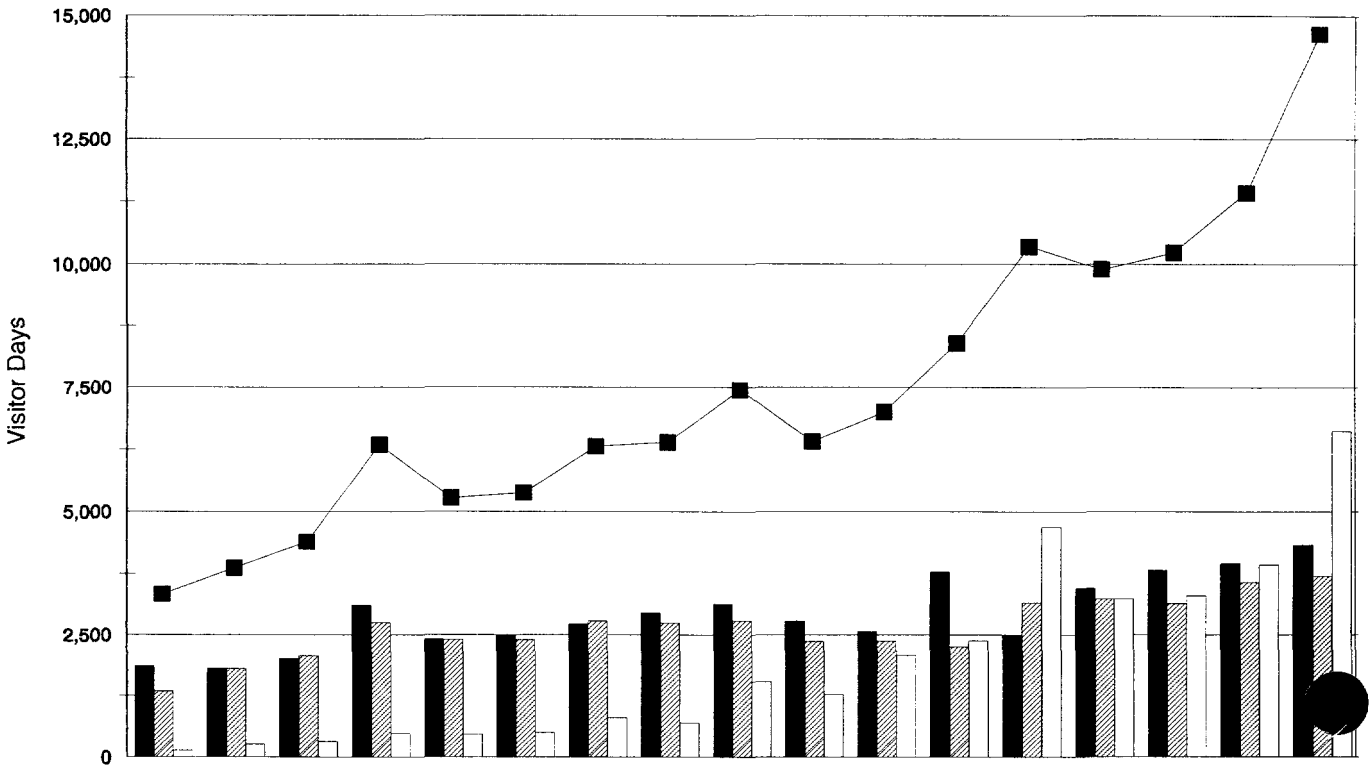
**Visitor Interaction with Brown Bears.** A critical resource management issue in the Brooks River area is how to control the growing numbers of anglers, photographers, and bear viewers without severely impacting the natural dynamics of the local brown bear population, or degrading the visitor experience. In 1991 in the Brooks River area, a total of 494 incidents involving undesirable bear or human behavior were recorded for the 128 days between the first and last incidents, which averages out to four incidents per day (NPS 1991a). The reduction of human/bear encounters in the area is a major safety concern of park management.

**Visitor Use Limits.** Day use visitation to the Brooks River area has substantially increased in the past decade, from 702 visits during the summer of 1983 to a surprising 6,621 visits in 1992, which represents a growth rate of over 900% in 10 summers (see table 1). Overnight accommodations at Brooks Lodge and at the National Park Service (NPS) operated campground continue to be quite popular and booked well in advance of the seasonal opening of the facilities. Limits on overnight use have been in place for several years. Brooks Lodge is allowed accommodations for 60 people and the campground limit is also 60 people. As day use climbs unchecked, the resources and the visitor experience suffer.

**Degradation of the Visitor Experience.** With such increases in day use visitation, facilities that were designed to accommodate few people are now being overwhelmed daily in July. This crowding has degraded the visitor experience in a number of ways. The Brooks Falls bear viewing platform, built in 1982 and designed for comfortable viewing by 15 to 20 people at a time, is often crowded beyond capacity with 30 to 40 people jammed onto it. In these crowded conditions the world-class bear viewing experience is greatly diminished. Visitors are having to wait two to three hours to get on the falls platform during peak times. Other facilities become overcrowded as well. During the 1992 season, for the first time in its history, Brooks Lodge was so inundated with day users wanting to buy lunch, that it had to make special efforts to seat lodge guests first.

**TABLE 1: BROOKS CAMP VISITOR DAYS**

Total Annual Visitor Days (Overnight Stays plus Day Use Visits)




| Year | 1976 | 1977 | 1978 | 1979 | 1980 | 1981 | 1982 | 1983 | 1984 | 1985 | 1986 | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Brooks Lodge | 1,860 | 1,808 | 2,010 | 3,100 | 2,408 | 2,487 | 2,721 | 2,952 | 3,127 | 2,778 | 2,561 | 3,774 | 2,495 | 3,442 | 3,809 | 3,948 | 4,318 |
| Campground | 1,340 | 1,801 | 2,072 | 2,746 | 2,401 | 2,396 | 2,781 | 2,742 | 2,786 | 2,360 | 2,368 | 2,253 | 3,149 | 3,227 | 3,133 | 3,564 | 3,683 |
| Brooks Day Use | 137 | 258 | 313 | 496 | 471 | 503 | 806 | 702 | 1,535 | 1,274 | 2,079 | 2,374 | 4,698 | 3,223 | 3,289 | 3,915 | 6,621 |
| Total Brooks | 3,337 | 3,867 | 4,395 | 6,342 | 5,280 | 5,386 | 6,308 | 6,396 | 7,448 | 6,412 | 7,008 | 8,401 | 10,342 | 9,892 | 10,231 | 11,427 | 14,622 |

**Archeological Concerns.** Brooks Camp was built over nationally significant archeological resources, some of which contain human burials, and potentially significant ethnographic resources. Operation and maintenance of concessioner and NPS facilities continues to cause resource degradation of these sites. At present, any maintenance proposal requiring ground disturbance must be assessed by an archeologist and a cultural anthropologist for impacts and design of a mitigation strategy. The recent fuel oil leaks from the fuel oil storage and delivery systems have compounded the problem requiring evaluation and planning of protection (see "Remediation Efforts" section in "Part Three: The Affected Environment").

**Support Facilities.** NPS facilities in the Brooks River area are not adequate for the level of staff required to manage the area due to increased day use. Management has had to consistently increase development in the area to keep pace with demands placed on the physical plant and utility systems.

### Impact Topics

An impact analysis of the six alternatives is discussed in "Part Four: Environmental Consequences." The topics analyzed are as follows: impacts on natural resources, impacts on cultural resources, impacts on visitor experience and safety, economic impacts, and cumulative impacts.

## LEGISLATION AFFECTING THE BROOKS RIVER AREA

### NPS Organic Act (1916)

As a unit of the national park system, Katmai National Park and Preserve is to be managed "to conserve the scenery and the natural and historic objects and wild life therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations."

### Presidential Proclamation (1918)

Katmai National Monument was established to preserve the features associated with one of the most powerful volcanic explosions ever recorded, which occurred on June 6, 1912.

### Presidential Proclamation (1931)

Katmai National Monument was expanded to include areas along the Shelikof Strait coastline and in the interior lake system where "there are located features of historical and scientific interest and for the protection of the brown bear, moose, and other wild animals."

### Amendment to the Organic Act (1978)

Congress reaffirmed the intent of the NPS Organic Act by stating that in national parks "the authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established."

### Alaska National Interest Lands Conservation Act (1980)

ANILCA redesignated the national monument to a national park and preserve, and significantly expanded the size of the protected area. The purpose of ANILCA, as stated in sec. 101(b), is:

> to preserve unrivaled scenic and geological values associated with natural landscapes;
>
> to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas;
>
> to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coastal rainforest ecosystems;
>
> to protect and preserve historic and archeological sites, rivers, and lands, and to preserve wilderness resource values and related recreational opportunities including but not limited to hiking, canoeing, fishing, and sport hunting, within large arctic and subarctic wildlands and on free flowing rivers; and to maintain opportunities for scientific research in undisturbed ecosystems.

ANILCA redesignated the monument as a national park and preserve. Section 202(2) states:

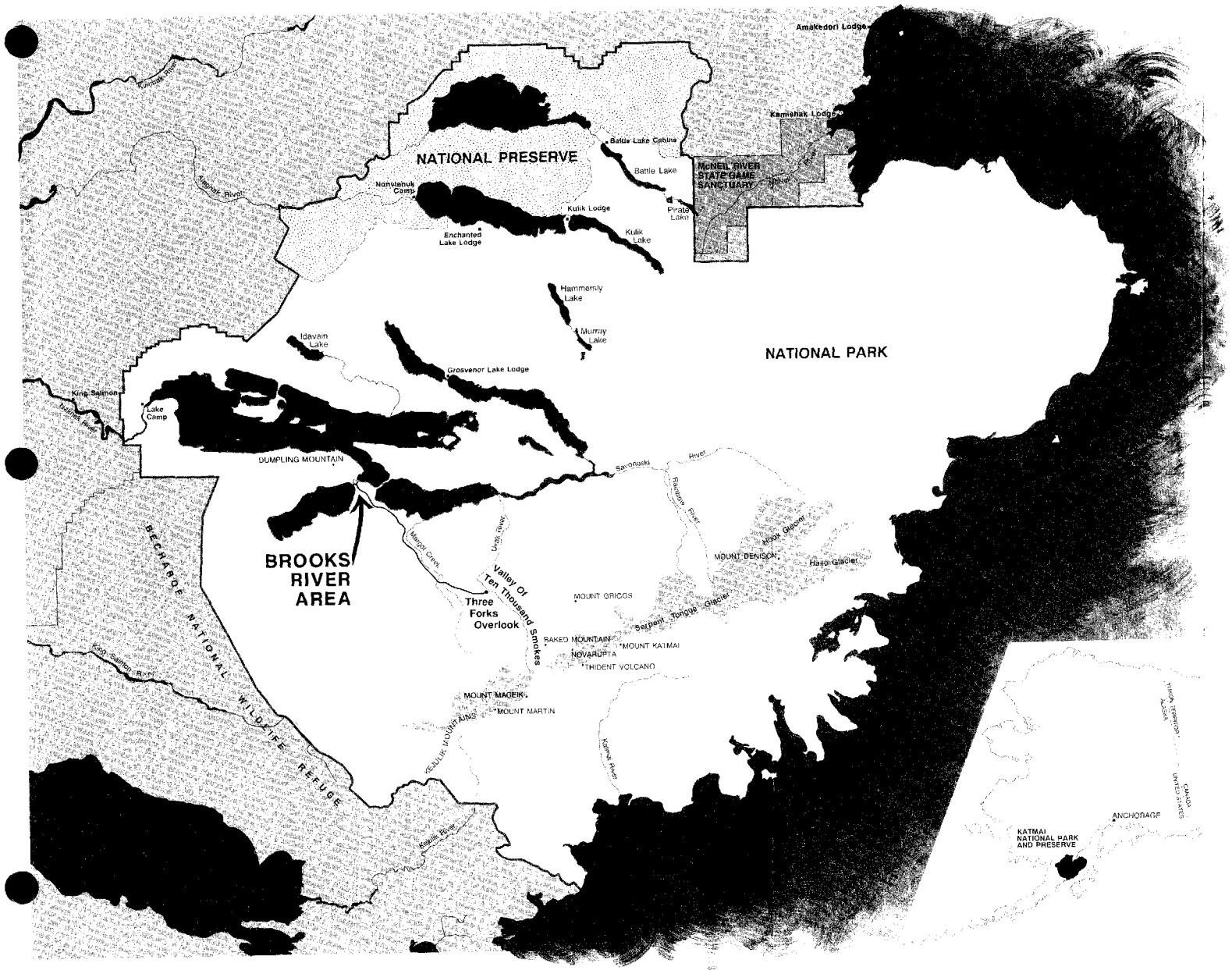
> The monument addition and preserve shall be managed for the following purposes, among others: To protect habitats for, and populations of, fish and wildlife including, but not limited to, high concentrations of brown/grizzly bears and their denning areas; to maintain unimpaired the water habitat for significant salmon populations; and to protect scenic, geological, cultural, and recreational features.

## OVERVIEW OF THE PARK AND PRESERVE AND THE BROOKS RIVER AREA

Katmai National Park and Preserve encompass approximately 4 million acres of public land at the head of the Alaska Peninsula. Katmai National Monument was established in 1918 and expanded to its present size through several presidential proclamations. In 1980, ANILCA changed the designation of most of the national monument to national park and designated an additional 308,000 acres as national preserve. The upper 67 miles of the Alagnak River, which starts within the park complex and has been designated as a wild river, is also under NPS administration.

The park contains a series of high mountains of volcanic origin within the Aleutian Range. Several of these mountains are still classified as active volcanoes. Two, Mt. Trident and Mt. Martin, are constantly steaming; a third, Mt. Mageik, contains a hot acidic lake in its summit caldera. The Valley of Ten Thousand Smokes, Mt. Katmai, Novarupta, and the many other volcanic features associated with the eruption of June 6, 1912, collectively form an internationally significant scientific feature as well as extraordinary scenic attractions.

Almost the entire park and preserve are of wilderness character, containing naturally functioning ecosystems that have only isolated manifestations of human influence, thus




# KATMAI NATIONAL PARK AND PRESERVE

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / DEC. '95 / 127 / 40045C

0 10 20 KILOMETERS
0 10 20 MILES

NORTH

ON MICROFILM

affording a laboratory for the observation and study of natural forces in an essentially undisturbed environment.

The park and preserve embrace the headwaters of a river drainage that provides vital spawning habitat for red (sockeye) salmon. Bristol Bay, west of the park, supports the largest red salmon fishery in the world, and the Naknek River drainage comprises one of its four most productive ecosystems. The Naknek River and Alagnak River drainages, including Lake Brooks, Brooks River, Naknek Lake, Grosvenor and Coville Lakes, American Creek, and the Nonvianuk, Alagnak, and Kulik Rivers support a world-class rainbow trout sportfishery.

Katmai National Park and Preserve is the largest sanctuary for the Alaska brown bear. Summer and autumn concentrations of bears occur along the park's major salmon streams and are accessible for observation and scientific study. The most popular bear viewing areas in the park are at Brooks Falls and around the mouth of Brooks River where it empties into Naknek Lake.

Brooks Camp, a nationally significant archeological district listed on the National Register of Historic Places, is situated on a site where a series of native cultures occupied the riverbanks and adjoining glacial ridges for 4,500 years. In addition, there are an unknown number of potentially significant ethnographic resources in the area.

## BROOKS RIVER AREA PURPOSE STATEMENTS

Stemming from the ANILCA legislation, the National Park Service has identified three primary purposes for the Brooks River area. The development concept plan proposals reflect these area purposes.

- Protect habitats for, and populations of, fish and wildlife, including, but not limited to, high concentrations of brown bears and their denning areas and maintain the watersheds and habitat vital to red salmon spawning in an unimpaired condition.

- Provide for the general public resource-based recreation that does not impair natural and cultural resource values.

- Protect and interpret outstanding natural, cultural, geologic, and scenic features.

## BROOKS RIVER AREA SIGNIFICANT RESOURCE STATEMENTS

- Katmai National Park and Preserve contains the largest concentration of protected brown bear populations in the world, many of which can be easily viewed by the public in the Brooks River area.

- The Brooks River channel serves as an important spawning area for red salmon. A falls in the river slows salmon migration and concentrates numerous salmon into a small area to be fed upon by brown bears.

- The gathering of brown bears to feed on migrating salmon at Brooks Falls provides a world-class wildlife viewing and photography opportunity of brown bears in a natural setting.

- Brooks River, Lake Brooks, and Naknek Lake support world-class recreational fisheries for rainbow trout and red salmon. Quality sportfishing opportunities exist in the river and adjoining lakes for Arctic grayling and lake trout.

- The immense size of the surrounding landforms, their topographic relief, volcanic and glacial origins, and their active geologic processes, in addition to the many expansive freshwater lakes, make the area an outstanding scenic resource.

- The Brooks River area contains an internationally significant concentration of ethnographic historic and prehistoric cultural remains spanning a 4,500-year period.

## DESIRED FUTURES FOR THE BROOKS RIVER AREA

The development concept plan provides a range of alternatives that comply with the direction given in the approved *General Management Plan*, the *Statement for Management*, the various legislation affecting the park and the Brooks River area, and the National Environmental Policy Act. Management objectives for the future of the Brooks River area are listed below. These, too, were derived from the approved management plans and congressional legislation.

### Natural Resources

- Protect and maintain habitat vital to red salmon and rainbow trout spawning and juvenile development cycles.

- Protect and maintain prime brown bear habitat.

- Remediate and mitigate damage to the water table, soils, and vegetation caused by leaks in the fuel oil delivery system at Brooks Camp.

- Protect ecosystem functions.

### Cultural Resources

- Preserve cultural resource sites and remains that best illustrate the 4,500 years of Alaska Peninsula occupation.

- Remediate and mitigate damage to cultural resources caused by leaks in the fuel oil delivery system at Brooks Camp.

### Visitor Experience/Interpretation

- Encourage visitors to learn about the Brooks River area natural and cultural resource values, and to experience them.

- Enhance high quality recreation experiences in the Brooks River area by maintaining low-to-moderate interaction levels between visitors; visits to the area should feature small groups, an unhurried atmosphere, and occasional opportunities for solitude.

- Make brown bear habitat along Brooks River accessible for bear viewing and sportfishing in a manner as safe as possible for visitors and to the degree that it does not significantly interfere with wildlife use and behavior.

- Focus visitor use and development in specific areas in order to minimize disturbance to natural, cultural, and scenic resources.

- Interpret for visitors the significance of cultural resource sites that span a 4,500-year period of site occupation.

- Encourage concessioner-provided services and facilities related to overnight lodging, sportfishing, and tours of the Valley of Ten Thousand Smokes. Such services and facilities should be economically feasible, site-suitable, and necessary for appropriate public recreation.

### Public Use Goal and Objectives for the Brooks River Area

**Goal.** To provide wildlife and fish and cultural resource oriented recreation, interpretation, and educational opportunities consistent with the park's resource oriented purposes.

### Objectives

1. To ensure that public use programs are compatible with the biological diversity of park resources and habitats, visitor use limits will be assigned to the area and a program monitoring the impacts of visitor use will be established.

2. Opportunities for wildlife viewing, photography, and fish-oriented recreation that is low-density in nature will be provided.

3. The National Park Service and concessioner will develop and maintain facilities for recreational users that are consistent with park management concerns regarding wildlife, fish, biological diversity, preservation of cultural resources, and public safety.

## RELATIONSHIP OF THIS PLANNING EFFORT TO OTHER APPROVED PLANS

### MANAGEMENT OBJECTIVES FROM THE STATEMENT FOR MANAGEMENT

These management objectives were written for the park in general in the 1983 *Statement for Management* and can be applied to the Brooks River area specifically.

- Identify, protect, and perpetuate the park's outstanding wildlife, vegetation, water, and volcanic features in their wilderness environment. (p. 9)

- Maintain the park and preserve as an area where brown bears can exist as naturally as possible with minimal adverse effects from humans. (p. 9)

- Identify, preserve, and protect the park and preserve's cultural resources in a manner consistent with historic preservation laws, NPS policies, and the purpose of the area. Particular attention will be paid to the known locations, such as the Brooks River Archeological District and National Historic Landmark. (p. 10)

- Provide visitors with adequate means of access to and within the park, consistent with the wilderness character of the area. (p. 10)

- Interpret the park and preserve through nonsophisticated, highly personal techniques and programs, consistent with the park's visitor use pattern. (p. 10)

### DIRECTION FROM THE GENERAL MANAGEMENT PLAN

The 1986 *General Management Plan* for Katmai National Park and Preserve directed the National Park Service to prepare a development concept plan for the Brooks River area. A major concern for this plan is to decide to what extent and where the expected increases in demand can be accommodated without overwhelming the natural and cultural resources by overuse or allowing the visitor experience to deteriorate because of overcrowding. Katmai National Park and Preserve has one of the fastest growing park visitations in Alaska. Brooks Camp, particularly during July, may have more than 240 people per day in a relatively small area of prime brown bear habitat.

Another concern identified by the *General Management Plan* is the protection of cultural resources. The Brooks River Archeological District contains 22 sites with at least 750 house depressions, making it one of the greatest known concentrations of prehistoric houses in Alaska. The Brooks River Archeological District is on the National Register of Historic Places and has been designated a national historic landmark. In addition, an unknown number of potentially significant ethnographic resources are present in the area.

The development concept plan needs to address several identified concerns regarding brown bears including human intrusion into prime bear habitat, potentially dangerous interactions between humans and bears, and disruption of normal bear feeding and behavior patterns. In this plan, prime bear habitat at Brooks River is defined as being the river corridor, riparian cover that provides access for bears to the river, and bedding areas. The obvious focus for the bears is the access and space for catching salmon and an undisturbed area in which to rest and digest the salmon feast. In regard to increasing interactions between growing numbers of visitors and bears, the issue is how to reduce this potentially hazardous situation and impacts on bears while still providing for visitor activities in the Brooks River area. As stated in the *Bear Management Plan* for Katmai National Park and Preserve (NPS 1986b): "It is clear to NPS managers that the increasing number of people and the seasonal concentrations of bears presents a serious conflict. It is also clear that if visitor use of Brooks Camp continues to increase, the potential for a tragic incident and for irreparable impact on the bear population also increases."

Basic to the Brooks River area development concept plan is the concern for appropriate protection and management of the brown bears that use the river. The 1986 *General Management Plan* gave certain directives and guidelines:

> Because Brooks Camp is situated in prime brown bear habitat, long-range plans may require either its relocation or additional restrictions on sportfishing along Brooks River, or both actions may be necessary. Ongoing studies documenting human/bear interactions in the Brooks Camp area will help guide future decisions. (p. iii)
>
> A development concept plan will be prepared to address the need for, location, and size of an overflow camping area, new visitor center, and an elevated boardwalk to and across Brooks River. (p. iii)
>
> The [General Management] plan has deferred the proposal to relocate Brooks Camp facilities until current human/bear interaction studies are complete. (p. v)
>
> To minimize conflicts between bears and visitors in the Brooks Camp area, all or parts of existing facilities may be relocated and/or additional Brooks River fishing regulations may be necessary. (p. v)
>
> Katmai National Park is the home of the largest protected population of brown bears in North America. Bear feeding habits are not fully understood, but it is clear that human activities disrupt bear feeding and other activities. Sometimes there are as many as 15 brown bears along the 1-mile-long Brooks River, and increasing densities of people in this same area result in encounters that endanger the safety of the people. [This statement was based on data available in 1986. In the early 1990s as many as 35 individual bears were thought to be visiting the Brooks River during heavy salmon runs.] Any removal of bears to reduce this potential threat would jeopardize the natural condition of the bear population. The issue is how to

reduce human interference with brown bears, particularly at Brooks Camp where most human activities occur. (p. 9).

The National Park Service is committed to taking whatever actions are necessary to limit conflicts between bears and visitors in the Brooks Camp area to an acceptable level. This may include a phased relocation of all or part of the existing facilities. It may also include placing additional restrictions on sportfishing along the Brooks River, including reducing limits or temporarily closing specific areas to human use. (p. 32)

The National Park Service is mandated by the Alaska National Interest Lands Conservation Act (ANILCA) and other laws and presidential proclamations to protect the habitat for, and populations of, fish and wildlife within the park and preserve. The National Park Service will strive to maintain the natural abundance, behavior, diversity, and ecological integrity of native animals as part of their ecosystems. NPS management of fish and wildlife will generally consist of baseline research and management of the human uses and activities that affect such populations and their habitat, rather than the direct management of resources. (pp. 44–45)

The park will not relocate problem bears. (p. 47)

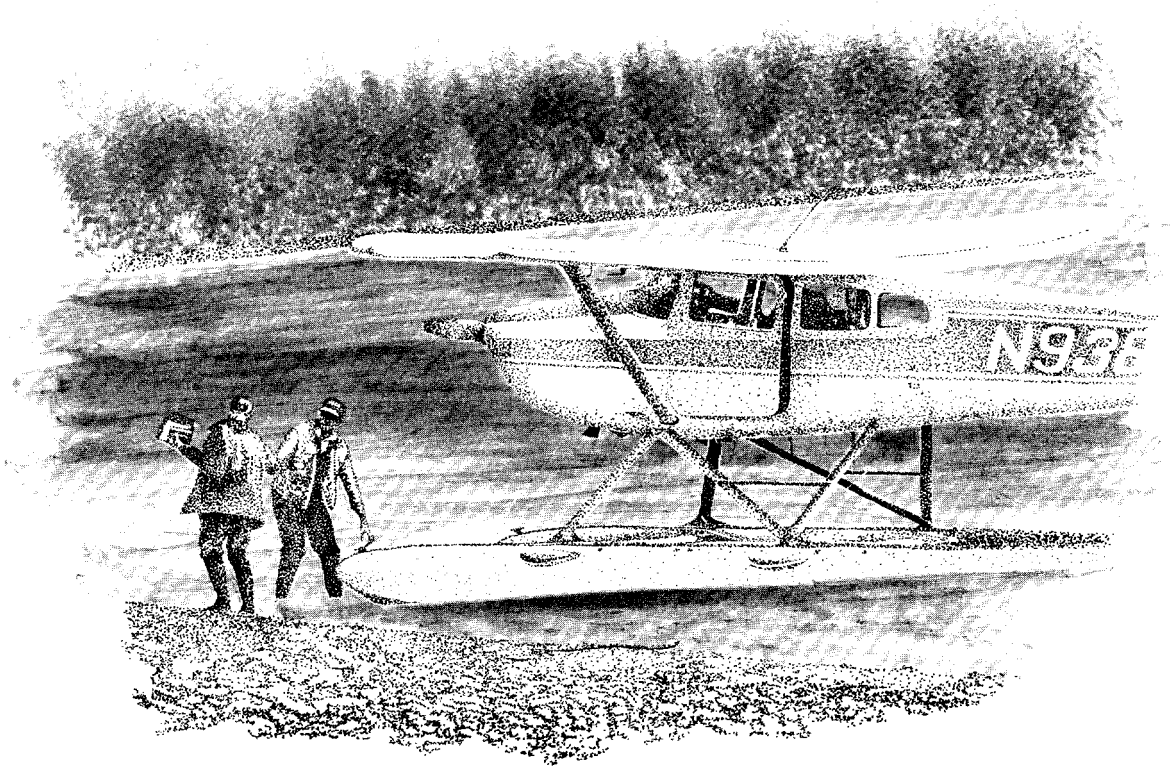
The objectives of . . . bear management . . . are to retain a naturally regulated population of brown bears in the park and to preclude the food-reinforced attraction of bears to people and thereby minimize confrontations between bears and people. (p. 47)

Any proposed developments will be designed to avoid impacts on the significant known archeological resources of the area. Ground-disturbing activities will be preceded by archeological surveys and testing. (p. 56).

The above quotes clarify NPS concerns regarding bear management, cultural resources, and facility development in the Brooks River area. In addition, the National Park Service will consult with Native Alaskan tribes on actions that have the potential to affect significant ethnographic resources.

In a wider perspective the Brooks River area experience is inextricably tied to the Valley of Ten Thousand Smokes. Park visitors are transported via concession-operated bus and vans 23 miles to the edge of the valley and can hike approximately 1 mile down a narrow foot trail to reach the ash-filled floor and Ukak River falls.

# PART TWO:
# ALTERNATIVES,
# INCLUDING THE PROPOSED ACTION



Float Plane Access to Brooks River Area

## INTRODUCTION

Part two describes the development concept plan for the Brooks River area of Katmai National Park and Preserve. It is a comprehensive plan for all aspects of future management and use of the area, including visitor use, management of natural and cultural resources, operations, development, and interpretation.

As part of the planning process, the National Park Service formulated a reasonable range of alternatives, including a no-action alternative, a proposed action alternative, and four other alternatives. A no-action alternative is included for comparison purposes as required by the National Environmental Policy Act. An analysis of impacts of the no-action, proposed action, and other alternatives is included in "Part Four: Environmental Consequences."

Summary comparison tables 4 and 5 describing the alternatives and their potential impacts, respectively, are included at the end of "Part Two: Alternatives, Including the Proposed Action." Estimated construction costs for the alternatives can be found in appendix A.

## ACTIONS COMMON TO ALL DEVELOPMENT ALTERNATIVES

Actions common to all development alternatives are those that are similar in intent and effect and are universally needed that they are planned in all development alternatives, sometimes uniformly, sometimes in varying degrees. Impacts of these actions are discussed in "Part Four: Environmental Consequences" under their subject heading in each alternative.

It is the National Park Service's intent to conduct additional environmental assessment and compliance when comprehensive design is begun for the selected alternative, including compliance with executive orders for wetlands and floodplains protection.

The Coastal Zone Management Act requires that federal actions be consistent with the enforceable policies of the state's approved coastal management program. A consistency determination has been completed and is included in appendix B.

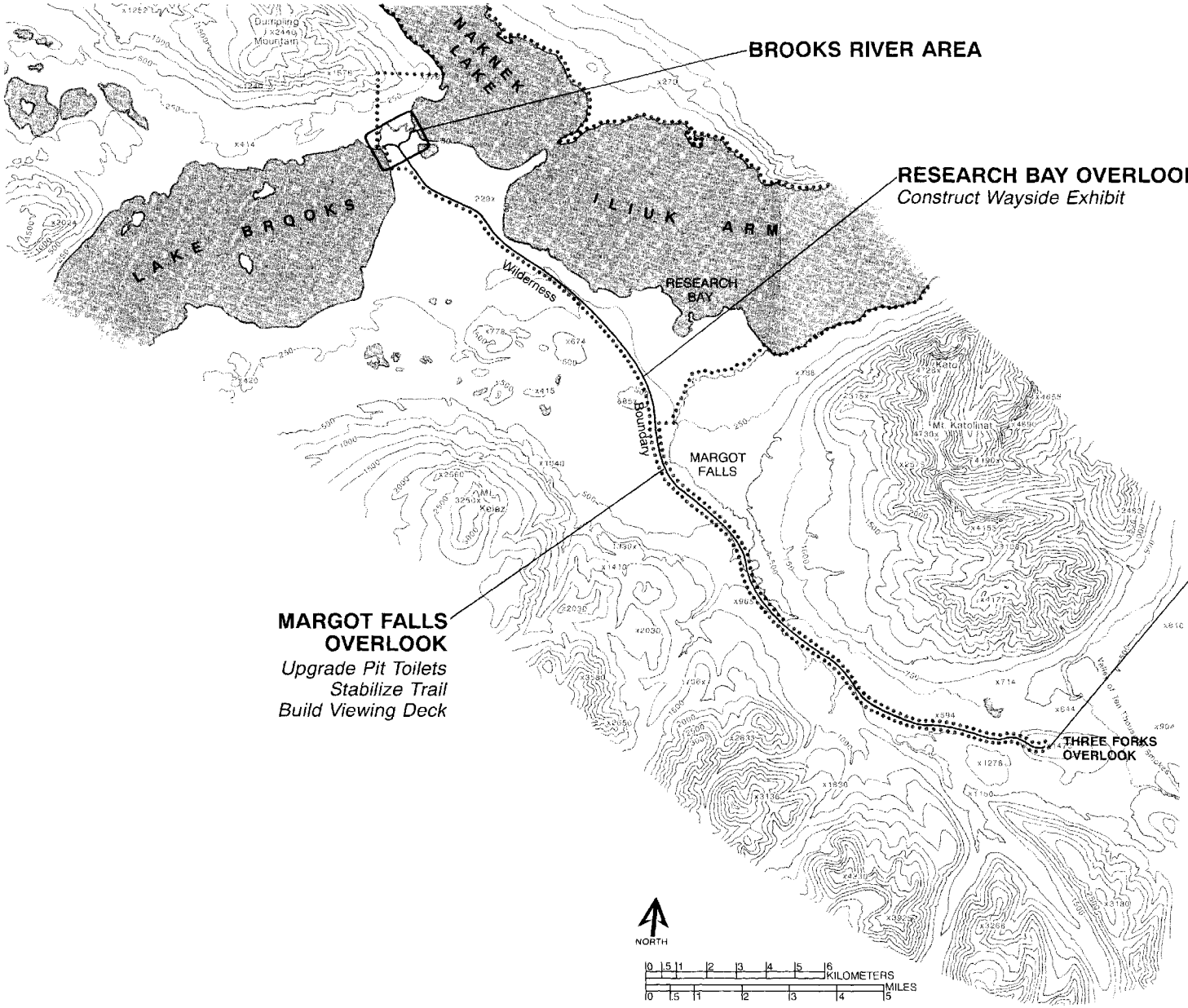
### VISITOR EXPERIENCE

The natural, cultural, and scenic resources of Katmai National Park and Preserve appeal to a variety of visitors who wish to enjoy and use those resources in a number of ways. Visitors seek an uncrowded, unhurried experience in a pristine, natural setting. Whether it is the risk of a chance encounter with an Alaskan brown bear along a trail, the relatively safe viewing from an elevated platform of bears catching salmon in the Brooks River, the opportunity to fish the same waters for salmon and trout, or the physical challenge of hiking among the ash flows of Novarupta, visitors participate in the Katmai experience with enthusiasm. However, many of the values associated with remoteness and wildlife are threatened by increasing numbers of visitors, and the experiences sought by visitors are not always realized.

All development alternatives in this plan promote the preservation and maintenance of a quality visitor experience that includes the values mentioned above. A quality visitor experience can be considered a resource at risk in the Brooks River area. The three primary visitor activities are bear viewing, sportfishing, and tours to the Valley of Ten Thousand Smokes. Other visitor activities, such as birdwatching, hiking, and boating, commonly take place but not in the large numbers as the three primary activities. The following paragraphs discuss the actions common to all development alternatives regarding these visitor activities.

#### Bear Viewing

Bear viewing and photography, and wildlife viewing in general, are encouraged as part of the visitor experience in each alternative. To maintain the quality of the experience, use limits in the core bear viewing area and on specific bear viewing platforms would be established. To ensure that fewer human/bear encounters occur in the future, and that bear viewing would not adversely affect the local bear population, the proposed approaches and locations of all bear




# VALLEY ROAD EXPERIENCE

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / SEPT. '93 / 127 / 20041

ON MICROFILM

viewing platforms were carefully chosen with respect to bear use along the river being the major locational factor. Because of the varying use limits proposed in the alternatives, the number and configuration of platforms are not the same in every alternative, but all proposed locations have been determined to meet the criteria for bear viewing platforms listed in appendix C as recommended by the Bear Research Committee (NPS 1993b).

### River Corridor Management

Sportfishing, photography, and other uses are proposed to continue in the Brooks River area in each alternative. Sportfishing and its effect on fishery stocks are regulated by the state of Alaska. The National Park Service's concern is the effects that sportfishing, photography, and other river use have on the local bear population in terms of habituation and food conditioning, and the obvious safety concerns of unlimited access in prime bear habitat. An action common to all development alternatives in this plan is to recommend the temporary closure by the National Park Service of certain reaches of Brooks River during periods of very high bear density. This action would reduce the number of human/bear encounters along the river, and decrease food conditioning and habituation in the local bear population.

### Valley of Ten Thousand Smokes Tour

The Brooks River area would continue to be the staging area for tours to the Valley of Ten Thousand Smokes. A variety of tour options would be developed by the National Park Service and the concessioner to interpret cultural and natural resources. Stops could include Research Bay and Margot Falls.

Interpretation at the Three Forks overlook cabin, at the end of the Valley Road, would be upgraded in its presentation of the significance of Katmai eruption. The cabin interior would be remodeled to provide an observation room, comfortable seating, and Katmai-related reading materials for those people on the valley tour who decide not to take the strenuous hike to the valley floor. A new ground level observation deck would be constructed in front of the cabin to give visitors an opportunity to sit and relax while enjoying or photographing the scenery. Panel exhibits around the deck would assist visitors in identifying the panorama of landscape features visible from this point. Disturbed areas around the Three Forks overlook cabin would be revegetated.

The pit toilets at the cabin would be relocated to a more favorable site. Nearby, a primitive campground with designated sites and lean-tos would be constructed to provide a place for backcountry users to stay while waiting for a return trip on the tour bus. This campground would not be in view from Three Forks overlook cabin.

A new self-guided trail publication and a rehabilitated, stabilized trail would greatly improve the visitor experience on the hike to Ukak Falls on the valley floor.

## INTERPRETIVE PROSPECTUS

An interpretive prospectus for the Brooks River area was approved in 1993 and represents the first step toward comprehensive interpretive planning for facilities proposed in this development concept plan. The 1993 *Interpretive Prospectus* replaces the 1974 *Interpretive Prospectus*, incorporates the approved 1991 *Wayside Exhibit Proposal*, and establishes the foundation for future exhibit planning and design, audiovisual production, and future publications. In addition, it briefly addresses base and optimal interpretive programming. The interpretive prospectus is based on the same interpretive themes and goals that were developed in this development concept planning process.

Guidance for interpretation was implied in early legislation establishing the monument, by listing significant features beginning with Mount Katmai and related volcanic resources, and concluding with the ANILCA legislation of 1980, specifically "to preserve for the benefit, use, education and inspiration of present and future generations certain land and waters . . . that contain nationally significant natural, scenic, historic, archeological, ethnographic, geological, scientific, cultural, recreational, and wildlife resource values." Current management objectives direct interpretation to "foster visitor understanding of and appreciation for the dramatic natural forces responsible for the park's volcanic features, Alaskan cultural history, and superlative fish and wildlife populations." In addition, management objectives direct the interpretation "of the park and preserve through highly personal techniques and programs, consistent with Katmai's natural environment and consistent with its visitor use patterns and physical resource values" (NPS 1983).

## INTERPRETIVE PROGRAM GOALS

- To foster visitor understanding of and appreciation for the dramatic natural forces responsible for the park's volcanic features, the Alaskan cultural history, and the superlative fish and wildlife resources.

- To interpret the park and preserve through nonsophisticated, highly personal techniques and programs consistent with Katmai's visitor use pattern.

- To design and operate visitor use areas in harmony with Katmai's wilderness character and minimize adverse effects on the natural and cultural resources.

- To provide information and interpretation that encourages visitors to use minimum-impact methods of camping, fish release, and wildlife observation and photography.

## PRIMARY INTERPRETIVE THEMES

Following are the primary interpretive themes and associated topics for Katmai National Park and Preserve.

1. The Valley of Ten Thousand Smokes, Mt. Katmai, Novarupta, and the many other volcanic features associated with the eruption of 1912 collectively form an internationally significant scientific feature as well as an extraordinary scenic attraction.

   - 1912 eruption of Novarupta
   - volcanism as a geologic process
   - glaciation as a geologic process
   - geomorphology of Aleutians/Alaska Peninsula
   - Griggs/National Geographic Society expeditions to Katmai
   - Father Hubbard expeditions to Katmai
   - current research studies in the Valley of Ten Thousand Smokes

2. Katmai National Park and Preserve are home to the world's largest protected population of brown bears.

   - brown bear biology
   - brown bear and salmon – feeding/spawning cycles
   - brown bear behavior/habituation
   - brown bear management and safety issues

3. Katmai National Park and Preserve embrace the headwaters of river drainages that provide vital spawning habitat for red salmon and other fishes.

   - red salmon biology
   - red salmon migration
   - Bristol Bay red salmon fishery
   - salmon/bear interactions
   - other anadromous and resident fish found at Katmai

4. Humans have played a significant role in the discovery, use, preservation, and management of Katmai National Park and Preserve.

   - aboriginal use of the Katmai area
   - archeological resources
   - ethnographic resources
   - early European-American exploration of Katmai
   - establishment of Katmai as a national monument/park/preserve
   - philosophy on preservation and use within cultural resource areas
   - modern subsistence use in the preserve area

5. Almost the entire park and preserve are of wilderness character, containing natural, unaltered ecosystems with only isolated manifestations of European-American influence.

   - wilderness philosophy and protection
   - research projects associated with undisturbed environments
   - experiencing Katmai's wilderness character

## AREA MANAGEMENT

### Natural Resources

The reduction of direct disturbance and impacts on the natural resources of the Brooks River area is an action objective common to all development alternatives. Methods for achieving the goal may be different between alternatives, but the same effect is sought.

Some of the action objectives for natural resources in the Brooks River area that deal specifically with the presence of bears are the elimination or reduction of human/bear encounters, of bear food conditioning incidents (like bears stealing fish from anglers), of trespass incidents by bears through developed areas, and of excessive habituation of the local bear population.

**Bear-Free Zones.** The proposal to establish bear-free zones for all existing or proposed development areas is an action common to all development alternatives. This plan proposes that these development areas be managed as bear-free areas, where trespass by bears is actively discouraged through approved bear management techniques. Development areas in this plan include visitor, maintenance, and research facilities and employee housing areas.

**People-Free Zones.** Brooks River is a world-class sportfishing area for rainbow trout and red salmon, as well as a world-class wildlife photography area. Without limiting the number of visitors or controlling the places and times that they fish or watch wildlife, the relatively uncrowded wilderness-like setting they now enjoy will be lost to crowding. Also, there is concern over the 400+ reported human/bear encounters that happen along Brooks River in the summer, many of which involve anglers (NPS 1991a). "Angling is the most intrusive human activity in this prime [bear] habitat because it requires that the person be in the river in direct competition for space with foraging bears. Resolution of this conflict through bear management is difficult without a policy determination about the relative priority of bears versus [sport]fishing" (NPS 1990a). Closures on the Brooks River along certain reaches and during certain seasonal periods of high bear density are proposed actions common to all development alternatives.

The National Park Service will work with the state of Alaska to change the fishing regulation of a one-fish-per-day limit to catch-and-release-only for all of Brooks River. This one action alone would greatly reduce the number of human/bear encounters and food conditioning incidents that occur along the river, and would eliminate the need for a fish cleaning building in the area and the associated water quality/solid waste concerns created by fish cleaning. At Brooks Camp it has already been proven that existing septic systems that have to handle fish entrails do not work in these riverside locations. Incineration would not be practical; in fact, the system failed in 1995. Dumping entrails in a special landfill is not feasible because of the bears and other wildlife. Haul-out by barge to the park boat dock and then trucking to the King Salmon landfill is the only other option. A catch-and-release regulation would solve this problem.

## Cultural Resources

**Prehistoric.** The internationally significant cultural resources in the Brooks River area have been designated a national historic landmark and are listed on the National Register of Historic Places. As such, they are subject to protection under the National Historic Preservation Act of 1966, as amended, the Archeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act of 1978, the Archeological Resources Protection Act of 1979, and the Native American Grave Protection and Repatriation Act of 1990. The implementing regulations for these acts stipulate procedures for consulting with the Alaska State Historic Preservation Officer, the Advisory Council on Historic Preservation, and interested Native Alaskan groups under section 106 of the National Historic Preservation Act. In addition, the National Park Service has developed a set of guidelines for the management of cultural resources that adhere to the laws and regulations.

The ultimate goal of the National Park Service in the Brooks River area is to protect cultural resources whenever feasible. Under all alternatives the Park Service would

- continue to expand its knowledge of the specific locations and types of archeological remains and ethnographic resources in the Brooks River area, especially in the immediate vicinity of existing and proposed development
- conduct archeological and ethnographic surveys and, when appropriate, subsurface testing of areas proposed for development away from the Brooks River area
- take the effects of proposed developments on cultural resources into account during the specific design and implementation of the actions
- avoid known cultural resources whenever feasible
- consult with the Alaska State Historic Preservation Officer, the Advisory Council on Historic Preservation, and interested Native Alaskan groups on all specific development and construction plans in accordance with section 106 of the National Historic Preservation Act (as amended)

The last trail segment on the Brooks Falls trail passes over a series of barabaras on archeological site XMK-011. These resources extend from the point at which the trail tops the ridge all the way to the Brooks Falls platform. Under all development alternatives, a boardwalk would be built along this trail segment to prevent further erosion of the barabaras. The boardwalk would be routed to avoid the barabaras, wherever possible, or to bridge them when it is not possible to stay to either side. Besides protecting the archeological resources, this measure would also keep visitors at a constant elevation, reducing surprise encounters with bears in the tall grass growing in adjacent barabaras.

**Historic.** The Old Log Cabin on Lake Brooks would be retained under all alternatives. It would be used as a visitor contact station during times when, due to wind conditions, floatplanes must land at Lake Brooks.

**Ethnographic.** All local Native Alaskan groups have a number of concerns and will be consulted on all potential impacts on these resources.

## Limits of Acceptable Change

Visitation in the Brooks River area has been steadily increasing over the past several years and shows no sign of slowing (see table 1). The upswing in use has resulted in a number of increased impacts on natural and cultural resources, and has also brought changes in the type and quality of visitor experiences. Throughout this planning effort, visitors, researchers, environmental advocates, and staff alike have expressed concern over the effects of this increasing use.

Many impacts from increasing visitation can be addressed through facility improvement, new development, or relocation. Accordingly, a major focus of this plan is to propose alternative ways to organize facilities to provide high quality resource and experience conditions. Facility development alone, however, cannot address all visitor impact issues. At some point, high levels of visitor use can overwhelm the area, creating unacceptable resource damage or dramatically changing the character of the visitor experience.

In order to address this issue, more direct management of visitors is necessary. Visitor management options generally fall into one of two classes:

- education or regulation efforts designed to modify visitor behaviors that cause unacceptable impacts, or
- limits that keep use below those levels that cause unacceptable impacts or overcrowded facilities

There is already an active education and regulation effort in place at Brooks River, as well as *de facto* limits on overnight use. With this plan, the National Park Service recommends formal limits on both day and overnight use in all development alternatives. These use limits are designed to prevent unacceptable impact levels. They were developed through a systematic process that began with explicit resource and experiential objectives, and involved extensive analysis of information from bear research studies, recommendations, visitor surveys, and resource reconnaissance. The following section briefly describes the process and logic used to develop the recommended limits.

**Managing Visitor Use Impacts and Determining Carrying Capacities.** Understanding visitor impact issues and determining the appropriate use levels for an area is a complex but not impossible task. Visitor impact management concepts, principles, and methodologies have been extensively developed over the past two decades. While at least three competing processes or frameworks have been developed for exploring and addressing these issues — limits of acceptable change (LAC), visitor impact management (VIM), and carrying capacity assessment process (CCAP) by land-managing agencies throughout the country — their similarities are far more striking than their differences. A full discussion of these processes is

outside the scope of this plan, but a brief introduction to several principles and concepts is useful. These principles and concepts guided development of the proposed use limits.

- The focus of visitor impact work has shifted from "how much use is too much" to "how much impact is too much." In many cases, the answer to both questions is desired; however, the impact question must be answered first. Use limits may be an effective method for addressing many impacts, but it is the impacts themselves that need to be defined and examined first.

- Impacts are defined as changes in resource or experiential conditions, and they do not necessarily equate with damage. Any visitation results in some impacts; the issue is defining when they have reached unacceptable levels. The use of standards defining the limits of acceptable change is the key step in all three of the currently used processes.

- Defining when impacts become unacceptable requires explicit statements about the objectives for an area. Depending on the desired resource or experiential setting, more or less impact of a certain kind may be acceptable. For example, in a developed recreation area, 10-foot-wide trails and continual interaction among visitors at attraction sites may be appropriate; in a wilderness-like setting, these impacts are clearly unacceptable. Use limits and the standards upon which they are based are not characteristics of an area just waiting to be discovered. They must be carefully developed from objectives about the resource setting and the type of experience to be provided.

- Objectives are based on evaluative information — value judgments — and need to be carefully separated from other information developed in this kind of analysis. One set of objectives and the resulting standards or use limits are not inherently better or worse than another; they are just different. In developing alternative objectives, it is important to specify the basis for those objectives and make their evaluative nature clear.

**Implementing Visitor Impact Management in the Brooks River Area.** The above principles were incorporated into this plan through the use of two well-developed concepts — indicators and standards.

- Indicators are variables that measure important resource or experiential conditions. They provide specific ways of understanding and representing the health of the ecosystem or quality of experience. Examples of indicators include variables such as (1) number of people on the Brooks Falls platform; (2) number of angling encounters (other parties/people in view at one time); or (3) number of fish or food stealing incidents by adult bears per year.

- Standards, in contrast, define how much impact is too much for each indicator. Using the examples from above, standards might include (1) no more than 30 bear viewers on the Brooks Falls platform at one time; (2) no more than 10–15 anglers in the river mouth at one time; or (3) no more than two fish stealing incidents by adult bears per

year. Standards state how much impact is acceptable for a given set of objectives in explicit, measurable terms.

This plan establishes indicators and standards for each of the development alternatives. Many indicators and some standards are common to all development alternatives, particularly with regard to impacts in the core use area at Brooks River (river corridor, platforms, trails). The logic here is that no matter which alternative is implemented, there are certain resource conditions that need to be maintained in the core use area. In the case of other impacts, however, indicators and standards change with the different facilities proposed for each development alternative.

During the early development of the draft plan, over 40 different indicators and standards were put forward by the planning team for park managers to consider. As the process continued, however, it became clear that several impact issues were either being addressed by facility modifications in the plan, correlated with each other and could be represented by a single indicator/standard, or not in any danger of reaching unacceptable levels and therefore unimportant in context of this planning effort. These were dropped. The remaining 20 or so indicators (depending on the alternative) are the most critical and relevant, and formed the basis for the development of use limits. The National Park Service proposes to monitor these indicators through time, thereby establishing objective measures of resource and experiential conditions in the Brooks River area.

The complete list of indicators and standards is given in table 2. Not all are applicable to all alternatives. Both indicators and standards were developed by NPS staff and planners at a series of workshops. They were based on professional judgment, bear research studies and recommendations, visitor survey data, and fieldwork. The key standards are associated with maintaining quality bear viewing and sportfishing experiences and reducing human/bear encounters in the core use area. Indicators and standards that would be subject to the variables in nature were not included for the obvious reason that they could not be guaranteed to happen and could not, indeed should not, be managed directly. For example, indicators such as number of bears at the falls per day or number of sows with cubs visiting the cutbank per week would be impossible to guarantee. By reducing the numbers of human/bear interactions and limiting the number of people on the river and how long they stay, the National Park Service can began to ensure that a fair number of bears will always remain attracted to the Brooks River area, "knowing" that the human competition for space and food is controlled.

Outside the core use area, almost all use impacts would be addressed through facility changes. In developing these indicators and standards, a number of basic assumptions were made about how the Brooks River area functions, and the kind of resource conditions and experiences that are desirable in the area. Major concepts that guided analysis include the following:

- Visitor use issues are most critical in July. This is the sustained high use period for the greatest impacts on resources and visitor experience.

- A trade-off exists between allowing more people to use the Brooks River area and impacting the resources and lowering the quality of the visitor experience. The National Park Service favors maintaining good resource conditions and high quality visitor experiences, even if it means some visitors may have to wait for access.

- The Brooks River visitor experience features periods of low and moderate interaction levels, and both developed and wilderness-like settings. The National Park Service recognized the need to develop standards commensurate with this diversity of settings. However, almost all public comment and survey data pertaining to visitor impact issues suggested maintaining the experiences similar to those being provided on average days at present and standards reflect these preferences. Current quality experiences are characterized by small to medium-sized groups at the viewing platforms, a high likelihood of seeing bears, a low likelihood of encountering large groups (greater than 40), opportunities for relative solitude while fishing, and sufficient time to explore the core use area (including significant time at the falls or other places in the core use area).

- Many of the current causes of human/bear interactions would be corrected by facility changes proposed in the development alternatives. But most of the social or experiential impacts can only be addressed by establishing use limits for the core use area. Standards defining use limits at specific places in the core use area are the key limiting factors in determining appropriate use limits at Brooks River.

- Basic assumptions about platform capacity and the average length of time a visitor should have in the core use area or at specific platforms are at the heart of the use limit determinations. It is possible to have higher use limits, but only by developing larger bear viewing platforms (and increasing "grandstand effects"), reducing the time visitors get to spend in the core use area or at specific platforms, and establishing more formal, regimented systems of allocating visitor time on platforms or at the river. Public comment and survey data suggest that most visitors oppose one or more of these options (NPS 1993e).

After LAC indicators and standards were established for each development alternative, it was possible to describe relationships between visitor use impacts and determine use limits. A desired set of conditions was articulated through the standards; the next step was to determine through analysis which combination of use limits, facilities, and other visitor management techniques would keep impacts from exceeding those standards. The output of this analysis are the use limits presented in table 3.

**Recommended Capacities.** Based on the process described above, the National Park Service recommends the following visitor use limits for each alternative (see table 3). These use limits define the maximum number of people that can be in the Brooks River area over the course of a day without creating unacceptable impacts defined by the standards.

TABLE 2: INDICATORS AND STANDARDS FOR THE DEVELOPMENT ALTERNATIVES

| | Alt. 1 | Alt. 2 | Alt. 3 | Alt. 4 | Prop. Action Alt. 5 |
|---|---|---|---|---|---|
| **Experience Oriented Indicators** | | | | | |
| Number of people on the falls platform | 20–30 | 30–40 | 30–40 | 20–30 | 30–40 |
| Number of people on cutbank platform | n/a | 20–30 | 20–30 | 20–30 | n/a |
| Number of people on the narrows platform | 25–30 | 25–30 | 25–30 | 25–30 | 25–30 |
| Number of people in river mouth area (on or off platforms) at one time | 50–60 | 40–50 | 40–50 | 40–50 | 40–50 |
| Number of people on river mouth overlook | 10–15 | 10–15 | 10–15 | n/a | 10–15 |
| Average wait to access falls platform (mins.) | 10–15 | 10–15 | 15–20 | 10–15 | n/a |
| Average time on falls platform per day (hrs.) | 2–3 | 2–3 | 2–3 | 2–3 | 1–2 |
| Average time in core use area (hrs.) | n/a | 6–9 | 6–9 | n/a | 2–3 |
| Average time waiting for shuttles (mins.) | n/a | 10–15 | 20–30 | 10–15 | 10–15 |
| Number of angling encounters (other parties/people in view at one time) | | | | | |
| Upper river (number of parties; parties = 3–5 people) | 1 | 1 | 1 | 1 | 1 |
| Lower river (number of parties; parties = 3–5 people) | 2 | 2 | 2 | 2 | 0 |
| River mouth (number of people) | 10–15 | 10–15 | 10–15 | 10–15 | 0 |
| **Human/Bear Interaction Indicators*** | | | | | |
| Number of bears killed | 0 | 0 | 0 | 0 | 0 |
| Number of bear trespass incidents per day | 2 | 0 | 0 | 2 | 0 |
| Number of armed responses by rangers to trespasses by bears per week | 1–3 | 0 | 0 | 0 | 0 |
| Number of bluff charges in July | 0 | 0 | 0 | 0 | 0 |
| Number of bluff charges in September | 3 | 1 | 1 | 1 | 1 |
| Number of fish or food stealing incidents by adolescent bears per year | 0 | 0 | 0 | 0 | 0 |
| Number of fish or food stealing incidents by adult bears per year | 1–2 | 1–2 | 1–2 | 1–2 | 1–2 |
| Number of property damage incidents (major damage to tents, boats, etc.) per year | 5 | 1 | 1 | 1 | 1 |

* The target with all human/bear indicators is 0, but levels up to the standard are generally tolerated before implementing further actions.

TABLE 3: RECOMMENDED USE LIMITS FOR THE DEVELOPMENT ALTERNATIVES*

| 1992 Situation | Lodge Guests | Campground Users | Day Use Users | Staff | Total Use |
|---|---|---|---|---|---|
| Current Limits | 60 | 60 | none | none | variable |
| Average July Day | 45 | 45 | 80 | 50 | 220 |
| Typical July Peak Day | 55 | 55 | 110 | 60 | 280 |
| ALTERNATIVES | | | | | |
| 1: Minimum Requirements | 60 | 60 | 60 (30)** | 60 | 240 (210) |
| 2: Beaver Pond Terrace: Former Proposal, Draft DCP/EIS | 75 | 75 | 40 (20) | 70 | 260 (240) |
| 3: Iliuk Moraine Terrace | 75 | 75 | 60 (30) | 80 | 290 (260) |
| 4: Day Use Area Only | 0 | 0 | 90 (70) | 30 | 120 (100) |
| 5: Beaver Pond Terrace: Proposed Action | 60 (60) | 60 (60) | 85 (50) | 55 (50) | 260 (220) |

* Each limit may be modified 15% up or down based on resource monitoring.
** June/July/August use limit is given first; September limit is in parentheses.

In table 3 limits are given for lodge guests, campground users, day use users, and staff, as well as total use for each alternative. The existing situation (current limits, average July day use, and use on a "typical" July peak day in 1992) is also given for comparative purposes. If total use for an alternative needed to be reduced in order to keep impacts from exceeding standards, day use was limited first. One reason is that there have been *de facto* limits on overnight use at Brooks for many years, while day use has been increasing dramatically. A more important reason is that day use is generally less compatible with high quality Brooks River experiences than overnight use. Higher day use detracts from the experiences of visitors in a variety of ways, including the following:

- Higher floatplane traffic and attendant noise levels.
- Larger numbers of people with only a few hours to experience the area tends to result in a more hurried atmosphere and more aggressive visitors. Overnight users have a greater luxury of time that encourages a more evenly paced exploration of the area.
- Higher "persons at one time" levels because day users tend to arrive for a few hours in the middle of the day. Overnight users can spread their time in the core use area throughout the daylight hours and thus reduce crowding.
- Less time for day users themselves to absorb and understand the concepts that guide appropriate behavior around bears in the Brooks River area, thus making the day users more likely to need instruction from rangers.

- Less overall time to learn about the area's natural and cultural heritage.

Day users also require greater levels of onriver management (more "bear talks" and more ranger oversight). Finally, in a survey of users at Brooks River, most users (including many day users) reported favoring limits on day use before reducing overnight use (NPS 1993e).

Recommended limits apply throughout the summer season although they are directed towards crowding problems in July and September. In September the concentration of bears near the river mouth and the lack of bear viewing opportunities at the falls (bears do not fish there then) further constrains the ability of the core use area to accommodate visitors. Accordingly, limits are lowest in September for day users (limits in parentheses in table 3).

These limit recommendations are ultimately tied to professional judgments of use-impact relationships. In many cases that relationship is not precisely known. While the plan recommends a single capacity limit for each development alternative, that number is designed to imply a **range** defined by 15% more and 15% less. The National Park Service expects to manage for the mid-point of the range at the outset, continue to monitor visitor impacts, and then revise limits up or down as impacts are evaluated and understood. If visitor impacts remain at acceptable levels, then the National Park Service can relax the capacity to a higher level within the range. In contrast, if impacts at the recommended use limits become unacceptable, the National Park Service would restrict use to the low end of the range. Similarly, some facilities should be designed for accommodating the low end of the visitor use limit to start, but with the design capacity to phase in additional space or units if monitoring demonstrates that higher visitor use limits would not be detrimental to the resources or the visitor experience.

In four of the five development alternatives, use limits are lower than existing use on peak days. This recognizes that peak day use limits in the past two or three years have caused unacceptable impacts and need to be addressed. In general, however, these recommended limits do not represent a significant cut in use over the course of the season or even the July peak season. They are essentially designed to simply truncate use on peak days when impacts reach unacceptable levels. As readers contemplate these limits, it is important to remember that these use limits would be far higher at Brooks River than any similar bear viewing location in Alaska. At McNeil River State Wildlife Sanctuary, only 10 users per day, accompanied by a guide, are allowed into its "core area," while at Pack Creek in Southeast Alaska, the Forest Service prohibits overnight use and day use rarely exceeds 30 to 40 visitors. Even with these proposed limits, Brooks River would remain the most highly accessible bear viewing resource in the state.

### Commercial Use License Holders

Commercial use licenses have been provided to companies providing fishing guide and other services to visitors staying at nearby lodges and hotels, or transportation to Brooks Camp. There are no restrictions on how many licenses can be issued; however, the amount and type of use as authorized by each license can be subject to operational restrictions, visitor use

limitations, and other conditions. Commercial use license holders would be affected by establishment of visitor day use limits for the Brooks River area (see alternatives 1, 2, 4, and 5 in the "Economic Impacts" section of "Part Four: Environmental Consequences").

## SUSTAINABLE DEVELOPMENT

Sustainable development attempts to minimize human impacts on the earth, recognizing that development practices often deplete natural support systems, or may lead to the destruction of critical cultural resources. Central to the concept of sustainable development is the idea that all decisions — from initial concept through design, construction, and operations — must be evaluated in light of the principles of natural and cultural resource conservation.

In the Brooks River area, a unique opportunity exists to affect visitor perceptions about the natural and cultural world, as demonstrated at this location. Here visitors can observe nature in action, learn about and appreciate the peoples who occupied this site for over 4,000 years, and enjoy the area without consuming it or diminishing the opportunity for the next generation to also enjoy it. Principles of sustainable development would be incorporated in the planning, design, construction, and operation of visitor and support facilities in the Brooks River area.

## DESIGN CHARACTER GUIDELINES

Prior to design of new facilities, guidelines would be completed that would describe in detail the types of construction materials to be used for all facilities in the Brooks River area. The intent would be to maintain a rustic lodge or camping experience in backcountry Alaska. Items to be covered by the design guidelines would include scale, materials, color, texture, continuity, furniture, and other issues related to the built environment that would contribute to the visitor experience. Roads would be maintained as primitive graveled roads in a wilderness corridor, and only improvements that blend into the natural setting would be made. To the maximum extent possible, facilities would not be readily evident from Naknek Lake other than required dock facilities, and even these facilities would be designed in such a way as to be of minimal visual impact on the park visitor.

All appropriate water and energy conservation technologies and materials recycling would be incorporated into the design of the proposed facilities according to NPS policy on sustainable development practices.

## ACCESS FOR DISABLED VISITORS

Park facilities to be constructed would utilize universal access design principles to the maximum extent possible. This would result in most facilities being accessible to all people. This may not be possible in limited circumstances due to topography, but a majority of the experiences enjoyed by visitors to the Brooks River area would be made accessible. Some facilities would provide a higher challenge and expose the user to a greater risk. The users

would be able to make their own choice. Major facilities such as the visitor center, lodge, cabins, and restrooms would provide the highest level of access; some bear viewing platforms, viewpoints, and trails would involve a minor level of challenge; other bear viewing platforms and trails would provide some of the highest levels of challenge. All accessibility considerations would be developed using current accessibility standards in consultation with appropriate clubs and organizations.

## NO-ACTION ALTERNATIVE

### CONCEPT STATEMENT

This alternative would perpetuate existing conditions in the Brooks River area and include only modest changes in development and operations at Brooks Camp. Most resource concerns would remain; no significant actions would be proposed to improve resource management or park and concession operations in the area.

### VISITOR EXPERIENCE AND USE LIMITS

Park headquarters in King Salmon is 33 air miles to the west of Brooks River. Access for visitors and staff is by floatplane or occasionally by boat. Katmai Air and commercial lines provide most of the air service between King Salmon and Brooks Camp, with a number of private air tour operators offering day flights.

Prior to arriving at Brooks Camp, visitors have the opportunity for orientation at the Interagency Visitor Center, located in the King Salmon airport complex. However, due to travel connection schedules, visitors are often picked up at the King Salmon airport and driven immediately to a waiting floatplane for transport to the Brooks River area.

Visitors arriving at Brooks Camp are directed to the visitor center for a mandatory 5–10 minute program by a park interpreter. This program includes an orientation to the area, a discussion of rules and regulations, and a detailed description of appropriate human behavior around brown bears. The visitor center is also the central distribution point for other information, backcountry and camping permits, cooperating association sales, and notification of interpretive programs.

Once at Brooks Camp, visitors walk. Most facilities are north of the river. Access is by foot on trails that are frequented by brown bears during salmon runs (July and September), and the trails are often muddy. The only road in the developed area is a 23-mile-long, single-lane gravel road that goes from Brooks Camp to the Valley of Ten Thousand Smokes, which is accessible to visitors by prearranged bus tour for a fee.

Visitors to the Brooks River area are offered several guided interpretive activities. These include evening programs on a variety of topics related to the resources of the Brooks River area and other parts of Katmai, a guided walk to a reconstructed barabara site, guided walks to Brooks Falls or to the overlook on Dumpling Mountain, and, in conjunction with the park concessioner, a full-day bus tour to the Valley of Ten Thousand Smokes and a hike into the valley.

Interpretive rangers are also called upon to spend a significant amount of time roving the Naknek Lake beach, Brooks Falls trail, floating bridge, and viewing platform areas to ensure

visitor compliance with rules and regulations, especially related to bears and fishing. Roving also allows interpreters to conduct informal interpretation with small groups and individuals.

Brooks Camp offers the setting for visitors to relax and, at an unhurried pace, discover the significance of the park's resources. Maximum visitation occurs in July, when an average of 45 visitors stay at the lodge, 45 use the campground, and up to 80 day use visitors may fly or boat in and leave by 8:00 P.M. Excluding day use visitors, average length of stay at Brooks Camp is three days, and is dependent on availability of overnight accommodations.

Ample opportunities exist for visitors to view wildlife, primarily brown bears during July and September. Two bear viewing platforms afford a relatively safe haven for extended bear viewing. The narrows platform is located on the south side of the Brooks River, near its mouth. Present access from Brooks Camp on the north bank is over a floating bridge. Reaching the elevated viewing space is by a handicap accessible ramp or stairs from ground level. The platform comfortably accommodates 25 people at two viewing levels. Photographing bears consumes much of viewer's time on the platform.

The other platform is located at Brooks Falls. Present access from Brooks Camp is by a foot trail, approximately 1 mile long. The trail passes through relatively dense forest frequented by bears, and encounters sometimes occur. The platform, which is reached by stairs from the ground level, comfortably accommodates 20 people on its single level. During peak visitation, the platform gets crowed, with up to 40 people viewing and photographing the bears. Survey data from 1993 suggest that most visitors prefer Brooks Falls platform use limits to be closer to 15 or 20 at one time. Park staff attempt to regulate the number of people on the platform at any one time by encouraging visitors to remain only an hour at the Brooks Falls platform and by holding people at the trailhead until the situation on the platform eases. In 1995 waits of up to three hours were required during peak viewing times.

Sportfishing is permitted in the Brooks River, even during salmon runs with the associated high use of the river by brown bears. The two principal fish species sought by anglers are rainbow trout and sockeye salmon. Catch and release fishing is encouraged; however, visitors may keep one fish per day other than rainbow trout. No fishing is permitted within 100 yards of Brooks Falls. During peak salmon runs the river is often crowded with anglers who compete with each other for space, while keeping a watchful eye up and downstream, as well as on the riverbanks, for brown bear who enter the river quietly to fish. Anglers, photographers, and other visitors are not permitted to approach closer than 50 yards to a single bear or within 100 yards of a bear family (i.e., a sow with cub or cubs). Anglers are frequently called out of the river by park staff until approaching bears move on. A fish cleaning station is near the mouth of the river where fish must be taken immediately for cleaning to avoid theft of fish by bears. Under existing conditions the potential is high for angler/bear confrontations. The park staff goes to great lengths to enforce regulations regarding fishing and bear safety, and informed visitors generally comply without reminders.

A concession-operated bus tour from the Brooks River area to the Three Forks overlook is offered daily for the round-trip fee of $57 with lunch, or $50 without lunch. A school bus, sometimes supplemented by a van, conveys visitors over a 23-mile-long, single-lane gravel

road to a cabin at the Three Forks overlook. A rest stop is made approximately 12 miles along the road at Margot Falls, where visitors can stretch their legs and take in scenic vistas. Three streams are forded by the bus to reach the Three Forks overlook. These stream channels are worked by heavy equipment to maintain the crossings. Pit toilets are available at the Three Forks overlook, and a small cabin provides shelter and access to a few outdated exhibits about volcanic events. A picnic style lunch is served in the cabin. Visitors are given the opportunity to hike the 3-mile-round-trip trail to Ukak Falls. The trail descends through a deep gorge, cut by the Ukak River through the 1912 volcanic ash flow, providing the visitor with a sense of the enormity of volcanic events in the not-so-distant past.

## EXISTING DEVELOPMENT

### Eskimo Barabara Exhibit

This covered, partially reconstructed barabara walk-in exhibit is at the end of a short trail from Brooks Camp. Several interpretive signs are on the railing of the viewing area, and these interpret the lifeways of the ancient occupants. Visitors are not allowed in the barabara itself.

### Brooks Camp Campground

This is the only formal camping area in the park and is located at the base of Dumpling Mountain, about 1/4 mile north of the main Brooks Camp development on Naknek Lake. The campground contains 17 sites. There is a food storage and garbage cache, three cooking shelters, two pit toilets, one water spigot, and a site for the park volunteer campground hosts.

### Naknek Lake Beach Floatplane Access

Floatplanes debark and embark passengers on Naknek Lake beach and camp visitors use it for recreational purposes. The beach is a common route for bear travel, feeding, and resting. Visitor use frequently brings bears and people into close contact.

### Concession and NPS Utilities/Maintenance Area

This area, which is in prime bear habitat and atop archeological sites, houses all the support facilities that are necessary to operate the collective functions of Brooks Camp. The many structures are listed in the "Site and Facility Analysis" section of "Part Three: The Affected Environment." These support facilities are aging and many improvements are needed to maintain their usefulness.

### Concession and NPS Seasonal Housing Area

The housing area is located in prime bear habitat and atop archeological sites. Bears pass through the area, particularly at night. Waterlines to housing and visitor facilities freeze each winter requiring frequent maintenance which threatens cultural resources.

### Visitor Center

This converted one-room log cabin serves as the main contact point for visitors arriving at Brooks Camp. The bear safety message and other orientation materials are presented here.

### Auditorium

This facility is a converted temporary bunkhouse. The structure is deteriorating. Normal maintenance threatens cultural resources.

### Visitor and Vehicle Trails

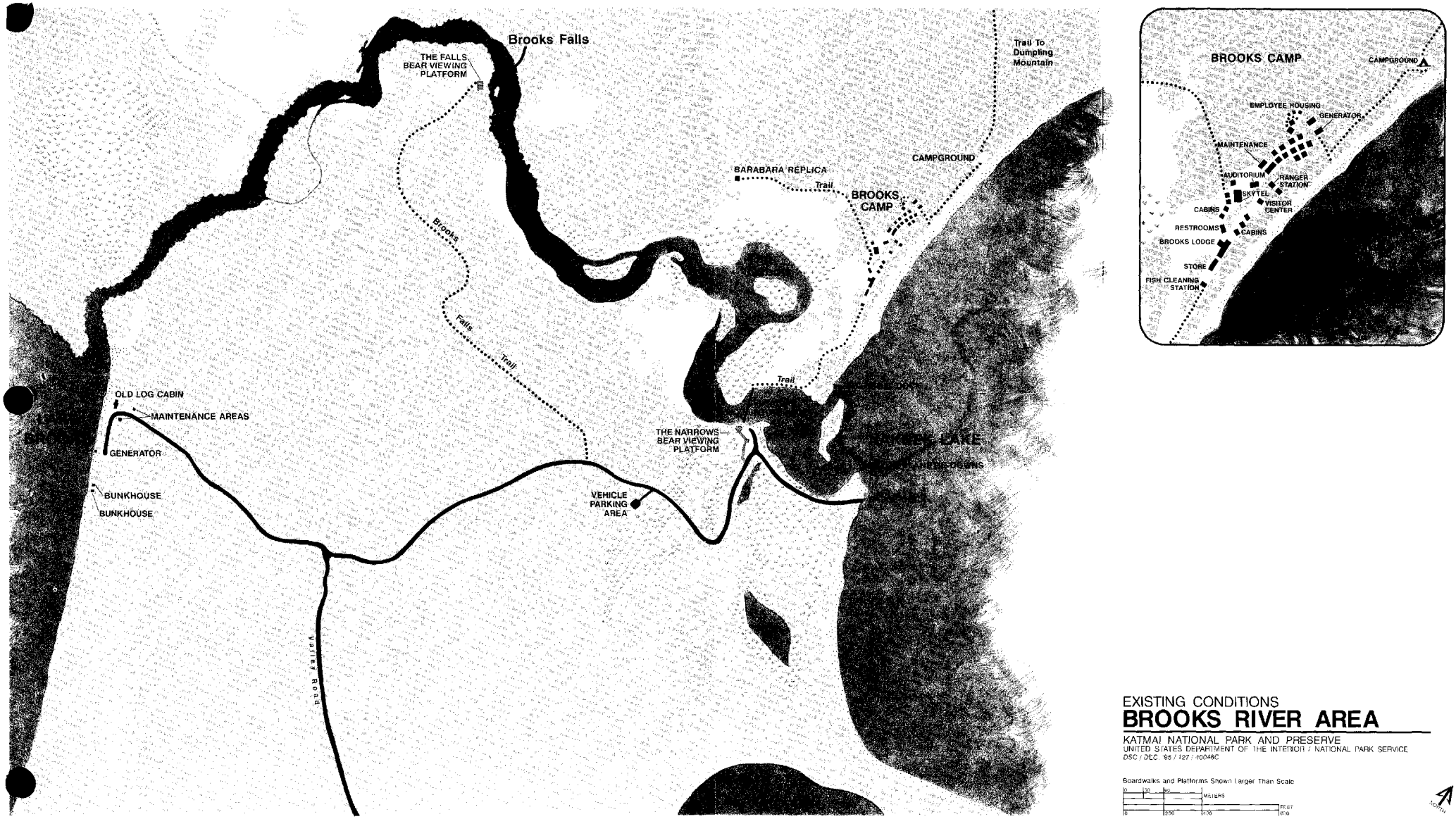
Approximately 0.5 mile of heavily used trails are within Brooks Camp. These trails are often bordered by dense underbrush screening bears from visitors. The trails are used by a small garden tractor and trailer use the trails to haul luggage and supplies.

### Brooks Lodge and Dining Facility

Brooks Lodge comfortably seats a dozen or more people around the fireplace and lounge. Seven large tables are provided for family style meals in the dining facility. The lodge is often crowded at peak use times, and is inadequate to meet demands during this period. Visitors congregate around the lodge during arrival/departures, prior to meeting the valley tour bus, at meal times and during rainy weather. Bears frequently pass along the nearby beach and within dense underbrush in close proximity to visitors. The structure sits atop significant archeological sites.

### Guest Cabins

There are seven small one-room cabins designed to house four guests in bunk beds and a Skytel building with nine small rooms accommodating four guests each. Room rates range from $250 to $280 per night for one to four persons, effectively limiting occupancy to a narrow range of the visiting public. Bears frequently pass close to the cabins. All structures sit atop significant archeological sites.




EXISTING CONDITIONS

# BROOKS RIVER AREA

KATMAI NATIONAL PARK AND PRESERVE

UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

DSC / DEC. '93 / 127 / 10048C

Boardwalks and Platforms Shown Larger Than Scale

### Bridge Trail and Floating Bridge

To get to the floating bridge to cross the river, visitors must walk a trail that parallels the north bank of the lower Brooks River. The trail bisects the riverbank and a low marsh with tall concealing grass. Bears regularly use this area for fishing, resting, and travel. Visitors travel through a heavy bear use area. Bear presence around the bridge frequently stops visitor traffic affecting visitor experience and flight schedules. The trail has been flooded during late summer. Each spring the trail surface must be built up with gravel mined from nearby borrow pits. All visitor traffic must cross a noisy pontoon footbridge spanning the Brooks River. The bridge is a bottleneck for visitor and bear traffic. It blocks normal bear passage along the river forcing the animals to climb the bank and walk around it or to climb over it. This brings the bears into the heavily used visitor route. The pontoon structure with its creaking noise and human movement over it forms a barrier across the river, which temporarily blocks the passage of migrating salmon. This results in a concentration of anglers at the bridge. Bears searching for salmon carcasses and remains that have floated down to the river mouth come in conflict with the anglers.

### The Narrows Bear Viewing Platform

This structure, designed to accommodate approximately 25 people, is located on the south shore of Brooks River, at the floating bridge access point, near the concession bus turnaround. The platform enables visitors to safely and unobtrusively enjoy bears foraging for salmon in the lower river, with a minimum of management intervention.

### Lower Brooks River (Road, Floatplane Tie-Downs, and Barge Dock)

The only safe place to tie up a floatplane or boat overnight is in the quiet water of an eddy on the south side of the river mouth. The only barge dock is nearby, and a gravel road has been built along the south side of the river to access Naknek Lake beach and the barge dock. This area is heavily used by fishermen, photographers, and bears. Frequent close contact occurs, occasionally resulting in bears taking fish from unsuspecting anglers. Photographers sometimes ignore the required distance they are to keep from bears and move in to get a close-up photograph. The presence of people and their activities force unhabituated bears to abandon their normal feeding and use patterns.

### Vehicle Parking Area

This area provides space to park the government vehicles and concession tour bus. It is unsecured and visible to visitors walking the park road.

### Brooks Falls Trail

From the trailhead this 0.6-mile route, constructed in 1983, connects the park road with the bear viewing platform at Brooks Falls. Heavy visitor foot traffic has caused extensive loss of vegetation and widening of the trail. Tree roots have been exposed by this erosion. The exposed ash surface becomes slick during wet weather and has resulted in visitors slipping and falling. For these reasons the trail has been surfaced with gravel in those areas. Numerous bear trails cross this route. Tall grass and other brush limit visibility along the trail. Visitors may encounter bears at close range along this route. The trail crosses several archeological resources as it nears the falls bear viewing platform.

### The Falls Bear Viewing Platform

This platform comfortably accommodates about 20 people. Use frequently exceeds 40 people. When the platform is full, people arriving are required to wait on the entrance stairs or remain on the trail in the bear use area. In 1995 rangers had to hold people at the trailhead for two to three hours before they could gain access to the platform.

### Lake Brooks Development

This area consists of two bunkhouses, generator and fuel storage, boat docking facilities, amphibious plane turnaround area, the Old Log Cabin, and maintenance areas. The area is entirely an NPS presence, except that floatplanes land on Lake Brooks primarily when wind conditions are not favorable for landing on Naknek Lake.

### Valley Road

This 23-mile-long, single-lane gravel road leads to the Valley of Ten Thousand Smokes. It has one rest stop with pit toilets at the Margot Falls overlook and three NPS-maintained stream crossings (fords).

### Three Forks Overlook

The current facility consists of a small, unstaffed interpretive cabin and a 1.5-mile-long trail that descends to the valley floor. The cabin sits atop a high knoll that has a commanding view, but is often shrouded in fog or is exposed to strong winds. The trail is relatively steep and is a difficult route for some elderly and physically limited persons. People walking into the Valley of Ten Thousand Smokes along the trail are dependent on bus drivers with limited interpretive training for information on the geologic history of the local features.

## PROPOSED DEVELOPMENT TO IMPROVE EXISTING CONDITIONS

### Brooks Camp Campground

Improvements would be made as needed to the cache, shelters, and pit toilets.

### Naknek Lake Beach

No changes would be made on the beach because it is a common route for bear travel. No formal floatplane tie-downs would be installed.

### Concession and NPS Seasonal Housing Area and Utilities/Maintenance Area

Utility systems in this area would be renovated. A new fuel oil delivery system, potable water system, sewage/leachfield system, and electrical system would be constructed in phases over a period of time, reflecting future findings from the remediation efforts. As staff increase to meet the increasing visitation more tent frames and cabins would be constructed, adding to the incremental expansion of the housing area. The existing procedures for septic system sludge disposal would be reevaluated. Pending reevaluation, alternative methods and sites for septic system sludge disposal may be considered and appropriate permits obtained.

### Ranger Station

No changes are proposed.

### Visitor Center and Auditorium

The existing structures would be made fully accessible. No new visitor center would be constructed as directed in the *General Management Plan.*

### Visitor and Vehicle Trails

No change in the pattern or use of trails in the area is proposed.

### Eskimo Barabara

No changes are proposed.

### Brooks Lodge and Dining Facility

The facility would be expanded toward the west to increase the dining room and lounge area.

### Guest Cabins

No changes are proposed.

### Bridge Trail and Floating Bridge

No changes are proposed. The boardwalk leading from camp and the bridge to the south side of the river, called for in the *General Management Plan*, would not be constructed.

### The Narrows Bear Viewing Platform

No changes are proposed.

### Lower Brooks River (Road, Floatplane Tie-Downs, and Barge Dock)

No changes are proposed. Routine maintenance would be required on the road and barge dock.

### Vehicle Parking Area

A two-bay vehicle shed would be built to provide maintenance workers with a dry place to service and repair vehicles.

### Brooks Falls Trail

Vegetation management along the trail to maintain site distances would continue.

### The Falls Bear Viewing Platform

The approach to the platform and the platform itself would be redesigned for obvious safety reasons. The same site would be used, but the platform would be redesigned for safety and expanded to accommodate around 30 photographers and wildlife viewers. It would not be fully accessible.

### Lake Brooks Development

No changes are proposed.

### Valley Road

The National Park Service and the Federal Highway Administration would stabilize and improve safety on this road while making no substantial changes to it.

### Three Forks Overlook

No changes are proposed.

## RESOURCE MANAGEMENT

Most natural resource management activities in the Brooks River area currently focus on the interactions of humans and brown bears. The management of human/bear interactions is guided by the *Bear Management Plan* for Katmai National Park and Preserve (NPS 1986b), with emphasis on prevention of conflicts. Responsive management measures are used when preventive management is unsuccessful and confrontations occur. In 1992 a total of 174 incidents were recorded (NPS 1992a); 56 of the 174 incidents involved bears "trespassing" in the immediate area of the buildings around Brooks Camp, which is managed as a bear-free zone for safety reasons, and to help prevent the excessive habituation of bears to humans. Another major category of incident reported was that of dominance interaction (42 of the 174 incidents), which is a competition between human and bear to occupy a particular space at the same time, outside of the Brooks Camp bear-free zone, resulting in human and/or bear yielding and leaving the area. Monitoring is conducted to assess instances of undesirable human/bear interactions, and multiple studies have been conducted over the last decade to understand and evaluate the relationships between bears and people in the Brooks River area.

The National Park Service commissioned a formal scientific study of the interaction of bears and people at Brooks River. The need for this study was referenced in the *General Management Plan.* Its findings and recommendations have been considered in the development of proposals in this plan. The final report, *Brown Bear Behavior and Human Activity at Salmon Streams in Katmai National Park, Alaska*, was submitted to the National Park Service in June 1990.

The following quotes from this study are particularly relevant to understanding the existing conditions of brown bear use of the Brooks River area:

> Brooks River is unique in the park. . . . Although the ecological importance of this small area has not been determined quantitatively, the energetic contribution of these salmon must certainly be fundamental to a significant proportion of the park's bears.

Planning and management for growth in visitation at Brooks River should recognize the implications of loss of access to this resource. [p. 104]

The stability of Katmai National Park's brown bear population is tied to the food sources upon which the bears depend, particularly to the salmon concentrations such as Brooks River. [p. 14]

Current levels of human use are effectively excluding some classes of bears (nonhabituated families, nonhabituated singles; about 45% of all bears [in the Brooks River area]) from lower river zones and limiting fishing time within these zones. [p. 104]

In July females with cubs of the year were observed approaching the river, then turning back when large numbers of people were encountered. Although the effects of such situations on survival and population productivity were not determined in this study, special management efforts to protect this cohort of bears are indicated by our observations. Nutritional and security needs of these families derive from the following considerations:

1) Females with two or three nursing cubs have high demand for nutritious salmon, and low body reserves of energy, especially early in the season.

2) Protection of cubs limits the range of river locations that such females can use because of potentially infanticidal males, and swift water. Also, some family groups tend to avoid people, which is especially difficult at the peak sockeye fishing season in July.

3) The first females with tiny cubs to approach the river near camp attract throngs of people. The numbers of people, combined with their resistance to abandoning fishing temporarily or aggressiveness in obtaining photographic opportunities, can overwhelm the capability of rangers to provide these bears access to the river.

4) The task of simultaneously leaving cubs on a bank in order to rush into the river to catch fish, while remaining close and vigilant enough, appeared stressful to some females. Finding people on all sides caused some females to abandon their attempts to fish. [p. 105]

This research has demonstrated the importance of Brooks River below the falls as feeding habitat for bear families. . . . Angling is the most intrusive human activity in this prime habitat because it requires that the person be in the river in direct competition for space with foraging bears. Resolution of this conflict through bear management is difficult without a policy determination about the relative priority of bears versus [sport]fishing [p. 108]

> Fish capture [by bears] in the lower river appeared directly affected by human activity, either through interruption of feeding, or more subtly, by reduction of the amount of alert fishing by scanning bears. [p. 36]
>
> The relative impact on bears of structures and activities in forested areas at a distance from the river is infinitely smaller than similar development near the river, which disturbs a myriad of ecological processes based on salmon consumption. [p. 104]
>
> Noise produced by aircraft, boats, and construction, constitutes intrusive stimuli which may be differentially experienced by the various age-sex classes of bears frequenting the river. Displacement of family groups in particular could have population-level effects. [p. 14]
>
> Late season visitation at Brooks River risks aggressive confrontations with bears unaccustomed to meeting people; disruption of habitat use by families of bears is also likely. If the visitor season were to be extended, special precautions and restrictions would be necessary since the pattern of human use would become less predictable to the bears. Unexpected encounters are associated with aggressive interactions and injuries from bears worldwide. [p. 106]
>
> The Brooks River area qualifies as key habitat for brown bears not only because of the abundance of salmon in Brooks River, but also the exceptional availability of these fish at the falls in July and the post-spawning salmon numbers in September and October. . . . Brooks Camp could hardly have been located in a worse place for conflict with bear movements and access to the river's fish. Increased visitation has only exacerbated this conflict. A longer-term plan for Brooks Camp is being developed by the National Park Service, including an option to relocate the camp. From the perspective of reducing the multiple sources of disturbances to bears, a change in camp location is the one option that could resolve a host of management problems. [p. 107]

The subpopulation of bears using the Brooks River is believed to be similar in density and age class distribution to comparable areas (NPS 1993d). Some bears using Brooks River have been shown to exhibit avoidance or intolerance when humans are present in the river corridor (NPS 1990a).

Other natural resource management activities currently conducted in the Brooks River area include a breeding bird survey, hare population index survey, bald eagle nesting/productivity survey, and wildlife observation records. Environmental monitoring, compliance, and remediation of soil and water quality is also conducted related to fuel leakage from underground storage tanks and distribution lines that has recently been identified and mapped. Environmental compliance and monitoring is also conducted for all development projects. Vegetation monitoring is conducted in areas of recent soil disturbance, to ensure that no alien plant species become established. Revegetation and landscaping of this and other disturbed sites is planned, using native species of local origin. Some thinning of brush is done to increase visibility along trails where close encounters between bears and humans are known

to occur. Similarly, tall grass bordering the trail to Brooks Falls is trimmed near major bear crossing areas. Road maintenance to the Valley of Ten Thousand Smokes involves periodic cutting of brush and occasional tree removal.

Ethnographic resources are important in this area and consultations continue on impacts and protection. Extensive archeological remains indicate that people have lived in the Brooks River area for over 4,000 years. These remains include at least 22 sites containing over 750 barabaras depressions and other types of cultural resources, which constitute the Brooks River Archeological District. This property has been determined to be nationally significant for its potential to yield scientific information regarding the prehistoric human occupation of Alaska.

The Brooks Camp development has been built on top of four archeological sites, some of which contain the oldest human remains yet discovered in the Naknek Lake region. The foot trail to the bear viewing platform runs the length of one archeological site, containing evidence of the earliest habitation of the falls area by humans. The vehicle parking area at the start of the Valley Road is adjacent to an unstudied, but apparently large archeological site. NPS facilities on Lake Brooks are next to an apparently extensive site dating at least 4,000 years ago.

Cultural resource management currently involves numerous archeological compliance procedures for ground-disturbing activities necessitated by maintenance and repair of underground utility systems through known or suspected archeological sites. When ground disturbance occurs, the staff archeologist personally conducts the excavation, or directly monitors the operation. Mapping of the site, identification of cultural resource materials, and mitigation/remediation projects are labor intensive under current conditions. The location of Brooks Camp on top of prime archeological resources requires the commitment of a staff archeologist to monitor and approve all ground disturbance from maintenance activities.

Management of historic structures in the Brooks River area includes the historic Bureau of Fisheries/U.S. Fish and Wildlife Service headquarters and laboratory, a log structure built in 1941 (called the Old Log Cabin in this plan), and a historic cabin and compound associated with European-American trapping and guiding. The park is assembling a List of Classified Structures.

No significant changes in the resource management program at Brooks River are proposed in the no-action alternative.

## AREA OPERATIONS

Brooks Camp is inaccessible by road. Park and concession staff are transported to Brooks Camp by float-equipped (Super Cub, Cessna 206, DeHavilland Beaver, Otter) or amphibious (Grumman Goose) airplane or by boat. Approximately 10 maintenance workers, their personal gear, and support needs are taken to Brooks Camp in late April, to begin the process of opening the camp. The cluster archeologist is responsible for conducting or monitoring all ground-disturbing activities to perform maintenance and repairs to frozen and/or ruptured water

and sewer lines and to electrical and fuel distribution systems. Opening operations require repeated crossings of the Brooks River mouth with both wheeled and track vehicles.

Support for Brooks Camp is mainly by aircraft from April through July. Brooks Camp is ready for summer operation by mid-May, at which time the balance of the Brooks NPS staff, and the concession employees arrive. The visitor season begins in early June with the opening of the rainbow trout fishing season, and continues through most of October, when bear watching and angling activities subside. The lodge closes in September, and two NPS employees usually remain in the area until approximately October 1.

The NPS fuel and freight barge, the M/T Ketivik, begins support operations from King Salmon to Brooks Camp when the water level of Naknek Lake and upper Naknek River rise sufficiently to allow passage, which is normally not before July 1. The barge hauls in gasoline, diesel fuel, building materials, and general supplies, which are trucked from King Salmon to the point of departure near Lake Camp on the upper Naknek River. Materials are off-loaded either on the beach in front of the Brooks Camp administrative housing, or at the dock facility just south of the mouth of Brooks River. The return trips are made carrying solid waste materials destined for recycling or landfill disposal. Solid wastes are sorted at Brooks Camp prior to shipping, and burnable materials are incinerated to reduce bulk. Sludge from the septic system is dumped and buried in a gravel pit along the Valley Road. The Ketivik ceases operations in late September due to deteriorating weather conditions that make travel difficult across Naknek Lake.

Additional transportation of materials and personnel is accomplished with the park's 28-foot-long boat (*Boston Whaler*). Operation of the *Boston Whaler* is also delayed by low water conditions early in the season. The boat is used extensively throughout the Naknek Lake system to support ranger patrols and resource management and research projects.

The Brooks Lodge is owned and operated by a private company, Katmailand, Inc., under an NPS concessions contract. Included in the concession-offered services are canoe and kayak rentals, a fishing tackle and souvenir shop, food service, and a bar. The company provides a fishing guide service and also operates a tour bus service from Brooks Camp to the Valley of Ten Thousand Smokes.

Reservations for camping in the Brooks Camp campground, which is operated by the National Park Service, are generally made in advance by phone. The peak use period is from late June through July and September, a period corresponding with the peaks in salmon and bear activity. The campground is very popular during this period and the park receives many more requests than there are spaces.

## ESTIMATED COSTS

Estimated construction costs for the no-action alternative are included in appendix A, table A-1.

## ALTERNATIVE 1: MINIMUM REQUIREMENTS

### CONCEPT STATEMENT

This alternative presents the actions that would be minimally necessary to keep Brooks Camp in place and have its operations comply with all laws, regulations, policies, and approved management plans. By retaining development on the peninsula of land north of the river mouth the ongoing impacts on bears, prime bear habitat, and nationally significant cultural resources are perpetuated. This alternative proposes development and actions that would ameliorate some of those concerns, and still provide for the continuation of the Brooks Camp experience. In order to maintain the experience of a remote wilderness fish camp, the number of day users would be limited.

### VISITOR EXPERIENCE AND USE LIMITS

The visitor experience in alternative 1 would be similar to the existing experience, except that it would be significantly improved from the education/interpretation perspective. The primary activities of bear viewing, sportfishing, and touring the Valley of Ten Thousand Smokes would still be available, and higher quality experiences would be provided by establishing day use limits. The existing limits on overnight use at the lodge and campground would remain in effect.

Access to Brooks Camp would still be by floatplane for the most part, but some visitors could also come by tour boat. All would arrive on the beach near the trail access to Brooks Camp. Alternate access would be on Lake Brooks when weather conditions make landing on Naknek Lake unsafe. Visitors would be met by a ranger and escorted directly to the new visitor center to hear the mandatory bear safety message. The new visitor center would provide an opportunity for visitors to acquire general information about the Brooks River area. Exhibits, a film, and personal interpretive services would provide specific information, and visitors would be encouraged to attend and participate in the interpretive programs. Lockers (for day users) and restrooms would be available at the new visitor center.

Fishing, camping, day hiking, canoeing, wildlife viewing, and nature photography would all be available activities under this alternative. The bus tour to the Three Forks overlook and the Valley of Ten Thousand Smokes would still originate near the narrows platform. Visitors would still be provided a picnic-style lunch and the opportunity to hike the 3-mile-round trip trail to Ukak Falls. Half-day tours to the Three Forks overlook would also be provided by the concessioner.

Except for bear viewing platforms and approach trails, the river and riparian corridor from the closure line above Brooks Falls downstream to the Oxbow closure line would be zoned as a people-free area in July due to the presence of large numbers of bears. Sportfishing and wildlife photography would continue from the Oxbow closure line to the river mouth, and in the upper river above the falls. In mid-September through October, Brooks River from the Oxbow

closure line downstream to the river mouth, except for the narrows platform, would be closed when bears congregate there to feed on late-spawning salmon and salmon carcasses. The Brooks River area commonly supports much fewer bears during the months of June and August than during July and September/October. There are numerous alternative recreational fishing opportunities and locations within the park and in the larger Bristol Bay region during July and September/October.

As explained in detail in the "Actions Common to All Development Alternatives, Limits of Acceptable Change" section for the peak visitor use periods of July and September, the following use limits would be established:

| July | September |
|---|---|
| 60 lodge guests | 60 lodge guests |
| 60 campground users | 60 campground users |
| 60 day users | 30 day users |
| 60 staff | 60 staff |
| Total: 240 people | Total: 210 people |

## PROPOSED DEVELOPMENT

### Rehabilitate Brooks Camp Campground

The campground would remain in its present location north of the river, within prime bear habitat. Relocation to any other area north of the river would neither reduce the likelihood of human/bear conflicts nor allow the facility to function any better. Several facility improvements at the campground would make the campground operations more responsive to concerns created by overnight use in bear habitat. Construction of new pit toilets and one or more enclosed food storage and preparation shelters at the campground, such as those now being used by the state of Alaska at McNeil River, would reduce the likelihood of human/bear conflicts. Design features of these shelters would include the following:

- bear-proof design that enables the safe preparation of food; campers would cook on their own stoves
- secure food storage areas for all foodstuffs
- enclosed, bear-proof trash containers
- potable water and sinks for drinking and for cleanup of cookware; this would eliminate the current situation of food scraps on the ground at the present water supply
- readily available fire extinguishers

### Establish a Bear Travel Corridor North of Brooks Camp

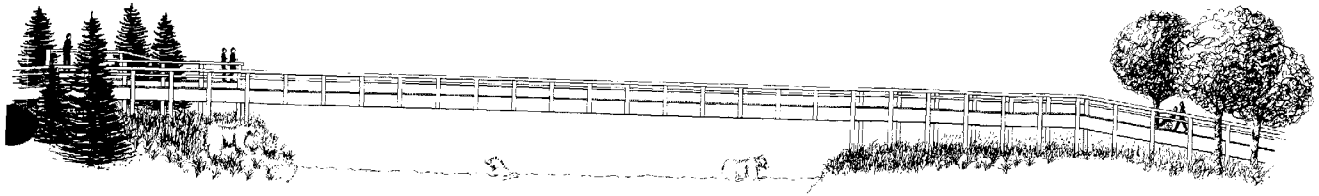
A bear travel corridor from Naknek Lake beach to the Oxbow area of Brooks River would be established on an experimental basis to help direct bear movements between the two areas decreasing the number of human/bear encounters. This travel corridor would be developed between the campground and housing areas of Brooks Camp, thereby discouraging random wanderings into camp. Removal of heavy vegetation alone may suffice to establish the corridor, although strategically placed drift fencing along the corridor may further discourage bears from wandering into camp.

### Upgrade Barabara Trail and Interpretation

The barabara trail alignment does not now create a problem with bear movement; however, if more people would use the trail because of improved interpretation, vegetation would be cleared for adequate sight distance. The trail would be upgraded to accessibility standards. The barabara exhibit itself would be upgraded by removing the existing wayside exhibit panels and replacing them with new and accurate panels, completing more of the barabara roof, and redesigning the structure so visitors may walk through the barabara, rather than merely look down from above.

### Construct Visitor Center

The 1986 *General Management Plan* specifically directed a visitor center to be built at Brooks Camp. The best site, all things considered, is adjacent to the existing visitor contact station with an unobstructed view of Naknek Lake, Iliuk Moraine, and the backcountry beyond. The concept here is to achieve an appropriate NPS focal point for visitor arrivals. The mandatory bear safety message would be given here upon arrival, whether by plane or boat. Additional interpretation of the Brooks River area would also occur at this facility. A portion of the visitor center complex would create a lodge type setting, where visitors could sit, relax, and enjoy viewing both the wildlife and scenery. An integral part of this visitor center complex would be a large, partially covered deck. This would provide visitors an opportunity to get out of the elements without taking up space in the lounge of the concessioner's lodge, as happens when there is inclement weather. Another primary attraction in the visitor center would be the main interpretive film about the Brooks River area that would emphasize the significance and interrelationship of the landforms, people, bears, and fish over a 4,000-year continuum. This film, along with additional interpreters and programs, would bring all the significant resource pieces together, creating a total visitor experience that goes beyond a one-dimensional focus on fishing, bear viewing, or sightseeing.



CONCEPTUAL
ELEVATED FOOTBRIDGE,
BEAR VIEWING PLATFORM
AND BOARDWALK

THE FALLS
BEAR VIEWING
PLATFORM
*Expand Platform*
*Extend Approach Ramp*

Brooks Falls

*PROPOSED*
*CLOSURE LINE*

TRAIL TO
DUMPLING
MOUNTAIN

CAMPGROUND
*Build Cooking Shelters*

BARABARA REPLICA
*Upgrade Interpretation*
*Mitigate Visual Intrusion*

*PROPOSED*
*CLOSURE LINE*

BROOKS FALLS TRAIL
*Harden Surface*
*Short Boardwalks Over Boggy Areas*
*Vegetation Management*

OLD LOG CABIN
*Proposed Contact Station*

MAINTENANCE AREAS
*Remove & Revegetate*

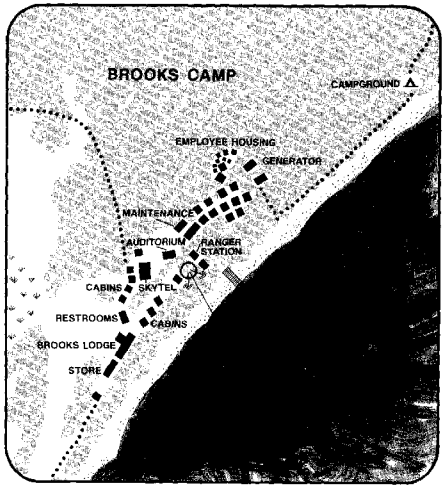
THE NARROWS
BEAR VIEWING
PLATFORM

PARKING AREA
& FUEL STORAGE
*Remove & Revegetate*

BUNKHOUSE

BUNKHOUSE

*PROPOSED MANAGEMENT SUPPORT FACILITY*
*Employee Housing Area*
*Shower, Laundry, Community Center*
*Maintenance Area*
*Vehicle Parking, Fuel Storage*
*Generator Facility, Maintenance Shops*
*(In or Near Existing Gravel Pit)*
*Research Facility*
*(Schematic Location of All Areas)*




ALTERNATIVE 1:
**BROOKS RIVER AREA**
# MINIMUM REQUIREMENTS

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / DEC. 95 / 127 / 40047D

Boardwalks and Platforms Shown Larger Than Scale

0 30 60 120
METERS
0 200 400 800
FEET

NORTH

### Construct Barge Dock

The need for a permanent barge dock north of the river has been identified if Brooks Camp is to remain in place. The dock would need to be designed to function in the variable water levels of the lake throughout spring, summer, and autumn.

Adequate maintenance of facilities north of the river cannot be carried out efficiently or in an environmentally sound manner without this barge access. Several improvement projects are needed at Brooks Camp that would be better served by a barge dock north of the river including (1) long-term remediation actions that would be conducted due to failures in the fuel delivery system, (2) the temporary housing of remediation crews, (3) eventual work on the failing sewage treatment system, and (4) rehabilitation of the physical plant at Brooks Camp to bring it up to code. The barge dock would eliminate repeated heavy equipment crossings of a world-class sportfishing anadromous stream (Brooks River), which would otherwise occur at more or less regular intervals in perpetuity. Tour boats could also use the barge dock to load and unload passengers.

### Construct Elevated Footbridge and Connecting Boardwalk

The 1986 *General Management Plan* directed that a boardwalk leading from Brooks Camp to the river be built. This alternative proposes that a boardwalk be built to extend from the area near the fish cleaning building to the north end of the floating bridge. The floating bridge would be replaced by a permanent elevated bridge. The elevated footbridge would be designed to be wide enough and strong enough to allow an ATV-size vehicle across, but not big enough for trucks or heavy equipment, therefore requiring the barge dock previously described. Viewing bays built into the boardwalk and bridge would facilitate movement on the bridge while still allowing the structure to double as a viewing platform. The south end of the elevated bridge would tie into the narrows platform, necessitating some structural changes there. This platform is accessible to visitors with disabilities and accommodates up to 25 individuals on two viewing levels. Anglers are able to access the platform when bears are present.

### Construct River Mouth Overlook

From time to time bears inadvertently corner visitors on the sandspit at the river mouth as the bears walk up the beach and cross the base of the sandspit to get to the river. Visitors are usually viewing wildlife in the river, and have their backs to the approaching bear. With nowhere to go, they are cornered and backed out onto the sandspit. An elevated safe haven is needed on high ground between the marsh, river, and lake, at the base of the sandspit. The elevated safe haven could double as a wildlife viewing stand, but would not be as accessible or built for large numbers of viewers. The overlook would meet a safety need at this location and assist in reducing human/bear encounters. It would be screened from view by vegetation between it and the narrows platform.

### Upgrade Overnight Floatplane Parking

Tie-downs and minimal docking sites would be provided on the calm water in the river mouth for floatplanes that overnight. Wave action along the lakeshores prohibits overnight tie-downs along the beach.

### Remove and Revegetate Parking and Fuel Storage Area

This facility would no longer be needed because the NPS and concessions vehicle and fuel storage would be in the new management support facility on the Valley Road.

### Rehabilitate and Upgrade the Brooks Falls Trail

Proposed small-scale management actions would improve the trail. In boggy areas, where the trail tread has become wide and muddy, short sections of at-grade boardwalks would be built. Vegetation would be managed in such a way as to eliminate blind curves in the trail, which may create surprise encounters with bears. The steep, slippery section of trail ascending the small ridge before the falls platform would be redesigned, taking better advantage of the slope. Trail erosion and damage to tree roots would be controlled. In areas of potential archeological impact, measures would be taken to eliminate the impact either through short sections of boardwalk or rerouting of the trail.

No cutbank platform would be built in this alternative. The cutbank would remain wild as a river access area for nonhabituated bears.

### Expand the Falls Bear Viewing Platform

The falls platform would be enlarged or connected to another small platform to comfortably accommodate about 30 visitors at a time. Visitor use of the two platforms would be controlled. A system for rotating visitors and limiting viewing time would be established to keep unsafe conditions from occurring on the platform, and to allow equal time for all who wish to view bears. An approach boardwalk to the platform would start back in the forest where the present trail tops the ridge and begins treading through several archeological sites. This is an area where surprise human/bear encounters happen because of the uneven terrain, high grass, dense trailside vegetation, and frequent bear activity. The approach boardwalk would then follow the edge of the grassy area to descend to the platform. This would eliminate the need for visitors to walk through frequently used bear habitat in order to access the platform. Visitors unable to gain access when the platform is full could safely wait their turn on the elevated walkway. The approach boardwalk would reduce human/bear encounters, both by separation and improved sight distances. Escape ladders would be provided on two sides of the enlarged platform or connected platforms.

### Remove Lake Brooks Facilities

The maintenance facilities on Lake Brooks would be removed and the sites revegetated. Their functions would be built into the proposed management support facility along the Valley Road. The house and adjacent bunkhouse would remain on the site, with electricity provided from the new support facility. The Old Log Cabin would serve as a visitor contact station for arrivals on Lake Brooks, and would be staffed only at those times. The dock and tie-downs would be upgraded.

### Construct Management Support Facility

Brooks Camp would remain north of the river, but as there are no other reasonable locations in which to expand, additional needed management support facilities for Brooks Camp would be constructed along the Valley Road near a previously disturbed area, away from the primary resources. Three separate clusters of related facilities would comprise the support facility: (1) an employee housing area that includes a central laundry/shower facility and a modest community/multipurpose center, (2) an adequate maintenance facility that would include shops, work areas, vehicle parking, fuel storage and delivery system, and a generator facility and distribution system, and (3) a small research facility for NPS and visiting scientists. All of the utility systems (sewer, water, electric, fuel) for the entire built environment in the Brooks River area would be placed in utilidors (utility corridors) that follow the transportation system. No utilidors would be below the layer of Katmai ash. Many could be aboveground or placed under boardwalks. Alternative sites and methods for disposal of sludge from the septic system would be evaluated in the context of facility redesign and remediation findings.

## RESOURCE MANAGEMENT

The park's Resource Management and Maintenance Divisions would work together closely in implementing this alternative. Brooks Camp, the proposed management support facility, and the Lake Brooks developed area would all be managed as bear-free areas under the *Bear Management Plan*. The bear travel corridor north of Brooks Camp would be a high priority for implementation. Existing ranger patrol patterns along the river would be reevaluated to respond to changed visitor use patterns along the river. LAC monitoring protocol and sites would be established. Methods for providing equitable bear viewing opportunities for visitors at the falls platform would be tested.

This alternative proposes to upgrade the interpretation at the barabara exhibit. The log structure covering the exhibit sits on top of an archeological site. Original excavations only extended a few feet beyond the pit. Significant resources may still exist in the immediate vicinity of the exhibit. As discussed under the "Proposed Development" section, interpretation would be upgraded by further stabilizing the barabara structure, completing the roof and walls of the reconstructed barabara, and hardening the site to allow visitors to walk through the barabara.

Archeological and ethnographic surveys have not been conducted for the proposed management support facility on the Valley Road. However, surveys in the vicinity indicate that the probability of encountering cultural resources in this location is low.

The location of Brooks Camp atop prime archeological resources requires the commitment of a staff archeologist to approve and monitor all ground disturbance associated with maintenance activities.

## AREA OPERATIONS

Most aspects of operating Brooks Camp would be similar to existing conditions. Maintenance operations would be the most affected by closing down the Lake Brooks operation and moving into an adequate facility on the Valley Road. Those staff required to live near the camp facilities (certain lodge employees and emergency response rangers) would continue to do so. Other staff would live in the new housing area. Brooks Lodge would continue to offer the same type and level of services as described in "Part Three: The Affected Environment." No additional sleeping facilities would be constructed. The lodge dining facility would be expanded slightly in order to better handle crowded conditions during inclement weather and prior to meal times. A new deck near the lodge porch would allow convenient viewing of the Oxbow area.

## PHASING SCHEDULE AND ESTIMATED COSTS

Since much of the development for alternative 1 is already in place, the proposed construction phasing schedule would be relatively simple. The four priority construction efforts would be the new visitor center, the dining facility expansion, the new barge dock, and the boardwalk/elevated bridge structure. Construction of the new barge dock, visitor center, boardwalk, and bridge would occur concurrent with the summer visitor season. Expansion of the lodge complex could occur in the spring and fall, minimizing disruption of lodge functions during the summer season. Construction of the shelters in the campground would occur prior to and during the summer season. The proposed management support facility should be built prior to removing the parking area, fuel storage, and Lake Brooks maintenance areas. All of the other construction items are relatively minor and could be carried out as clearances are received and funding secured.

Estimated construction costs for alternative 1 are included in appendix A, table A-2.

## ALTERNATIVE 2: FORMER PROPOSAL IN THE DRAFT DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT – BEAVER POND TERRACE

### CONCEPT STATEMENT

The underlying concept for this alternative is that all facilities and visitor use in the area north of Brooks River are inappropriate human intrusions on prime bear habitat, nationally significant archeological sites, and potentially significant ethnographic resources. Such activities have deleterious effects for long-term resource preservation. This alternative would remove Brooks Camp and all other facilities north of the river and replace them in kind on the terrace overlooking the Beaver Pond in a less sensitive area where human/bear conflicts would be minimized as would impacts on archeological and ethnographic resources. The facilities would remain small and congruent with the park's wilderness character. After removal efforts, remediation, and revegetation are completed, the north side of the river to the base of Dumpling Mountain would be designated as a people-free area, returning the area's resources to a more natural state.

To carry out this alternative concept suitable relocation sites had to be identified. The following seven relocation criteria were used to identify alternate sites:

- The alternate site must be in an area little used by bears.
- It must have the potential for only low archeological and ethnographic resource occurrence.
- It must have a scenic setting.
- It must not be in designated wilderness.
- It must be reasonably close to the core use area of Brooks River
- It must be reasonably accessible by floatplanes landing in Naknek Lake
- It must provide adequate drainage for septic systems.

The Beaver Pond terrace meets all seven relocation criteria.

### VISITOR EXPERIENCE AND USE LIMITS

Most visitors would arrive by floatplane, some by tour boat, on Naknek Lake beach east of the Beaver Pond. They would be met by a ranger and led to a contact station adjacent to the docking area for the mandatory bear safety message and shuttle information. Alternate access would be at Lake Brooks when weather makes landing on Naknek Lake unsafe. A contact station in the Old Log Cabin on Lake Brooks would be staffed at those times. After receiving the bear safety message, visitors would board a shuttle to be taken to the campground or the visitor center and lodge on the terrace overlooking Beaver Pond, or to the Brooks River visitor contact station.

Because of the distances involved with relocation from the critical resource area, a shuttle system would be necessary under this alternative. The shuttles would operate at frequent

intervals, connecting the floatplane landing sites with the visitor center and lodge and campground with the Brooks River visitor contact station. A system of foot trails would connect the primary access site on Naknek Lake to all the facilities and the Brooks River area. Visitors would be able to walk on trails between the same areas served by the shuttle system. Access to the Brooks River bear viewing platforms and the barabara exhibit would be by trail. This new barabara exhibit would be constructed near the proposed visitor contact station and trailhead. It would replace the barabara exhibit north of the river.

A central place in the visitor experience would be the proposed visitor contact station and trailhead. The existing Brooks Falls trailhead would become the site for the orientation center for all visitor use at Brooks River. This staffed facility would inform and educate bear viewers, photographers, and anglers, and regulate access to the bear viewing platforms as necessary. A day use shelter and restrooms would be provided.

In this alternative visitors would have the choice of going to three bear viewing platforms — the narrows platform, the proposed cutbank platform, and the falls platform. Strategically positioned, these platforms would offer premium opportunities for bear viewing and photography while not being within sight of each other. An appropriate number of panel exhibits would be used near the viewing platforms to highlight the significance of the river and the interrelationship between bears, fish, and people. Access to the three platforms may be limited, depending on use limits to prevent overcrowding on the platforms and to reduce human/bear encounters on the trails.

Arrival at the Brooks River visitor contact station would be by trail or shuttle from the lodge/campground area. After a short orientation, the river could be reached via the falls trail or the river mouth trail. If visitors chose to view bears they could access two platforms from the falls trail or another from the river mouth trail. If they were sportfishing and wanted to keep a fish they would head for the river mouth.

Except for bear viewing platforms and approach trails, the river and riparian corridor from the closure line above Brooks Falls downstream to the Oxbow closure line would be zoned as a people-free area in July due to the presence of large numbers of bears. Sportfishing and wildlife photography would continue from the Oxbow closure line to the river mouth, and in the upper river above the falls. In mid-September through October, Brooks River from the Oxbow closure line downstream to the river mouth, except for the narrows platform, would be closed when bears congregate there to feed on late-spawning salmon and salmon carcasses. The Brooks River area commonly supports much fewer bears during the months of June and August, than during July and September/October. Numerous alternative recreational fishing opportunities and locations exist within the park and in the larger Bristol Bay region during July and September/October.

Bus tours to the Valley of Ten Thousand Smokes would be offered in half-day and full-day trips and would originate at the lodge.

To create and maintain the visitor experience just described, the peak bear viewing and sportfishing periods of July and September would have these use limits:

| July | September |
|---|---|
| 75 lodge guests | 75 lodge guests |
| 75 campground users | 75 campground users |
| 40 day users | 20 day users |
| 70 staff | 70 staff |
| Total: 260 people | Total: 240 people |

## PROPOSED DEVELOPMENT

### Remove All Facilities North of the River

All facilities north of the river and the floating bridge would be removed. The artificial dike on the north bank of the river, upon which the existing bridge access trail sits, would be allowed to naturally erode reconnecting the marsh to the river. Since required fuel oil spill remediation efforts would continue long after facility removal, human presence and access would be dealt with operationally until remediation is complete. Access to the Dumpling Mountain trail would be by boat from the new floatplane/boat docking facility near the Beaver Pond. The trailhead would be at the existing campground water spigot.

The area north of the river starting 20 feet back from the north bank waterline and continuing up to the base of Dumpling Mountain would be designated as a people-free zone. To allow anglers to adequately fish the river and have both banks available when moving out of a bear's way, the boundary of the people-free zone would be set back from the north bank as described.

### Remove Barge Dock and Tie-Downs and Construct River Mouth Overlook

The barge dock and tie-downs on the south side of the river would be removed. The road would be converted to a trail for access on the south side of the river mouth for sportfishing and wildlife viewing and photography. Culverts would be placed in the trail to allow the marsh to connect with the river as it did in the past. An overlook that would serve as a safe haven would be constructed at the river mouth.

### Provide Fish Cleaning Building

If sportfishing continues under existing regulations that allow taking of fish, a fish cleaning building would be constructed near the narrows bear viewing platform. This area was selected because (1) it would be accessible for electrical connection, (2) it is in the area where most fisherman catch their keeper fish, and (3) it is close to the narrows bear viewing platform for

safe haven access. An outfall line for disposal of groundup fish waste would be constructed from the cleaning station into Naknek Lake. Necessary permits would be obtained.

### Construct Trailhead Contact Station

The existing falls trailhead would become the site for the orientation center for all visitor use at Brooks River. It would also serve to educate fishermen as well as bear viewers and photographers on proper behavior in bear habitat. A day use shelter and restrooms would be provided. A full-size barabara replica and exhibit would be built nearby to replace the interpretive opportunity lost north of the river.

### Rehabilitate Trail to Brooks Falls and Construct Bear Viewing Platforms

Proposed small-scale management actions would improve the trail. In boggy areas, where the trail tread has become wide and muddy, short sections of at-grade boardwalks would be built. Vegetation would be managed to eliminate blind curves in the trail, which may create surprise encounters with bears. The steep, slippery section of trail ascending the small ridge before the falls platform would be redesigned, taking better advantage of the slope. Trail erosion and damage to tree roots would be controlled. In areas of potential archeological impact, measures would be taken to eliminate the impact either through short sections of boardwalk or rerouting of the trail. The falls platform would be expanded to two platforms and managed in such a way as to circulate bear viewers and photographers by having them enter at one end of the connected platforms, move through from one platform to the other, and exit to the trail from the other end. This would reduce crowding and all the back-and-forth movement that happens on the existing platform. Under this alternative an additional bear viewing platform would be constructed near the cutbank. The platform would be located so it would not be visible from the other two platforms and would be set back an appropriate distance from the riverbank. Its location would satisfy the recommended criteria listed in appendix C. The trail to this platform would be at ground level.

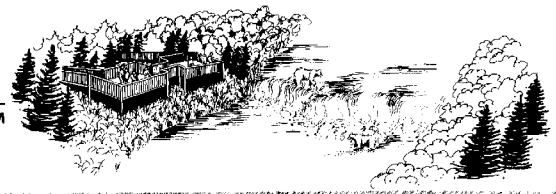
### Remove Lake Brooks Facilities

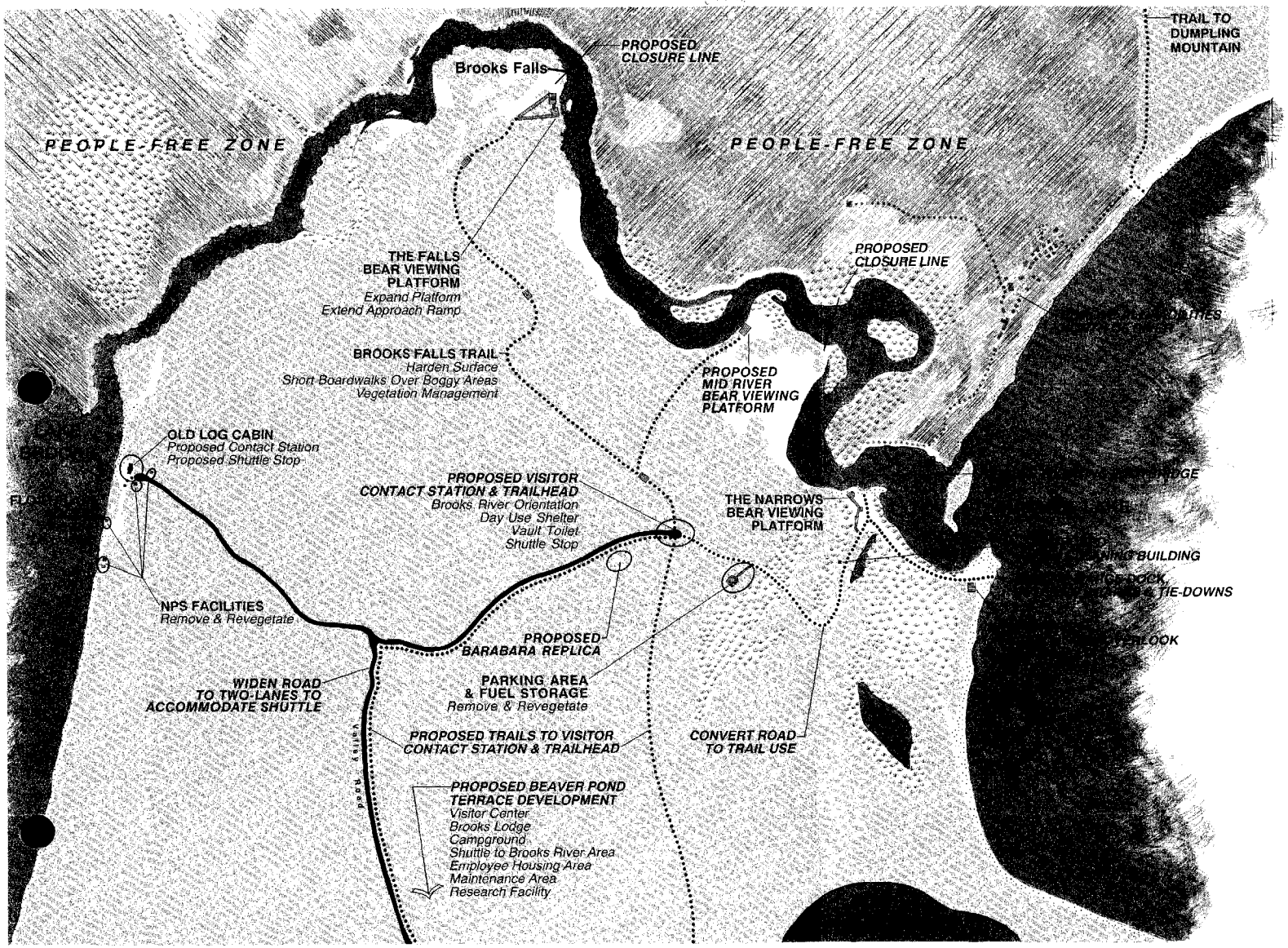
All facilities on the shore of Lake Brooks would be removed and their former areas revegetated, except for the Old Log Cabin. The cabin would become a visitor contact station and shuttle stop when floatplanes must land on Lake Brooks, and it would be staffed only during those times.

### Construct Primary Access Site and Facilities

New floatplane and tour boat tie-downs and docking, barge wharf, and contact station would be constructed on Naknek Lake southeast of the present barge dock location. This location would avoid prime bear habitat and major travel corridors during the summer season. Visitors

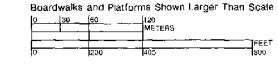
CONCEPTUAL
BEAR VIEWING PLATFORM






ALTERNATIVE 2:
**FORMER PROPOSAL**
IN THE DRAFT DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT
**BEAVER POND TERRACE**
# BROOKS RIVER AREA
KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / DEC. 95 / 127 / 20039D

Boardwalks and Platforms Shown Larger Than Scale



CONCEPTUAL
BEAVER POND TERRACE AREA
WITH VIEW OF BEAVER POND

BROOKS FALLS

BROOKS RIVER

PROPOSED SHUTTLE STOPS

PROPOSED TRAILS TO VISITOR CONTACT STATION & TRAILHEAD

PROPOSED CAMPGROUND

WIDEN ROAD TO ACCOMMODATE SHUTTLE

TWO-LANE ROAD

PROPOSED PUBLIC AREA
Visitor Center
Orientation & Interpretation
Observation Deck
Lodge
Shuttle Stop

PROPOSED MANAGEMENT SUPPORT FACILITY
Employee Housing Area
Shower, Laundry,
Community Center
Research Facility
Maintenance Area
Vehicle Parking, Fuel Storage,
Generator Facility, Maintenance Shops

SINGLE-LANE ROAD FROM MAINTENANCE AREA TO THREE FORKS OVERLOOK

Wilderness Boundary

Valley Road

PROPOSED TRAIL ALONG RIVER

L A K E

ILIUK MORAINE

ALTERNATIVE 2:
**FORMER PROPOSAL**
IN THE DRAFT DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT

# BEAVER POND TERRACE

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / OCT '95 / 20040C

Boardwalks and Platforms Shown Larger Than Scale

0 227 454.5 METERS
CONTOUR INTERVAL 25 FEET
0 375 750 1500 2250 3000 FEET

NORTH

arriving by floatplane or tour boat would be met at the contact station by a ranger and transported to the lodge or campground by shuttle bus.

After much discussion with many pilots during the summers of 1989 and 1990, it was determined that safe landing areas for floatplanes would be a limiting factor in any proposed relocation of Brooks Camp. To safely access the Brooks River area by floatplanes landing on Naknek Lake, the arrival area must be within the protected bay near the river mouth. To move farther east along the shore beyond the Beaver Pond places the arrival area outside the protected bay where winds are stronger and waves are larger. To move closer to the river mouth places the arrival area in more heavily used bear habitat. An adequate variable lake level barge docking facility, floatplane tie-downs, and tour boat dock, all with wave protection, would be needed to supply and service the proposed development. The design of this facility would be determined by the physical characteristics of the site, lakeshore current, and recurring wave and wind patterns. Wave and wind protection might be obtained by construction of a breakwater or pier system. The National Park Service would request from the Federal Aviation Administration that a flight restriction over the core use area at Brooks River be established because with the primary access site farther from the river mouth there would be no reason to overfly Brooks River, except in an emergency situation. The exact details of such a proposal would be worked out between the National Park Service and Federal Aviation Administration.

### Construct Facility Access Road

A two-lane facility access road about 1.7 miles long and 26 feet wide would be built from the arrival area to the new facilities on the Beaver Pond terrace, and would connect with the Valley Road. The access road would be constructed as two lanes to accommodate the visitor shuttle system and concession bus tour that would be operating in this alternative. A hardened gravel road surface would be sufficient; paving in this remote locality is not required or feasible.

### Implement Shuttle System

A shuttle system would be necessary for visitor access to the core use area and proposed public facilities. A fleet of six 11-passenger vans would be used to shuttle visitors between shuttle stops. Two vans would shuttle between the primary access site and the visitor center, lodge, and campground. Four vans would shuttle between the visitor center and the visitor contact station and trailhead. One van on each route would be handicap accessible. With this capacity, at any one time, 66 visitors, equal to one-third of the daily use limit, could be using the shuttle system. Demand, of course, would vary. The number of vans operating on any given day would reflect actual demand that day. The proposed management support facility would have adequate parking and repair space to accommodate the shuttle fleet. Alternative funding sources for the shuttle system would need to be examined and the costs born by the users where possible.

### Develop Beaver Pond Terrace Area

The concession and NPS operations that are now being conducted in facilities north of the river would be replaced on a larger scale to the Beaver Pond terrace. The lodge would offer a range of visitor accommodations at various prices. Suites, rooms, a hostel, a dormitory, and tent houses could be made available to the visiting public. The public use area would be separated from the management support facility area on the Beaver Pond terrace to allow for a quieter, more relaxing visitor experience. Facilities in the public area (visitor center, lodge, cabins, and campground) would take advantage of the views out over the Beaver Pond and Naknek Lake. The management support facility area would be south of the new road, with access from the Valley Road. Except for employee housing, scenic views are not a consideration in the site location.

The new development would be linked to the core use area by a trail that skirts the visitor center, lodge, and campground and goes through the forest to end at the Brooks River visitor contact station, and by a shuttle connection on the Valley Road. A trail would also parallel the road from the lodge and campground area to the visitor contact station. A 3-mile-long loop trail would originate at the lodge area and wind through the forest to the summit of the ridge above Iliuk Moraine. After traveling the length of the ridge the trail would return to the lodge area by paralleling the Valley Road. The portion of the Valley Road north of the maintenance area would have to be widened to two lanes to accommodate the shuttle service. Alternative sites and disposal methods for septic system sludge would be incorporated into the new facility design considerations.

### Construct Brooks River Research Facility

A support research facility for the Brooks River area would be constructed to provide space for ongoing and future field research. Space needs to be provided for microscopes, computers, and areas to work with large amounts of material or large specimens. Also, laboratory work space with adequate room to erect portable/adjustable tables, adequate natural and electric lighting, at least four large work sinks with hot and cold running water, walk-in freezer space and refrigerator space, a temporary storage room for artifacts with locking cabinets and adjustable shelving, a storage room for all gear needed on field projects (including room to lay out and dry wet gear), a bathroom, a stove and fume hood, chemical storage, an emergency shower, and a specimen dryer would be needed. The estimated minimum area for such a facility is 2,000 square feet.

Adequate insulation is needed in the facility so that it can be used early in the spring and late into the fall. Part of the facility should support limited winter use. Current Panabode construction does not meet these needs. Use of active and passive solar and wind energy generation should be incorporated in the design of these facilities. Because of the potential use of chemicals in the lab, a hazardous materials disposal plan would be written and implemented after approval.

The research facility would be designed as a supplemental facility to the King Salmon research facility that already has been planned and for which the park has requested funds. The Brooks River facility would not provide common work space or curatorial storage space that must be easily accessible by headquarters staff year-round in King Salmon. As a supplemental facility it would serve for staging and short-term use for biologists, geologists, volcanologists, archeologists, and inventory and monitoring teams that have reason to work in or transit through the area.

## RESOURCE MANAGEMENT

The bear management program in the Brooks River area would still strive to reduce human/bear encounters and conflicts, but it would be greatly helped along by the removal of all structures and human activities north of the river in prime bear habitat. A method for monitoring the bear viewing platforms would be established to ensure equitable time for all visitors to the platforms. Bear-free areas would be established around the new public use area on the Beaver Pond terrace, the new campground, and the proposed management support facilities. The approved techniques in use by the park staff to secure bear-free areas would still be used. After removal of all facilities north of the river, the National Park Service would conduct monitoring to document any changes in bear use on the north side of the river.

A water quality monitoring program would be established for the Beaver Pond to ensure that no impacts result from construction or operation of the new facilities.

The remediation efforts in the vicinity of Brooks Camp would continue for some time. Resource staff would monitor the remediation crew's actions and impacts to ensure that a minimum of human influence and interference occurs north of the river.

From a cultural resource perspective, the removal of all facilities north of the river to a less sensitive area would benefit the long-term preservation of the cultural sites in the Brooks River area. The four sites would be surveyed to determine the appropriate preservation strategy. The determination would be made in consultation with appropriate Native Alaskan groups, the State Historic Preservation Office, and the Advisory Council on Historic Preservation.

The proposed full-size barabara replica and exhibit adjacent to the shuttle road would be sited away from all known archeological sites.

An archeological site is known to exist at the cutbank. The trail to the proposed cutbank bear viewing platform would pass through an area with a large number of barabara. Placement of the platform would consider archeological resources as well as bear access and feeding areas.

No formal archeological or ethnographic surveys of the terrace overlooking the Beaver Pond have been conducted. However, reconnaissance surveys undertaken during the course of the study for this proposal failed to find any obvious sites. The terrace is well removed from the river and lakes, which made it a less attractive living place for prehistoric peoples who were

oriented to the river and lake resources. A slight possibility exists that remains of hunting sites or other culturally important sites could be found in the area.

## AREA OPERATIONS

Brooks Lodge would continue to offer the same services it currently offers. The number of guest rooms would increase from 16 to 32, using a combination of single cabins, duplexes, and quadplexes, depending on topographic and vegetation features at the new site. The new lodge, dining facilities, office, and camp store would be increased in size to better handle the demand for these services. Some smaller existing structures may be relocated to the new site; however, all larger structures would probably be replaced, and economics could dictate that even the smaller structures would be replaced.

The concessioner would provide shuttle service for guests and their luggage from the lake to the lodge area, and a shuttle service would be available for those who do not wish to walk between the visitor center, lodge, and campground, and the contact station. Full-day and half-day trips would also be provided by the concessioner to the Valley of Ten Thousand Smokes. Fishing equipment, boat rentals, and fishing guide services would also continue to be available. Funding for all the shuttle service would be determined by consultation between the National Park Service and the concessioner.

## PHASING SCHEDULE AND ESTIMATED COSTS

Construction phasing for this alternative would be substantial, but not complicated. The primary access site, new transportation system, utility systems, and facilities would have to be built first, before the removal of facilities north of the river and at Lake Brooks. Because of the short access season at Brooks River, construction of relocated facilities must be done during the summer season. Construction of boardwalks and platforms along the river would also be done during the summer visitor season.

Estimated construction costs for alternative 2 are included in appendix A, table A-3.

## ALTERNATIVE 3: ILIUK MORAINE TERRACE

### CONCEPT STATEMENT

The underlying concept for this alternative is that all facilities and visitor use in the area north of Brooks River are inappropriate human intrusions on prime bear habitat, nationally significant archeological sites, and potentially significant ethnographic resources. Such activities have deleterious effects for long-term resource preservation. In this alternative, the National Park Service proposes to remove Brooks Camp and all other facilities north of the river and to replace them in kind on the terrace overlooking Iliuk Moraine. The Iliuk Moraine terrace is in a less sensitive bear use area where human/bear conflicts would be minimized as would impacts on archeological resources. The facilities would remain small and still congruent with the park's wilderness character; however, this alternative would provide for the largest number of day users discussed in this plan. After removal efforts, remediation, and revegetation are completed, the north side of the river to the base of Dumpling Mountain would be designated as a people-free area, returning the area's resources to their former wild state.

To carry out this alternative concept, suitable relocation sites had to be identified. Seven relocation criteria were used to identify alternate sites:

- The alternate site must be in an area little used by bears.
- It must have the potential for only low archeological or ethnographic resource occurrence.
- It must have a scenic setting.
- It must not be in designated wilderness.
- It must be reasonably close to the core use area of Brooks River.
- It must be reasonably accessible by floatplanes landing in Naknek Lake.
- It must provide adequate drainage for septic systems.

The Iliuk Moraine terrace meets all seven relocation criteria.

### VISITOR EXPERIENCE AND USE LIMITS

Most visitors would arrive by floatplane, some by tour boat, on Naknek Lake beach east of the Beaver Pond. They would be met by a ranger and led to a contact station adjacent to the docking area for the mandatory bear safety message and shuttle information. Alternate access would be at Lake Brooks when weather makes landing on Naknek Lake unsafe. A contact station in the Old Log Cabin on Lake Brooks would be staffed at those times. After receiving the bear safety message, visitors would board a shuttle to be taken to the campground or the visitor center and lodge on the terrace overlooking Iliuk Moraine, or to the Brooks River visitor contact station. A simple system of gravel roads would be constructed to connect the beach landing area with those facilities located on the terrace above Iliuk Moraine. The high terrace located at the end of Iliuk Moraine offers a superb site for placing visitor facilities. The topography of this landform provides horizontal and vertical diversity allowing buildings to wrap

around the contours and take advantage of the natural terracing on the moraine. For example, the new visitor center would be situated to take advantage of the scenic panorama of Naknek Lake, Iliuk Arm, and the surrounding mountains. In addition to its interpretive functions, the visitor center would include an observation deck providing a gathering place with protection from the elements.

Concessioner facilities such as the lodge, view decks, and cabins would be sited to take full advantage of the landform as well. The lodge, with its dining and lounge facilities, can offer patrons scenic views while the cabins can make use of the diverse topography to maximize desirable solar exposures, views, and privacy.

The new visitor center would assist visitors in making the best use of their time in the Brooks River area. Films and exhibits would focus on the Brooks River area, stressing the significance and interrelationship of the landforms, people, bears, and fish over a 4,000-year continuum, as well as placing the Brooks River area within the context of the larger story of Katmai National Park and Preserve.

Another major function of the new visitor center would be to provide a lodge-type setting, where visitors could sit, relax, and enjoy the panoramic views of Iliuk Arm and the surrounding mountain ranges that frame this arm of Naknek Lake. The spectacular view from Iliuk Moraine, overlooking the Iliuk Arm of Naknek Lake would be a critical element in the design of the new visitor center. Interpretive trails would lead from the new visitor center allowing visitors to learn about the area's wildlife, its vegetation, and the glacial forces that created this landscape. Since this area is less frequented by bears, visitors would feel less inhibited to walk the lakeshore or experience the scenic vistas visible from the ridgetop southwest of the moraine.

Because of the distances involved with relocation from the critical resource area, a shuttle system would be necessary under this alternative. The shuttles would operate at frequent intervals, connecting the floatplane landing sites with the visitor center and lodge and campground with the Brooks River visitor contact station and trailhead. From the new visitor center and lodge on the Iliuk Moraine terrace, visitors would be shuttled to the visitor contact station and trailhead just south of the river. A system of foot trails would connect the primary access site on Naknek Lake to all the facilities and the Brooks River area. Visitors would be able to walk on trails between the same areas served by the shuttle system. Access to the Brooks River bear viewing platforms and the barabara exhibit would be by trail. This new barabara exhibit would be constructed near the proposed visitor contact station and trailhead. Visitors would walk only a short distance to discover 4,000 years of human history associated with Brooks River. It would replace the barabara exhibit north of the river.

A central place in the visitor experience would be the proposed visitor contact station and trailhead. The existing Brooks Falls trailhead would become the site for the orientation center for all visitor use at Brooks River. This staffed facility would inform and educate bear viewers, photographers, and anglers, and regulate access to the bear viewing platforms as necessary. A day use shelter and restrooms would be provided.

In this alternative visitors would have the choice of going to three bear viewing platforms — the narrows platform, the proposed cutbank platform, and the falls platform. Strategically positioned, these platforms would offer premium opportunities for bear viewing and photography while not being within sight of each other. An appropriate number of panel exhibits would be used near the viewing platforms to highlight the significance of the river and the interrelationship between bears, fish, and people. Access to the three platforms may be limited, depending on use limits to prevent overcrowding on the platforms and to reduce human/bear encounters on the trails.

Arrival at the Brooks River visitor contact station would be by trail or shuttle from the lodge/campground area. After a short orientation, the river could be reached via the falls trail or the river mouth trail. If visitors chose to view bears they could access two platforms from the Falls Trail or another from the River Mouth Trail. If they were sportfishing and wanted to keep a fish they would head for the river mouth.

Except for bear viewing platforms and approach trails, the river and riparian corridor from the closure line above Brooks Falls downstream to the Oxbow closure line would be zoned as a people-free area in July due to the presence of large numbers of bears. Sportfishing and wildlife photography would continue from the Oxbow closure line to the river mouth, and in the upper river above the falls. In mid-September through October, Brooks River from the Oxbow closure line downstream to the river mouth, except for the narrows platform, would be closed when bears congregate there to feed on late-spawning salmon and salmon carcasses. The Brooks River area commonly supports much fewer bears during the months of June and August, than during July and September/October. Numerous alternative recreational fishing opportunities and locations exist within the park and in the larger Bristol Bay region during July and September/October.

Bus tours to the Valley of Ten Thousand Smokes would be offered in half-day and full-day trips and would originate at the lodge.

To provide the desired Brooks River experience for a maximum number of bear viewers, photographers, and anglers, and have adequate facilities for them, the following visitor use limits would be established for the peak periods of July and September:

| July | September |
|---|---|
| 75 lodge guests | 75 lodge guests |
| 75 campground users | 75 campground users |
| 60 day users | 30 day users |
| 80 staff | 80 staff |
| Total: 290 people | Total: 260 people |

## PROPOSED DEVELOPMENT

### Remove All Facilities North of the River

All facilities north of the river and the floating bridge would be removed. The artificial dike on the north bank of the river, upon which the bridge access trail sits, would be allowed to naturally erode reconnecting the marsh to the river. Since required fuel oil spill remediation efforts would continue long after facility removal, human presence and access would be dealt with operationally until remediation is complete. Access to the Dumpling Mountain trail would be by boat from the new floatplane/boat docking facility near the Beaver Pond. The trailhead would be at the existing campground water spigot.

The area north of the river starting 20 feet back from the north bank waterline and continuing up to the base of Dumpling Mountain would be designated as a people-free zone. In order to allow anglers to adequately fish the river and have both banks available when moving out of a bear's way, the boundary of the people-free zone would be set back from the north bank as described.

### Remove Barge Dock and Tie-Downs and Construct River Mouth Overlook

Under this alternative the barge dock and tie-downs on the south side of the river would be removed. The road would be converted to a trail for access on the south side of the river mouth for sportfishing and wildlife viewing and photography. Culverts would be placed in the trail to allow the marsh to connect with the river as it did in the past. An overlook that would serve as a safe haven would be constructed at the river mouth.

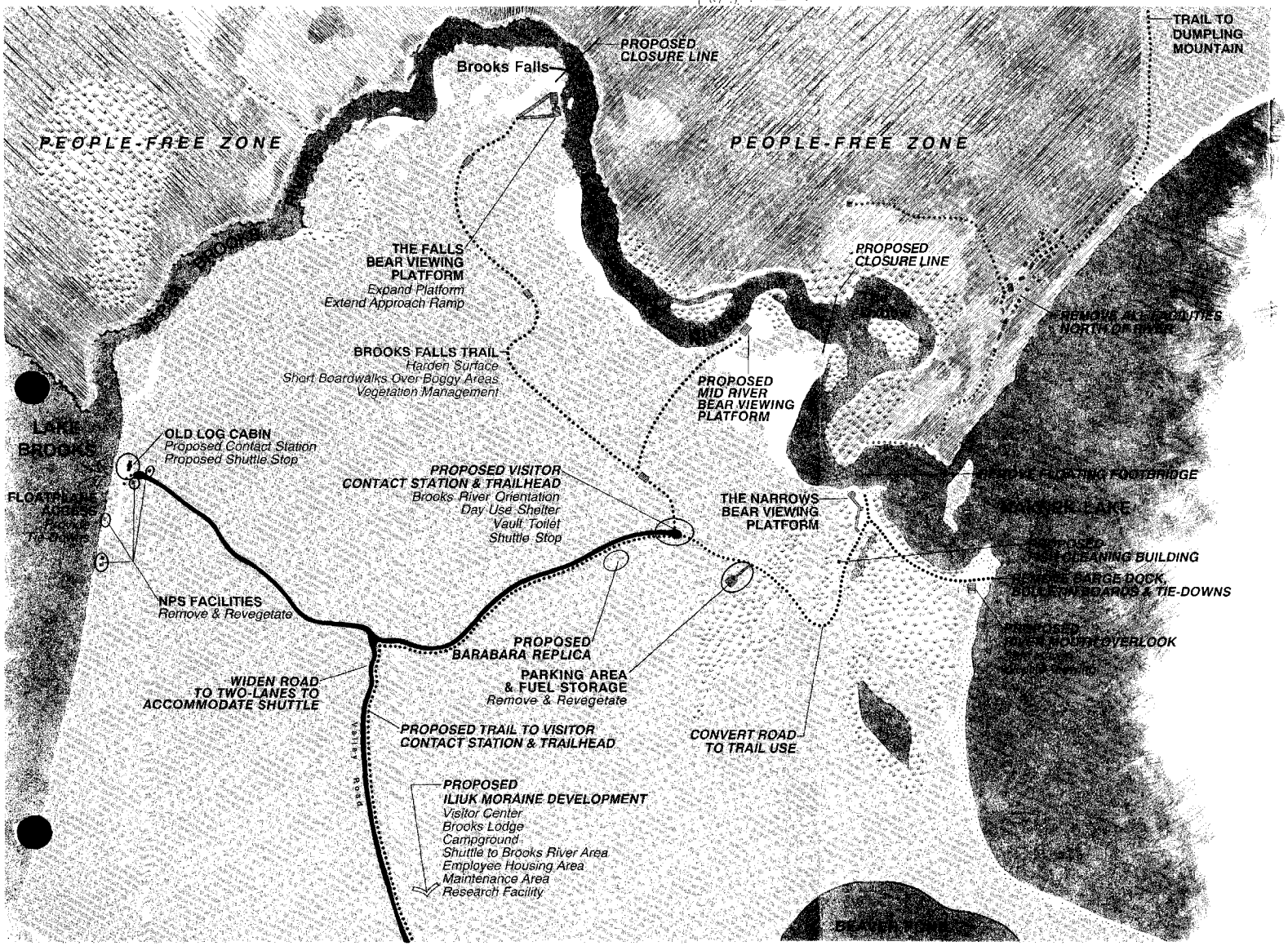
### Provide Fish Cleaning Building

If sportfishing continues under existing regulations which allows taking of fish, a fish cleaning building would be constructed near the narrows bear viewing platform. This area was selected because (1) it would be accessible for electrical connection, (2) it is in the area where most fisherman catch their keeper fish, and (3) it is close to the narrows bear viewing platform for safe haven access. An outfall line for disposal of groundup fish waste would be constructed from the cleaning station into Naknek Lake. Necessary permits would be obtained.

### Construct Trailhead Contact Station

The existing falls trailhead would become the site for the orientation center for all visitor use at Brooks River. It would also serve to educate fishermen as well as bear viewers and photographers on proper behavior in bear habitat. A day use shelter and restrooms would be provided. A full-size barabara replica and exhibit would be built nearby to replace the interpretive opportunity lost north of the river.

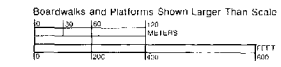
CONCEPTUAL
BEAR VIEWING PLATFORM




ALTERNATIVE 3:
ILIUK MORAINE TERRACE
# BROOKS RIVER AREA

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC : DEC '95 / 127 / 40049D

Boardwalks and Platforms Shown Larger Than Scale



CONCEPTUAL
ILIUK MORAINE AREA
WITH VIEW OF
NAKNEK LAKE

BROOKS FALLS

BROOKS RIVER

PROPOSED
SHUTTLE STOPS

WIDEN ROAD
TO ACCOMMODATE
SHUTTLE

TWO-LANE ROADS

PROPOSED MANAGEMENT
SUPPORT FACILITY
Maintenance Area
Vehicle Parking, Fuel Storage
Generator Facility, Maintenance Shops
Research Facility
Employee Housing Area
Shower, Laundry, Community Center

SINGLE-LANE ROAD

Wilderness Boundary

Valley Road

ILIUK MORAINE

PROPOSED TRAIL
ALONG MORAINE

PROPOSED TRAIL
ALONG RIDGE

# ALTERNATIVE 3:
# ILIUK MORAINE TERRACE

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / DEC. '93 / 127 / 40051B

Boardwalks and Platforms Shown Larger Than Scale

CONTOUR INTERVAL 25 FEET

0 227 454.5 METERS

0 375 750 1500 2250 3000 FEET

NORTH

### Rehabilitate Trail to Brooks Falls and Construct New Bear Viewing Platforms

Proposed small-scale management actions would improve the trail. In boggy areas, where the trail tread has become wide and muddy, short sections of at-grade boardwalks would be built. Vegetation would be managed to eliminate blind curves in the trail, which may create surprise encounters with bears. The steep, slippery section of trail ascending the small ridge before the falls platform would be redesigned, taking better advantage of the slope. Trail erosion and damage to tree roots would be controlled. In areas of potential archeological impact, measures would be taken to eliminate the impact either through short sections of boardwalk or rerouting of the trail. The falls platform would be expanded to two platforms and managed to circulate bear viewers and photographers by having them enter at one end of the connected platforms, move through from one platform to the other, exiting to the trail from the other end. This would reduce crowding and all the back-and-forth movement on the existing platform. Under this alternative, an additional bear viewing platform would be erected near the cutbank. The platform would be located so it would not be visible from the other two platforms and would be set back an appropriate distance from the riverbank. Its location would satisfy the recommended criteria listed in appendix C. The trail to this platform would be at ground level.

### Remove Lake Brooks Facilities

All facilities on the shore of Lake Brooks would be removed and their former areas revegetated, except for the Old Log Cabin. The cabin would become a visitor contact station and shuttle stop during times when floatplanes must land on Lake Brooks, and it would be staffed only at those times.

### Construct Primary Access Site and Facilities

New floatplane and tour boat tie-downs, and docking, barge wharf, and contact station would be constructed on Naknek Lake southeast of the present barge dock location. This location would avoid prime bear habitat and major travel corridors during the summer season. Visitors arriving by floatplane or tour boat would be met at the contact station by a ranger and transported to the lodge or campground by shuttle bus.

After much discussion with many pilots during the summers of 1989 and 1990, it was determined that safe landing areas for floatplanes would be a limiting factor in any proposed relocation of Brooks Camp. To safely access the Brooks River area by floatplanes landing on Naknek Lake, the arrival area must be within the protected bay near the river mouth. To move farther east along the shore beyond the Beaver Pond places the arrival area outside the protected bay where winds are stronger and waves are larger. To move closer to the river mouth places the arrival area in more heavily used bear habitat. An adequate variable lake level barge docking facility, floatplane tie-downs, and tour boat dock, all with wave protection, would be needed to supply and service the proposed development. The design of this facility would be determined by the physical characteristics of the site, lakeshore current, and

recurring wave and wind patterns. Wave and wind protection might be obtained by construction of a breakwater or pier system. The National Park Service would request from the Federal Aviation Administration that a flight restriction over the core use area at Brooks River be established because with the primary access site farther from the river mouth there would be no reason to overfly Brooks River, except in an emergency situation. The exact details of such a proposal would be worked out between the National Park Service and Federal Aviation Administration.

### Construct Facility Access Road

A two-lane facility access road about 2.5 miles long and 26 feet wide would be built from the arrival area to the new facilities on the Iliuk Moraine terrace, and would connect with the Valley Road. It would be constructed as two lanes to accommodate the visitor shuttle system and concession bus tour that would be operating in this alternative. A hardened gravel road surface would be sufficient; paving in this remote locality is not required or feasible.

### Implement Shuttle System

A shuttle system would be necessary for visitor access to the core use area and proposed public facilities. A fleet of seven 11-passenger vans would be used to shuttle visitors between shuttle stops. Three vans would shuttle between the primary access site and the visitor center, lodge, and campground. Four vans would shuttle between the visitor center and the visitor contact station and trailhead. One van on each route would be handicap accessible. With this capacity, at any one time 77 visitors, equal to one-third of the daily use limit, could be using the shuttle system. Demand, of course, would vary. The number of vans operating on any given day would reflect actual demand that day. The management support facility would have adequate parking and repair space to accommodate the shuttle fleet. Alternative funding sources for the shuttle system would need to be examined and the costs borne by the users where possible.

### Develop Iliuk Moraine Terrace Area

The concession and NPS operations that are now being conducted in facilities north of the river would be replaced on a larger scale to the Iliuk Moraine terrace. The lodge would offer a range of visitor accommodations at various prices. Suites, rooms, a hostel, a dormitory, and tent houses could be made available to the visiting public. Public areas like the visitor center, lodge, cabins, and campground would take advantage of the vistas, while the management support facility would be located out of view so as not to intrude on the visitor experience. Development would be fairly distant, about 2.5 road miles from the river, which would make this alternative totally dependent on a shuttle system. Although a trail system would connect the developed area to the river, few people would probably walk to the river. The visitor would be provided with an adequate, dependable, controlled access to the core use area. Two trails

would be developed to take advantage of the great scenery and interpretive opportunities in the area. One would descend from the lodge area to Iliuk Moraine and go out to a viewing area on the moraine, then descend to the lake edge before looping back to the lodge. The second trail would ascend the ridge south of the lodge to take in views of the mountainous spine of the Aleutian Range.

### Construct Brooks River Research Facility

As in alternative 2, a support research facility for the Brooks River area would be constructed to provide space for ongoing and future field research. Space needs to be provided for microscopes, computers, and areas to work with large amounts of material or large specimens. Also, laboratory work space with adequate room to erect portable/adjustable tables, adequate natural and electric lighting, at least four large work sinks with hot and cold running water, walk in freezer space and refrigerator space, a temporary storage room for artifacts with locking cabinets and adjustable shelving, a storage room for all gear needed on field projects (including room to lay out and dry wet gear), a bathroom, a stove and fume hood, a storage area for chemicals, an emergency shower, and a specimen dryer would be needed. The estimated minimum area for such a facility is 2,000 square feet.

Adequate insulation is needed in the facility so that it can be used early in the spring and late into the fall. Part of the facility should support limited winter use. Current Panabode construction does not meet these needs. Use of active and passive solar and wind energy generation should be incorporated in the design of these facilities. Because of the potential use of chemicals in the lab, a hazardous materials disposal plan would be written and implemented after approval.

The research facility would be designed as a supplemental facility to the King Salmon Research Facility that already has been planned and for which the park has requested funds. The Brooks River facility would not provide common workspace or curatorial storage space that must be easily accessible by headquarters staff year-round in King Salmon. As a supplemental facility, it would serve for staging and short-term use for biologists, geologists, volcanologists, archeologists, and inventory and monitoring teams that have reason to work in or transit through the area.

## RESOURCE MANAGEMENT

The bear management program in the Brooks River area would still strive to reduce human/bear encounters and conflicts, but it would be greatly helped along by the removal of all structures and human activities north of the river in prime bear habitat. A method for monitoring the bear viewing platforms would be established to ensure equitable time for all visitors to the platforms. Bear-free areas would be established around the new public use area on the Iliuk Moraine terrace, the new campground, and the proposed management support facilities. The approved techniques in use by the park staff to secure bear-free areas would

still be used. After removal of all facilities north of the river, the National Park Service would conduct monitoring to document any changes in bear use on the north side of the river.

The remediation efforts in the vicinity of Brooks Camp will continue for some time. Resource staff would monitor the remediation crew's actions and impacts to ensure that a minimum of human influence and interference occurs north of the river.

From a cultural resource perspective, the removal of all facilities north of the river to a less sensitive area would benefit the long-term preservation of the archeological sites and ethnographic resources in the Brooks River area. The four archeological sites would be surveyed to determine an appropriate preservation strategy. The determination would be made in consultation with appropriate Native Alaskan groups, the State Historic Preservation Office, and the Advisory Council on Historic Preservation.

The proposed full-size barabara replica and exhibit at the end of the shuttle road would be sited near but not on a known archeological site, in order to use the visible pits in interpretation. However, the barabara replica would not be constructed on a known site.

An archeological site is known to exist at the cutbank. The trail to the proposed cutbank bear viewing platform would pass through an area with a large number of barabara. Placement of the platform would consider archeological resources as well as bear access and feeding areas.

No formal archeological or ethnographic surveys have been conducted of the terrace overlooking Iliuk Moraine and the spruce forest between there and Brooks River. However, reconnaissance surveys undertaken during the course of the study for this proposal failed to find any obvious sites. The proposed development site high above Iliuk Moraine was a less attractive living place for prehistoric peoples who were oriented to the river and lake resources. A slight possibility exists that remains of hunting sites or other culturally significant sites could be found in the area.

## AREA OPERATIONS

Brooks Lodge would continue to offer the same services it currently offers. Lodging rooms would increase from 16 to 32, placed in single cabins, duplexes, and quad configurations. The new lodge, dining facilities, camp store, and concessions office would be increased in size to accommodate larger numbers of overnight and day use visitors. Some smaller existing structures may be relocated to the new site; however, all larger structures would probably be replaced.

The concessioner would provide shuttle service for guests and their luggage from the lake to the lodge area, and a shuttle service would be available for those who do not wish to walk between the visitor center and lodge area and the contact station. Full-day and half-day trips would also be provided by the concessioner to the Valley of Ten Thousand Smokes. Fishing equipment, boat rentals, and fishing guide services would also continue to be available.

Funding for all the shuttle services would be determined by consultation between the National Park Service and the concessioner.

## PHASING SCHEDULE AND ESTIMATED COSTS

Construction phasing for this alternative would be substantial, but not complicated. The primary access site, new transportation system, utility systems, and facilities would have to be built before the facilities north of the river and at Lake Brooks would be removed. Because of the short access season at Brooks River, construction of relocated facilities must be done during the summer season. Construction of boardwalks and platforms along the river would also be done during the summer visitor season.

Estimated construction costs for alternative 3 are included in appendix A, table A-4.

## ALTERNATIVE 4: DAY USE AREA ONLY

### CONCEPT STATEMENT

This alternative removes all facilities north of the river and does not replace them in the park. The Brooks River area would be managed as a day use area only with established limits on visitor numbers at peak bear use times. Overnight accommodations for those preparing to visit Brooks River would be provided by private enterprise in the King Salmon/Naknek area. Access to Brooks River would be primarily by tour boat when water conditions and weather permit, otherwise the traditional floatplane would be used. A management support facility would be required for NPS and concessioner day use operations at the Brooks River area.

### VISITOR EXPERIENCE AND USE LIMITS

Most visitors would arrive by tour boat, some by floatplane, on Naknek Lake beach just south of the Brooks River mouth. They would be met by a ranger and led to the lakeside visitor contact station adjacent to the docking area for the mandatory bear safety message, Brooks River area orientation, and shuttle information. Alternate floatplane access would be at Lake Brooks when weather makes landing on Naknek Lake unsafe. A contact station in the Old Log Cabin on Lake Brooks would be staffed at those times. After receiving the bear safety message, visitors would walk along an elevated boardwalk or take the shuttle, which would operate frequently, to the day use shelter and trailhead. Foot trails would connect the day use shelter with the bear viewing platforms at the cutbank and Brooks Falls. Food and equipment storage, picnic area, and restroom facilities would be provided at the day use shelter.

In this alternative visitors would have the choice of going to three bear viewing platforms — the narrows platform, the proposed cutbank platform, and the falls platform. Strategically positioned, these platforms would offer premium opportunities for bear viewing and photography while not being within sight of each other. An appropriate number of panel exhibits would be used near the viewing platforms to highlight the significance of the river and the interrelationship between bears, fish, and people. Access to the three platforms may be limited, depending on use limits to prevent overcrowding on the platforms and to reduce human/bear encounters on the trails.

Except for bear viewing platforms and approach trails, the river and riparian corridor from the closure line above Brooks Falls downstream to the Oxbow closure line would be zoned as a people-free area in July due to the presence of large numbers of bears. Sportfishing and wildlife photography would continue from the Oxbow closure line to the river mouth, and in the upper river above the falls. In mid-September through October, Brooks River from the Oxbow closure line downstream to the river mouth, except for the narrows platform, would be closed when bears congregate there to feed on late-spawning salmon and salmon carcasses. The Brooks River area commonly supports much fewer bears during the months of June and August, than during July and September/October. Numerous alternative recreational fishing

opportunities and locations exist within the park and in the larger Bristol Bay region during July and September/October.

Full-day and half-day bus tours to the Valley of Ten Thousand Smokes would originate at the lakeside visitor contact station.

No overnight campground would be provided in the Brooks River area; however, backcountry campers would be permitted to camp in designated primitive sites beyond the 2-mile limit according to the park's *Backcountry Management Plan.*

To achieve and maintain a quality day use experience in this alternative, the following day use limits would be established for the peak periods of July and September:

| July | September |
|---|---|
| 90 day users | 70 day users |
| 30 staff | 30 staff |
| Total: 120 people | Total: 100 people |

## PROPOSED DEVELOPMENT

### Remove All Facilities North of the River

All facilities north of the river and the floating bridge would be removed. The artificial dike upon which the bridge access trail sets would be allowed to naturally erode reconnecting the marsh to the river. Remediation efforts would continue long after facility removal, so human presence and access would be dealt with operationally until remediation is complete. Access to the Dumpling Mountain trail would be by boat from the new floatplane/boat docking facility south of the river mouth. The trailhead would be at the existing campground water spigot.

The area north of the river starting 20 feet back from the north bank waterline and continuing up to the base of Dumpling Mountain would be designated as a people-free zone. In order to allow anglers to adequately fish the river and have both banks available when moving out of a bear's way, the boundary of the people-free zone would be set back from the north bank as described.

### Provide Shuttle Stop/Barge Dock/Fish Cleaning Building

The road out to the barge dock would have to be upgraded to accommodate shuttle traffic. A fish cleaning building would be provided nearby for anglers who fish the river mouth and want to take home their limit of fish. The barge dock would be improved to allow for access at varying lake levels.

### Construct Lakeside Visitor Contact Station/Provide Tour Boat and Floatplane Access

This contact station would become the focus of arrivals to the Brooks River area. Floatplane tie-downs and tour boat docking would be provided. Visitors would enter the lakeside visitor contact station and become oriented to Brooks River and the activities in the area. From here they could take the shuttle to the falls trailhead or take the bus for the Valley of Ten Thousand Smokes tour or walk the elevated boardwalk that skirts the marsh to access the bear viewing platforms.

### Provide Day Use Shelter and Trailhead

This shelter would provide temporary storage for visitors' food and equipment while they are on the trails. In a day use only scenario, it can be expected that the visitors would have their lunches with them. Lunches would be eaten at the shelter. A nearby full-size barabara replica and exhibit would re-create the interpretive opportunity that was lost north of the river.

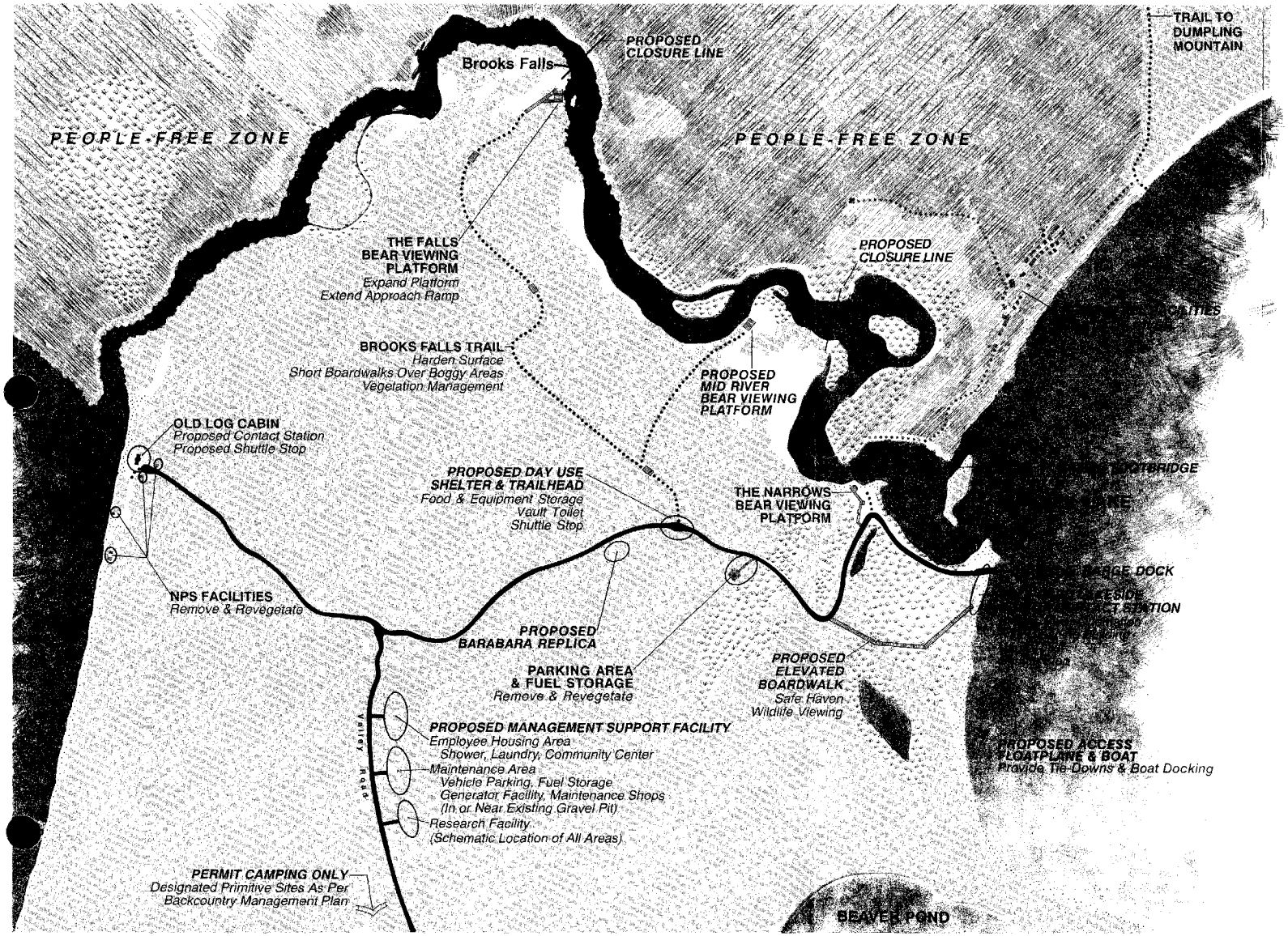
### Rehabilitate Trail to Brooks Falls and Construct New Bear Viewing Platforms

The small segment of the falls trail that goes directly uphill to a bear trail crossing would be rerouted farther to the southwest and take advantage of the topography for good sight distance. A safe haven approach would be provided to eliminate the need for visitors to walk through frequently used bear habitat in order to access the platform. Visitors unable to gain access when the platform is full could safely wait their turn on the elevated approach walkway. The falls platform would be redesigned, expanded, and managed in such a way as to circulate bear viewers and photographers by having them enter at one end of the enlarged platform, move through at their own pace, exiting back to the trail from the other end. This would reduce crowding and all the back-and-forth movement that happens on the existing platform. Escape ladders would be provided on two sides of the platform. Under this alternative, an additional new bear viewing platform would be erected near the cutbank. The platform would be located so it would not be visible from the other two platforms and would be set back an appropriate distance from the riverbank. The trail to this platform would be at ground level. The spacing of bear viewing platforms in this alternative is critical because visitor use would consist of many small groups arriving and departing at various times throughout the day.

### Remove Lake Brooks Facilities

All facilities would be removed and the areas revegetated except for the Old Log Cabin, which would become a visitor contact station and shuttle stop during times when floatplanes must land on Lake Brooks, and which would be staffed only at those times.

CONCEPTUAL DAY USE SHELTER WITH FOOD AND EQUIPMENT STORAGE




ALTERNATIVE 4:
**BROOKS RIVER AREA**
# DAY USE AREA ONLY

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / DEC '96 / 127 / 40050

Boardwalks and Platforms Shown Larger Than Scale

0 30 60 120 METERS
0 200 400 800 FEET

### Implement Shuttle System

A shuttle system would be necessary for visitor access. Two 11-passenger vans would be used to shuttle visitors between shuttle stops. One van would be handicap accessible. Shuttle rides would be short; many day visitors would prefer to walk the short distance between the lakeside visitor contact station and the trailhead. The management support facility would have adequate parking and repair space to accommodate the shuttles. Alternative funding sources for the shuttle system would need to be examined and the costs borne by the users where possible.

### Construct Brooks River Area Management Support Facility

A management support facility would be necessary for a day operation. It would be located along the Valley Road, back from the prime resource with low visibility and low noise levels. In this alternative, if a number of visitors get stranded overnight due to weather conditions or mechanical problems with their transportation, emergency overnight lodging and food supplies would be provided by the National Park Service in the community center at the support facility. The entire road system north of the management support facility would be upgraded to accommodate shuttle and operations traffic. Alternative sites and disposal methods for septic system sludge would be considered in the design of these new facilities.

### Construct Brooks River Research Facility

As in alternatives 2 and 3, a support research facility for the Brooks River area would be constructed to provide space for ongoing and future field research. Space needs to be provided for microscopes, computers, and work areas for large amounts of material or large specimens. Also, laboratory workspace with adequate room to erect portable/adjustable tables, adequate natural and electric lighting, at least four large work sinks with hot and cold running water, walk-in freezer space and refrigerator space, a temporary storage room for artifacts with locking cabinets and adjustable shelving, a storage room for all gear needed on field projects (including room to lay out and dry wet gear), a bathroom, a stove and fume hood, chemical storage, an emergency shower, and a specimen dryer would be needed. The estimated minimum area for such a facility is 2,000 square feet.

Adequate insulation is needed in the facility so that it can be used early in the spring and late into the fall. Part of the facility should support limited winter use. Current Panabode construction does not meet these needs. Use of active and passive solar and wind energy generation should be incorporated in the design of these facilities. Because of the potential use of chemicals in the lab, a hazardous materials disposal plan would be written and implemented after approval.

The research facility would be designed as a supplemental facility to the King Salmon Research Facility that already has been planned and for which the park has requested funds.

The Brooks River facility would not provide common workspace or curatorial storage space that must be easily accessible by headquarters staff year-round in King Salmon. As a supplemental facility it would serve for staging and short-term use for biologists, geologists, volcanologists, archeologists, and inventory and monitoring teams that have reason to work in or transit through the area.

### Restrict Camping

The core use area of Brooks River would remain off limits to overnight camping. The campground that was removed from the north side of the river would not be replaced on the south side. Backcountry campers would be allowed to camp in designated primitive sites beyond the 2-mile limit according to the park's *Backcountry Management Plan*. A developed campground south of the river, near the management support facility, is not proposed in this alternative because it would prejudice overnight use in favor of campers and against lodge patrons. In this gateway community alternative the private sector would provide both lodging and campground facilities outside the park. No developed campground would be needed in or near the core use area.

### Provide Gateway Community Opportunity

This alternative presents an economic opportunity for the communities of King Salmon and Naknek in that overnight facilities, both lodge and campground, for potential Brooks River area visitors would be provided by private sector development using the gateway community concept. The communities of Naknek and King Salmon would act as a gateway through which potential visitors accessed the park and preserve. Tour boat and back-up floatplane round-trip conveyance to Brooks River and other places in the park would also be provided by private enterprise.

Currently, there are several lodging and restaurant enterprises in the two towns. The community of Naknek has a lodging potential of approximately 100 beds and 220 restaurant seats, and the community of King Salmon has a lodging potential of about 170 beds and 220 restaurant seats also. Combined, the two communities offer travelers approximately 270 beds and 440 restaurant seats. The visitor use limit for the Brooks River area, in this alternative, is 90 visitors per day in July and 70 visitors per day in September. The private sector should consider the implications and influences that the existing accommodations, with their seasonal use and the proposed use limits, would have on any new economic development in the gateway community.

## RESOURCE MANAGEMENT

Bear management in the Brooks River area would still strive to reduce human/bear encounters and conflicts, but it would be greatly helped along by the removal of all structures and human

activities north of the river in prime bear habitat. A method for monitoring the bear viewing platforms would be established to ensure equitable time for all visitors to the platforms. Bear-free areas would be established around the proposed lakeside visitor contact station, day use shelter, and the proposed management support facilities. The approved techniques in use by the park staff to secure bear-free areas would still be used. After removal of all facilities north of the river, the National Park Service would conduct monitoring to document any changes in bear use on the north side of the river.

The remediation efforts in the vicinity of Brooks Camp would continue for some time. Resource staff would monitor the remediation crew's actions and impacts to ensure that a minimum of human influence and interference occurs north of the river.

From a cultural resource perspective, the removal of all facilities north of the river to a less sensitive area would benefit the long-term preservation of the archeological sites and ethnographic resources in the Brooks River area. The four archeological sites would be surveyed to determine the appropriate preservation strategy. The determination would be made in consultation with appropriate Native Alaskan groups, the State Historic Preservation Office, and the Advisory Council on Historic Preservation.

For interpretive purposes the proposed full-size barabara replica and exhibit near the existing parking and fuel storage area would be sited near but not on a known archeological site.

An archeological site is known to exist at the cutbank. The trail to the proposed cutbank bear viewing platform would pass through an area with a large number of barabara.

The area proposed for a management support facility along the road to the Valley of Ten Thousand Smokes has not been surveyed for archeological or ethnographic resources. However, given its distance from the river and lakes, and the minimal nature of food resources found in the immediate forest environs, it is extremely unlikely that any sites exist in the vicinity. Moreover, complete archeological and ethnographic surveys would be conducted at the area prior to development of site-specific facility plans, and all archeological and ethnographic resources would be avoided whenever possible.

## AREA OPERATIONS

Tour boats under NPS permit or contract would provide the main access for visitors to Brooks River. Floatplanes would still be used for access during emergencies and by private parties and fly-in fishing groups, and some administrative trips. Concession services would be reduced to providing transportation services for full-day and half-day trips to the Valley of Ten Thousand Smokes. Personal items, film, insect repellent, and packaged snacks and beverages would be available at the day use shelter. Lunches for the valley tour would be supplied by the concessioner. These would be brought in daily with the valley tour group, or prepared at an onsite lunch preparation facility at the shelter, whichever proves most feasible. Concession

staff would be reduced to about five onsite employees. Housing and maintenance facilities for concession operations would be shared in the proposed management support facility.

## PHASING SCHEDULE AND ESTIMATED COSTS

Phased construction would be similar to alternatives 2 and 3 in that the removal of Brooks Camp facilities north of the river would be undertaken only after completion of the proposed management support facility, improved barge dock, proposed day use shelter, and lakeside visitor contact station. Construction of the boardwalk and platforms, trail rehabilitation, and the proposed barabara exhibit would be phased in after basic utilities and operational facilities were in place. Demolition and revegetation of the Lake Brooks facilities and the parking area and fuel storage site would be concurrent with Brooks Camp removal.

Estimated construction costs for alternative 4 are included in appendix A, table A-5.

## ALTERNATIVE 5: PROPOSED ACTION – BEAVER POND TERRACE

### CONCEPT STATEMENT

The National Park Service's proposed action is the proposal that was presented in the *Supplement to the Draft Development Concept Plan / Environmental Impact Statement* (NPS 1995) with minor modifications. Based on public comment received during review of the supplement, the following primary changes have been made to alternative 5:

(1) Development costs have been reduced.
(2) July day user limits have been reduced to 85 people per day from 95 and staff limits have been increased to 55 from 45.
(3) September total use has been decreased to 220 from 260, day user limits have been reduced to 50 from 85, and staff limits have been increased to 50 from 45.
(4) All visitor cabins and staff housing units would have toilets and wash basins instead of centralized facilities.
(5) All staff housing units would have cooking facilities.
(6) The mid-September through October Brooks River closure would be from an Oxbow closure line, rather than from the falls, downstream to the river mouth.
(7) There would be an Iliuk Moraine trail.
(8) The facility for evening programs would be included in the orientation center/ranger station rather than in the lodge.
(9) No universally accessible boardwalk would be built to the river mouth platform; it would remain a gravel trail.

The goal of the proposed action is to preserve the quality of and opportunity for visitor experiences at the Brooks River area which make it a special destination. Key elements of this experience are a wilderness-like natural setting, a unique cultural resource heritage, and a diverse array of recreational opportunities, especially for brown bear viewing. To achieve this goal, the proposed action focuses on comfortable but rustic overnight cabins and hostel with a central lodge gathering and dining area and a campground serving an equal number of visitors. These facilities would be in keeping with the park's wilderness character by being light on the land. Visitor use levels would be limited in the Brooks River area and the visitor experience carefully managed to protect those resources that contribute to the quality of experience. An underlying concept of this alternative is that all facilities and visitor use in the area north of Brooks River should be relocated to lessen impact on prime bear habitat, nationally significant archeological sites, and potentially significant ethnographic sites. Brooks Camp and all other facilities north of the river would be removed except for the Dumpling Mountain trail. Except for the trail, this area would be restored to as nearly natural conditions as is reasonable.

To better disperse visitor use in the entire Naknek drainage and surrounding region, primary visitor orientation would be at the gateway community of King Salmon, where a full description of the region's resource-based recreation would be offered. The proposed action recognizes

Brooks River area management as part of the broader regional context of the King Salmon/Naknek/Lake Camp gateway area, and the importance of dispersing visitor use and diversifying access opportunities over a broader area of the park. Onsite visitor orientation would begin with a bear safety message at the Brooks River orientation center and portray the cultural story. Other orientation activities associated with encouraging dispersed use within and adjacent to the Brooks River area and along the road to the Valley of Ten Thousand Smokes would also be provided.

Another guiding principle is to emphasize the role of partnerships to implement DCP recommendations, for example, public-private partnerships for developing needed facilities and managing visitors. Facilities and programs historically provided by the National Park Service may be provided by other parties under NPS guidance. Cost was also a concern, as well as making this a sustainable development with minimal impacts. These partnerships will initially be involved in regional planning and assess the environmental, economic, and cultural implications of various alternatives in dispersing use, providing quality visitor experiences and protecting the resources.

To carry out this alternative concept, suitable relocation sites had to be identified. The following seven relocation criteria were used to identify alternate sites:

- The alternate site must be in an area little used by bears.
- It must have the potential for only low archeological resource occurrence.
- It must have a scenic setting.
- It must not be in designated wilderness.
- It must be reasonably close to the core use area of Brooks River.
- It must be reasonably accessible by floatplanes landing in Naknek Lake.
- It must provide adequate drainage for septic systems.

The Beaver Pond terrace meets all seven relocation criteria.

## VISITOR EXPERIENCE AND USE LIMITS

King Salmon would be a focus for visitor orientation and access to Katmai National Park and Preserve, including the Brooks River. As a gateway community to the park, King Salmon would also serve as a starting point for visits to adjacent wildlife refuges, Aniakchak National Monument, and other recreational opportunities. The cultural history of the area and its natural resources would also be described.

Visitors would be encouraged to explore the variety of resources available in and adjacent to King Salmon. The National Park Service would work cooperatively with the citizens of King Salmon, the Native Alaskan corporations, Bristol Bay and Lake and Peninsula Boroughs, U.S. Fish and Wildlife Service, and others to broaden the scope of information available on recreational opportunities in the region through ongoing management of the King Salmon Visitor Center.

Several commercial operators have considered the use of watercraft in lieu of aircraft as a means of providing day users with access to Brooks River from King Salmon and Lake Camp. While the shallow waters at the outlet of Naknek Lake were thought to be a limitation on the use of boats for visitor access to Brooks River, it has been demonstrated that watercraft could provide a viable alternative or supplement for access.

Boat travel can be a safe, economical way to convey people to the Brooks River area. The trip to Brooks Camp would offer visitors the opportunity to experience the lake and river system that defines the park, provides habitat for salmon, and ultimately sustains the bears. Groups of visitors could receive information on the geology, culture, and wildlife of the area on their trip. Additionally, watercraft could serve as transportation and for viewing other parts of the Naknek Lake drainage from King Salmon and Lake Camp. Such trips could include day excursions, dropoff/pickup for backcountry users, wildlife viewing trips, and general park orientations, including the flora, fauna, and geology of the park as identified in the 1986 *General Management Plan.*

Aircraft also would be used to access the Brooks River area by following designated corridors to provide safe access while keeping noise at the Brooks River area to a minimal level.

Within the Brooks River area, most visitors would arrive by boat or floatplane at the Naknek Lake beach area east of the Beaver Pond. Docking would be provided here for the boats and floatplanes where there is adequate shelter from the winds. At the King Salmon Visitor Center and during their transit to the Brooks River area, visitors would be informed about human-bear interactions and the natural, cultural, and geologic resources of the area. Arriving visitors would be shuttled to the Brooks River orientation center where they would receive a mandatory bear safety message and information about scheduling trips to areas outside the Brooks River area and to the Brooks River corridor. Trips to the bear viewing platforms would be managed as appropriate, and the number of visitors in the river corridor would also be carefully managed. Current bear viewing platforms would be expanded and modified to provide a better visitor experience, full accessibility, and better resource protection. A shuttle system would be provided for those visitors needing assistance in getting around the area.

Under the proposed action there would be an opportunity for substantial numbers of visitors to experience the Brooks River area while at the same time decreasing crowding and the potential for human/bear interactions. This would be accomplished through a more structured approach to day use and improved management for day and overnight visitors. Access to the Brooks River corridor would be provided through a system for trip planning and scheduling. Access to Brooks River would be managed by a system to be developed by the National Park Service. The proposed action is based on a defined number of visitors permitted within various locations along the Brooks River corridor at one time. Key to the successful management of this system is the implementation of a procedure when needed, such as the requirement for all visitors (day and overnight) to select specific time periods when they wish to go to the bear viewing platforms. In addition, visitors could be led to the platforms by guides, and interpretation would be provided to, from, and on the platforms. The goal of ensuring a quality

visitor experience would be augmented by working with commercial operators to ensure information and orientation before visitors leave home.

Visitor use limits at the Brooks River area would be established to maintain the uncrowded wilderness-like quality of the visitor experience as well as to provide for visitor safety and resource protection. Visitor use limits or visitation on a reservation basis is common in Alaska at areas where bear viewing is one of the principal attractions.

To create and maintain the visitor experience described above, the peak bear viewing and sportfishing periods of July and September would have these use limits:

| July | September |
|---|---|
| 60 lodge guests | 60 lodge guests |
| 60 campground users | 60 campground users |
| 85 day users | 50 day users |
| 55 staff | 50 staff |
| Total: 260 people | Total: 220 people |

Because of the high bear concentrations and spawning salmon at certain times of the year, the National Park Service would establish temporary closures for certain reaches of Brooks River during periods of very high bear use. Such actions would reduce the number of human/bear encounters along the river, and decrease food conditioning and habituation in the local bear population. The current policy of restricting visitor access within a zone 100 yards above and below Brooks Falls would continue. Except for bear viewing platforms and approach trails, the river and riparian corridor from the closure line above Brooks Falls downstream to the river mouth would be zoned as a people-free area in July when there are large numbers of bears present. In July, this section could be opened only if numbers and other attributes of bears present allowed. In mid-September through October, Brooks River from the Oxbow closure line downstream to the river mouth, except at the narrows platform, would be closed when bears congregate there to feed on late-spawning salmon and salmon carcasses. Access for sportfishing, wildlife photography, and nature viewing would continue in the upper river above the falls. The Brooks River commonly supports much fewer bears during the months of June and August, than during July and September/October. There are numerous alternative recreational fishing opportunities and locations within the park and in the larger Bristol Bay region during July and September/October.

To avoid possible conflicts with bears while carrying or cleaning fish, there would be a catch-and-release policy on the entire river and the immediate area of the lakes through the year. These actions would be accomplished by working with the Alaska Department of Fish and Game to develop the best methods that would protect the resource and allow appropriate access to the river and the fisheries.

## CULTURAL RESOURCE INTERPRETATION

An integrated set of programs and facilities would be planned and developed to bring the human history of the region to life along with the story of the local environment. The expanded interpretive program would include activities in the King Salmon/Naknek/Lake Camp gateway area and at Brooks River. The 1993 *Interpretive Prospectus* for Katmai National Park and Preserve would be updated to better reflect the richness of the cultural resources and to meet the growing interests of visitors. This program would be implemented by the National Park Service in partnership with other public and private parties. The provisions of Title 13 of ANILCA would be applied in this process, and the National Park Service would seek out local people knowledgeable in Native culture and history to develop and conduct interpretive programs.

Interpretive programs for archeological sites would be improved. More active facilities, such as a possible replica barabara and living history exhibit, would be located outside the river corridor. Brooks River interpretive programs would be planned as an integral part of the broader interpretive program available in King Salmon and throughout the park.

## PROPOSED DEVELOPMENT

### Remove All Facilities North of the River

All facilities north of the river, including the floating bridge, would be removed. Except for the Dumpling Mountain trail which would be retained, this area would be restored to as nearly natural conditions as is reasonable. The artificial dike on the north bank of the river, upon which the existing bridge access trail sits, would be allowed to erode naturally reconnecting the marsh to the river. The area north of the river would be designated a people-free zone and as shown on the map extends from the north side of the river to the base of Dumpling Mountain. Because fuel oil spill remediation efforts would continue after removal of facilities and structures, administrative access would be allowed until the contaminated areas were remediated. Access to the Dumpling Mountain trail would be by boat from the new floatplane/boat docking facility near the Beaver Pond. The trailhead would begin from the existing campground water spigot.

### Remove Barge Dock and Tie-Downs

The barge dock, bulletin boards, and tie-downs on the south side of the river would be removed. The road between the narrows platform and the river mouth platform would be converted to a trail, and culverts would be installed to reestablish surface water flow and allow the river to reconnect to the marsh as it did in the past.

### Construct Orientation Center/Ranger Station

An orientation center and ranger station would be constructed in the lodge area on the Beaver Pond terrace. There would be accommodation for orientation on bears, offices, a library, slide storage/interpretation preparation, Alaska Natural History Association sales, and evening programs. It would serve to orient visitors and educate fishermen, bear viewers, and photographers on proper behavior in bear habitat.

### Construct Falls Trailhead and Naknek Lake Contact Stations

A contact station, with a covered and screened structure to protect people while they waited to proceed to the falls, would be provided at the falls trailhead. A contact station would be provided at the Naknek Lake access site.

### Rehabilitate Trail to Brooks Falls

The trail alignment and approach to the falls platform would be improved by the construction of boardwalks in boggy areas, hardening with materials such as gravel but not asphalt, vegetation management including removal or trimming to eliminate blind corners, and rerouting of trail sections to take advantage of slope conditions and to better protect and interpret cultural resources.

### Construct Bear Viewing Platforms

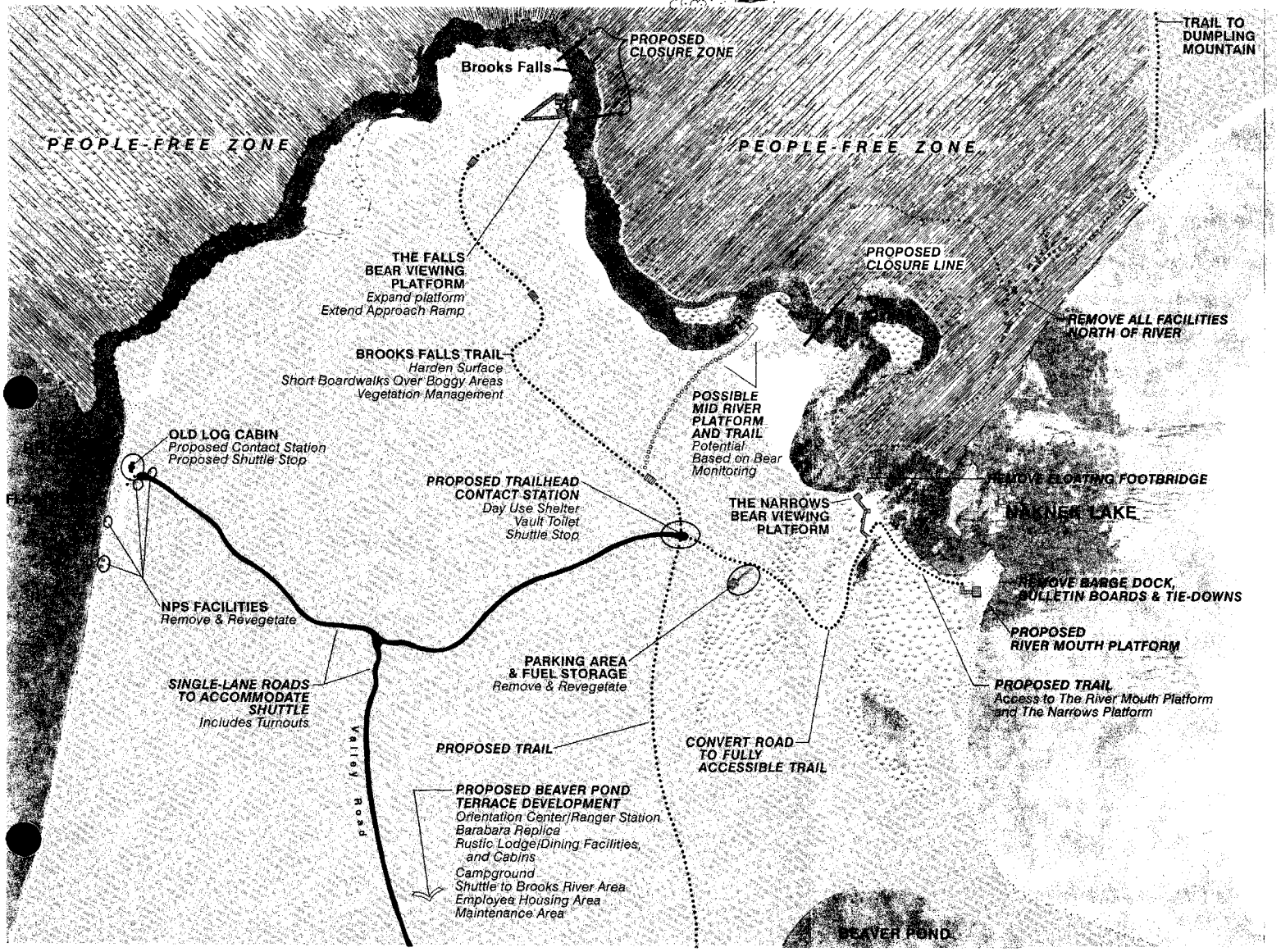
Bear viewing would be provided from the two existing platforms and a new platform at the mouth of the river. All platforms would be constructed or reconfigured to provide quality bear viewing from many angles and separate entrances and exits for safety, efficient group movement, and full accessibility. The river mouth platform would be designed primarily as a safe haven. It would be relatively small and tucked behind trees. It would not be easily seen from other platforms, and it would not obstruct wildlife use patterns.

The falls platform would be expanded and redesigned. This would enable people who were taking photographs and observing bear activity to have a less crowded experience than what occurs on the existing platform.

The narrows platform would be connected with the proposed river overlook platform by a trail. This would provide access from the river mouth to the existing platform and access for wildlife viewing, fishing, photography, and related activities.

A mid-river platform could be built if absolutely necessary, based on LAC monitoring called for in the "Limits of Acceptable Change" section. Necessary compliance would be completed at the time this platform was determined to be required.

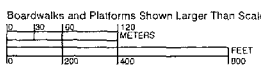
CONCEPTUAL
BEAR VIEWING PLATFORM



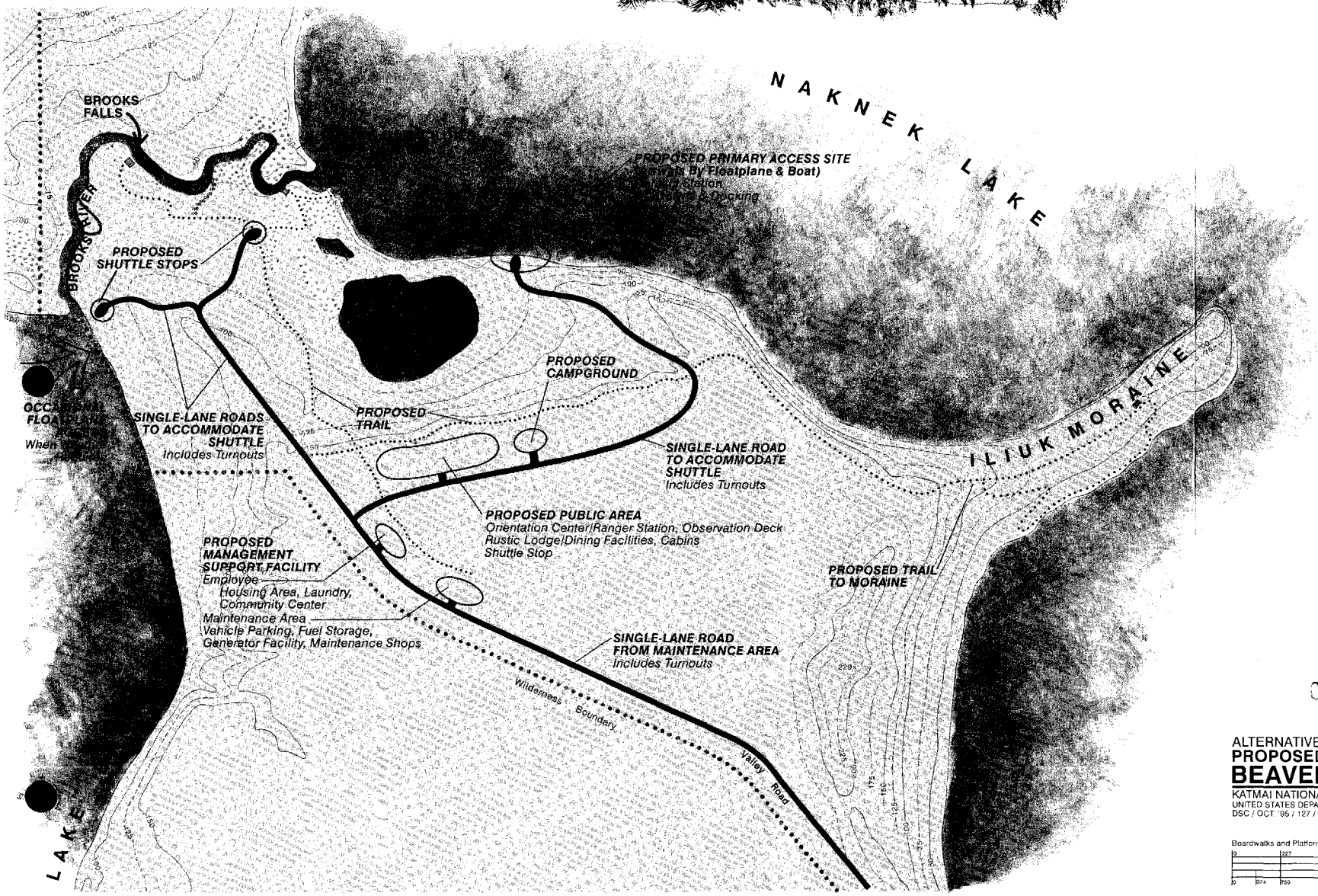

ALTERNATIVE 5:
**PROPOSED ACTION**
**BEAVER POND TERRACE**
# BROOKS RIVER AREA

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / OCT. '95 / 127 / 20050

Boardwalks and Platforms Shown Larger Than Scale



CONCEPTUAL
BEAVER POND TERRACE AREA
WITH VIEW OF BEAVER POND



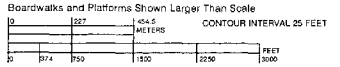

ON MICROFILM

ALTERNATIVE 5:
**PROPOSED ACTION**

# BEAVER POND TERRACE

KATMAI NATIONAL PARK AND PRESERVE
UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
DSC / OCT '95 / 127 / 20051

Boardwalks and Platforms Shown Larger Than Scale



### Remove Lake Brooks Facilities

All facilities on the shore of Lake Brooks would be removed and the area revegetated, except for the Old Log Cabin. The cabin would be retained and adaptively used as a visitor contact station and shuttle stop during those times when floatplanes must land on Lake Brooks. Minimum emergency response for visitor safety and handicap access would remain for those times that planes must land here.

### Construct Primary Access Site and Facilities

New floatplane and boat tie-downs, docking, and a barge wharf would be constructed on Naknek Lake southeast of the present barge dock station. Wave and wind protection might be achieved by construction of a breakwater or pier system.

### Construct Facility Access Road

From the arrival area to new facilities on the Beaver Pond terrace, a one-lane, hardened gravel access road with some pullouts, about 1.7 miles long and 14 feet wide, would be constructed. This road would also connect to the Valley Road. The road would allow movement of supplies and visitors needing assistance to the facilities.

### Implement Shuttle System

Visitors arriving by floatplane or boat would walk or, if necessary, be transported to the lodge or campground by a shuttle. A shuttle system would be operated through the use of a concession contract and the costs paid by the users where possible. In addition to cost, energy efficiency, noise reduction, and shuttle size and numbers would be considerations for the concessioner.

### Develop Beaver Pond Terrace Area

The relocated Brooks Camp would consist of a lodge/dining facility and associated overnight cabins, a hostel, a campground, staff facilities, and interpretive facilities. These facilities would be designed and sited to minimize impacts on the cultural and natural environment (especially wildlife), during construction and operation.

The lodge and other facilities would be simple and functional, reflecting the best of the designs of traditional, wilderness backcountry accommodations. The National Park Service would set more precise performance standards when a competitive prospectus is released for the development and management of the lodge and campground. The competitive process would

be used to attract commercial applicants who can be the most innovative in crafting an attractive, comfortable facility with minimal environmental impacts. The National Park Service would follow the same high standards in the design and operation of its own facilities (e.g., staff quarters) or would require them of any contract.

While detailed design solutions would emerge through the competitive process, the intent would be to maintain a rustic lodge or camping experience in a wilderness-like setting. Competitive design solutions would consider the effects of scale, natural/rustic appearance, materials, color, texture, continuity, furniture, and other issues related to the built environment that would contribute to the visitor experience and minimize visual and natural resource impacts. Facilities would be designed for summer use only with construction practices that are common in bush Alaska. The ability of the contractor to meet principles of sustainable development and incorporate these in site and facility planning, design, construction, and operation would be evaluated.

The proposed facilities are described in more detail below.

**Lodge and Related Facilities.** The central lodge would provide a dining facility and gathering area for overnight guests and day users and for evening programs, including times of inclement weather. Limited sales of essential items would be authorized at the lodge. Cabins providing overnight accommodations would serve up to 60 guests. All units would have toilets, wash basins, and showers. Some would be single units, while others would be clustered into duplexes, triplexes, or quadplexes. A central toilet/shower facility would be provided for the hostel and campers. Concession offices and public restrooms would be provided.

**Campground.** A campground would serve a capacity of 60 campers. Enclosed bear-proof cooking shelters and food storage would be provided in the campground. Restrooms but no showers would be provided at the campground. One interpretive campfire area would be developed for programs and social visiting by campers and other overnight guests who wanted this outdoor experience. The campground could be managed by the lodge concessioner.

**Staff Facilities.** Criteria that apply to the proposed visitor facilities would also apply to staff facilities, except for scenic views. All units would have bathrooms with toilets, wash basins, and showers;, cooking facilities; food storage; and dining space. Economy of scale may be achieved by combining systems where practicable. Staff accommodations would be for a limit of 55 people, some of whom would be transient staff who need to conduct business occasionally at Brooks (e.g., public health, researchers, engineers, biologists). There would be a central laundry/community center. The maintenance area would provide vehicle parking, fuel storage, a generator facility, and maintenance shops.

**Interpretive Facilities.** Cultural and natural interpretive facilities and exhibits, such as reconstruction of a barabara replica, archeological excavation sites, ethnographic displays and work areas, flora and fauna exhibits, bear and salmon life cycle stories, and geology would be planned and developed. An orientation center and evening program facility would be developed in the public area on the Beaver Pond terrace. Demonstrations of traditional practices and

explanations of the culture and lifestyle could be included. These activities and exhibits would be tied in with activities at Lake Camp and King Salmon to provide a full array of programs to tell the story of the environment and the cultures of the region.

**Interpretive Trails.** A 3-mile loop trail would originate on the terrace and proceed through the forest to the summit of the ridge above Iliuk Moraine, and on down to the moraine and shortline. A trail would be developed from the falls trailhead contact station and end at the maintenance area.

## RESOURCE MANAGEMENT

Bear management in the Brooks River area would strive to reduce human/bear encounters, and would be assisted by removal of all structures and human activity north of the river. Bear-free areas would be established around the developed sites at the Beaver Pond terrace by use of approved techniques.

A scientific, cultural, and natural resource monitoring program would be developed to evaluate impacts. Adjustments to ensure resource protection would be made based on the data collected, and appropriate mitigating measures would be implemented as necessary. A water quality monitoring program would be established for the Beaver Pond to ensure that no impacts result from construction to operation of the new facilities.

Cultural resources would be surveyed and monitored to ensure their protection and to select the best site for the limited development at the Beaver Pond terrace. All cultural interpretive sites would be selected with the assistance of the Council of Katmai Descendants and would be sensitive to the archeological and ethnographic importance of the area. Activities and facilities would be located considering the need to minimize conflicts with bears while taking best advantage of the area's superb resources for educating visitors.

## AREA OPERATIONS

Concession facilities and operations would consist of a combined lodge and dining facility, clustered separate cabins, a hostel, a central shower/washroom, and a campground. Partnership opportunities between the National Park Service and the concessioner would be explored for construction and maintenance of staff and maintenance facilities. The shuttle service would be provided by the concessioner between the terrace, lakes, and the falls trailhead contact station. Fishing equipment, boat rentals, and various guide services could be available. Access to Brooks Camp by boat or floatplane would be by commercial operators licensed to provide this service. Floatplanes would be required to follow specified routes, weather permitting. Tours to the Valley of Ten Thousand Smokes would continue to be offered.

## FUNDING AND ESTIMATED COSTS

Project funding for concession facilities would not come necessarily from funds appropriated by Congress. Implementation of the concession aspects of this plan is intended to be carried out from funds provided through concession contract provisions, such as funds set aside or invested by the concessioner in a capital improvement fund. This set-aside fund would be based on a percentage of the concessioner's gross receipts to be determined during future concession contracting processes.

Estimated construction costs for the proposed action are included in appendix A, table A-6.

## PROPOSED REGIONAL CONTEXT CONCEPT

Under the proposed action the development concept for Brooks River would be linked to the broader King Salmon and Naknek Lake region.

### Dispersed Use/Diversified Access

To mitigate for visitor use limits at the Brooks River area, the National Park Service would explore dispersed park use and travel throughout the Naknek Lake area as called for in the *General Management Plan*. Greater use of waterborne access into central areas of the park could be anticipated. Boat service would provide a means to reach the Brooks River area and other central Katmai destinations, and improve access to departure and pickup points for hiking and river trips, such as the Savonoski loop. Boat service could also be an attraction unto itself.

Challenges to establishing a waterborne access system, such as high wind, rough water, or low river flow, could likely be overcome with actions such as broader time frames to get to destinations, innovative boat design, and cooperation with floatplane operators for alternate transportation options.

Along with better waterborne access, the National Park Service would plan and establish other boat-accessible destinations for day and overnight use on Naknek Lake. Examples of possible destinations include the Bay of Islands and mouth of the Ukak River. Such sites would offer a range of activities for day and overnight visitors, such as boating, fishing, camping, and hiking. Activities would be compatible with the wilderness designation and character of the area and consistent with NPS *Management Policies* (NPS 1988b).

### Gateway Community Cooperation

The National Park Service would participate in any cooperative planning or other projects that promoted King Salmon as a gateway community to the park, adjacent refuges, Aniakchak National Monument, and other recreational opportunities in the Naknek drainage and broader region. Future planning partners could include other public and private parties and businesses, including Bristol Bay and Lake and Peninsula Boroughs, U.S. Fish and Wildlife Service, other federal and state agencies, Native corporations, and the Southwest Municipal Conference. The current joint King Salmon Visitor Center is an excellent example of how such a partnership is working and could provide a model for future efforts.

The National Park Service would cooperate with interested partners to plan and implement improvements to Lake Camp as called for in the *General Management Plan.*

## ALTERNATIVE CONSIDERED BUT REJECTED: NAKNEK WEST

This alternative would have relocated visitor lodging and interpretive facilities from the Brooks River area to a major NPS development site somewhere along the northwest shore of Naknek Lake uplake of Lake Camp. The relocation of visitor-related facilities away from critical bear habitat would have allowed for substantial expansion of accommodations and services. Road access to King Salmon would have improved logistical support for the development. Visitors would have been transported to the Brooks River area via concession-operated boats and floatplanes. Once onsite, visitors would have traveled through the area on an elevated boardwalk. The visitor experience at Brooks River would have been similar in length to that proposed in alternative 4, which would establish the Brooks River area as a day use area only.

Development on a large scale in this low, marshy, shoreline area along Naknek Lake has inherent major environmental concerns, and these factored heavily in its rejection. Although the concept of this alternative has been around since the 1970s, the reality is that no sites exist on the northwest shore of Naknek Lake or any of its islands that meet the seven criteria (listed in alternatives 2, 3, and 5) for relocation of the Brooks Camp development.

Field searches by air and water conducted by the planning team revealed a number of environmental problems that precluded further consideration of this alternative. The major concerns were as follows:

- Any road that would connect the proposed development site to King Salmon would require massive filling in of wetlands and disturbance of natural drainage patterns and wildlife habitat.

- Higher areas farther east along the north shore of Naknek Lake that might have enough space for the development relocation are inside a recommended wilderness area. NPS *Management Policies* prohibit proposing development in recommended wilderness areas. The connecting road would be even more environmentally destructive.

- Drainage requirements for septic systems could not be met in any of the shoreline areas. The land is just too low and boggy.

- No good natural harbors or protected bays were located on park lands along the shoreline. Harbor conditions and areas with higher ground were investigated around the moraines and islands near the north shore. These waters were choked with glacially transported boulders. Major dredging would be required to open up access to even the best of these sites.

Another factor that worked against this alternative was the obvious negative effect on the visitor experience. All of the northwest shore of Naknek Lake is low and lacks the scenery necessary to make a resort lodge commercially viable. Visitors at such a development would indeed be in the park, but that is about all. The core use areas for wildlife viewing and sportfishing are still a long distance from Naknek West.

TABLE 4: SUMMARY COMPARISON OF ALTERNATIVES

| LOCATION | NO-ACTION ALTERNATIVE | ALTERNATIVE 1 | ALTERNATIVE 2 | ALTERNATIVE 3 | ALTERNATIVE 4 | ALTERNATIVE 5: PROPOSED ACTION |
|---|---|---|---|---|---|---|
| **Brooks Camp** | Retain campground (17 sites), improve cache, shelters, pit toilets | Retain campground (17 sites); construct bear-proof cooking shelters, and other improvements | Relocate campground to Beaver Pond terrace and establish capacity of 75 persons | Relocate campground to Iliuk Moraine terrace and establish capacity of 75 persons | Remove campground; permit primitive camping only | Relocate campground to Beaver Pond terrace and establish capacity of 60 persons |
| | Retain housing area, infill with tent cabins | Retain housing at existing level; construct bear travel corridor; provide more housing in new management support facility | Relocate housing to Beaver Pond terrace | Relocate housing to Iliuk Moraine terrace | Relocate housing to management support facility on Valley Road | Same as alternative 2 |
| | Retain ranger station | Same as no-action alternative | Relocate to Beaver Pond terrace | Relocate to Iliuk Moraine terrace | Relocate to lakeside visitor contact station | Same as alternative 2 |
| | Retain visitor center and make fully accessible | Construct new visitor center on Naknek Lake | Construct new visitor center on Beaver Pond terrace and contact station at the falls trailhead | Construct new visitor center on Iliuk Moraine terrace and contact station at the falls trailhead | Relocate visitor orientation to new lakeside visitor contact station | Construct orientation center/ranger station on Beaver Pond terrace and establish contact stations at the falls trailhead and Naknek Lake access site |
| | Retain Eskimo barabara replica exhibit | Upgrade Eskimo barabara trail and exhibits | Relocate barabara replica exhibit function near the falls trailhead | Same as alternative 2 | Same as alternative 2 | Relocate barabara replica exhibit function to Beaver Pond terrace |
| | Expand Brooks Lodge and dining facility to the west to increase size of lounge and dining room | Same as no-action alternative | Relocate Brooks Lodge/dining facility to Beaver Pond terrace and expand capacity | Relocate lodge/dining facility to Iliuk Moraine terrace and expand capacity | Remove lodge/dining facility; provide day use shelter at the falls trailhead; provide food and equipment storage | Relocate Brooks Lodge/dining facility to Beaver Pond terrace |
| | Retain guest cabins | Same as no-action alternative | Relocate guest cabins to Beaver Pond terrace and expand capacity to 75 persons | Relocate guest cabins to Iliuk Moraine terrace and expand capacity to 75 persons | Remove guest cabins; overnight facilities available in King Salmon and Naknek or other lodges | Relocate guest cabins to Beaver Pond terrace and establish capacity of 60 overnight guests |
| | Retain maintenance facilities | Relocate maintenance facilities to new management support facility | Relocate maintenance facilities to Beaver Pond terrace near Valley Road | Relocate maintenance facilities to Iliuk Moraine terrace | Relocate maintenance facilities to new management support facility near Valley Road | Same as alternative 2 |
| | Retain floating bridge | Replace floating bridge with elevated bridge and connecting boardwalk | Remove floating bridge | Same as alternative 2 | Same as alternative 2 | Same as alternative 2 |
| | Retain the narrows bear viewing platform | Retain narrows bear viewing platform and link with elevated bridge | Retain narrows bear viewing platform | Same as alternative 2 | Same as alternative 2 | Same as no-action alternative |
| | Retain floatplane access to Naknek Beach and retain barge dock and floatplane tie-downs | Retain floatplane access as in no-action but construct permanent barge dock north of the river | Relocate floatplane functions to primary access site on Naknek Lake east of Beaver Pond; provide contact station, tie-downs, and docking | Same as alternative 2 | Relocate floatplane functions to south of river mouth; improve barge dock; provide contact station, tie-downs, and tour boat docking | Same as alternative 2 |
| | | Construct river mouth overlook | Same as alternative 1 | Same as alternative 1 | | Construct river mouth platform |
| | Retain road from the falls trailhead to barge dock | Same as no-action alternative | Convert road from the falls trailhead to river mouth overlook into fishermen trail | Same as alternative 2 | Upgrade road to barge dock to accommodate shuttles | Convert road from the falls trailhead to river mouth platform into trail |
| | Retain fish cleaning building | Same as no-action alternative | Construct fish cleaning building near the narrows bear viewing platform | Same as alternative 2 | Construct fish cleaning building near lakeside visitor contact station | Remove fish cleaning building; do not replace |
| | | | | | Construct elevated boardwalk over marsh from lakeside visitor contact station to road | |
| | Retain vehicle parking and fuel storage area; construct vehicle shed | Relocate to management support facility on Valley Road | Relocate parking and fuel storage area to Beaver Pond terrace near Valley Road | Relocate parking and fuel storage area to Iliuk Moraine terrace | Same as alternative 1 | Same as alternative 2 |
| | Renovate all camp utility systems | Same as no-action alternative; expand capacity of utility systems in new management support facility on Valley Road | Relocate utility systems to Beaver Pond terrace | Relocate utility systems to Iliuk Moraine terrace | Relocate utility systems to new management support facility on Valley Road | Same as alternative 2 |
| | Retain Brooks Falls trail with minor improvements | Retain Brooks Falls trail with major improvements to falls approach | Retain Brooks Falls with major improvements to falls approach segment and construct cutbank platform | Same as alternative 2 | Same as alternative 2 | Retain Brooks Falls trail with major improvements to falls approach |
| | Redesign and enlarge the falls bear viewing platform for 30 persons | Redesign and enlarge capacity of the falls bear viewing platform for 40 persons | Expand the falls bear viewing platform to two platforms with capacity for 40 people | Same as alternative 2 | Same as alternative 1 | Redesign and expand the falls bear viewing platform |
| **Lake Brooks** | Retain Lake Brooks development | Remove maintenance areas at Lake Brooks; adaptively use Old Log Cabin as a contact station; provide tie-downs | Remove all facilities at Lake Brooks; adaptively use Old Log Cabin as contact station and shuttle stop; provide tie-downs | Same as alternative 2 | Same as alternative 2 | Same as alternative 2 |

TABLE 4: SUMMARY COMPARISON OF ALTERNATIVES (CONT.)

| LOCATION | NO-ACTION ALTERNATIVE | ALTERNATIVE 1 | ALTERNATIVE 2 | ALTERNATIVE 3 | ALTERNATIVE 4 | ALTERNATIVE 5: PROPOSED ACTION |
|---|---|---|---|---|---|---|
| **Valley Road** | Retain road size and alignment | Same as no-action alternative, except widen road segment at new management support facility | Widen road to two lanes from Brooks River trailhead to maintenance area on Valley Road | Widen road to two lanes from Brooks River trailhead to Iliuk Moraine Junction | Same as alternative 1 | Same as no-action alternative and add pullouts |
| | No new construction along Valley Road | Construct management support facility (employee housing, maintenance, and research) | Relocate functions (employee housing, research, and maintenance) to Beaver Pond terrace along Valley Road | Relocate functions (employee housing, research, and maintenance) to Iliuk Moraine terrace | Same as alternative 1, but reduced size | Relocate functions (employee housing and maintenance) to Beaver Pond terrace along Valley Road |
| | Retain Research Bay overlook | Improve turnout and construct wayside exhibit at Research Bay overlook | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 |
| | Retain Margot Falls overlook | Stabilize trail, build viewing deck, and upgrade pit toilets at Margot Falls overlook | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 |
| | Retain Three Forks overlook | Improve contact facility, observation room and deck, exhibits, and trail; relocate pit toilets; and build primitive campground at Three Forks overlook | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 |
| **Beaver Pond Terrace/ Iliuk Moraine Terrace** | | | Construct primary access site on Naknek Lake, east of Beaver Pond | Same as alternative 2 | Construct tour boat docking and floatplane tie-down area south of river mouth | Same as alternative 2 |
| | | | Construct two-lane gravel access road to Beaver Pond terrace | Construct two-lane gravel access road to Iliuk Moraine terrace | | Construct one-lane gravel access road with pullouts to Beaver Pond terrace |
| | | | Construct trail system connecting developed area with Brooks River | Same as alternative 2, with additional trails on Iliuk Moraine and ridgetop | | Same as alternative 3 |
| **Visitor Use Limits** (total visitors per day in July) | None | 240 people per day | 260 people per day | 290 people per day | 120 people per day | 260 people per day |

TABLE 5: SUMMARY COMPARISON OF IMPACTS

| IMPACT TOPIC | NO-ACTION ALTERNATIVE | ALTERNATIVE 1 | ALTERNATIVE 2 | ALTERNATIVE 3 | ALTERNATIVE 4 | ALTERNATIVE 5: PROPOSED ACTION |
|---|---|---|---|---|---|---|
| **Natural Resources** | | | | | | |
| Land Disturbance/ Restoration | Incremental expansion, extent unknown | Small patches within a 30-acre development zone impacted; 0.3 acres restored | Small patches within a 105-acre development zone impacted; 3.5 acres restored | Small patches within a 107-acre development zone impacted; 3.5 acres restored | Small patches within a 22-acre development zone impacted; 3.5 acres restored | Small patches within a 98.3-acre development zone impacted; 3.3 acres restored |
| Hydrology | River mouth confined on both banks; pollution of groundwater from septic systems continues | River mouth confined on south bank; pollution of groundwater from septic systems continues | River mouth confined on south bank; pollution of groundwater from septic systems ceases; new wells required | Same as alternative 2 | Same as alternative 2 | River mouth confined on north bank and partially confined (culverts) on south bank; pollution of groundwater from septic systems ceases; new wells required |
| Wildlife and Fish | Uncontrolled visitation continues to affect bear population; human/bear conflicts increase; development still in prime bear habitat, fish habitat continues to be impacted by multiple stream crossings of heavy equipment | Human/bear conflicts continue since development is still in prime bear habitat; fish habitat continues to be impacted by multiple stream crossings of heavy equipment; new management facility creates second bear-free zone | Human/bear conflicts reduced; facilities removed from prime bear habitat; fish habitat no longer impacted by heavy equipment crossings; new development not in prime bear habitat; Beaver Pond waterfowl nesting habitat not disturbed | Same as alternative 2 | Same as alternative 2, except new management facility would create a second bear-free zone near prime bear habitat | Same as alternative 2 |
| Species of Special Concern | No effect | No effect | No effect | No effect | No effect | No effect |
| Designated Wilderness | No physical effect; crowding at Brooks could create more use of wilderness | No physical effect; limits at Brooks may stimulate more use of wilderness | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 | Same as alternative 2 |
| **Cultural Resources** | | | | | | |
| Prehistoric | Sites continue to be impacted by facility development and maintenance in the national historic landmark | Same as no-action alternative | Impacts on sites in the national historic landmark are greatly reduced; development placed in less sensitive areas | Same as alternative 2 | Same as alternative 2 | Same as alternative 2 |
| Historic | No effect | No effect | No effect | No effect | No effect | No effect |
| [illegible]ographic | No effect | No effect | No effect | Possible adverse effect on traditional cultural values on Iliuk Moraine | No effect | No effect |
| **Visitor Experience and Safety** | | | | | | |
| Reduction of human/bear conflicts | Human/bear conflicts increase | Human/bear conflicts decrease | Human/bear conflicts substantially decrease | Same as alternative 2 | Same as alternative 2 | Same as alternative 2 |
| Visitor use limits | None; facilities eventually overrun by increasing day use | Limits have positive impact on Brooks Camp experience | Limits would have positive impact on Brooks River experience; shuttle system in effect | Same as alternative 2 | Positive impact for day use control; negative impact for overnight use groups | Limits have positive impact on Brooks River experience; scheduled improvements might have some negative impacts on experience; shuttle system in effect |
| River corridor management | Existing regulations and closure remain in effect | Temporal closures on lower river — pending negotiations with Alaska Department of Fish and Game — would reduce human/bear conflicts | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 | Temporal closures on lower river and catch-and-release fishing policy reduce bear/human conflicts |
| Valley tour improvements | No restoration of impacted areas; no visitor safety improvements | Positive interpretation and restoration impacts; safety improvements along road and trails | Same as alternative 1 | Same as alternative 1 | Same as alternative 1 | Same as alternative 2 |
| **Economic Impacts** | | | | | | |
| Subsistence | No significant restriction | Same as no-action alternative | Same as no-action alternative | Same as no-action alternative | Same as no-action alternative | Same as no-action alternative |
| Concession operations | Minor facility improvements; expanded business due to increasing day use | Minor facility improvements; business continues at current levels | New facilities; increase in business | New facilities; increase in business | Concessioner operates the valley tour only, no overnight facilities; gateway community opportunity | Same as alternative 2 |
| Regional tourism and commercial use licenses | Positive impacts on tourism interests would increase with no limits on visitation until resource and experience conditions worsened and visitation slowed down as a result | No effect on regional tourism; commercial use license holders may be slightly affected | Regional tourism would increase moderately due to increased use limits at lodge and campground | Same as alternative 2 | Minor benefit on regional tourism; local tourist interests in King Salmon and commercial use license holders would benefit by providing overnight, camping facilities, and guided day trips to Brooks River | Regional tourism would increase moderately due to greater regional focus of interpretation; use limits at Brooks River also causes greater distribution of people throughout region |
| **[illegible]ulative Impacts** | Long-term negative impacts on water table, prime bear habitat, and cultural resources | Same as no-action alternative | Long-term positive impact on water table, prime bear habitat, fisheries, cultural resources, and visitor experience | Same as alternative 2 | Long-term positive impact on water table, prime bear habitat, fisheries, and cultural resources; long-term negative impact on overnight visitation experience | Same as alternative 2 |

# PART THREE:
# THE AFFECTED ENVIRONMENT

Waiting for Their Turn on The Falls Platform

## REMEDIATION EFFORTS

In the spring of 1991, an underground fuel distribution line ruptured during pressurized transfer operations, causing an estimated 50 gallons of fuel oil to leak into the ground. As an extension to the remediation of this leak, a comprehensive site reconnaissance was carried out during the summer of 1991. In 1992 an environmental engineering company was contracted to conduct a site characterization to accurately define the extent of soil and groundwater contamination throughout the Brooks River area. Additional sites found to be contaminated with hydrocarbons (gasoline and fuel oil) were identified and mapped. A tank tightness test was also conducted on all six underground storage tanks (four diesel, two gasoline) late in the 1992 season. All six of the tanks and the attached distribution lines failed to meet the Alaska Department of Environmental Conservation's regulatory requirements for leakage rates. An 8,000-gallon tank located near the generator building, containing 5,500 gallons of diesel, continued to leak fuel after the system was depressurized at the end of the season. The remaining fuel was transferred to temporary aboveground storage units and new aboveground tanks were delivered in 1993. All six tanks were excavated and removed from the area. All underground distribution lines have been emptied.

The fuel system at Brooks Camp will be replaced with a total aboveground system that can readily be dismantled and moved. Hence, this activity will not preempt the current planning process, nor preclude the full consideration of all development concept plan alternatives. The National Park Service continues to work closely with the Alaska Department of Environmental Conservation in the development of long-range soil and groundwater remediation. The remediation system, being designed under contract, will disturb a minimum of surface and subsurface soils, due to the known presence of archeological resources.

## NATURAL RESOURCES

Twenty-three air miles east-southeast of King Salmon lies Brooks Camp. The small camp is situated on a peninsula of land at the mouth of Brooks River, hence its name. The area consists of white spruce forest south of the river and a mosaic of deciduous woods, open grassy areas, and some white spruce forest north of the river. Marshy areas are common along the floodplain in the oxbows and at the river mouth. Brooks River flows from Lake Brooks on a meandering course eastward for about 1.5 miles before it empties into Naknek Lake, the largest freshwater lake in the national park system.

About midway down Brooks River is Brooks Falls. Although pleasant to view, the falls are not spectacular in a scenic sense. The falls are, however, a critical component of the ecological web along Brooks River. By creating a barrier to salmon migration, the falls provide a position from which brown bears are able to easily catch salmon as the fish attempt to jump the falls or school in the pools below. Many bears congregate at the falls and along the river below the falls during the salmon runs that occur in July and September. Bear viewing is currently unregulated leading to human/bear encounters that are deleterious to the maintenance of a wild, free roaming bear population in the area.

The sockeye salmon runs and resident rainbow trout population provide excellent sportfishing opportunities. Sportfishing in the area is regulated by the Alaska Department of Fish and Game and the National Park Service. This combination of world-class bear viewing and world-class salmon and trout fishing is what attracts people to Brooks River.

Visitation to the Valley of Ten Thousand Smokes is inextricably tied to the visitor experience people have at Brooks River because valley tours originate at the lodge. The geologic and scenic resources of the Valley of Ten Thousand Smokes must be considered as natural resources that can affect, and are affected by, existing conditions at Brooks River.

### CLIMATE

Summer temperatures in the Brooks River area are generally cool. Sunny or partly cloudy days are recorded only one day in five during the summer. Clouds, fog, and rain are frequent. July has an average of only five days when temperatures exceed 70°F (20°C). Average summer temperatures for June, July, and August are 50°F, 54°F, and 54°F, respectively. An average of 50°F during the growing season is considered the minimum necessary to sustain tree growth (NPS 1982).

Strong, sudden winds called williwaws occur periodically, sometimes lasting for several days. The unexpected occurrence of a williwaw can cause serious safety hazards to small boats on Naknek Lake, where waves can build to 7 feet high.

## AIR QUALITY

Air quality in the area is largely unaltered by human activities. Local and ephemeral impacts can be detected in the immediate area of Brooks Camp from airplanes, boat motors, and generator exhaust fumes. The smell of burning plastics is detectable when the garbage incineration unit is operating.

## TOPOGRAPHY AND SOILS

The Brooks River area lies on a low, flat area bounded by large lakes to the east and west. Dumpling Mountain rises 2,440 feet in elevation 3 miles northwest of the Brooks River. A low lying plain extends approximately 5 miles to the south, where the foothills and outlying peaks of the Aleutian Range begin, separating the Brooks River area from the Shelikof Strait Coast. This range contains numerous peaks over 6,000 feet in elevation, many with glaciers and permanent snowfields.

The Brooks River area is underlain by largely unconsolidated, surficial deposits, composed primarily of alluvial and glacial gravels. Ash layers throughout the soil horizons and pumice deposits along lakeshores attest to the influence of volcanic activity on the area. The combination of coarse gravels, ash, and organic matter has resulted in well drained soils with minimal surface runoff.

## HYDROLOGY

Brooks Camp is located on the 1.5-mile-long Brooks River, which flows from Lake Brooks to Naknek Lake. A fault line bisects the river approximately halfway down its length, creating the 6-foot-high Brooks Falls, which is a major visitor attraction to the area for the viewing of salmon and brown bears. The lakes and river form a part of the Naknek River system, draining 2,660 square miles of the park and eventually flowing into Bristol Bay, on the Bering Sea side of the Alaska Peninsula. Lake Brooks and Naknek Lake were formed by glacial scouring. The deepest recorded depth in Naknek Lake is 530 feet in the Iliuk Arm. The lakes in the area are much shallower toward the west as the result of glacial deposition.

The mouth of Brooks River has shifted in recent times. Prevailing winds on Naknek Lake create a longshore drift that, when combined with the tendency of the river to meander, changes the channel configuration and the patterns of sediment deposition as the river flows into the lake. Lake and river levels can rise as much as 7 feet between spring and late summer, and local flooding around the mouth of Brooks River has occurred to the 38-foot contour line on the camp's lakeside, and to the fish cleaning building, elevation approximately 37 feet, on the riverside. No formal floodplain analysis has been completed for the Brooks River area. Wetlands are common in the Brooks River area. Several large meadows and marshes are located along the lower reach of Brooks River. Wetlands are common throughout

the park and preserve and may be important to water quality of the lakes and streams to which they are hydrologically connected.

Water chemistry and quality is greatly affected by volcanic and glacial activity. Higher levels of trace metals including strontium, boron, and lithium are found as a result of volcanic activity. The Iliuk Arm of Naknek Lake is heavily influenced by glacial silt and volcanic materials including ash and pumice. Summer stratification does not fully develop in the area's deep lakes. Instead, the lakes circulate often through the summer due to coastal winds. Dissolved oxygen readings are mostly influenced by the water temperature at times or circulation events.

Nutrient availability throughout the Naknek system is undoubtedly influenced by the annual upstream migration of salmon from the sea. Without this regular influx of a million or more adult salmon returning to spawn and die, productivity would be greatly reduced. Total phosphorus appears to be a key nutrient in the system, but nitrogen is limiting in Brooks and Naknek Lakes.

The area's lakes are oligotrophic and very clear. For instance, Battle Lake, in the Alagnak River headwaters, transmits light to great depths similar to transmission at Crater Lake in Oregon. The preservation of water quality throughout Katmai National Park and Preserve has been a primary purpose and driving force behind the various acts that expanded the unit since its establishment. The importance of maintaining pristine water quality is recognized as the park's number one natural resource management priority (NBS, In Press).

The juncture of a clearwater river with a lake, such as the immediate area of Brooks Camp, is important and sensitive habitat that is limited and diminishing due to human influences and development. In these areas topography, hydrology, and vegetation interact to funnel and concentrate the activities of wildlife and humans. Additional examples of this phenomenon are seen at similar developments within Katmai National Park and Preserve including Kulik Lodge, located at the mouth of Kulik River connecting Kulik and Nonvianuk Lakes; Grosvenor Lodge, at the mouth of Coville River connecting Lakes Coville and Grosvenor; and Cry O' The Loon Lodge, located at the head of the Nonvianuk River at the mouth of Nonvianuk Lake. Additionally, the area at the mouth of Kukaklek Lake, the origin of the Alagnak Wild River, is in private ownership and susceptible to development.

## VEGETATION

The Brooks River area contains several plant associations. It is in the southern and western-most extent of boreal forest on the Alaska Peninsula. In Katmai an estimated 128,000 acres of open and closed canopy white spruce forest exists; 31,400 acres of which is within a 12-mile radius of Brooks River. White spruce and Kenai birch form a closed canopy stand over much of the area, with an understory of various species of cranberry, willow, and alder. The riparian corridor is a mosaic of dense alder thickets and tall grass meadows interspersed with bogs containing hydrophytic plant species. Brooks Camp campground is located in a prominent

stand of balsam poplar. Spruce forest changes to tall shrub, then to a tundra community as elevation increases on Dumpling Mountain.

Several species of alien plants have been observed in the Brooks Camp area, introduced accidently or intentionally through human activities. These include shepherd's purse, pineapple weed, clover, and dandelion. Most alien plant species have become established as a result of soil disturbing projects.

## WILDLIFE AND FISH

The primary resource concern regarding wildlife in the Brooks River area is the maintenance of the brown bear/salmon cycle as it relates first to the continued health of the local brown bear population and secondarily to the continued opportunities for world-class bear viewing. Other wildlife species that use the river, like river otter, mink, bald eagle, common merganser, glaucous-winged gull, and Arctic tern would benefit from plan proposals that reduce human intrusion in the area.

The Brooks River area is internationally recognized for outstanding wildlife and fish resources. Brooks River, Naknek Lake, and Lake Brooks are formally recognized by the state of Alaska as waters important for anadromous fishes (Alaska Dept. of Fish & Game 1992). Each July, approximately 100,000 or more red salmon return from the sea to spawn in the Brooks River and in tributaries to Lake Brooks. A smaller run of several hundred coho salmon also make the run in late summer. Monitoring efforts in the 1960s involving the use of a fish weir located at the start of Brooks River revealed a small number of king, pink, and chum salmon also making the journey (FWS 1964). The salmon migration attracts a substantial number of other animals, including 40–60 brown bears, who arrive to fish for the salmon in the river, particularly as they attempt to jump the falls. The bears remain through the latter part of July, when they disperse to other streams with later-timed runs. Bears return to the Brooks River again in September to catch spawning and spawned out salmon concentrated in the river.

Many of the red salmon that migrate through the Brooks River into Lake Brooks during July return back downstream to spawn in the Brooks River in late August and September (FWS 1964). Of 58,150 red salmon passing upstream from Brooks River into Lake Brooks in 1963, 54,705 returned to the Brooks River to spawn. A spawning density of greater than one egg pocket per square meter of riverbed was reported.

Rainbow trout grow to large size as a result of the rich supply of nutrients from salmon eggs and juvenile salmon, and are prized by anglers for their trophy quality. Rainbows concentrate in the Brooks River to spawn from mid-May through mid-June. Rainbow spawning occurs in both the upper and lower Brooks River. After spawning, the rainbows return to Naknek Lake or Lake Brooks. There are few rainbows remaining in the Brooks River during the main salmon migration, as the bright ocean-run salmon are intolerant of, and actively harass, rainbows in the river. In late August as salmon spawning intensifies, rainbows reenter the river from both

lakes to feed on the newly laid salmon eggs. Rainbow numbers in the Brooks River are highest in late September.

The lower Brooks River from the downstream end of the cutbank to the island at the river mouth is important grayling spawning habitat (Alaska Department of Fish and Game 1995). Grayling initiate spawning activity in early May. An estimated 300–500 grayling were reported on May 19 in the 1980 survey. Other fish species present in the Naknek River drainage, with some found in the Brooks River, include Arctic char, Dolly Varden, lake trout, Arctic lamprey, humpback whitefish, least cisco, pygmy whitefish, round whitefish, pond smelt, northern pike, longnose sucker, burbot, threespine and ninespine sticklebacks, and coast range and slimy sculpins (Heard et. al 1969; Ellis 1974).

Spawning by any fish species does not occur at the river mouth, due to lack of suitable habitat. This is an area of constantly shifting fine sands and silts that are deposited as the velocity of the river's current is slowed down upon reaching the lake.

A variety of bird species frequent the Brooks River area. A pair of great-horned owls raised a brood near the campground in 1991. Common ravens and black-billed magpies are common residents. A colony of bank swallows nests between the high cutbank and the oxbow of the river. Mallards and common mergansers are common and conspicuous nesters. Glaucous-winged, mew, and Bonaparte's gulls are common scavengers frequently found in close association with brown bears feeding on salmon. Arctic terns feed on salmon fry and smolt. The successful fledging of two American dippers was documented in 1992 from a nest at Brooks Falls.

Common forest birds around the Brooks River area include American robin, gray jay, varied and hermit thrushes, black-capped and boreal chickadees, and dark-eyed juncos. The Beaver Pond provides suitable feeding habitat for tundra swans, as well as a variety of diving birds including common golden-eye, greater scaup, and white-winged scoter. The park initiated a breeding bird survey route in 1992 along the Valley of Ten Thousand Smokes Road (NPS 1992e). Twenty eight species of birds were recorded. In addition to many of the species listed above, ruby-crowned and golden-crowned kinglets, red-breasted nuthatch, gray-cheeked and Swainson's thrushes, yellow-rumped, blackpoll, and Wilson's warblers, and American tree, Savannah, and white-crowned sparrows were identified.

Mammals in the Brooks River area, in addition to brown bears, include moose, wolf, wolverine, mink, short-tailed weasel, river otter, beaver, porcupine, snowshoe hare, lynx, Arctic ground-squirrel, red squirrel, red-backed vole, northern jumping mouse, little brown bat, and several species of shrews. The brown bears have increased in numbers in the last 10 years and are an important species in this area.

## SPECIES OF SPECIAL CONCERN/CRITICAL HABITATS

No state or federally listed threatened or endangered species of plants or animals reside in the area encompassed by this development concept plan (FWS 1992); see appendix D. However, the American peregrine falcon (*Falco peregrinus anatum*) may occasionally pass through on their seasonal migrations. Other species of special concern that are known to inhabit the area include the northern goshawk (*Accipiter gentilis*), harlequin duck (*Histrionicus histrionicus*), and lynx (*Felis lynx canadensis*). These species receive special consideration in federal project planning efforts. In 1991 a lynx was seen regularly by visitors as it came to the river to drink. Lynx tracks are commonly seen throughout the year. A brood of harlequin ducks was observed in the upper Brooks River in 1990 and 1991, but not in 1992. However, a brood of harlequins was noted on Margot Creek in 1992 and 1995, roughly 10 miles east of Brooks River, and adult harlequins were observed in Brooks Camp in 1994 and 1995.

Two bald eagle nests in the area had been active until the early 1980s. One was located 300 yards west of the campground, and the other on the shore of the Beaver Pond. Bald eagles are not considered threatened or endangered in Alaska. No eagle nesting currently occurs within 2 miles of Brooks Camp. In 1993 and 1994 a pair of bald eagles attempted to nest between the Beaver Pond and Naknek Lake. The attempt failed.

## DESIGNATED WILDERNESS

Congress designated some 3,425,811 acres within Katmai National Park and Preserve as wilderness in section 701 of ANILCA. The Brooks River area and the Valley of Ten Thousand Smokes road corridor were deemed unsuitable for wilderness designation because of existing development and visitor use patterns. The large area between the Valley Road and Naknek Lake from Brooks River to Margot Creek was excluded from wilderness designation because of proximity of development (NPS 1988a). Wilderness areas of the park and preserve are managed in accordance with the Wilderness Act of 1964, except as otherwise expressly provided for in ANILCA.

## CULTURAL RESOURCES

### PREHISTORIC

Extensive archeological remains indicate that people have lived in the Brooks River area for over 4,000 years. These remains include at least 22 sites containing over 750 barabara depressions and other types of cultural resources, which constitute the Brooks River Archeological District, a property on the National Register of Historic Places. This property has been determined to be nationally significant for its potential to yield scientific information regarding the prehistoric human occupation of Alaska. The banks of the 1.5-mile-long Brooks River and its associated series of ancient beach ridges and river terraces are the location of the Brooks River Archeological District, now also designated a national historic landmark.

The national historic landmark is comprised of the abundant surface and subsurface cultural remains of 20 well-preserved archeological sites, dating from 2500 B.C. to historic times, that are located near the river and adjacent Brooks and Naknek Lakes. A series of 10 volcanic ash falls that have been deposited over the past 6,500 years in the Brooks River area enhance the national historic landmark's value in that they are excellent time markers in the stratified archeological deposits, and are certain indicators of post-depositional disturbance.

Nine cultural phases spanning some 4,500 years are represented in 20 well-preserved archeological sites bearing evidence of occupation in the form of subsurface cultural remains and in 960 recorded surface depressions, many believed to be the remains of substantial semisubterranean houses. The cultural features consist of hearths, storage pits and house floors, human burials, and faunal debris, both terrestrial and marine, including anadromous fish. The primary subsistence base for the area has been Brooks River's seasonal anadromous fish runs, supplemented by terrestrial fauna and plants until recent times.

The archeological sites taken together represent an impressively large concentration of stratified cultural deposits that have yielded a good representation of the remains of every known cultural tradition from the people who were present in 4500 B.P. through historic Yupik-speaking people whose descendants inhabit the Alaska Peninsula today. Of particular significance is the preeminent representation of unmixed occupation debris and house remains of Arctic Small Tool tradition people (ca. 1800 B.C. – 1100 B.C.) that have been sited as the single area of greatest concentration of such remains known in Alaska and possibly in North America (Dumond 1981).

The Brooks Camp development exists on top of four archeological sites, some of which contain the oldest remains yet discovered in the Naknek Lake region. The foot trail to the Brooks Falls bear viewing platform runs the length of one archeological site, containing evidence of the earliest habitation of the falls area by humans. The vehicle parking area near the start of the road to the Valley of Ten Thousand Smokes is adjacent to an unstudied, but apparently large archeological site. The NPS facilities on Lake Brooks adjoin an apparently extensive resource dating to at least 2,000 years ago.

Boundaries for most of the individual sites have yet to be determined. In some cases, where substantial archeological testing has been done or where evidence of occupation appears to correspond to the extent of a particular geomorphological feature, a judgment regarding the boundaries of a particular site has been offered (Dumond 1981; Harritt 1992).

Integrity of the archeological sites ranges from good to excellent, with over 90% of all archeological properties remaining intact. The sites currently undergoing the greatest amount of impact are XMK-008 and XMK-009, located at Lake Brooks, and XMK-033, XMK-035, XMK-043 and XMK-044, located on the north and south sides of Brooks River near its mouth. The sources of impacts are NPS and concessioner construction activities that have disturbed the cultural materials present to varying degrees. Sites XMK-010, XMK-011, XMK-012, XMK-016, and XMK-034 are undergoing severe erosion from natural or human sources. Recently, XMK-008, XMK-035, and XMK-044 were partly contaminated by fuel oil caused by leaking fuel tanks and lines.

The disturbances are of three types: (1) surface disturbance, (2) subsurface disturbance to a depth no greater than through the Katmai volcanic ash that dates to 1912, and (3) deep subsurface disturbance that penetrates pre-1912 deposits sealed by the Katmai ash. Generally speaking, NPS and concessioner construction activities have created disturbances of the first two types. Buildings are generally set on piers (small uprights) that are excavated into the ground usually no deeper than the top portion of the Katmai ash. Projects such as leachfield construction, installation of underground utilities, and most recently excavations of fuel tank and fuel line sites to determine leakage are the most destructive type of disturbance. The sum effect of disturbance caused by construction or contamination by fuel tanks and lines has not been fully assessed. Based on present information, no estimate of the total damage can be made.

The cultural resources of the Brooks River area are interpreted by means of a self-guided trail with three wayside exhibits. The trail is somewhat isolated from the focus of other activities in Brooks Camp. It ends at a structure that houses a partial reconstruction of a prehistoric Eskimo barabara. Guided tours by park staff let visitors know of the best existing opportunity to learn of the significant cultural resources at Brooks River.

Sites potentially affected by development are listed in appendix E. Reconnaissance level archeological surveys of the Beaver Pond terrace and Iliuk Moraine terrace revealed no evidence of archeological sites.

## HISTORIC

Of historic importance are two archeological sites once inhabited by Yupik-speaking people located on Naknek Lake — XMK-037 and an unnumbered site not yet evaluated according to National Register of Historic Places criteria. At least one historic Native Alaskan grave is located somewhere on the banks of Brooks River. The grave was originally marked by a Russian Orthodox cross (NPS 1940). A historic cabin and compound associated with

European-American trapping and guiding ((Packer Scotty's cabin), carried out in the area from the turn of the century until the 1950s, was included in the national historic landmark nomination as a noncontributing property (Dumond 1981; NPS 1940).

Research conducted in support of the Bristol Bay commercial fishing industry began on the upper Naknek drainage in the 1920s. The historic Bureau of Fisheries/U.S. Fish and Wildlife Service headquarters and laboratory, a log structure built in 1941, is located at the outlet of Lake Brooks. Recently the building has been used for employee quarters. A determination of eligibility for national register nomination has been submitted.

Both NPS and the concessioner built structures in the early 1950s. Few of these buildings remain. The oldest concessioner buildings are an employee cabin, a storage building, and two underground caches built in 1950. The oldest NPS-constructed building is the present visitor contact station, built in 1956. None meets the 50-year age criterion to be considered for the National Register of Historic Places.

## ETHNOGRAPHIC

According to some Native Alaskan consultants, Native use of the Brooks River area (or Kitivik in Sugpiaq, the Native language of the historic Brooks Camp users) is directly related to the Katmai eruption of 1912 and the prior use of the upper Naknek Lake drainage, including villages now lumped together as "Old Savoonski." In the 19th century, settlements known as Igak and Alingak, and later Nunamiut and Savoonski, were located at the head of Naknek Lake. These villages appear to have been the primary residences of the inland Pacific Eskimo peoples living on the Alaska Peninsula. During the 19th century and up until the 1912 eruption, residents of Old Savoonski villages would not infrequently hike over the Katmai Pass and trade with their kinsmen or traders at the village of Katmai. The Native people of the Upper Naknek drainage, like their coastal kinsmen, often preferred to be called Aluutiq or Sugpiaq, indicating their cultural connections with the latter group. Earlier Caucasian observers mistakenly labelled these people "Aleuts" and much misinformation has been spread about them.

The Brooks River area, or Kitivik, appears at this time to have been a satellite encampment to the Old Savoonski villages during much of the 19th century. According to Native consultants, Kitivik was used primarily as a fishing camp, containing a few winter cabins substantial enough to afford shelter and located south of the river, along the beachline but in the trees.

A number of changes modified the way people in the Upper Naknek Lake area used the resources of the area, including both the Old Savoonski villages and Kitivik: fur trapping for Russian and American companies, conversion to the Russian Orthodox Church, employment opportunities with fish canneries, the 1912 eruption, 1919 flu epidemic, and the establishment of schools. After the 1912 eruption, a number of Old Savoonski residents resided at Kitivik for greater periods of time than they had previously, as the salmon runs up Savoonski River were greatly diminished by the effects of the volcano. Kinsmen on the coast were resettled in distant Perryville, cutting off interactions. Former residents of Savoonski established a new settlement,

New Savoonski, on the lower Naknek River, rather than intermingle with the Native peoples of Paugvik from whom they were ethnically different, and with whom they had fought in the past. The 1919 flu epidemic killed many people living in New Savoonski, further decimating the numbers of Sugpiaq peoples who knew and used Kitivik.

Despite the epidemic and like changes, Kitivik continued to be used in the first half of this century by a number of families who fished for the red salmon out of Brooks River, trapped in the winter time with dog teams, hunted bears (an important cultural practice engendering respect for the hunter), and gathered plants. One of several families with ties to Kitivik is descended from a recognized chief of Old Savoonski. Cited by Native consultants as evidence of their cultural connection to the Brooks River area, when the chief's aged, widowed wife was unable to go to Kitivik, she requested water, soil, and food from Kitivik be brought to her to make her feel better.

According to Native consultants, the ethnographic resources (i.e, those resources having some physical manifestation that are of importance to Native peoples originally affiliated with Brooks Camp) include, but are not limited to the following: red salmon (known locally as redfish); landscape features such as the beachline, river mouth and to a lesser degree the falls; former fish rack, cabin, tent sites, and other historic era habitation sites; select plants used in the past for medicinal purposes and as food; a few historic era burials; Dumpling Mountain; and Iliuk Arm of Naknek Lake. A complete list of ethnographic resources, their exact locations, and most importantly, their significance has not yet been documented or assessed.

The ethnographic resources associated with the Brooks River area appear to be rich, varied, and largely undocumented or unassessed. The primary cultural resource investigations in the Brooks Camp area have been archeological, with special emphasis on prehistoric archeology. The preliminary information received from Native consultants suggests that Kitivik or Brooks River area may be eligible for listing on the National Register of Historic Places as a traditional cultural property.

## SITE AND FACILITY ANALYSIS

The current facilities and visitor access in and around the Brooks River area and Valley of Ten Thousand Smokes are described in detail in the "No-Action Alternative" section of "Part Two: Alternatives, Including the Proposed Action." The actual structures and equipment are listed below:

### NPS STRUCTURES

#### Lake Brooks

2 Three-bedroom seasonal use residences
1 Four-bedroom seasonal use residence
1 Utility building with electric power plant contains two diesel generators (15 kW and 20 kW)
1 Carpenter shop
1 Plumbing shop
1 Mechanics shop
1 Lumber storage shed
1 Water system
1 Wastewater system with two lift stations, pressure piping, septic tanks, and leachfield
1 Bathhouse for four-bedroom residence
7 Small buildings (caches/fire hose cabinets/pump house, etc.)
1 Boat dock
1 Aircraft parking pad

#### Brooks Camp

8 Cabins (seasonal use residences)
4 Wall tents (seasonal use residences)
1 Weatherport (seasonal use residence)
1 Ranger office (355 square feet)
1 Visitor contact station (360 square feet)
1 Auditorium (800 square feet)
1 Utility building with electric power plant with three diesel generators (50 kW and two 100 kW)
1 Small generator building for diesel (12 kW generator set)
1 Fish cleaning building
1 Maintenance warehouse/shop and attached laundry and shower house (1,113 square feet)
1 Solid waste handling and incinerator building
1 Building: one-half ranger storage and one-half room for solid waste storage
2 Fuel storage, transfer, and dispensing systems (parking lot and Brooks Camp)
1 Water intake, treatment, reservoir, and distribution system complete with fire pump and hydrants
1 Sewer system complete with septic tanks, lift stations, and leachfield
1 Campground with food storage caches and three shelters

1 Floating footbridge (220 feet long)
2 Bear viewing platforms (falls platform, narrows platform)
8 Small buildings (outhouses/caches/fire hose houses, etc.)
1 Bulkhead ramp and docking site for M/T Ketivik
1 Remainder of dock (river moving has destroyed part of the dock)
Numerous trails connecting buildings and facilities
23+ miles of roadway

**Equipment/Vehicles**

1 Road grader
1 Five-cubic yard dump truck
2 John Deere 450 track loaders
1 Bobcat loader
1 Light duty 4x4 truck
3 Cushman haulsters
1 Suburban
1 Sanitary waste vacuum pumper (1,000 gallon)
1 Freight and fuel hauling vessel for M/T Ketivik (46 feet long by 13 feet wide)
1 Garden tractor with trailer
5 Boats with outboard motors (skiffs)
1 *Boston Whaler* patrol boat (28 feet long)
1 Jetboat (20 feet long)
Numerous small equipment items such as generators, compressors, lawn mowers, pumps)

## CONCESSION STRUCTURES

1 Office
1 Lodge/dining facility
1 Root cellar
1 Guest shower house
1 Skytel (9 guest rooms)
7 Guest cabins
13 Employee cabins
1 Employee shower house
1 Laundry/maintenance building
1 Furnace building

## NATIONAL PARK SERVICE AND CONCESSION OPERATIONS

NPS administration and operation of the Brooks River area and adjoining Valley of Ten Thousand Smokes road corridor constitutes the park's single most major investment in terms of money, personnel, and resource management. Preparation for the seasonal operation of Brooks Camp begins in May with the process of thawing frozen water and sewer lines, repairing utilities, opening buildings, grading the Valley Road, clearing trails, replacing the built-up gravel trail along the lower river, placing the floating bridge in the river, etc. This activity requires that both wheeled and tracked equipment be driven across the lower river to access the camp area. During this time it is not feasible to use boats for transportation, so all access is via floatplane. By the last week of May, a full staff of NPS and concession employees is in place.

The NPS Brooks Camp staff totals approximately 28 seasonal employees and permanent employees stationed in King Salmon in the winter and Brooks Camp in the summer. Roughly one-third of the NPS employees are maintenance workers, one-third are interpreters, and the remainder are protection rangers and biological technicians. Pilots and administrative support staff are based in King Salmon. Depending on the method of considering indirect and fixed costs, it is estimated that 40%–60% of the park's annual base operating budget of $1.3 million dollars is directed toward the operation of Brooks Camp. A staff of approximately 18 Katmailand employees live and work at Brooks Camp during the visitor season, including a camp manager, store/office manager, cooks, servers, bartenders, tour bus drivers, maintenance workers, and maids.

The summer visitor season begins June 1 and extends through September 10. The 16 concession rooms are usually full throughout the season. Campground use is generally light to moderate through late June, but demand usually exceeds the 60-person limit throughout the month of July. Campground use is nearly as heavy during August and is light during the month of September.

Day visitation has constituted the greatest increase in human use of the Brooks River area. This began in the late 1970s and early 1980s when the area was opened to use by commercial use license operations. Numerous private lodges from as far away as Lake Clark National Park and Preserve flew increasing numbers of guests to Brooks River for sportfishing and bear viewing. The development of a large hotel in King Salmon and recent involvement of major tour companies led to increasing numbers of persons being flown to the Brooks River area to view bears and take the bus trip to the Valley of Ten Thousand Smokes. Over the past few years there has been an increasing number of foreign visitors. A small, but growing number of backcountry canoeists and backpackers begin and end their trips at Brooks Camp.

Park rangers attempt to meet and orient all arriving visitors to bear safety concerns. This is often difficult due to the unscheduled and scattered arrival of floatplanes. Ranger patrols are largely focussed on preventing close encounters between visitors and bears. The scattered visitor use patterns often result in rangers not being able to warn visitors of an approaching

bear and to direct them to move out of the area. In many cases, close encounters between bears and visitors are only discovered through secondhand reports.

The concession operation closes on September 10 requiring 10 days to complete. A battery powered electric fence is erected around the concessioner's lodge and office/camp store buildings to discourage bear damage. Two park staff usually remain in the camp to meet visitors through October 1.

Katmailand, Inc. is authorized through a concession contract that expires on December 31, 1996, to provide facilities and services at Brooks Camp as described in the no-action alternative.

# PART FOUR:
# ENVIRONMENTAL CONSEQUENCES

Bears Attracted to Sewage Line Inspection Plate
Near Fish Cleaning Building

## IMPACTS OF NO-ACTION ALTERNATIVE

### IMPACTS ON NATURAL RESOURCES

#### Topography and Soils

Impacts on the topography and soils would be confined to the immediate area of Brooks Camp and NPS structures and utilities at Lake Brooks. No new areas would be developed, and the Valley Road would not be widened. Brooks Camp would be expected to continue incrementally expanding its development footprint on the peninsula as needs arise for new buildings and more space. Without visitation limits no projections can be given to the ultimate size that the expansion for visitor services north of the river may reach. The septic system would have to be expanded, constructing more leachfields on the peninsula. It is currently recognized that there is little space in which to do so. A continued, expanded presence at Brooks Camp would create severe septic system problems in the near future, especially with the continued use of the fish cleaning building. The septic system failures now happening at Brooks Camp are attributed to increased visitor use and groundup fish waste. The topography around Brooks Camp is also a contributing factor to the septic system failures because it is low elevation, contains a lot of volcanic ash, and has a high water table. Over time, fuel oil leak remediation actions would improve subsurface conditions in the area. Contaminated soils would be disposed of in an environmentally sensitive manner. Silt fences would be used during all phases of ground disturbance to prevent erosion and water pollution.

#### Hydrology

The hydrology of the Brooks River mouth would continue to be confined by the constructed trail tread leading to the floating bridge on the north side of the river, and confined on the south side by the gravel roadbed leading to the barge dock. Both of these gravel barriers prohibit natural hydrographic flows between the marshes and the river mouth. Because of the existing facility arrangement and operational needs, the gravel trail and gravel road must be maintained in the no-action alternative even to the detriment of a naturally flowing river system.

The shallow water table in the vicinity of Brooks Camp has been contaminated with fuel oil leaks. Remediation efforts are underway and will continue into the future.

The water table would also eventually become contaminated from the failed septic systems. Odors from the septic systems already occur from time to time during system failures. The leachfield failed in 1995 and had to be replaced. It still is under capacity, and further actions are required to meet standards.

No restoration of the natural hydrology would occur under the no-action alternative. Floodplains would be unaffected by this alternative. Wetlands would continue to adjust to the manipulation of natural flows at the river mouth.

### Vegetation

There would be minimal impacts on terrestrial vegetation in the area. Localized clearing of vegetation would be undertaken as the camp facilities expanded. Trimming of trees and shrubs along the trails for better sight distance in bear habitat, and clearing of grass along the trail segment approaching the falls platform would continue in an effort to reduce chance human/bear encounters. Marsh vegetation (wetlands) would continue to adjust to the artificial water impoundments created by the trail and road. Fisherman trails in the marshes of the Oxbow in the lower river would continue to widen as angling pressure on the lower river increases.

### Wildlife and Fish

Wildlife in the Brooks River area would be negatively affected by the no-action alternative because nothing is proposed to isolate the facilities that are in prime bear habitat. Access to Brooks Camp by floatplane would still be along Naknek Beach, a known bear travel corridor. The campground would remain in its present location, which would require continued maintenance of two bear-free areas inside prime bear habitat. Human/bear encounters would increase as unchecked visitation also increased. Habituation and food conditioning in the local bear population would undoubtedly increase as viewing platforms became chronically overcrowded and anglers in the lower river stayed concentrated at the floating bridge. Other species of wildlife, less tolerant of humans would abandon the river, as have nesting bald eagles in the recent past.

Fish habitat and water quality would continue to be marginally affected by multiple stream crossings of heavy equipment to open camp in the spring. These crossings are completed prior to the first anadromous red salmon migrating up Brooks River in late June. The crossings occur at the river mouth in fine silt deposits, which are not generally used as spawning areas for salmon and rainbow trout. Farther upstream, placement of the floating bridge is done over a known spawning area.

### Species of Special Concern/Critical Habitats

No state or federally listed species or their critical habitats would be affected by the no-action alternative.

### Designated Wilderness

No federally designated or recommended wilderness would be directly affected by this alternative. The lack of use limits for the Brooks River area could eventually translate into more visitation to bear watching areas on the edge of or within wilderness as the visitor experience degrades due to crowding. Alternate sites to Brooks River, like Margot Creek and Savonoski

River, may receive additional visitor pressures. In its next revision, the park's *Backcountry Management Plan* should address the potential that a lack of use limits at Brooks River would have on wilderness.

## IMPACTS ON CULTURAL RESOURCES

### Prehistoric

Development has already occurred on four archeological sites that are contributing elements to the national historic landmark status. Because many archeological remains are deeply buried at Brooks Camp, and because these remains are not continuous across the entire development area, it is difficult to determine the exact location of concentrations of resources. These four archeological sites annually receive some direct or indirect impacts from routine maintenance activities and from corrective actions taken to fix broken pipes. The continued presence of intensive development on nationally significant archeological resources constitutes an adverse effect.

The trail to the falls platform crosses over several barabaras. In many places, visitor traffic has caused erosion to the protective layer of Katmai ash. Continued use of the trail would continue to erode these significant resources.

The cultural resources in the Brooks River Archeological District are nationally significant. Under the terms of sections 106 and 110(f) of the National Historic Preservation Act, the National Park Service is obligated to take the presence of these resources into consideration when any action is undertaken that could damage these resources. Whenever it is feasible, the known cultural resources would be avoided. Because the effects are potentially adverse, the National Park Service would enter into an agreement with the State Historic Preservation Office, the Advisory Council on Historic Preservation, and appropriate Native Alaskan groups to mitigate the effects on archeological and ethnographic resources. This agreement may require the continued presence of an archeologist on staff to approve and monitor all ground-disturbing activities, amounting to a substantial long-term operational cost.

In areas that have not been previously surveyed for cultural resources, such surveys would be conducted and any newly discovered archeological, ethnographic, or historic resources would be evaluated for their significance before any proposed action would be undertaken.

### Historic

There would be no impacts on the historic structures.

### Ethnographic

Local Native Alaskan groups are very much concerned about the real possibility that recent Native Alaskan burials may be impacted by routine maintenance activities in the existing Brooks Camp development, as well as other potentially significant ethnographic resources in the area. Through scoping meetings on this plan the National Park Service has begun a dialogue with the appropriate Native Alaskan groups to ensure that their concerns are heard throughout the planning process.

## IMPACTS ON VISITOR EXPERIENCE AND SAFETY

### Interpretation and Education

The 1993 *Interpretive Prospectus* has set in motion a number of interpretive and educational message and media changes that would greatly improve those two programs at Brooks Camp and on the tour to the Valley of Ten Thousand Smokes. In the face of unchecked increases in day use, it would be difficult to achieve a significant reduction in the number of human/bear encounters.

### Effect of Visitor Use Limits

The lack of visitor use limits would have a negative, detrimental impact on the visitor experience at Brooks River. With no limits, the resources and facilities would become increasingly crowded. Brooks Camp has already experienced a 900% growth in visitation in the past decade (see table 1). Considering the growth trend, unchecked, uncontrolled visitation would eventually overtake the visitor capacity of the area and the precious experience would be lost.

### Reduction of Human/Bear Conflicts

In the absence of visitor use limits, education about appropriate visitor behavior in bear habitat is the recognized way to attempt to reduce human/bear conflicts. The no-action alternative does not have the breadth or vision to make a significant contribution toward achieving this mandate from the 1986 *General Management Plan.* In the other alternatives, actions such as establishing use limits, creating bear travel corridors, and relocating the campground are proposed to achieve a reduction in human/bear incidents from its current level. These actions are significant enough to be considered outside the purview of the no-action alternative.

### River Corridor Management

No changes in fishing regulations or temporary closures on the river would be recommended in the no-action alternative. The river would remain open to all fly-in sportfishing parties.

### Valley of Ten Thousand Smokes Tour Improvements

No improvements to facilities at Margot Falls or Three Forks overlooks would be proposed. Channel manipulation by heavy equipment above the three stream crossings on the Valley Road would still be carried out. Appropriate permits to continue doing so would be sought (see appendix F). Improvements in interpretation on the valley tour would be carried out according to the 1993 *Interpretive Prospectus*.

## ECONOMIC IMPACTS

### Subsistence

There would be no significant restriction on subsistence uses under the no-action alternative. For a description of the impacts on subsistence users, see appendix G.

### Concession Operations

Under this alternative the concessioner's business would continue at its current level, with no additional major development or staffing costs. The concessioner could expect increased revenues from a growing number of day users purchasing lunch, fishing tackle, and other services. No major construction would be undertaken. Minor facility improvements would be expected around camp, especially expansion of the lodge and dining room. Impacts on concessions operations would center around the best way to accommodate unregulated day use in and around camp.

### Regional Tourism

The impact on regional tourism would not change from current conditions under this alternative, except that increased flights to Brooks Camp can be expected in the absence of established day use limits. Lodge and campground use would remain limited to 60 persons per night per facility. Passenger carriers and surrounding fishing lodges that hold commercial use licenses would benefit locally by taking advantage of unregulated day use in the Brooks River area.

### Minority and Low Income Populations and Communities

The Department of the Interior's policy on environmental justice (Executive Order 12898) requires the National Park Service evaluate the impacts on minority and low income populations and communities. The impact on minority and low income populations is unknown; however, if there are any effects, they are expected to be insignificant.

## CUMULATIVE IMPACTS

Cumulative impacts on park resources in the Brooks River area are most obvious regarding continuing negative impacts on cultural resources and continuing occupation of prime bear habitat by incrementally expanding visitor use facilities. Degradation of water quality in the area is a direct result of facility systems failures in the area. The physical presence of remediation efforts and technology north of the river for at least the next decade is a cumulative impact resulting from the perpetuation of no action since the 1986 *General Management Plan.*

The no-action alternative would have a long-term negative cumulative impact on the visitor experience because no attempt would be made to control the growth in day use. As the area becomes more popular, the demands for more and better visitor services would increase. Growth in visitor use north of the river, greater than that which occurred in the early 1990s, would have negative cumulative impacts on the local bear population. Eventually no section of the lower river below the falls would be free of people at any given daylight hour in July. Only those excessively habituated bears with exceptional tolerance of people would be left on the river. The past decade has shown a 900% increase in visitor use for the Brooks River area with no slowing of the trend in sight. To overwhelm the resource by sheer numbers so that the very experience people seek is no longer available is the ultimate cumulative impact.

## IMPACTS OF ALTERNATIVE 1: MINIMUM REQUIREMENTS

### IMPACTS ON NATURAL RESOURCES

#### Topography and Soils

Impacts on the topography and soils would be confined to the immediate area of Brooks Camp, NPS structures and utilities at Lake Brooks, and the proposed management support facility on the Valley Road. Brooks Camp facilities would be expanded by construction of a new visitor center, a barge dock, an elevated footbridge/boardwalk, cooking shelters in the campground, lodge and dining room expansion, and improvements at the barabara exhibit. Once these improvements were completed, no further expansion of the Brooks Camp development footprint on the peninsula would be allowed. Additional impacts on the topography and soil, in a spatial sense, would cease.

Impacts would continue through routine and nonroutine maintenance activities. The septic system would have to be expanded, constructing more leachfields on the peninsula. And currently there is little space in which to do so. A continued, expanded presence at Brooks Camp would create severe septic system problems in the near future, especially with the continued use of the fish cleaning building. The septic system failures now happening at Brooks Camp are attributed to increased visitor use and groundup fish waste. The topography around Brooks Camp is also a contributing factor to the septic system failures, because it is low elevation, contains a lot of volcanic ash, and has a high water table. Over time, fuel oil leak remediation actions would improve subsurface conditions in the area. Contaminated soils would be disposed of in an environmentally sensitive manner. Silt fences would be used during all phases of ground disturbance to prevent erosion and water pollution.

The proposed management support facility, consisting of an employee housing area, a maintenance area, and a research facility, would occupy a small part of an approximately 30-acre development "zone" along the Valley Road near to and including the existing gravel pit. Actual site design would be dependent on the combined attributes of the area. No determination of exact locations for facilities such as houses, vehicle parking areas, and maintenance shops is made in this plan.

About 1/3 acre of spruce forest would be revegetated in the Brooks River area by the rehabilitating the parking area and fuel storage lot, the Lake Brooks maintenance area, and the Lake Brooks generator facility.

#### Hydrology

The gravel trail on the north side of the river would be allowed to erode reestablishing the natural flow of water between the Oxbow marsh and the river mouth. Access to and over the river from Brooks Camp would be by the elevated boardwalk and footbridge. The hydrology

of the Brooks River mouth would continue to be confined on the south side by the gravel road bed leading to the barge dock. This gravel road prohibits natural hydrologic flows between the marsh south of the river and the river itself. Because of the existing facility arrangement and operational needs, the gravel road must be maintained in the minimum requirements alternative even to the detriment of a naturally flowing river system.

The shallow water table in the vicinity of Brooks Camp has been contaminated with fuel oil leaks. Remediation efforts are underway, and will continue into the future.

The water table would also eventually become contaminated from the failed septic systems. Odors from the septic systems already occur from time to time during system failures.

Floodplains would be unaffected by this alternative. Wetlands would continue to adjust to the manipulation of natural flows at the river mouth. Wetlands areas would be avoided in the selection of locations for any proposed development.

### Vegetation

Minimal impacts on terrestrial vegetation in the immediate Brooks Camp area would occur. Localized clearing of vegetation would result as the proposed facilities were constructed. Some clearing of vegetation would be necessary to establish a bear travel corridor around the north perimeter of Brooks Camp, but the amount would not be extensive. Trimming of trees and shrubs along the trails for better sight distance in bear habitat, and clearing of grass along the trail segment approaching the falls platform would continue in an effort to reduce chance human/bear encounters. Marsh vegetation would continue to adjust to the artificial water impoundment created by the gravel road out to the barge dock south of the river. Fisherman trails in the marshes of the Oxbow in the lower river would continue to widen as angling access to the lower river continues from the direction of Brooks Camp.

Small patches of white spruce forest would be cleared within a 30 acre-development zone for construction of the proposed management support facility. About 0.3 acre of white spruce forest would be revegetated through the removal of parking and maintenance areas elsewhere in the Brooks River area.

### Wildlife and Fish

Wildlife in the Brooks River area would be negatively affected by the minimum requirements alternative because nothing is proposed to remove or isolate the facilities that are in prime bear habitat, except the construction of a bear travel corridor around the northern perimeter of the camp and continued aversive conditioning of trespass bears by resource management rangers. Access to Brooks Camp by floatplane would still be along Naknek Beach which is a known bear travel corridor. The campground would remain in its present location which would require resource management to continue to maintain two bear-free areas inside prime bear

habitat. However, construction of bear-proof cooking shelters would greatly improve bear management in the campground.

The development footprint and zone of human influence would be greatly expanded in the Brooks River area. This would have a negative effect on overall bear use at Brooks River. Construction of the proposed management support facility along the Valley Road would create some new problems including the establishment of a new bear-free zone that would require effort to maintain, and increased movement of people through high-use bear areas between Brooks Camp and the new facilities, including during early morning and late night hours.

Fish habitat and water quality would continue to be marginally impacted by multiple stream crossings of heavy equipment to open camp in the spring. These crossings are completed prior to the first anadromous red salmon migrating up Brooks River in late June. The crossings occur at the river mouth in fine silt deposits, which are not generally used as spawning areas for salmon and rainbow trout. Farther upstream, placement of the floating bridge is done over a known spawning area. Construction of the elevated bridge would eliminate the need to assemble and disassemble the floating bridge every year with minor affects on anadromous fish habitat.

### Species of Special Concern/Critical Habitats

No state or federally listed species or their critical habitats would be affected by the minimum requirements alternative.

### Designated Wilderness

No federally designated or recommended wilderness would be affected by this alternative. The establishment of use limits on Brooks River could give cause for guides to seek out other fishing and bear viewing areas in the park that may be in designated wilderness. In its next revision, the park's *Backcountry Management Plan* should address the potential that established use limits at Brooks River would have on designated wilderness in its next revision.

## IMPACTS ON CULTURAL RESOURCES

### Prehistoric

The continued presence of intensive development on nationally significant archeological resources constitutes an adverse effect.

The cultural resources in the Brooks River Archeological District are nationally significant. Under the terms of sections 106 and 110(f) of the National Historic Preservation Act, the National Park Service is obligated to take the presence of these resources into consideration

when any action is undertaken that could damage these resources. Whenever it is feasible, known cultural resources would be avoided. However, continued occupation of the Brooks Camp area may constitute an adverse effect. Therefore, the National Park Service would negotiate a memorandum of agreement to mitigate adverse effects. This agreement would be between the National Park Service, the State Historic Preservation Officer, the Advisory Council on Historic Preservation, and appropriate Native Alaskan groups. This agreement would probably require the continued presence of an archeologist on staff to approve and monitor all ground-disturbing activities, amounting to a substantial, long-term operations cost.

In areas that have not been previously surveyed for cultural resources, such surveys would be conducted and any newly discovered archeological or ethnographic resources would be evaluated for their significance before any proposed action would be undertaken.

Ongoing impacts on the four archeological sites under the existing Brooks Camp development would be lessened somewhat by the construction of at grade utility corridors and a moratorium on all future expansion after the facility improvements proposed in this alternative are completed.

Archeological remains are known from the barabara area. Surveys would precede any renovations proposed for the barabara exhibit.

The extent of archeological remains in the location for the proposed visitor center are unknown, but are expected to be less than in other undeveloped areas of Brooks Camp. Archeological tests in the immediate vicinity have yielded negative results.

Archeological and ethnographic surveys would be conducted in the areas of the proposed elevated boardwalk, proposed barge dock, and proposed river mouth overlook. These areas are expected to contain few artifacts.

The trail to the falls platform crosses over several barabara. In many places, visitor traffic has caused erosion of the protective layer of Katmai ash. Continued use of the trail would perpetuate erosion of these significant resources. Short sections of boardwalks are proposed to curtail trampling in archeological sites. Proposed improvements for access to the falls platform, as discussed in the "Actions Common to All Development Alternatives" section of "Part Two: Alternatives, Including the Proposed Action" would primarily protect archeological and ethnographic resources, but would also reduce human/bear encounters, and provide increased visitor enjoyment without significantly impacting the resources.

Surveys would be conducted of the proposed management support facility on the road to the Valley of Ten Thousand Smokes. No specific locations have yet been determined, except for the proposal that the maintenance area be sited in or near the existing gravel pit.

### Historic

There would be no impacts on the historic structures.

### Ethnographic

Some Native Alaskan groups have indicated a concern about impacts on an archeological site known to have been used in the 20th century, and which is located on the narrow stretch of land between the Beaver Pond and Naknek Lake. No development is proposed near this site. There may be other ethnographic resources in the area of concern to specific groups of people.

## IMPACTS ON VISITOR EXPERIENCE AND SAFETY

### Interpretation and Education

The 1993 *Interpretive Prospectus* has set in motion a number of interpretive and educational message and media changes that would greatly improve those two programs at Brooks Camp and on the tour to the Valley of Ten Thousand Smokes. With established use limits for all day and overnight use, the interpretive program would be able to assist in efforts to reduce the number of human/bear encounters in the Brooks River area. The new visitor center would become the focus for visitor education on appropriate human behavior when encountering bears.

### Effect of Visitor Use Limits

Visitor use limits would have a positive impact on the visitor experience at Brooks River. The proposed limits on visitation would allow for adequate time on the bear viewing platforms and would help preserve the uncrowded fishing experience. Lodge and campground use limits would be unaffected in this alternative, but day users would be reduced from a July average of 80 per day to a limit of 60 per day, which would ease some of the pressure, especially on the peak days, in the Brooks River area.

### Reduction of Human/Bear Conflicts

The minimum requirements alternative would make a contribution toward achieving the 1986 *General Management Plan* mandate to reduce human/bear conflicts in the Brooks River area. By establishing use limits, creating a bear travel corridor around the northern perimeter of Brooks Camp, constructing bear-proof cooking shelters in the campground, and replacing the floating bridge with an elevated footbridge over the river, many of the human/bear encounters and bear trespass incidents that are caused by existing conditions would no longer happen.

### River Corridor Management

The temporary closures and fishing regulation changes discussed in the "Actions Common to All Development Alternatives" section would be recommended under this alternative. Catch-and-release-only and temporary closures during high bear use would greatly reduce the number of human/bear conflicts occurring along the river. The visitor experience would be enhanced by less encounters with bears and by fewer warnings and/or citations to anglers and photographers. Numerous alternative recreational fishing opportunities exist within the park and in the overall Bristol Bay region during temporary closures on Brooks River.

### Valley of Ten Thousand Smokes Tour Improvements

The proposed minor developments at the Research Bay, Margot Falls, and Three Forks overlooks, as discussed in the "Actions Common to All Development Alternatives" section, would be entirely consistent with the proposed upgrade of the visitor experience on this tour. Physical impacts would be minimal, most of them repairing damaged areas that have experienced trampling of vegetation and trail erosion. Channel manipulation by heavy equipment above the three stream crossings on the Valley Road would still be conducted. Necessary permits would be obtained.

## ECONOMIC IMPACTS

### Subsistence

There would be no significant restriction on subsistence uses under alternative 1. For a description of the impacts on subsistence users, see appendix G.

### Concession Operations

Under this alternative the concessioner's business would continue at its current level, with only minimal development costs and no increased staffing costs.

### Regional Tourism

The minimum requirements alternative would have little effect on the regional or local economy. Lodge use and campground use would remain limited to 60 persons per night for each facility. Expenditures by day users would be expected to remain relatively constant with existing conditions. Commercial use license holders from fly-in camps may lose revenue due to day use limits.

### Minority and Low Income Populations and Communities

The Department of the Interior's policy on environmental justice (Executive Order 12898) requires that the National Park Service evaluate the impacts on minority and low income populations and communities. The impact on minority and low income populations in unknown; however, if there are any effects, they are expected to be insignificant.

## CUMULATIVE IMPACTS

Cumulative impacts on park resources in the Brooks River area are most obvious regarding continuing negative impacts on cultural resources and continuing occupation of prime bear habitat by incrementally expanding visitor use facilities. Degradation of water quality in the area is a direct result of facility systems failures in the area. The minimum requirements alternative would have a long-term negative cumulative impact on prime bear habitat north of the river. As the area becomes more popular, the demands for more and better visitor services would continue.

The removal of small patches of white spruce forest in an approximately 30-acre development zone for the proposed management support facility would have a minor negative impact on this area of disturbed white spruce forest that already has the Valley Road cut through it. The proposed actions in this alternative would temporarily disrupt wildlife populations in the immediate area. Development of a new management support facility along the Valley Road would not be related to any other proposed development on park lands, except for minor improvements along the Valley Road at the three overlooks. Development of small areas within a 30-acre development zone of white spruce forest is insignificant when compared to the remaining thousands of acres of white spruce forest in the park and preserve. Also, the moratorium on future construction north of the river that would go into effect after the proposed facilities were completed would be a related positive cumulative impact of this alternative. All future facility expansions would be constructed in the management support facility, and not on the Brooks Camp peninsula in the middle of prime bear habitat and river access corridors.

## IMPACTS OF ALTERNATIVE 2: FORMER PROPOSAL IN THE DRAFT DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT – BEAVER POND TERRACE

### IMPACTS ON NATURAL RESOURCES

#### Topography and Soils

Removal of all facilities north of the river would result in approximately 3 acres of land that would be rehabilitated after remediation actions were completed. Over time, fuel oil leak remediation actions would improve subsurface conditions in the area. Contaminated soils would be disposed of in an environmentally sensitive manner. The road from the existing barge dock to the proposed visitor contact station would be converted to trail use. Removal and revegetation of the parking and fuel storage area and Lake Brooks facilities would rehabilitate about 1/3 acre. Proposed development areas, except for the contact station and trailhead, are on higher ground with more porous soils that drain easily, resulting in fewer problems with the septic systems.

Physical impacts on topography and soils would occur south of the river along the road corridor that links the proposed visitor contact station and trailhead with the proposed visitor center and lodge on the terrace and proposed management support facility on the Valley Road. This road would be widened to accommodate two-way shuttle traffic. A two-lane gravel shuttle road would be built from the Valley Road along the Beaver Pond terrace down to the proposed primary access site on Naknek Lake. The combined area of disturbance for widening of existing roads and construction of the new road would be approximately 13 acres.

The proposed management support facility, consisting of an employee housing area, a maintenance area, and a research facility, would occupy an area of white spruce forest about 30 acres in extent, along the Valley Road. Actual site design would be dependent on the combined attributes of the area. No determination of exact locations for proposed facilities such as houses, vehicle parking areas, and maintenance shops is made in this plan. Additional environmental compliance and review would be undertaken as specific locations are selected.

The proposed public area and campground on the Beaver Pond terrace would occupy a small area of white spruce forest within a 60-acre development zone. Most of this area would be left natural for vegetative screening between the lodge, cabin units, visitor center, and other public places. The entire development would be set on the level terrace landform. No sidehill development is proposed due to environmental concerns and the facility relationship with the Beaver Pond at the base of the terrace. Site selection for each facility would be dependent on the characteristics of the site; therefore, no specific locations for the visitor center, lodge, or cabin units are illustrated in this plan. Additional environmental compliance and review would be undertaken as specific locations are chosen.

Lesser proposed facilities such as trails, contact stations, and viewing platforms would collectively impact about 2 acres of white spruce forest. An estimated total of 105 acres of white spruce forest would be impacted in various degrees in this alternative. Some acres would be cleared for roads, houses, a maintenance facility, a visitor center, a lodge, and other structures while most would be retained in a natural state for vegetative screening between facilities. The best available erosion control technology would be used to surround the construction areas. Approximately 3.5 acres of developed land in the Brooks River area would be revegetated to approximate its natural species composition.

### Hydrology

The gravel trail on the north side of the river would be allowed to erode reestablishing the natural flow of water between the Oxbow marsh and the river mouth. The hydrology of the Brooks River mouth would continue to be confined on the south side by the gravel road bed leading to the barge dock. Although this gravel road would be converted to trail use it would still prohibit natural hydrographic flows between the marsh south of the river and the river itself unless culverts were put in place to reconnect the marsh and the river.

The shallow water table in the vicinity of Brooks Camp has been contaminated with fuel oil leaks. Remediation efforts are underway and will continue into the future. Removal of all facilities north of the river would stop further contamination of the water table by fuel oil leaks. In time, water quality in the shallow water table would be substantially improved.

Floodplains would be unaffected by this alternative. Wetlands would continue to adjust to the manipulation of natural flows at the river mouth. No wetlands would be impacted on the Beaver Pond terrace. Impacts on wetlands along the river would be avoided. Septic systems in the new developed areas would be constructed so as not to affect water quality in the Beaver Pond. In this alternative, a monitoring program would be established to document water quality trends in the Beaver Pond and at selected points along Naknek Lake and Brooks River. Wells would have to be drilled to supply the new development.

### Vegetation

Trimming of trees and shrubs along the trails for better sight distance in bear habitat, and clearing of grass along the trail segment approaching the falls platform would continue in an effort to reduce chance human/bear encounters. Marsh vegetation would adjust to the new water regime created by culverts in the gravel road out to the barge dock south of the river. Fisherman trails in the marshes on the northern bank of the Oxbow in the lower river would eventually recover since no one would be accessing the river from that direction any longer.

Small patches of white spruce forest would be cleared within an area of about 30 acres for construction of the proposed management support facility. Similarly, small patches of white spruce would be cleared within an area of about 60 acres for construction of the public use

area and campground. New road construction and widening of existing road segments would clear about 13 acres of white spruce forest. These 103 acres, out of the thousands of acres of white spruce forest in the park and preserve, are less valuable in terms of essential habitat when compared to the reality of returning the north side of Brooks River to a wild state for the benefit of the local bear population and other wildlife dependent on the river.

### Wildlife and Fish

The reduction of human activity in the high-use bear area north of Brooks River would be a positive benefit, particularly to nonhabituated and less people-tolerant bears. Human activity would be restricted to the Dumpling Mountain trail and around the remediation sites. After removal of Brooks Camp facilities, access to the area for remediation work would still be along the Naknek Lake beach, north of the river. The local bears would soon learn that they now have unencumbered access to the entire Brooks River from the north bank. The area between the river and the denning areas at the foot of Dumpling Mountain would be a people-free zone. The area of remediation activities would have to be managed as a bear-free zone while being actively worked. Other wildlife that use the river would also benefit from the absence of human activity along the north side of the river. The salmon runs would no longer be slowed by the floating bridge, nor would any spawning or juvenile rearing habitat be disturbed by multiple crossings of heavy equipment to maintain Brooks Camp operations and facilities.

Development on the Beaver Pond terrace would be in an area that is about 1 mile south of prime bear habitat along Brooks River. This development and the proposed management support facility along the Valley Road would have very little impact on brown bear habitat and population in the Brooks River area. Special consideration for the maintenance of the ecological integrity of the Beaver Pond below the terrace would be incorporated into the design of the proposed public area and campground. Site selection would take into account the variable resource attributes of the terrace for the best locations for the visitor center, lodge, guest cabins, campground, and lesser facilities. This plan recognizes the connection between the Beaver Pond nesting habitat and the Brooks River feeding habitat for waterfowl. From a cultural and wildlife perspective, this plan considers the Beaver Pond as an extension of the Brooks River prime resource area and thus would be managed to avoid human impacts.

### Species of Special Concern/Critical Habitats

No state or federally listed species or critical habitats would be affected by the proposed relocation to the Beaver Pond terrace.

### Designated Wilderness

No federally designated or recommended wilderness would be affected by this alternative. The establishment of use limits on Brooks River could give cause for guides to seek out other

fishing and bear viewing areas in the park that may be in designated wilderness. In its next revision, the park's *Backcountry Management Plan* should address the potential that established use limits at Brooks River would have on designated wilderness in its next revision.

## IMPACTS ON CULTURAL RESOURCES

### Prehistoric

Removal of existing development north of the river would result in some additional disturbance to archeological sites. In particular, the area near the Skytel is known to contain human burials. Human bones may lie in existing utility trenches. When the existing development is removed from the north side of the river, all belowground intrusions, including utility lines, foundation posts, and leachfields, would be left in place to eliminate any further disturbance to archeological resources.

The trail to the falls platform crosses over several barabaras. In many places, visitor traffic has caused erosion of the protective layer of Katmai ash. Continued use of the trail would perpetuate erosion of these significant resources. Short sections of boardwalks are proposed to curtail trampling in archeological sites. Proposed improvements for access to the falls platform, as discussed in the "Actions Common to All Development Alternatives" section, would primarily protect archeological and ethnographic resources, but would also reduce human/bear encounters, and provide increased visitor enjoyment without significantly impacting the resources.

An archeological site is known to exist at the cutbank. The proposed cutbank platform would be placed in an area with the fewest archeological resources avoiding the archeological site. The trail to the proposed cutbank platform would be routed to avoid the numerous archeological features in the area.

The proposed barabara exhibit at the end of the shuttle road would be sited near but not on a known archeological site, in order to use the visible pits in interpretation. However, the barabara would not be constructed on a known site.

Archeological and ethnographic surveys would be conducted for the proposed management support facility on the road to the Valley of Ten Thousand Smokes. No specific locations have yet been determined, except for the proposal that the maintenance area be sited in or near the existing gravel pit.

Reconnaissance level archeological surveys of the Beaver Pond terrace and the proposed road corridors revealed no evidence of archeological sites. It is extremely unlikely that sites of the significance of those near the Brooks River would be found on the Beaver Pond terrace. There is a remote possibility that relatively small remains of hunting camps may lie buried in the proposed developed area, as well as sites of ethnographic significance. Intensive archeological surveys to find those sites were not undertaken for this plan because, in the best

professional judgment of archeologists familiar with the area, the level of survey that would be required to find such small and scattered remains before specific locations for structures and roads were determined would be prohibitively expensive. These small sites, if they exist at all, can easily be avoided during project design.

### Historic

There would be no impacts on the historic structures.

### Ethnographic

Some Native Alaskan groups have indicated a concern about impacts on an archeological site known to have been used in the 20th century, located on the narrow stretch of land between the Beaver Pond and Naknek Lake. No development is proposed near this site in this alternative. There may be other ethnographic resources in the area.

## IMPACTS ON VISITOR EXPERIENCE AND SAFETY

### Interpretation and Education

The 1993 *Interpretive Prospectus* has set in motion a number of interpretive and educational message and media changes that would greatly improve those two programs in the Brooks River area and on the tour to the Valley of Ten Thousand Smokes. With established use limits for all day and overnight use, the interpretive program would be able to assist in efforts to reduce the number of human/bear encounters in the Brooks River area. The visitor contact station at the Brooks Falls trailhead would become the focus area for visitor education on appropriate human behavior when encountering bears.

### Effect of Visitor Use Limits

Visitor use limits would have a positive impact on the visitor experience at Brooks River. The proposed limits on visitation would allow for adequate, but not lengthy, time on the bear viewing platforms and would help preserve the uncrowded fishing experience. Lodge and campground use limits would be increased in this alternative to 75 per night, but day users would be reduced from an average of 80 per day to 40. Including 70 operational staff this alternative would establish the experiential and resource maximum capacity of the Brooks River area at around 260 people per day. This is somewhat more crowded than what now occurs.

### Reduction of Human/Bear Conflicts

This alternative would substantially reduce human/bear conflicts in the Brooks River area. By eliminating all human activity north of the river, except for the required remediation efforts and occasional hikers on the Dumpling Mountain trail, the area that now has the majority of human/bear encounters and conflicts would mostly be back in a wild setting. Human/bear conflicts would still occasionally occur in the river corridor, and cannot be completely avoided. This alternative would provide three viewing platforms with fishermen access to avoid encounters with bears in the river. The proposed safe haven at the river mouth would also help in reducing human/bear encounters. Consolidation of the maintenance and housing area into a single proposed management support facility away from bear habitat, instead of having housing and maintenance in five different areas as under existing conditions, would greatly reduce the potential for human/bear encounters. Consolidation of public facilities away from bear habitat, up on the Beaver Pond terrace, would also be a factor in reducing human/bear encounters.

### River Corridor Management

The temporary closures and fishing regulation changes discussed in the "Actions Common to All Development Alternatives" section would be recommended under this alternative. Catch-and-release-only and temporary closures during high bear use would greatly reduce the number of human/bear conflicts occurring along the river. The visitor experience would be enhanced by less encounters with bears and by fewer warnings and/or citations to anglers and photographers. Numerous alternative recreational fishing opportunities exist within the park and in the overall Bristol Bay region during temporary closures on Brooks River.

### Valley of Ten Thousand Smokes Tour Improvements

The proposed minor developments at the Research Bay, Margot Falls, and Three Forks overlooks, as described in the "Actions Common to All Development Alternatives" section, would be entirely consistent with the proposed upgrade of the visitor experience on this tour. Physical impacts would be minimal, most of them repairing damaged areas that have experienced trampling of vegetation, and trail erosion. Channel manipulation by heavy equipment above the three stream crossings on the Valley Road would still be conducted. Necessary permits would be obtained (see appendix F).

## ECONOMIC IMPACTS

### Subsistence

There would be no significant restriction on subsistence uses under alternative 2. For a description of the impacts on subsistence users, see appendix G.

### Concession Operations

Under this alternative the concessioner's business would increase in terms of number of lodging rooms and anticipated other sales. The relocation costs would be substantial for a business of this size and type, particularly considering the seasonality of its operation. Construction costs of the new facilities could be offset somewhat by the government's compensation for the concessioner's interest in and removal of existing facilities. The amount of this compensation would be governed by concession contract provisions, and is anticipated to be significant; however, it is also anticipated that the government would be required to subsidize the concessioner's relocation in order for it to be feasible. A full feasibility study, prior to development, is needed to determine how the construction would be funded.

### Regional Tourism

The proposal to relocate Brooks Camp facilities to the Beaver Pond terrace would have a short-term, positive effect on the local economy through the construction phases. Regional tourism would not be expected to increase in the Brooks River area because of the proposed use limits in effect. Lodge use and campground use would be limited to 75 persons per night for each facility. Day use limits would be reduced to 40 per day. Commercial use license holders from fly-in camps may lose revenue due to day use limits.

### Minority and Low Income Populations and Communities

The Department of the Interior's policy on environmental justice (Executive Order 12898) requires that the National Park Service evaluate the impacts on minority and low income populations and communities. The impact on minority and low income populations in unknown; however, if there are any effects, they are expected to be insignificant.

## CUMULATIVE IMPACTS

Cumulative impacts resulting from the relocation of Brooks Camp facilities to the Beaver Pond terrace would be largely beneficial for resources north of the river and for the visitor experience along the river. South of the river, impacts on natural resources on the Beaver Pond terrace would be largely negative due to the large scale of new development and access to the terrace, but impacts on the visitor experience would be positive.

The establishment of a people-free zone and removal of all facilities north of the river would have a continued positive effect on the cultural resources by reducing and eventually removing the current long-term impacts on archeological and ethnographic resources in the vicinity of Brooks Camp.

The long-term cumulative impact on the Brooks River bear population and their habitat by the proposal would be beneficial. All overnight and major day use facilities would be removed from prime bear habitat.

The removal of small patches of white spruce forest in development zones of approximately 30 acres for the proposed management support facility, approximately 60 acres for the proposed public area and campground, and approximately 13 acres for road access (total of 103 acres of development zones) would have a negative impact on this area of virgin forest that has grown undisturbed since the great eruption of June 1912. The actions in this alternative would be extremely intrusive on the wild lands of the Beaver Pond terrace, and would permanently alter wildlife populations in the immediate area. Development on the Beaver Pond terrace would not be related to any other proposed development impacts on park lands. The benefits to the prime resource area far outweigh the negative impacts of new construction in an area that was not recommended for wilderness designation because of its proximity to development (NPS 1986b, 1988a).

## IMPACTS OF ALTERNATIVE 3: ILIUK MORAINE TERRACE

### IMPACTS ON NATURAL RESOURCES

#### Topography and Soils

Removal of all facilities north of the river would result in approximately 3 acres of land that would be rehabilitated after remediation actions were completed. Over time, fuel oil leak remediation actions would improve subsurface conditions in the area. Contaminated soils would be disposed of in an environmentally sensitive manner. The road from the existing barge dock to the proposed visitor contact station would be converted to trail use. Removal and revegetation of the parking and fuel storage area and Lake Brooks facilities would rehabilitate about 1/3 acre. Proposed development areas, except for the contact station and trailhead, are on higher ground with more porous soils that drain easily, resulting in fewer problems with the septic systems.

Physical impacts on topography and soils would occur south of the river along the road corridor that links the proposed visitor contact station and trailhead with the proposed visitor center, lodge, and management support facility on the Iliuk Moraine terrace. Existing portions of the Valley Road would be widened to accommodate two-way shuttle traffic between visitor use nodes. A two-lane gravel shuttle road would be constructed from the proposed primary access site on Naknek Lake to Iliuk Moraine terrace. Another shuttle road would link the Iliuk Moraine terrace development with the Valley Road and Brooks River. The combined area of disturbance for widening of existing roads and construction of the new road would be approximately 15 acres.

Small patches of white spruce forest would be cleared within an area of white spruce forest about 30 acres in extent on Iliuk Moraine terrace for construction of the proposed management support facility, consisting of an employee housing area, a maintenance area, and a research facility. Actual site design would be dependent on the combined attributes of the area. No determination of exact locations for proposed facilities such as houses, vehicle parking areas, and maintenance shops is made in this plan. Additional environmental compliance and review would be undertaken as specific locations are chosen.

The proposed public area and campground on the Iliuk Moraine terrace would occupy a small area of white spruce forest within a 60-acre development zone. Most of this area would be left natural for vegetative screening between the lodge, cabin units, visitor center, and other public places. The entire development would be set on the level terrace landform, taking advantage of the spectacular views over Naknek Lake. No sidehill development is proposed due to environmental concerns. Site selection for each facility would be dependent on the characteristics of the site; therefore, no specific locations for the visitor center, lodge, or cabin units are illustrated in this plan. Additional environmental compliance and review would be undertaken as specific locations are chosen.

Lesser proposed facilities such as trails, contact stations, and viewing platforms would collectively impact about 2 acres of white spruce forest. An estimated 107 acres of white spruce forest would be impacted in various degrees in this alternative. Some acres would be cleared for roads, houses, a maintenance facility, a visitor center, a lodge, and other structures while most would be retained in a natural state for vegetative screening between facilities. The best available erosion control technology would be used to surround the construction areas. Approximately 3.5 acres of developed land in the Brooks River area would be revegetated to approximate its natural species composition.

### Hydrology

The gravel trail on the north side of the river would be allowed to erode reestablishing the natural flow of water between the Oxbow marsh and the river mouth. The hydrology of the Brooks River mouth would continue to be confined on the south side by the gravel roadbed leading to the barge dock. Although this gravel road would be converted to trail use, it would still prohibit natural hydrographic flows between the marsh south of the river and the river itself unless culverts were put in place to reconnect the marsh and river.

The shallow water table in the vicinity of Brooks Camp has been contaminated with fuel oil leaks. Remediation efforts are underway and will continue in the future. Removal of all facilities north of the river would stop further contamination of the water table by fuel oil leaks. In time, water quality in the shallow water table would be substantially improved.

Floodplains would be unaffected by this alternative. Wetlands would continue to adjust to the manipulation of natural flows at the river mouth. No wetlands would be impacted on the Iliuk Moraine terrace. Impacts on wetlands along the river would be avoided. Septic systems in the new developed areas would be constructed so as not to affect water quality in Naknek Lake. Wells would have to be drilled to supply the new development.

### Vegetation

Trimming of trees and shrubs along the trails for better sight distance in bear habitat, and clearing of grass along the trail segment approaching the falls platform would continue in an effort to reduce chance human/bear encounters. Marsh vegetation would adjust to the new water regime created by culverts in the gravel road out to the barge dock south of the river. Fisherman trails in the marshes on the northern bank of the Oxbow in the lower river would eventually recover because no one would be accessing the river from that direction any longer.

Small patches of white spruce forest would be cleared within an area of about 30 acres for construction of the proposed management support facility. Similarly, small patches of white spruce would be cleared within a 60-acre development zone for construction of the public use area and campground. New road construction and widening of existing road segments would clear about 15 acres of white spruce forest. These 105 acres, out of the thousands of acres

of white spruce forest in the park and preserve, are less valuable in terms of essential habitat when compared to the reality of returning the north side of Brooks River to a wild state for the benefit of the local bear population and other wildlife dependent on the river.

### Wildlife and Fish

The reduction of human activity in the high-use bear area north of Brooks River would be a positive effect, particularly on nonhabituated and less people-tolerant bears. Human activity would be restricted to the Dumpling Mountain trail and around the remediation sites. After removal of Brooks Camp facilities, access to the area for remediation work would still be along the Naknek Lake beach, north of the river. The local bears would soon learn that they now have unencumbered access to the entire Brooks River from the north bank. The area between the river and the denning areas at the foot of Dumpling Mountain would be a people-free zone. The area of remediation activities would have to be managed as a bear-free zone while being actively worked. Other wildlife that use the river would also benefit from the absence of human activity along the north side of the river. The salmon runs would no longer be slowed by the floating bridge, nor would any spawning or juvenile rearing habitat be disturbed by multiple crossings of heavy equipment to maintain Brooks Camp operations and facilities.

Development on the Iliuk Moraine terrace would be in an area about 2.5 miles south of prime bear habitat along Brooks River. This development would have little impact on the brown bear habitat and population in the Brooks River area. Site selection would take into account the variable resource attributes of the terrace for the best locations for the visitor center, lodge, guest cabins, campground, and management facilities. This alternative would not impact the Beaver Pond waterfowl nesting habitat in any way.

### Species of Special Concern/Critical Habitats

No state or federally listed species or critical habitats would be affected by the proposed relocation of facilities to the Iliuk Moraine terrace.

### Designated Wilderness

No federally designated or recommended wilderness would be affected by this alternative. The establishment of use limits on Brooks River could give cause for guides to seek other fishing and bear viewing areas in the park that may be in designated wilderness. In its next revision, the park's *Backcountry Management Plan* should address the potential that established use limits at Brooks River would have on designated wilderness in its next revision.

## IMPACTS ON CULTURAL RESOURCES

### Prehistoric

Removal of existing development north of the river would result in some additional disturbance to archeological sites. In particular, the area near the Skytel is known to contain human burials. Human bones may lie in existing utility trenches. When the existing development is removed from the north side of the river, all belowground intrusions, including utility lines, foundation posts, and leachfields, would be left in place to eliminate any further disturbance to archeological resources.

The trail to the falls platform crosses over several barabaras. In many places, visitor traffic has caused erosion of the protective layer of Katmai ash. Continued use of the trail would perpetuate erosion of these significant resources. Short sections of boardwalks are proposed to curtail trampling in archeological sites. Proposed improvements for access to the falls platform, as discussed in the "Actions Common to All Development Alternatives" section, would primarily protect archeological and ethnographic resources, but would also reduce human/bear encounters and provide increased visitor enjoyment without significantly impacting the resources.

An archeological site is known to exist at the cutbank. The proposed cutbank platform would be placed in an area with the fewest archeological resources avoiding the archeological site. The trail to the proposed cutbank platform would be routed to avoid archeological features in the area.

The proposed barabara exhibit at the end of the shuttle road would be sited near but not on a known archeological site, in order to use the visible pits in interpretation. However, the barabara would not be constructed in a known site.

Reconnaissance level archeological surveys of the Iliuk Moraine terrace and the proposed road corridors revealed no evidence of archeological sites. It is extremely unlikely that sites of the significance of those near the Brooks River would be found on the Iliuk Moraine terrace. There is a remote possibility that relatively small remains of hunting camps may lie buried in the proposed developed area, as well as sites of ethnographic significance. Intensive archeological surveys to find those sites were not undertaken for this plan because, in the best professional judgment of archeologists familiar with the area, the level of survey that would be required to find such small and scattered remains before specific locations for structures and roads were determined would be prohibitively expensive. These small sites, if they exist at all, can easily be avoided during project design.

### Historic

There would be no impacts on the historic structures.

### Ethnographic

Some Native Alaskan groups have indicated a concern about impacts on an archeological site known to have been used in the 20th century, and which is located on the narrow stretch of land between the Beaver Pond and Naknek Lake. No development is proposed near this site in this alternative. There may be other ethnographic resources in the area of concern to specific groups of people. Some members of the Alaska Peninsula Corporation would view any development on the Iliuk Moraine as an act of desecration of land used by their ancestors. Only a loop trail and a viewpoint are proposed to be developed on Iliuk Moraine. The National Park Service would consult with the Alaska Peninsula Corporation to determine whether any mitigating measures would be acceptable to them. If not, proposed development would have an adverse effect on the traditional cultural values of the Iliuk Moraine.

## IMPACTS ON VISITOR EXPERIENCE AND SAFETY

### Interpretation and Education

The 1993 *Interpretive Prospectus* has set in motion a number of interpretive and educational message and media changes that would greatly improve those two programs in the Brooks River area and on the tour to the Valley of Ten Thousand Smokes. With established use limits for all day and overnight use, the interpretive program would be able to assist in efforts to reduce the number of human/bear encounters in the Brooks River area. The proposed visitor contact station at the Brooks Falls trailhead would become the focus area for visitor education on appropriate human behavior when encountering bears.

### Effect of Visitor Use Limits

Visitor use limits would have a positive impact on the visitor experience at Brooks River. The proposed limits on visitation would allow for adequate, but not lengthy, time on the bear viewing platforms and would help create a relative uncrowded fishing experience. Overnight use at the lodge would be increased to 75 people per night. Campground use would also be increased to 75 people per night. July day use would be limited to 60 people per day. Including 80 operational staff, this alternative would establish the experiential and resource maximum capacity of the Brooks River area at around 290 people per day. This is more crowded than now occurs.

### Reduction of Human/Bear Conflicts

This alternative would substantially reduce human/bear conflicts in the Brooks River area. By eliminating all human activity north of the river, except for the required remediation efforts and occasional hikers on the Dumpling Mountain trail, the area that now has the majority of human/bear encounters and conflicts would mostly be back in a wild setting. Human/bear conflicts would still occasionally occur in the river corridor, and cannot be completely avoided. This alternative would provide three viewing platforms with fishermen access to avoid encounters with bears in the river. The proposed safe haven at the river mouth would also help in reducing human/bear encounters. Consolidation of the maintenance and housing area into a single proposed management support facility away from bear habitat, instead of having housing and maintenance in five different areas as now occurs in existing conditions would greatly reduce the potential for human/bear encounters. Consolidation of public facilities away from bear habitat, up on the Iliuk Moraine terrace, would also be a factor in reducing human/bear encounters.

### River Corridor Management

The temporary closures and fishing regulation changes discussed in the "Actions Common to All Development Alternatives" section would be recommended under this alternative. Catch-and-release-only and temporary closures during high bear use would greatly reduce the number of human/bear conflicts occurring along the river. The visitor experience would be enhanced by less encounters with bears and by fewer warnings and/or citations to anglers and photographers. Numerous alternative recreational fishing opportunities exist within the park and in the overall Bristol Bay region during temporary closures on Brooks River.

### Valley of Ten Thousand Smokes Tour Improvements

The proposed minor developments at the Research Bay, Margot Falls, and Three Forks overlooks, as discussed in the "Actions Common to All Development Alternatives" section, would be entirely consistent with the proposed upgrade of the visitor experience on this tour. Physical impacts would be minimal, most of them repairing damaged areas that have experienced trampling of vegetation, and trail erosion. Channel manipulation by heavy equipment above the three stream crossings on the Valley Road would still be conducted. Necessary permits would be obtained (see appendix F).

## ECONOMIC IMPACTS

### Subsistence

There would be no significant restriction on subsistence uses under alternative 3. For a description of the impacts on subsistence users, see appendix G.

### Concession Operations

Under this alternative the concessioner's business would increase in size in terms of the number of lodging rooms and anticipated other sales. The relocation costs would be substantial for a business of this size and type, particularly considering the seasonality of its operation. As in alternative 2, construction costs of the new facilities could be offset somewhat by the government's compensation for the concessioner's interest in and removal of existing facilities. However, it is also anticipated that the government would still be required to subsidize the concessioner's relocation in order for it to be feasible. A full feasibility study, prior to development, is needed to determine how the construction would be funded.

### Regional Tourism

Relocating Brooks Camp facilities to the Iliuk Moraine terrace would have a short-term positive effect on the local economy through the construction phases. Regional tourism would be expected to increase moderately in response to the proposed use limits. Although the number of rooms would increase some, it is not anticipated that this increase would have a material effect on similar lodging available in King Salmon, which is now at full occupancy during the same period of the year, nor would it necessarily benefit fly-in camps that hold a commercial use license in the park.

### Minority and Low Income Populations and Communities

The Department of the Interior's policy on environmental justice (Executive Order 12898) requires that the National Park Service evaluate the impacts on minority and low income populations and communities. The impact on minority and low income populations in unknown; however, if there are any effects, they are expected to be insignificant.

## CUMULATIVE IMPACTS

Cumulative impacts resulting from the relocation of Brooks Camp facilities to the Iliuk Moraine terrace would be largely beneficial for resources north of the river and for the visitor experience along the river. South of the river, impacts on natural resources on the Iliuk Moraine terrace would be largely negative due to the large scale of new development and access to the terrace, but impacts on the visitor experience would be positive.

The establishment of a people-free zone and removal of all facilities north of the river would have a continued, positive effect on the cultural resources reducing and eventually removing the current long-term impacts on archeological resources in the vicinity of Brooks Camp.

This alternative may have long-term cumulative effects on members of the Alaska Peninsula Corporation, a recognized Native Alaskan group with ethnographic ties to Iliuk Moraine. The effects would be adverse.

The long-term cumulative impact on the Brooks River bear population and their habitat by facility relocation would be beneficial. All overnight and major day use facilities would be removed from prime bear habitat.

The removal of small patches of white spruce forest in development zones of approximately 30 acres for the proposed management support facility, approximately 60 acres for the proposed public area and campground, and approximately 15 acres for road access (total 105 acres of development zones) would have a negative impact on this area of virgin forest that has grown undisturbed since the great eruption of June 1912. The proposed actions in this alternative would be extremely intrusive on the wild lands of the Iliuk Moraine terrace, and would permanently alter wildlife populations in the immediate area. Development on the Iliuk Moraine terrace would not be related to any other proposed development impacts on park lands. The benefits to the prime resource area far outweigh the negative impacts of new construction in an area that was not recommended for wilderness designation because of its proximity to development (NPS 1986b, 1988a).

## IMPACTS OF ALTERNATIVE 4: DAY USE AREA ONLY

### IMPACTS ON NATURAL RESOURCES

#### Topography and Soils

Removal of all facilities north of the river would result in approximately 3 acres of land that would be rehabilitated once remediation actions were completed. Over time, fuel oil leak remediation actions would improve subsurface conditions in the area. Contaminated soils would be disposed of in an environmentally sensitive manner. The road from the existing barge dock to the proposed visitor contact station would remain. Removal and revegetation of the parking and fuel storage area and Lake Brooks facilities would rehabilitate about one third of an acre. Proposed development areas, except for the contact station and trailhead, are on higher ground with more porous soils that drain easily, resulting in fewer problems with the septic systems.

Physical impacts on topography and soils would occur south of the river along the road corridor that links the proposed visitor contact station and trailhead with the proposed management support facility on the Valley Road.

The proposed management support facility, consisting of an employee housing area, a maintenance area, and a research facility, would occupy small areas of white spruce forest within a 20-acre development zone along the Valley Road near a large gravel pit. Actual site design would be dependent on the combined attributes of the area. No determination of exact locations for proposed facilities such as houses, vehicle parking area, and maintenance shops is made in this plan. Additional environmental compliance and review would be undertaken as specific locations are chosen.

Lesser proposed facilities such as trails, contact stations, and viewing platforms would collectively impact about 2 acres of white spruce forest. Small patches within an estimated total of 22 acres of white spruce forest would be impacted in various degrees in this alternative. Some acres would be cleared for houses, maintenance facility, visitor contact stations, and other structures while most of the development zone would be retained in a natural state for vegetative screening between facilities. The best available erosion control technology would be used to surround the construction areas. Approximately 3.5 acres of developed land in the Brooks River area would be revegetated to approximate its natural species composition.

#### Hydrology

The gravel trail on the north side of the river would be allowed to erode reestablishing the natural flow of water between the Oxbow marsh and the river mouth. The hydrology of the Brooks River mouth would continue to be confined on the south side by the gravel road bed leading to the improved barge dock. The roadbed would still prohibit natural hydrographic flows

between the marsh south of the river and the river itself unless culverts were put in place to reconnect the marsh and river.

The shallow water table in the vicinity of Brooks Camp has been contaminated with fuel oil leaks. Remediation efforts are underway, and will continue in the future. Removal of all facilities north of the river would stop further contamination of the water table by fuel oil leaks. In time, water quality in the shallow water table would be substantially improved.

Floodplains would be unaffected by this alternative. Wetlands would continue to adjust to the manipulation of natural flows at the river mouth. No wetlands would be impacted at the proposed management support facility. Impacts on wetlands along the river would be avoided. Three wells would have to be drilled to supply the new developments, or a waterline would be run along the road to the day use shelter and lakeside visitor contact station.

### Vegetation

Trimming of trees and shrubs along the trails for better sight distance in bear habitat, and clearing of grass along the trail segment approaching The falls platform would continue in an effort to reduce chance human/bear encounters. Marsh vegetation would adjust to the new water regime created by culverts in the gravel road out to the improved barge dock south of the river. Fisherman trails in the marshes on the northern bank of the Oxbow in the lower river would eventually recover since no one would be accessing the river from that direction any longer.

Small patches of white spruce forest would be cleared within a 20-acre area for construction of the proposed management support facility, and 2 acres would be cleared for lesser proposed facilities. These small patches within a 22-acre development zone, out of the thousands of acres of white spruce forest in the park and preserve, are less valuable in terms of essential habitat when compared to the reality of returning the north side of Brooks River to a wild state for the benefit of the local bear population and other wildlife dependent on the river.

### Wildlife and Fish

The reduction of human activity in the high-use bear area north of Brooks River would be a positive benefit, particularly to nonhabituated and less people-tolerant bears. Human activity would be restricted to the Dumpling Mountain trail and around the remediation sites. After removal of Brooks Camp facilities, access to the area for remediation work would still be along the Naknek Lake beach, north of the river. The local bears would soon learn that they now have unencumbered access to the entire Brooks River from the north bank. The area between the river and the denning areas at the foot of Dumpling Mountain would be designated a people-free zone. The area of remediation activities would have to be managed as a bear-free zone while being actively worked. Other wildlife that use the river would also benefit from the

absence of human activity along the north side of the river. The salmon runs would no longer be slowed by the floating bridge, nor would any spawning or juvenile rearing habitat be disturbed by multiple crossings of heavy equipment to maintain Brooks Camp operations and facilities.

Development along the Valley Road would be in an area about 1/2 mile south of prime bear habitat along Brooks River. This development would have minor impact on the brown bear habitat and population in the Brooks River area. Site selection would take into account the variable resource attributes of the area, including previously disturbed sites for the best locations for the proposed management support facilities. This alternative would not impact the Beaver Pond waterfowl nesting habitat in any way.

### Species of Special Concern/Critical Habitats

No state or federally listed species or critical habitats would be affected by this alternative.

### Designated Wilderness

No federally designated or recommended wilderness would be affected by this alternative. The establishment of use limits on Brooks River could give cause for guides to seek out other fishing and bear viewing areas in the park that may be in designated wilderness. In its next revision, the park's *Backcountry Management Plan* should address the potential that established use limits at Brooks River would have on designated wilderness in its next revision.

## IMPACTS ON CULTURAL RESOURCES

### Prehistoric

Removal of existing development north of the river would result in some additional disturbance to archeological sites. In particular, the area near the Skytel is known to contain human burials. Human bones may lie in existing utility trenches. When the existing development is removed from the north side of the river, all belowground intrusions, including utility lines, foundation posts, and leachfields, would be left in place to eliminate any further disturbance to archeological resources.

The trail to the falls platform crosses over several barabaras. In many places, visitor traffic has caused erosion of the protective layer of Katmai ash. Continued use of the trail would perpetuate the erosion of these significant resources. Short sections of boardwalks are proposed to curtail trampling in archeological sites. Proposed improvements for access to the falls platform, as discussed in the "Actions Common to All Development Alternatives" section of "Part Two: Alternatives, Including the Proposed Action," would primarily protect archeological

and ethnographic resources, but would also reduce human/bear encounters and provide increased visitor enjoyment without significantly affecting the resources.

An archeological site is known to exist at the cutbank. The proposed cutbank platform would be placed in an area with the fewest archeological resources avoiding the archeological site. The trail to the proposed cutbank platform would be routed to avoid the archeological features in the area.

The proposed barabara exhibit at the end of the shuttle road would be sited near but not on a known archeological site, in order to use the visible pits in interpretation. However, the barabara would not be constructed on a known site.

### Historic

There would be no impacts on the historic structures.

### Ethnographic

Some Native Alaskan groups have indicated a concern about impacts on an archeological site known to have been used in the 20th century, and which is located on the narrow stretch of land between the Beaver Pond and Naknek Lake. No development is proposed near this site in this alternative. There may other ethnographic resources in the area.

## IMPACTS ON VISITOR EXPERIENCE AND SAFETY

### Interpretation and Education

The approved *Interpretive Prospectus* has set in motion a number of interpretive and educational message and media changes that would greatly improve those two programs in the Brooks River area and on the tour to the Valley of Ten Thousand Smokes. With established use limits the interpretive program would be able to assist in efforts to reduce the number of human/bear encounters in the Brooks River area. The proposed lakeside visitor contact station would become the focus area for visitor education on appropriate human behavior when encountering bears.

### Effect of Visitor Use Limits

Day use limits would have a positive impact on the visitor experience at Brooks River. The proposed limits on visitation would allow for adequate time on the bear viewing platforms and would help create an uncrowded fishing experience. Day use would be limited to 90 people

per day. Including the staff, the recommended limit for this alternative would be around 120 people per day. The Brooks River area would be less crowded than now occurs.

Brooks River area is less quiet in this alternative compared to alternatives 2 and 3 because of the floatplane access coming in just south of the river mouth. Also buses and shuttles would be driving along the south side of the river mouth at various intervals, and barge docking and associated activities would be highly visible. Because no overnight accommodations are available nearer than King Salmon it is estimated that a certain segment of the current users would stop coming to Brooks River. The result would be a less crowded Brooks River area with fewer visitors and staff than the other alternatives.

### Reduction of Human/Bear Conflicts

This alternative would substantially reduce human/bear conflicts in the Brooks River area. By eliminating all human activity north of the river, except for the required remediation efforts and occasional hikers on the Dumpling Mountain trail, the area that now has the majority of human/bear encounters and conflicts would mostly be back in a wild setting. Human/bear conflicts would still occasionally occur in the river corridor, and cannot be completely avoided. This alternative would provide three viewing platforms with fishermen access to avoid encounters with bears in the river. Consolidation of the maintenance and housing area into a single proposed management support facility away from bear habitat, instead of having housing and maintenance in five different areas as now occurs in existing conditions would greatly reduce the potential for human/bear encounters.

### River Corridor Management

The temporary closures and fishing regulation changes discussed in the "Actions Common to All Development Alternatives" section would be recommended under this alternative. Catch-and-release-only and temporary closures during high bear use would greatly reduce the number of human/bear conflicts occurring along the river. The visitor experience would be enhanced by less encounters with bears and by fewer warnings and/or citations to anglers and photographers. Numerous alternative recreational fishing opportunities exist within the park and in the overall Bristol Bay region during temporary closures on Brooks River.

### Valley of Ten Thousand Smokes Tour Improvements

The proposed minor developments at Research Bay overlook, Margot Falls overlook, and Three Forks overlook, as discussed in the "Actions Common to All Alternatives" section, would be entirely consistent with the proposed upgrade of the visitor experience on this tour. Physical impacts would be minimal, most of them repairing damaged areas that have experienced trampling of vegetation, and trail erosion. Channel manipulation by heavy equipment above the

three stream crossings on the Valley Road would still be conducted. Necessary permits would be obtained (see appendix F).

## ECONOMIC IMPACTS

### Subsistence

There would be no significant restriction on subsistence uses under alternative 4. For a description of the impacts on subsistence users, see appendix G.

### Concession Operations

This alternative would completely change the nature of the concession operation at Brooks Camp. The existing concessioner's possessory interest in its operation would be purchased by the government, with the amount of this compensation governed by concession contract provisions. A new concession contract would be issued for a much smaller operation. The government would build adequate concession facilities for the new level of concessioner involvement in the Brooks River area (air transportation and tour to the Valley of Ten Thousand Smokes) and rent them out to the concessioner.

### Regional Tourism

This alternative may have a potential beneficial economic impact on the communities of King Salmon and Naknek because of the lack of overnight lodging at Brooks Camp. No campers would be staying overnight in the Brooks River area. The only camping available would be in designated primitive sites well away from the river. A potential beneficial economic impact may be the establishment of more overnight lodging and a commercial campground in the King Salmon/Naknek area, with guided day trips to the Brooks River area. Commercial use license holders with fly-in day users would have to share daily limits and would lose revenue.

### Minority and Low Income Populations and Communities

The Department of the Interior's policy on environmental justice (Executive Order 12898) requires that the National Park Service evaluate the impacts on minority and low income populations and communities. The impact on minority and low income populations in unknown; however, if there are any effects, they are expected to be insignificant.

## CUMULATIVE IMPACTS

Cumulative impacts resulting from removing and not relocating Brooks Camp facilities inside Katmai National Park and Preserve would be beneficial for resources north of the river and for the visitor experience along the river. South of the river, impacts on resources along the Valley Road would be largely negative due to construction for the new development.

The establishment of a people-free zone and removal of all facilities north of the river would have a continued positive effect on the cultural resources reducing and eventually removing the current long-term impacts on archeological and ethnographic resources in the vicinity of Brooks Camp. The long-term, cumulative impact on the Brooks River bear population and their habitat by facility removal would be beneficial.

The removal of small patches of white spruce forest in an approximately 22-acre development zone for the proposed management support facility would have a minor negative impact on this area of disturbed white spruce forest that already has the Valley Road cut through it. The actions in this alternative would temporarily disrupt wildlife populations in the immediate area. Development of the management support facility along the Valley Road would not be related to any other proposed development on park lands, except for the minor improvements along the Valley Road at the three overlooks. Development of small areas within a 22-acre development zone of white spruce forest is insignificant when compared to the remaining thousands of acres of white spruce forest in the park and preserve. The benefits to the prime resource area far outweigh the negative impacts of new construction in an area that was not recommended for wilderness designation because of its proximity to development (NPS 1986b, 1988).

## IMPACTS OF ALTERNATIVE 5: PROPOSED ACTION – BEAVER POND TERRACE

### IMPACTS ON NATURAL RESOURCES

#### Topography and Soils

Removal of all facilities north of the river would result in approximately 3 acres of land that would be rehabilitated after fuel oil leak remedial actions were completed. Removal and revegetation of the parking and fuel storage area and Lake Brooks facilities would rehabilitate about 1/3 acre.

Physical impacts on topography and soils would occur south of the river. Construction of a one-lane gravel road from the Valley Road along the Beaver Pond terrace down to the proposed primary access site on Naknek Lake would disturb approximately 6.3 acres.

The proposed management support facility, consisting of an employee accommodation area and maintenance facility, would be located in an area about 30 acres in size along the Valley Road. Actual site design and locations for accommodations, vehicle parking, and maintenance shops are not determined in this plan, and additional environmental compliance would be undertaken as specific sites were selected.

Small patches of white spruce forest would be cleared within an approximately 60-acre development zone for construction of the proposed public area, including a lodge/dining facility, cabins, a hostel, an orientation center/ranger station, and a campground. The entire development would be set on the level terrace landform. No sidehill development is proposed due to environmental concerns and the facility relationship with the Beaver Pond at the base of the terrace. Site selection for each facility would be dependent on characteristics of the site, and facilities would be designed to take advantage of natural topographic features while minimizing impact. Since the exact locations of proposed facilities are unknown, additional environmental compliance would be undertaken as specific locations are chosen.

The development of new trails, a boardwalk, and viewing platforms would collectively impact about 2 acres.

Development would take place within a small part of a 98.3-acre development zone. Approximately 3.3 acres of currently developed land would be revegetated in a manner appropriate to local topography and soils.

## Hydrology

Erosion of the 400 linear foot length of gravel trail paralleling the north shore of the river would allow the natural flow of water between the Oxbow marsh and river mouth to be reestablished. The gravel road between the existing barge dock and the narrows bear viewing platform would be converted to a trail with culverts in place to allow more natural hydrographic flows between the marsh south of the river and the river itself.

The shallow water table in the vicinity of Brooks Camp has been contaminated with fuel oil leaks. Remediation efforts underway would continue regardless of the outcome of this plan. Removal of all facilities north of the river would stop further contamination of the water table by new fuel leaks. In the long term, water quality in the shallow water table and on the surface would be restored.

Proposed new development areas would be on higher ground with more porous soils that drain easily, resulting in fewer problems with the septic systems. New septic systems would be constructed so as not to affect water quality in the Beaver Pond. A monitoring program would be established to document water quality trends in the Beaver Pond and at selected points along Naknek Lake and Brooks River. Some wells would have to be drilled to supply the new development.

Floodplains would benefit by reestablishment of natural hydrographic regime at the river mouth. Construction of the new barge dock and boat and floatplane docks at Naknek Lake would result in minor, short-term impacts at the lakeshore. If a pier or simple breakwater structure were constructed as part of the new docking facilities, additional environmental analysis would be done. Construction of the new platform at the river mouth would result in negligible impacts. All necessary permits and additional environmental compliance would be completed prior to construction. Wetlands would benefit as they would continue to adjust to the removal and restoration of the trail and road at the river mouth. No wetlands would be newly disturbed.

The catch-and-release policy would eliminate the need for a fish cleaning building, and, therefore, the associated solid waste/water quality concerns created by fish cleaning.

## Vegetation

Trimming of trees and shrubs along the trails for better sight distance in bear habitat, and clearing of grass along the trail segment approaching the falls platform would continue in an effort to reduce chance human/bear encounters. Vegetation in the Oxbow marsh would continue to adjust, becoming more hydrophilic as the artificial water impoundment created by the gravel trail on the north shore of the river erodes away. Culverts placed beneath the proposed trail to the river mouth platform would allow vegetation in the marsh south of the river to adjust with the reconnection of the marsh with the river, as well. Fisherman trails in the marshes on the northern bank of the Oxbow in the lower river would eventually recover as no one would be accessing the river from that direction any longer.

Small patches of white spruce forest would be cleared within a 30-acre development zone for construction of the proposed management support facility. Small patches of spruce would also be cleared in a 60-acre development zone for construction of the public use area. Much of this area would be left natural for vegetative screening between the lodge/dining facility, orientation center, hostel, cabins, campground, shower facility, and other public places. The development of new trails and viewing platforms would collectively impact about 2 acres of primarily white spruce forest. New road construction would result in 6.3 acres of white spruce forest cleared.

Development would take place within a small part of a 98.3-acre development zone. Approximately 3.3 acres would be revegetated as Lake Brooks and Brooks Camp facilities are removed.

### Fish and Wildlife

The reduction of human activity in the high-use bear area north of Brooks River would benefit bears, particularly nonhabituated and less people-tolerant bears. Human activity would be restricted to the Dumpling Mountain trail and around the fuel spill remediation sites. After removal of Brooks Camp facilities, access to the north side for remediation work would be along the Naknek Lake beach, north of the river. The bears would have unencumbered access to the entire Brooks River from the north bank. The area between the river and the denning areas at the foot of Dumpling Mountain would be a people-free zone. The area of remediation activities would be managed as a bear-free zone while being actively worked. Other wildlife that use the river would also benefit from the absence of human activity along the north side of the river.

With seasonal river closures in-place, a greater number of bears, particularly nonhabituated families and singles, would approach the lower river, instead of avoiding it as they currently do because of the crowds of people. The seasonal closures would also temporarily eliminate the direct competition for river space between people and bears, and would improve the foraging ability of bears by allowing them to focus on fishing rather than on the activities of nearby visitors.

The catch-and-release only policy would reduce conflicts between fishermen and bears, as well as the extent to which bears associate fishermen with food.

Development on the Beaver Pond terrace would be in an area about 1 mile south of important bear habitat along Brooks River. This development and the proposed management support facility along the Valley Road would have little impact on important brown bear habitat or the population of bears in the Brooks River area.

Special consideration for the maintenance of the ecological integrity of the Beaver Pond below the terrace would be incorporated into the design of the proposed public area. Under this alternative the connection between the Beaver Pond nesting habitat and Brooks River feeding habitat for waterfowl would be preserved.

Migrating salmon would no longer be slowed by the floating bridge, nor would any spawning or juvenile rearing habitat be disturbed by multiple crossings of heavy equipment to maintain Brooks Camp operations and facilities.

### Species of Special Concern/Critical Habitats

No state or federally listed species or critical habitat would be affected by the proposed action.

### Designated Wilderness

No federally designated or recommended wilderness would be affected by this alternative. The establishment of use limits on Brooks River could give cause for guides to seek other fishing and bear viewing areas in the park that may be in designated wilderness. In its next revision, the park's *Backcountry Management Plan* should address the impact that established use limits at Brooks River would have on designated wilderness.

## IMPACTS ON CULTURAL RESOURCES

### Prehistoric

Removal of existing development north of the river could result in some additional disturbance to archeological sites. When the development is removed, all belowground intrusions would be left in place to eliminate any further disturbance to archeological resources.

In many places, visitor traffic on the falls trail has caused erosion of the protective layer of Katmai ash above the barabaras. Continued use of the trail would perpetuate erosion of these significant resources, although short sections of boardwalk on the trail to the falls platform would curtail trampling of archeological sites. This and other proposed improvements discussed in the "Actions Common to All Development Alternatives" section of "Part Two: Alternatives, Including the Proposed Action" would further protect archeological resources and ethnographic. Any necessary cultural resource compliance and mitigation would be performed prior to construction of the river mouth platform and the trail from that platform to the narrows platform.

No specific locations have been determined for any of the proposed developments; however, archeological surveys would be conducted prior to siting and construction of any of the proposed roads or facilities. Prior to completion of facilities design, the Beaver Pond terrace, road alignment, and management support facility areas would be surveyed and appropriate mitigating measures taken for any archeological resources that might be found.

Although visitors would still be traversing prime brown bear habitat along the trails to the bear viewing platforms, the visitors would access platforms according to procedures designed to minimize human/bear encounters while monitoring high quality experiences. The rangers would be knowledgeable about brown bear behavior and would be able to take appropriate safety measures should there be an encounter.

The potential for negative bear encounters would be further reduced because the number of visitors traveling throughout the river corridor, not just to and from the platforms, would be controlled. The catch-and-release fishing policy and the seasonal river closures during times of high bear use would also greatly reduce the number of human/bear conflicts occurring along the river. The third bear viewing platform established at the river mouth would provide fishermen with an escape from aggressive bears.

By eliminating all human activity north of the river, except for the required remediation efforts and occasional hikers on the Dumpling Mountain trail, the area that now has the majority of human/bear encounters and conflicts would mostly be returned to a wild setting.

Consolidation of NPS and concession maintenance and housing areas into a single management support facility away from prime bear habitat, rather than the five different areas, would greatly reduce the potential for human/bear encounters. Consolidation of public facilities on the Beaver Pond terrace and construction of bear-proof cooking shelters at the campground would also reduce human/bear encounters.

Some human/bear conflicts would continue to occasionally occur in the river corridor.

### River Corridor Management

Refer to the "Impacts on Natural Resources" section and the above discussion on the "Reduction of Human/Bear Conflicts."

### Valley of Ten Thousand Smokes Tour Improvements

The proposed minor developments at the Research Bay, Margot Falls, and Three Forks overlooks, as discussed in the "Actions Common to All Development Alternatives" section would be entirely consistent with the proposed upgrade of the visitor experience on this tour. Physical impacts would be minimal, most of them repairing damaged areas that have experienced trampling of vegetation and trail erosion. Channel manipulation by heavy equipment above the three stream crossings on the Valley Road would still be conducted. Necessary permits would be obtained.

### Historic

There would be no impacts on the historic structures.

### Ethnographic

Some Native Alaskan groups have indicated a concern about impacts on an archeological site known to have been used in the 20th century, located on the narrow stretch of land between the Beaver Pond and Naknek Lake. There would be no impact as no development is proposed near this site.

## IMPACTS ON VISITOR EXPERIENCE AND SAFETY

### Interpretation and Education

The 1993 *Interpretive Prospectus* would be updated as necessary to reflect the broader cultural resource and regional context emphases of this alternative. The new orientation center at Brooks Camp, and the visitor center in King Salmon would all improve interpretive programs and opportunities for the park and related region. In particular, interpretation of cultural resources and native lifestyles would be enhanced at the Brooks River area and at King Salmon.

### Effect of Visitor Use Limits

Visitor use limits would have a positive impact on the visitor experience at Brooks River. Under the proposed action there would be a more structured system of use, resulting in the distribution of visitors to different locations in the river corridor during the day. Visitors would be allowed to visit their selected destination according to a system developed as appropriate, and the number of people at one time on the platforms would not exceed 40. These actions would reduce crowding at the bear viewing platforms and along the river in general. Because of the system, however, some visitors may not have as a relaxed and unhurried experience as in other alternatives. The proposed action would establish an experiential and resource maximum capacity of 260 people per day. This is more people than now visit Brooks Camp; however, these higher numbers would be mitigated by a system that would allow a high quality visitor experience.

### Reduction of Human/Bear Conflicts

The interpretive programs in King Salmon and Brooks Camp would reduce the number of human/bear encounters. All visitors would receive a mandatory bear safety message traveling to and upon arrival at Brooks Camp.

## ECONOMIC IMPACTS

### Subsistence

There would be no significant restriction on subsistence uses under the proposed action. For a description of the impacts of the alternatives on subsistence users, please see appendix G.

### Concession Operations

The concessioner's business would increase in terms of having a greater ability to rent every unit and anticipated sales from this operation.

Relocation costs would be substantial for a business of this size and type, particularly considering the seasonality of its operation. Construction costs of the new facilities could be offset somewhat by the government's compensation for the concessioner's interest in and removal of existing facilities. The amount of this compensation would be governed by concession contract provisions, and is anticipated to be significant; however, it is also anticipated that the government may be required to subsidize the concessioner's relocation to the Beaver Pond terrace to make the proposed action feasible. A full feasibility study prior to development is needed to determine how the construction would be funded.

Additional costs may be borne by concession operators or other partners to construct and operate shared maintenance areas, housing, and other facilities and programs.

### Regional Tourism

The proposal to relocate Brooks Camp facilities to the Beaver Pond terrace would have a short-term, positive effect on the local economy through the construction phase. The visitor center in King Salmon would benefit regional tourism by stimulating the growth of a variety of commercial businesses that support recreational opportunities in the Naknek Lake region.

Commercial use license holders from nearby fly-in camps may lose revenue due to day use limits in the long term when demand exceeded the set carrying capacity.

### Minority and Low Income Populations and Communities

The Department of the Interior's policy on environmental justice (Executive Order 12898) requires that the National Park Service evaluate the impacts on minority and low income populations and communities. The impact on minority and low income populations in unknown; however, if there are any effects, they are expected to be insignificant.

## IMPACTS ON KING SALMON

The impacts of any proposed development recommended for King Salmon by future cooperative community planning efforts would be evaluated at that time, and any necessary environmental compliance completed by the appropriate entity prior to implementing a proposal. The visitor experience would be improved by better exposure to a broad range of possible recreation activities and interpretation that focuses on the unique cultural, historical, and natural history of the Naknek Lake region.

## CUMULATIVE IMPACTS

New impacts on natural resources on the south side of the river, where development would occur within a small part of a 98.3-acre development zone, would be offset in part by rehabilitation of the existing Brooks Camp and Lake Brooks areas once those facilities were removed. Brown bears would benefit from the establishment of a people-free zone on the north bank and reduction in human/bear encounters. The cumulative impact on brown bears that use the Brooks River area and prime bear habitat would be beneficial. There would be a long-term, positive impact on archeological resources by removal of the Brooks Camp facility and reduction of trampling on some trails.

The increased emphasis on the fishing, boating, sightseeing, and other recreational opportunities in the greater Naknek region would result in the incremental and unquantifiable increase in visitation and associated visitor impacts over a vast area.

## IRREVERSIBLE OR IRRETRIEVABLE COMMITMENT OF RESOURCES

There would be an irretrievable loss of small patches of white spruce forest within the 98.3-acre development zone proposed for location of roads and other facilities, for the life of the development. The design, construction, and operation of the new facilities would result in the irretrievable commitment of a small but unknown amount of resources. This could be mitigated by the use of sustainable design, resulting in energy conservation, reduced dependence on depletable resources, and improved quality of the built environment.

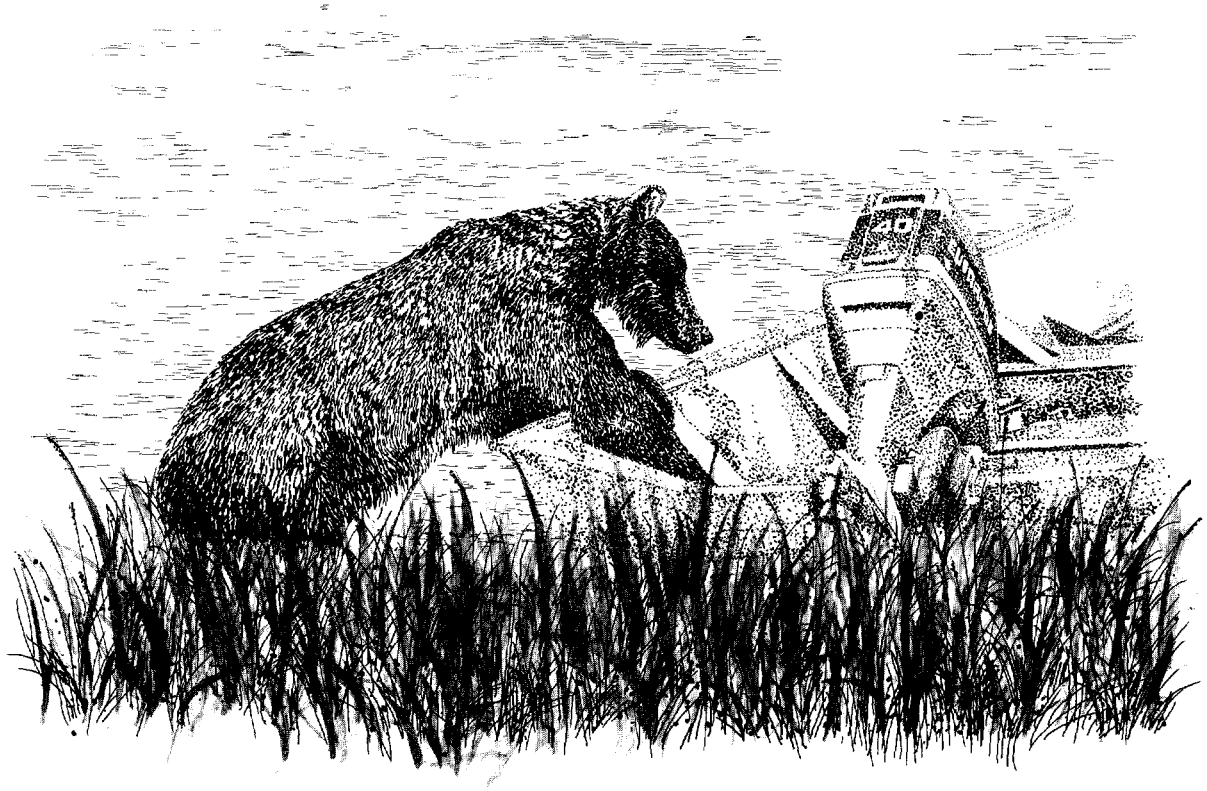
## UNAVOIDABLE ADVERSE IMPACTS

The primary adverse impact is the long-term loss of wildlife habitat and vegetation associated with the development of facilities and roads. Most of this development would occur in white spruce forest.

## RELATIONSHIP BETWEEN SHORT-TERM USE OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Removal of the Brooks Camp facility and establishment of a people-free area on the north side of the river would, over the long term, have a beneficial effect on the productivity of prime brown bear and other wildlife habitat. Productivity would also be enhanced by reestablishing natural surface water flow to the marsh on the south side river mouth. Although up to 98.3 acres could be disturbed by new development, most of this is in white spruce forest, where development would have fewer impacts on the river floodplain and prime brown bear habitat.

# PART FIVE:
# CONSULTATION AND COORDINATION



Habituation in Progress

## PUBLIC INVOLVEMENT

### DEVELOPMENT OF THE PROPOSAL AND PREPARATION OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

**April 4–6, 1989** — Scoping for the Brooks River area development concept plan was initiated in meetings held at the Denver Service Center of the National Park Service and attended by representatives of the park and regional office. During the three days of meetings the participants organized the planning effort that was to follow. The primary product of the April meetings defined the purpose, the significance, and the management objectives for the Brooks River area. These three elements agree with the direction given in the 1986 *General Management Plan.*

**April 17, 1989** — Dr. Barrie Gilbert, Professor in the Department of Fisheries and Wildlife, Utah State University, presented an orientation lecture entitled "Human-bear relationships at Brooks River, Katmai National Park, Alaska" for Denver Service Center personnel assigned to the planning project.

**July 6–15, 1989** — Planning team orientation and scoping meetings were held in Katmai National Park and Preserve between July 6 and July 15. This planning and scoping trip was timed to coincide with the height of both bear and visitor use in the Brooks River area. Scoping meetings and workshops conducted at Brooks Camp included permanent and seasonal park staff, concessions staff, and the visiting public.

**August 14–19, 1990** — Full planning team conducts field reconnaissance of possible relocation sites for the Brooks Camp facilities.

**June 28 – July 2, 1991** — Public meetings were held on the summer 1991 *Brooks River Area Development Concept Plan, Alternatives Workbook.* The public was invited to comment on the major issues affecting the Brooks River area and on the four conceptual alternatives presented in the workbook before the National Park Service proceeded with a draft plan. The meetings were held as follows:

June 28–30 at Brooks Camp. Three evening meetings and two afternoon sessions for visitors and staff
July 1 at King Salmon. Public meeting at the Conserfac
July 2 at Anchorage. Public meeting at the Loussac Library

Over 450 workbooks were distributed at the meetings or through the mail to interested parties and government agencies. The public response period was from June 28 to September 15, 1991 – a total of 79 days.

**July 16, 1991** — Meeting with state coordinator and representatives from Alaska Department of Fish and Game and Department of Environmental Conservation regarding the alternatives workbook.

**August 29, 1991** — Letter from the Director, Office of Management and Budget, Division of Governmental Coordination, Office of the Governor, State of Alaska, commenting on the alternatives workbook.

**October 25, 1991** — Analysis of public comments on the summer 1991 alternatives workbook mailed out to all names on the project mailing list.

**March 13, 1992** — Letter from the Alaska State Historic Preservation Officer commenting on the alternatives workbook.

**Not Received** — Letter from the Advisory Council on Historic Preservation commenting on the alternatives workbook.

**July 19–25, 1992** — Bear Research Committee and Planning Team conduct final field reconnaissance.

**March 16, 1993** — Letter sent to U.S. Fish and Wildlife Service requesting information on federally listed species in the Brooks River area.

**March 16, 1993** — Letter sent to Alaska Department of Fish and Game requesting information on state listed species in the Brooks River area.

**April 19, 1993** — Letter from U.S. Fish and Wildlife Service stating no federally listed or proposed threatened or endangered species are known from the Brooks River area.

**Not Received** — Letter from Alaska Department of Fish and Game regarding state listed or proposed threatened or endangered species known from the Brooks River area.

**June 7, 1993** — Notice of intent to prepare an environmental impact statement on the Brooks River area development concept plan published in the *Federal Register* (#31977).

**August 1993** — All commercial use license holders were contacted by the park and advised that limits to visitation at Brooks Camp would be discussed in the plan.

**April 1, 1994** — Notice of availability of *Draft Development Concept Plan / Environmental Impact Statement* for the Brooks River area published in the *Federal Register* (59:67, p. 15455).

**April 1 through June 30, 1994** — Public comment period on the *Draft Development Concept Plan / Environmental Impact Statement.*

**April 22, 1994** — *Draft Development Concept Plan / Environmental Impact Statement* mailed to the Advisory Council on Historic Preservation and State Historic Preservation Office for review comments.

**May 9, 1994** — Telephone conversation between Tim Smith, staff archeologist of the State Historic Preservation Office, State Office of History and Archeology, Anchorage, and the Katmai National Park and Preserve archeologist.

**May 16, 1994** — Public meeting in King Salmon.

**May 18, 1994** — Public meeting in Anchorage.

**Not Received** — Comment letters from the Advisory Council on Historic Preservation and State Historic Preservation Office on the *Draft Development Concept Plan / Environmental Impact Statement.*

## PUBLIC COMMENT PERIOD ON THE SUPPLEMENT TO THE DRAFT DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT

July 18, 1995 — Public meeting in Anchorage.

July 19, 1995 — Public meeting in King Salmon.

## RECORD OF NATIVE ALASKAN CONSULTATIONS

During the following consultations, a number of park projects were discussed, as well as the 1991 *Brooks River Area Alternatives Workbook.* While a number of parkwide concerns were expressed by Native Alaskans in the meetings, the only one which pertained specifically to the alternatives discussed in the workbook dealt with recent Native Alaskan burials. Subsistence issues are addressed in appendix G.

**December 1992** — Meeting between regional ethnographer, park archeologist, and Tom Hawkins, Bristol Bay Native Association, in Anchorage.

**February 1, 1993** — Meeting between regional ethnographer, park archeologist, and the Bristol Bay Native Association (BBNA)/Bristol Bay Native Corporation (BBNC) staff members Tom Hawkins, Robert Price, Jack Moores, Trefon Angasan, and Lou Ann Backford at BBNC Regional Office in Anchorage.

**February 12, 1993** — Meeting between park archeologist, park subsistence specialist, and Dolly Hermann, President of the Naknek Village Council, at her home.

**February 22, 1993** — *Brooks River Area Alternatives Workbook* mailed to Allen Aspelund, Representative, Bristol Bay Native Corporation, Naknek; Donald Nielson, President, South Naknek Village Council, South Naknek; Ad Beylund, Manager, Paug-Vik, Inc., Naknek; Clara Angasan, President, King Salmon Native Association, King Salmon; and Ralph Angasan, President, Alaska Peninsula Corporation, King Salmon.

**March 11, 1993** — Park archeologist met with Ad Beylund, Manager, Paug-Vik, Inc., Naknek.

**March 1993** — Park archeologist met with Ralph Angasan, President, Alaska Peninsula Corporation, and Clara Angasan, President, King Salmon Native Association, King Salmon in King Salmon and Naknek; also telephoned Norman Anderson, Village Administrator, Naknek Village Council; Donald Nielson, South Naknek Village Council; Terry Hofferle, Bristol Bay Native Association, Dillingham. Mailed workbook to the latter.

**March 25, 1993** — Written responses from Dugan Nielson, Bristol Bay Native Association, Dillingham; Mary Jane Neilson, Alaska Peninsula Corporation

**March 26, 1993** — Written responses from Donald Neilson, South Naknek Village Council, South Naknek; Tom Hawkins, Bristol Bay Native Corporation, Anchorage.

**March 30, 1993** — Written response form Ralph Angasan, Alaska Peninsula Corporation.

**April 20, 1993** — Regional ethnographer and park archeologist met with BBNA personnel and with Mary Jane Nielson, South Naknek.

**April 29, 1993** — Park archeologist met with Mary Jane Nielson and three members of her family at her home.

**December 1993** — Regional cultural anthropologist met with Bristol Bay Native Corporation representatives and an ad hoc group made up of Alaska Peninsula Corporation staff, South Naknek Village Council, King Salmon Village Council, and Bristol Bay Native Association.

**February 1994** — Regional cultural anthropologist met with staff members of the Bristol Bay Native Corporation and Alaska Peninsula Corporation.

**May 1994** — Regional cultural anthropologist met with staff members of Bristol Bay Native Corporation and Alaska Peninsula Corporation. Telephone correspondence with staff members of Bristol Bay Native Association.

**November 1994** — Regional cultural anthropologist met with Bristol Bay Native Corporation staff members and Council of Katmai Descendants.

**May 18–20, 1995** — Three-day meeting at Brooks Camp discussing numerous cultural resource issues with Council of Katmai Descendants, Bristol Bay Native Corporation, South Naknek Village Council, King Salmon Village Council, and Alaska Peninsula Corporation.

**August 1995** — Meeting of the President and Secretary of the Council of Katmai Descendants with the Alaska System Support Office anthropologist.

## LIST OF AGENCIES AND ORGANIZATIONS TO WHOM COPIES OF THE DRAFT DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT AND SUPPLEMENT TO THE DRAFT DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT WERE SENT OR DISTRIBUTED

### Alaska Congressional Delegation

Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young

### Federal Agencies

Advisory Council on Historic Preservation
District Attorney, Anchorage
U.S. Environmental Protection Agency
National Marine Fisheries Service
U.S. Air Force, King Salmon Air Station
U.S. Fish and Wildlife Service, Region 7, Anchorage Field Office
U.S. Geological Survey, Earth Sciences Information Center

### State Agencies

Alaska Department of Environmental Conservation
Alaska Department of Fish and Game
Alaska Department of Tourism
Alaska Department of Transportation and Public Facilities
Alaska Governor's Office
Alaska State Historic Preservation Office

### Local Agencies

Akhiok Kaguyak, Inc.
Alagnak Native Corporation
Alaska Peninsula Corporation

Bristol Bay Borough
Bristol Bay Native Association
Bristol Bay Native Corporation
Chignik Lake Village
Chignik Lagoon Village Corporation
Chignik Lagoon Village Council
Egegik Village Council
Igiugig Native Corporation
Ivanof Bay Village
Kodiak Area Native Association
Kodiak Island Borough
Kokhanok Village Council
Lake and Peninsula Borough
Lake and Peninsula School District
Levelock Natives, Ltd.
Levelock Village Council
Naknek Village Council
Native Village of Chignik
Native Village of Perryville
Native Village of Pilot Point
Native Village of Port Heiden
Oceanside Corporation
Paug-Vik Incorporated, Ltd.
Pilot Point Native Corporation
South Naknek Elders Council
South Naknek Village Council
Ugashik Village Council

### Organizations and Businesses

Alaska Flyfishers
Alaska Wildlife Alliance
Becharof Corporation

Birch, Horton & Associates
Bredesen Company
Cambridge Information Group
Center for Urban Affairs and Policy Research
Chignik River, Ltd.
Cook Inlet Aquaculture Association
Dynamac Corporation
Fortune Properties, Inc.
Joseph Van Os Photo Safaris
Katmailand, Inc.
Katmai Lodge
King Salmon Guides, Inc.
Koniag, Inc. Land Manager
Landau Associates, Inc.
Land-Use Chronicle
National Parks and Conservation Association
Ouachita Coca-Cola Bottling Co., Inc.
Quinnat Landing Hotel
Sierra Club, Alaska Field Office
Steve Lackie Photography
Todds Igiugig Lodge
Tundra Times
Washington Athletic Club
Wilderness Photography
Wilderness Society, Alaska Region

## COMMENTS AND RESPONSES

### SUMMARY OF COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Approximately 1,000 copies of the *Draft Development Concept Plan / Environmental Impact Statement* were distributed to government agencies, public interest groups, and individuals. Written comments were accepted from April 1 to June 30, 1994, a period of 91 days. In addition two public meetings were held, one on May 16, 1994, in King Salmon and one on May 18, 1994, in Anchorage. Questions and comments by the public were not restricted in scope or length.

A total of 73 comment letters were received from government agencies, public interest groups, and individuals during the comment period. All letters are reprinted in this section. NPS responses to all substantive comments are also included in this section. Some comments called for clarification of information in the draft plan/EIS; others required text modifications. No responses are provided to comments that only expressed opinions and did not identify a needed text clarification, correction, or modification.

For informational purposes a list of the agencies, organizations, and individuals of the comment letters reproduced in this document is provided. The page number where each letter can be found follows the commentor's name.


**Federal Agencies**
U.S. Environmental Protection Agency 193

**State Agencies**
Office of the Governor, State of Alaska 196
Department of Community and Regional Affairs 201
State Historic Preservation Office 203

**Native Alaskan Groups**
Alaska Peninsula Corporation 204
Bristol Bay Native Association 206
King Salmon Native Council 214
Paug-Vik Inc., Ltd. 215
South Naknek Village Council 218

**Organizations and Businesses**
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No See Um Lodge 237
Hartley, Inc. Branch River Air Service 238
Quinnat Landing Hotel 240
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

JUN 27 1994

REPLY TO
ATTN OF: WD-126

Bill Pierce, Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, Alaska 99613

Dear Mr. Pierce:

The Environmental Protection Agency (EPA) has reviewed the draft environmental impact statement (EIS) for the Concept Plan proposed for the **Brooks River Area**, Katmai National Park, Alaska. This review was conducted in accordance with Section 309 of the Clean Air Act, and the National Environmental Policy Act (NEPA).

The purpose of the proposed project is to plan for the management, use, and development of the Brooks River Area, Katmai National Park. The preferred alternative includes: removal of all National Park Service (NPS) and concessions facilities north of Brooks River; designation of the north side of the river as a people-free zone, construction of new visitor facilities on the Beaver Pond Terrace south of the river; establishment of day use limits for the Brooks River Area; recommendation of temporary closures on reaches of Brooks River during times of intense bear use; and, improvement of the area's interpretation program. Based on our review we offer the following comments.

Other than a brief description, and the large scale, somewhat ambiguous maps that have been provided, the draft EIS does not attempt to identify and delineate wetlands in the project area. Given that the preferred alternative will, to some degree, impact approximately 105 areas of undisturbed habitat, the potential for direct wetlands impacts should not be overlooked. In particular, it appears there is a potential for wetlands impacts in the vicinity of the proposed float plane access, boat tie-downs and docking, barge wharf and contact station on Naknek Lake. Construction of the facility access road, and widening of the existing Valley Road may also result in direct wetlands impacts.

1a Wetlands areas should be formally delineated using the Army Corps of Engineers (ACE) 1987 Wetlands Delineation Manual; the applicant's jurisdictional determinations should be verified by the ACE. Further, the EIS should be revised to document efforts to avoid wetlands losses and minimize impacts. Compensatory mitigation should be outlined in the revised EIS for all unavoidable wetlands losses. Finally, a discussion of all potential permits (e.g. Section 404 permit from the ACE) that may be required for this project, should also be included in the final EIS.

In a related matter, as part of the preferred alternative, the gravel road which currently restricts the natural hydrologic connection between the Oxbow marsh south of the Brooks River and the River itself, will be converted to trail use. The final EIS should

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General Comment: The National Park Service has considered the comments by the EPA on the *Draft Development Concept Plan/Environmental Impact Statement* for the Brooks River Area. We agree that the EIS does not delineate wetlands in the project area other than in a general sense with the maps that show marshes and waterways. No National Wetland Inventory maps have been produced for the area, and no formal wetlands determinations have been made in the Brooks River area. Wetland determinations would be obtained as a part of the comprehensive design for the project and considered in an environmental assessment tiered from the EIS. The National Park Service will abide by Executive Order 11990 ("Protection of Wetlands") and the NPS *Wetland Protection Guideline* of May 28, 1980 (see 45 FR 35916 as revised by 47 FR 36718).

1a. The National Park Service agrees. When one of the development alternatives is chosen and comprehensive design is begun, wetlands in proposed development footprints would be formally delineated according to Army Corps of Engineers methods and procedures. Wetlands are seldom delineated for conceptual plans such as this because the actual footprints for proposed impacts are not known, and, due to the dynamic nature of wetland margins, delineation would be best accomplished during the comprehensive design phase.

The planning strategy employed in each conceptual alternative was to reduce human impacts on bears and their habitat. By proposing facility relocations that would decrease impacts on bear habitat de facto protection for wetlands was also being proposed. Wetlands were avoided in the plan proposals and wetlands impacts would be less in each alternative, than what occurs now.

Since the exact surface amount of wetlands that would be impacted cannot be determined until formal wetlands delineation is completed during comprehensive design, mitigation will be discussed in the environmental documentation for the comprehensive design. It is generally felt, however, that there would be a net benefit on wetlands by moving the existing Brooks Camp facilities from the north side of Brooks River. Eliminating the floating bridge, the artificial trail dike on the north side of the river and the multiple-wheeled vehicle crossings at the river mouth would be positive mitigation steps. Most improvements along the river would be pier-platforms and boardwalks that would minimumly affect wetlands. A Statement of Findings would be prepared during the comprehensive design effort that would discuss whatever mitigation would be needed to compensate for unavoidable wetlands losses.

The draft DCP/EIS recognized that permits would be required for some existing and/or proposed actions. The final EIS includes an appendix with a list of potential permits needed to complete the project. Environmental documentation accompanying the comprehensive design will discuss permit requirements as necessary

## COMMENTS



1b investigate the possibility of reestablishing this natural hydrologic connection, conceivably through constructing culverts under the trail.

1c Furthermore, the FIS should evaluate potential measures for mitigating construction related impacts on the water quality of Naknek Lake, Lake Brooks and adjoining waterways. Specifically, the section on surface water quality should fully consider both temporary (i.e., construction-related) and permanent impacts of the construction of the barge facilities, floatplane access and other related features. Additionally, a contingency

1d plan for fuel spills resulting from potential barge accidents or vehicle refueling activities should be evaluated in the final EIS.

1e Finally, given the very substantial increase in tourism in the Brooks River Area (900% increase over the past ten summers), it is foreseeable that Park facilities will eventually be expanded beyond what is planned for in the draft EIS. Therefore, the final EIS should include a commitment to prepare supplemental NEPA documentation if future expansion warrants it.

In conclusion, based on our review and in accordance with EPA policy, we have rated this draft EIS as EC-2, indicating that we have environmental concerns (EC) about the proposed project. In particular, the draft EIS does not adequately assess the proposed project's potential wetlands impacts. Additionally, the document does not adequately evaluate the potential for impacts to surface water quality, or present contingency measures to ensure that surface water quality is not impacted by accidental fuel spills. Accordingly, additional information (2) is required in the final EIS to address these issues.

Should you have any questions concerning our comments, please contact Wayne Elson of my staff at (206) 553-1463.

Sincerely,

Joan Cabreza, Acting Chief
Environmental Review Section

cc: Larry Norris, NPS Denver Service Center
U.S. Army Corps of Engineers, Anchorage District

## RESPONSES

1b. The final EIS addresses this concern in each alternative where it is technically feasible to do so.

1c. When the comprehensive design progresses far enough to estimate wetlands impacts it will also discuss potential measures for mitigating the related impacts of construction activities on water quality in the Brooks River area. Potential temporary and permanent construction impacts will be better understood after the actual locality for barge, boat, and floatplane access has been determined and the type of construction that would be used (e.g., piers, floating docks, breakwater). The National Park Service will attempt to minimize adverse impacts on water quality during construction activities by using the best available technology and methods. The National Park Service would comply with the necessary requirements and permits to mitigate impacts on water resources during construction. More specific details about how that would be accomplished will be discussed in subsequent environmental assessments.

1d. The National Park Service has a draft spill prevention, control and countermeasure (SPCC) plan for the current facilities in the Brooks River Area. A revised SPCC plan would be prepared for new facilities as necessary.

1e. A basic premise to all the development alternatives in the draft plan is that use limits would be established that would preclude facility expansion "beyond what is planned for in the draft" plan. Supplemental environmental documentation tiering from the final EIS will be completed on construction activities as their impacts become known through comprehensive design.

**SUMMARY OF THE EPA RATING SYSTEM FOR DRAFT ENVIRONMENTAL IMPACT STATEMENTS: DEFINITIONS AND FOLLOW-UP ACTION ***

Environmental Impact of the Action

LO–Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplish with no more than minor changes to the proposal.

EC–Environmental Concerns

The EPA review has identified environmental impacts that should be avoid in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO–Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU–Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1–Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2–Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoid in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3–Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussion are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 policy and Procedures for the Review of Federal Actions Impacting the Environment.

STATE OF ALASKA

WALTER J. HICKEL, GOVERNOR

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

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NATIONAL PARK & PRESERVE
JUL 5 1994

June 30, 1994

John M. Morehead
Director
National Park Service
2525 Gambell Street
Anchorage, AK 99503

Dear Mr. Jack Morehead:

The State of Alaska has reviewed the draft Development Concept Plan and Environmental Impact Statement for the Brooks River area within the Katmai National Park and Preserve. This letter represents the consolidated comments of the State's resource agencies.

2a

Brooks Camp was initially developed, not because of bears, but to support the world class recreational fishing opportunities present on the Brooks River. The Development Concept Plan clearly shifts recreational use of the river area away from recreational fishing toward bear viewing. While we recognize the value of local bear viewing opportunities, the State does not support any alternative which is biased against traditional, non-impacting, consumptive, recreational activities.

Alternatives

2b

We are dismayed that this internationally recognized sport fishing opportunities along the Brooks River are being forsaken by park managers. The National Park Service (NPS) has been developing a bear viewing program which has heightened conflicts between bear viewers and recreational anglers. For example, the bear viewing platform and footbridge were placed at a key recreational fishing area. Consequently, recreational anglers are placed in direct view of people watching bears. When funds were recently available to make improvements for visitor facilities, the NPS chose not to elevate and move the location of the footbridge--the single most cause of bear/human conflicts in the area.

01-A35JH

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2a. The DCP does not shift "recreational use of the river area away from recreational fishing toward bear viewing." This shift occurred years ago when bears became more common on the river. It is commonly recognized and supported in survey data that the major reason people visit Brooks River is to view bears. Indeed, the 1993 Brooks Lodge brochure dedicates the full cover and most of the photos and text to extol the wonderful bear viewing opportunities there. Only on the last page is sportfishing mentioned, and then only in one paragraph with one photo. The focus at Brooks River is bears and the opportunities to view them in a natural setting.

2b. Sportfishing opportunities along the Brooks River are not being forsaken by park managers. This planning effort is attempting to define the experience and visitation levels that will ensure continued use of the Brooks River for sportfishing. Without a clear definition of the experience the anglers seek, and a mechanism to match use to the experience, day use levels would increase until it would be impossible to fish Brooks River in a relatively uncrowded, wilderness like setting. With proper management of visitor use and placement of facilities, the "internationally recognized sport fishing opportunities" at Brooks will continue.

We urge the NPS to increase its focus on enforcement of its own and the State's regulations on food-handling and similar activities which attract bears. During the summer of 1992, the NPS inappropriately implemented a sport fishery closure, preempting State regulatory authority, rather than enforcing and citing a park visitor for violating park regulations at Brooks River. Increased enforcement, education, and limitations, particularly of photographers; as well as redesigning the bridge crossing at Brooks River and bear viewing platforms, should receive increased attention as essential projects regardless of alternative rather than "respond to problem incidents park-wide." The latter is undefined and certainly of less immediate import than enforcing existing regulations. We remain unconvinced that any alternative will realistically solve bear/human conflicts until the bear viewing platforms and river crossing are designed to reduce encounters. We support no alternative which includes the proposed reductions on sport fishing activities.

2c

NPS must also simultaneously revise day-to-day operations to include "training" of bears, as is done through the State's highly acclaimed McNeil River bear viewing program. Such training does not affect the "natural" state of the bears; such training, along with steps to reduce unnecessary encounters, would allow visitor uses of the area to further increase without impacts to the bear population.

2d

The bears have coexisted with recreational anglers at Brooks River for decades. We believe the bears, bear viewers, and recreational anglers can coexist at Brooks River. Instead, the orientation throughout the plan is to unnecessarily reduce fishing activities in favor of limited viewing opportunities.

2e

Bristol Bay Native Corporation Views

State agencies are aware of the interests of the BBNC concerning an increased focus on day use of the park, dispersing recreational use to other areas, and shifting overnight lodging out of the vicinity of Brooks Camp. Generally the State is supportive of BBNC's observations and suggestions, with the notable exception of proposals to limit sport fishing.

Specifically, the State endorses the following concepts:

* The plan should place greater emphasis on promoting a gateway community orientation, which is consistent with ANILCA Sections 1306 and 1307. Such an approach would provide a stronger contribution to the regions's cultural and economic health.

* The plan should disperse visitors to other locations within the park and avoid unnecessary restrictions to visitation.

2c. The National Park Service agrees, that is why every development alternative provides for a redesign of bear viewing platforms, redesigns or eliminates the floating bridge, and manages vegetation along the trails to reduce human/bear encounters. No alternative claims to solve human/bear conflicts, but all development alternatives would reduce such conflicts. No alternative proposes reductions specifically for sport fishing activities on Brooks River. All alternatives propose better river corridor management to reduce human/bear conflicts. To establish temporary closures on parts of the river when bear use is high is only common sense safety. Bear watchers, bird watchers, wildlife photographers and anglers would all be subject to the temporary closure. This plan is not against sportfishing in Brooks River. The plan states that a desired future for the visitor experience is to "make brown bear habitat along Brooks River accessible for bear viewing and sportfishing in a manner as safe as possible for visitors and to the degree that it does not significantly interfere with wildlife use and behavior."

2d. NPS *Management Policies* state: "The National Park Service will seek to perpetuate the native animal life...as part of the natural ecosystems of parks. Management emphasis will be on minimizing human impacts on natural animal population dynamics" (Ch 4:5). And in regard to animal control or "training," policies state: "Where persistent human/animal conflict problems exist, a determination will be made of whether or not curtailing or modifying visitor use and other human activities might be a more desirable alternative" (Ch 4:6). Habituation or "training" as the commenter calls it certainly works at McNeil River, where only 10 visitors are allowed in per day and fishing is prohibited when bears are present.

2e. The state of Alaska saw the wisdom in prohibiting sportfishing where bears temporarily gather on McNeil River, and has consequently provided for one of the safest bear viewing opportunities in the world. The National Park Service does not seek to follow the state's example by reducing sportfishing activities in favor of limited viewing opportunities. Refer to response 2c for common sense safety all river users would be subject to the temporary closure. This plan is not biased against sportfishing as the commenter implies. It does propose a river corridor management strategy that would benefit visitors and wildlife alike.

## COMMENTS



2f

At least one new alternative should include a well-developed gateway community approach which highlights the linkages between the Brooks River area, the remainder of the park, and the surrounding region. Such an approach should specifically focus on the balance between ease of management and improving the economic well-being of the region's economy.

Cultural Resources

Consistent with BBNC's comments about the cultural significance of the Katmai area, the State believes that NPS should emphasize both *protection* of cultural resources and their *interpretation*. The current placement and operation of Brooks Camp facilities, for example, is both detrimental to the cultural resources and does little to direct visitor attention to the rich cultural history of this historically and archaeologically significant area. More emphasis is needed in research and interpretation in cooperation with local residents whose ancestors were the first to utilize and appreciate the significance of this area.

State Ownership of Navigable Waterways

The State continues to assert ownership and management jurisdiction over the beds of navigable waterways and the watercolumns throughout the Katmai National Park and Preserve. The NPS does not have the authority to manage or restrict uses of these waterways, and must approach the State with any management proposals for these areas.

Public and State Involvement

2g

We request that commitments to full and active future participation by the public in general, and the State in particular, be clearly inserted up-front in the plan. Although there is a listing of all other plans for Katmai and description of their relationship to the Brooks River planning effort, there is no recognition of the role of the public and State, as required by the ANILCA, in preparation and revisions of the plan. Adoption of the General Management Plans (GMPs) for each park unit was contingent upon subsequent step-down planning efforts invoking the same public and State involvement as required of the umbrella documents (ANILCA Section 1301). It was generally understood that the original GMPs did not contain the required specifics and details, hence many commitments were made that similar public involvement would be incorporated into subsequent plans.

2h

The State is concerned about this issue based on the track record of this DCP in the last few years. Initial alternatives prepared by the NPS were discussed in a meeting in July, 1991. As a result of this meeting, both the State and NPS concurred that additional data was necessary, and commitments were made to

## RESPONSES

2f. Alternative 4 of the plan has been modified to include the potential development of a gateway community concept related to park visitation, lodging, tour boat access and other service functions.

2g. All public involvement requirements of NEPA were met.

2h. A wildlife biologist with the Alaska Department of Fish and Game, stationed in King Salmon, has been a consultant to the NPS planning team since the initiation of this project. The plan has benefitted at all phases from the professional input received by the state's representative. The NPS Alaska Regional Office has held periodic meetings with the State CSU Coordinator and other representatives to discuss the status and progress of the plan. The National Park Service looks forward to more state consultation and coordination during the implementation phases of this plan. Also public meetings are open to the state.

cooperatively conduct further research and come up with revised alternatives. At an August 1993 briefing meeting covering the status of planning for Brooks Camp, Department of Fish and Game (DFG) representatives raised a number of specific data questions regarding research design, alternate measures to reduce bear/human encounters, and steps to resolve some of the immediate people management problems. In the time between these two meetings, our records indicate that the NPS only contacted DFG on three occasions seeking input into bear research studies and related possible activities. The consultations did not address the range of concerns previously raised by DFG and cannot be considered adequate consultation or coordination as required in ANILCA Section 1301 and reiterated in the GMP.

Use of the Statement for Management

We once again strongly object to application of management direction which is derived from the "Statement for Management" (page 5). The Statements for Management for each Alaska park unit were unilaterally prepared by the NPS subsequent to passage of ANILCA without the public involvement required in ANILCA Section 1301. The State strongly objected to the adoption of the decisions contained in those documents and has consistently objected to their continued inappropriate use as guidelines for management of the units. Such continued use of these documents is contrary to clear Congressional intent that the public and state be fully involved in planning decisions regarding resources.

Management Objectives

The State has also consistently maintained that numerous management objectives within the "Statement for Management" are in conflict with mandates of ANILCA. For example, objective #2 contains an direction which could conflict with ANILCA mandates:

> Objective #2: "maintain the park and preserve as an area where brown bears can exist as naturally as possible with minimal adverse impacts from humans"
>
> Yet ANILCA mandates the unit be managed to "protect . . . recreational features."

Obviously the Brooks River area has been used historically as a significant recreation area for sport fishing. The population of bears is stable or higher than in previous years. As such the population is not impacted by the sport fishing activities which continue in the area. The plan inappropriately focuses on restricting fishing-related activities and public access.

2i

2i. The Katmai National Park and Preserve management objectives contained in its "Statement for Management" are not in conflict with the ANILCA at all, but rather reflect its breadth and benefits to all Alaskans. The partial quote with which the commenter has chosen to illustrate the state's view could be misconstrued. The entire quote is shown in the plan in the section titled "Legislation Affecting the Brooks River Area." Section 202(2) of the ANILCA states:

> The monument addition and preserve shall be managed for the following purposes, among others: To protect habitats for, and populations of, fish and wildlife including, but not limited to, high concentrations of brown/grizzly bears and their denning areas; to maintain unimpaired the water habitat for significant salmon populations; and to protect scenic, geological, cultural, and recreational features.

The priority that the Congress set for the protection of recreational features at Katmai National Park and Preserve would seem to follow in importance the other listed natural and cultural resources.

As the commenter suggests, the local bear population at Brooks River probably has not been affected numerically by sportfishing activities, however, scientific studies have documented numerous times that habituation and food-conditioning of bears is occurring on the river as anglers compete directly with the bears for the salmon resource. One of the stated public use objectives in this plan for the Brooks River area is that "opportunities for wildlife viewing, photography, and fish oriented recreation that is low density in nature will be provided." Reasonable public access and uncrowded fishing-related activities will continue to be available at Brooks River under all development alternatives in this plan.

Conclusion

The State does not support any of the alternatives as currently written, and specifically opposes any alternatives which restrict sport fishing. We urge the NPS to work with the State and the public, including BBNC, to develop a new alternative, perhaps even a new draft DCP, which facilitates both existing and future types of recreational public use.

Thank you for the opportunity to comment on this plan. If you have any questions, please feel free to call this office.

Sincerely,

Sally Gibert
State CSU Coordinator

cc:
Bill Pierce, Superintendent, Katmai NP&Pr
Harry Noah, Commissioner, Department of Natural Resources
Carl Rosier, Commissioner, Department of Fish and Game
John Sandor, Commissioner, Department of Environmental Conservation
Bruce Campbell, Commissioner, Department of Transportation and Public Facilities
Richard Burton, Commissioner, Department of Public Safety
John Katz, Governor's Office, Washington, D.C.

STATE OF ALASKA

DEPARTMENT OF COMMUNITY AND REGIONAL AFFAIRS

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June 22, 1994

Superintendent
Katmai National Park and Preserve
P. O. Box 7
King Salmon, AK 99613

Dear Madam or Sir:

RE: BROOKS RIVER AREA DRAFT DEVELOPMENT CONCEPT PLAN

The department appreciates the opportunity to review and provide comment to the National Park Service's draft Development Concept Plan for the Brooks River Area of the Katmai National Park and Preserve. One of the department's missions is to assist rural Alaskan communities in strengthening and diversifying their local economies. Some of the development alternatives recommended in the plan would provide an opportunity for the nearby communities to receive economic benefit from the visitor industry generated by the the park's wilderness attractions.

3a

In review of the four alternatives, the department suggests that perhaps an additional alternative should be considered. The new alternative would combine the attributes identified in development alternatives two and four, including construction of more camp grounds to facilitate a greater number of visitors to the park. Development of the visitor facilities mentioned in those alternatives would designate the communities of King Salmon and Naknek as gateways for visitors to the park. This concept has proven highly successful for the City of Seward as being the gateway community to the Kenai Fjords National Park.

The economic impacts associated with the recent down-sizing of the Air Force base in King Salmon and the decrease in value of Bristol Bay salmon to the Naknek fishermen has forced the local leadership of these communities to seek other economic activities as a means to sustain their economies. Tourism development is fast becoming a significant contributor to the area's economy and your agency could easily accommodate this development by adopting the suggested development alternative.

21-P1LH

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3a. See response 2f.

## COMMENTS

Superintendent
Katmai National Park and Preserve
June 22, 1994
Page Two

3b

Clearly, it would not be in the best interest for the state to support those enclave development alternatives that provide enclave facilitation of long term visitors because of its diminutive benefit to the neighboring communities and local residents.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Edgar Blatchford
Commissioner

cc: Tom Peterson, Statewide Economic Development Specialist

## RESPONSES

3b. Concessions development within parks (enclave development) often contributes to the local economy. Alternatives 2 and 3 would produce both short-term and long-term economic benefits for the gateway communities of King Salmon and Naknek. See comment 13h.

IN REPLY REFER TO:

United States Department of the Interior
NATIONAL PARK SERVICE
Katmai National Park and Preserve
Aniakchak National Monument and Preserve
P.O. Box 7
King Salmon, Alaska 99613

May 9, 1994

MEMORANDUM

TO: SUPERINTENDENT KATM

FROM: PARK ARCHEOLOGIST KATM

SUBJECT; RECORD OF TELEPHONE CONVERSATION, 5/9/94 AT 2:00 P.M.

TIM SMITH, STAFF ARCHEOLOGIST AT THE STATE HISTORIC PRESERVATION OFFICE, STATE OFFICE OF HISTORY AND ARCHAEOLOGY, ANCHORAGE, CALLED TO SAY THAT HE LIKES THE SOUND OF ALTERNATIVE #2 FOR BROOKS RIVER, AS IT IS DESCRIBED IN THE BROOKS RIVER DEVELOPMENT CONCEPT PLAN ENVIRONMENTAL IMPACT STATEMENT.

4. Comment noted.

## COMMENTS

ALASKA PENINSULA CORPORATION
800 Cordova St., Suite 103
P.O. Box 104360
Anchorage, Alaska 99510
Telephone (907) 274-2433
Telecopier/Facsimile (907) 274-8694

April 27, 1994

John Morehead, Regional Director
National Park Service
2525 Gambell St. Rm. 107
*Anchorage, AK 99503*

Dear Mr. Morehead:

Alaska Peninsula Corporation is the village corporation for the village of South Naknek. We own lands that are adjacent to Katmai National Park and many of our shareholders are direct descendants of the people who fled their homes when Novarupta erupted in 1912.

APC has always had an active interest in development plans at Katmai National Park because we believe the value of our 92,240 acres of land adjacent to the Park's southern boundary will certainly have more value because of the park than if there were no parks in the area.

5a We support alternative #4, the day use only alternative that is cited in the draft development/concept plan for the use in the Brooks River at Katmai National Park. Under this alternative, economic opportunities in the tourism industry will be more available to the local businesses than if there were a concessionaire operating in the park.

5b In alternative #2, the moving of the development to an area south of the area currently used would not address the problem with development within an archaeological area.

5c In addition, the Park Service has not addressed the possibility that this area is encroaching upon a Native Allotment Claim by the heirs of the Pelegia Estate. The Native Allotment question is far from over. Although the Park Service successfully appealed the allotment claim to the IBLA, the issue will be resolved in Federal Court.

5d Alternative #3 would remove all development to the Iliuk moraine. We are also opposed to this alternative because it would disturb the unique quality of the area. As children, we migrated up to the Iliuk area each year for spiritual connectedness with our ancestors. Our ancestors traveled to this area each year to harvest salmon. We have always regarded the Iliuk as holy ground and would consider any development at Iliuk as an act of desecration to land that our ancestors used.

Yours truly,

Mary Jane Nielsen, General Manager
ALASKA PENINSULA CORPORATION

## RESPONSES

5a. Comment noted.

5b. There is no evidence that any archeological sites would be destroyed by new roads or lodging facilities proposed on the Beaver Pond terrace (alternative 2). Reconnaissance level archeological surveys of the areas proposed for future development have failed to locate archeological sites. The National Park Service believes there is very little likelihood that significant sites are in those locations. In environments similar to those of the study areas, buried sites without a surface manifestation, if they exist at all, tend to be very small, and can easily be avoided during design phases. The "Part Four: Environmental Consequences" — "Impacts on Cultural Resources" sections of the final plan have been modified to clarify this.

The plan states that the National Park Service would conduct archeological surveys and, when appropriate, subsurface testing of areas proposed for development away from the Brooks River area in order to verify the presence or absence of archeological resources. If, in the remote chance that such resources are found, the National Park Service would take the effects of proposed developments on cultural resources into account during specific design and implementation of the actions, avoiding cultural resources where feasible. The National Park Service would consult with the State Historic Preservation Officer, the Advisory Council on Historic Preservation, and interested Native Alaskan groups on all specific development and construction plans in accordance with section 106 of the National Historic Preservation Act.

5c. On September 24, 1993, the Interior Board of Land Appeals issued a decision that concluded that no portion of the Native Allotment application of Palakia Melgenak was valid. That decision was final agency action for the Department of the Interior. Unless the final determination of the department is set aside by a federal court, the lands that once encompassed the application continue to be park lands that are appropriately considered in the planning process.

5d. The National Park Service did not have access to information that the Iliuk Moraine area had cultural significance to a recognized Native Alaskan group when the draft was prepared, despite the fact that the Alaska Peninsula Corporation and other neighboring Native Alaskan groups were provided copies of the summer 1991 *Brooks River Area Development Concept Plan Workbook* which described and illustrated a conceptual development alternative on the Iliuk Moraine. Additional copies were provided to the corporation in February 1993. This information has been integrated into the final plan. The description of impacts on ethnographic resources for alternative 3 has been modified to reflect a potential adverse effect.

BRISTOL BAY BOROUGH ASSEMBLY
RESOLUTION 94-9

A RESOLUTION CONCERNING THE KATMAI NATIONAL PARK OPTIONS

WHEREAS, the Bristol Bay Borough Serves the communities of Naknek, South Naknek and King Salmon and could be impacted by any action taken by the Park Service on use alternatives for the Katmai National Park, and

6a WHEREAS, the Beaver Pond Terrace is unacceptable because there are significant archaeological sites at this location, and

6b WHEREAS, the Illiuk Moraine Terrace is an unacceptable site because any development would destroy the cultural and pristine mysticism of the area, and

WHEREAS, the Brooks River site is in an archaeological zone that already has suffered an oil spill on the archaeological site, and

6c NOW THEREFORE BE IT RESOLVED that the Bristol Bay Borough Assembly recommends that the National Park Service delay any actions for 90 days and consider alternatives that provide protection to the environment and archaeological sites as well as provide more access to other areas of the park and ask that all interested parties participate.

PASSED AND APPROVED BY THE ASSEMBLY OF THE BRISTOL BAY BOROUGH, ALASKA THIS 16th day of May, 1994.

Assembly President

ATTEST:

Borough Clerk

KATMAI NATIONAL PARK & PRESERVE JUN 10 1994 KING SALMON, AK



6a. Archeological surveys have indicated that there are no surface manifestations of archeological sites on the Beaver Pond Terrace.

6b. See response 5d.

6c. Alternatives 2, 3, and 4 provide protection to the environment and archeological sites on the Brooks River.

BRISTOL BAY NATIVE ASSOCIATION
P O BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257

May 9, 1994

John Morehead
Regional Director, National Park Service
2525 Gambel, Room 107
Anchorage, AK 99503

VIA TELEFAX

Dear Mr. Morehead;

Recent events have galvanized a number of thoughts in my mind regarding the Brooks River Area of the Katmai. It is more than apparent that the region of Bristol Bay, especially the Native community has unified behind an approach to management, use, and development of the National Park there.

7a

BBNA's concerns regarding management of the Katmai have been and continue to be:

1. Protection, preservation and illumination and repatriation of the archaeological and cultural resources of the Katmai. Repatriation may seem to be a strange word to use for sites and artifacts still in the ground - and for cultural resources that live today - but these have been held hostage by the federal government since creation of the Park.

   There have been some changes since the people of the Katmai were locked out of their ancestral homelands. Recognition of the importance of the archaeological sites in the Katmai to the "family of man" is a major change of the intervening years - however recent developments at Kukak by have demonstrated that we are the best watchdogs for the protection of archaeologically important sites. Our fears for the Kukak site have been characterized by the fear of "another Brooks Camp in the making".

2. Concern for the sound management and wise use of the fish and wildlife habitat of the Park and its ecosystem. The major fishery resource originating in the Katmai is one upon which our regional economy is dependent.

3. The failure of Park management to date to live up to the commitments to local hire and local economic development



7a. The National Park Service is recognized throughout the country as the preeminent caretaker of the nation's cultural resources, including the protection and preservation of archeological resources. The proposal to move most development away from the Brooks River Archeological District and National Historic Landmark has been in part prompted by this concern. The National Park Service regards repatriation as it is legally defined by the Native American Graves Protection and Repatriation Act of 1990. Under this act, any human remains or objects defined by the law to qualify for repatriation will be repatriated to the appropriate direct descents or culturally affiliated group.

owed the Native community and imposed by secs. 1306, 1307, and 1308 of the Alaska National Interest Land Conservation Act.

7b

The alternative presented in the National Park Service's Draft Development Concept/Plan/Environmental Impact Statement which best meets these concerns is alternative #4. This alternative calls for a reorientation of management and use which takes an affirmative approach to our continuing concerns. This alternative would move toward ameliorating some of the damage done to the archaeological site at Brooks Camp, avoid the risk of developmental damage to the spawning stream, and establish King Salmon as the "Gateway to the Katmai" with all of the economic potential attendant to that designation.

BBNA's Board of Directors will consider a Resolution endorsing Alternative #4 at its meeting on May 13. If there is anything that we can do to promote this issue please call me.

Sincerely,

Terry Hoefferle
CEO



7b. See response 2f.

**BRISTOL BAY NATIVE ASSOCIATION**
P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257

KATMAI NATIONAL PARK & PRESERVE
JUN 0 8 1994
KING SALMON, AK

Bill Pierce
Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

June 6, 1994

Dear Mr. Pierce,

This letter is in response to the April 1994 Draft Development Concept Plan/Environmental Impact Statement (DCP/EIS) for the Brooks River Area in the Katmai National Park and Preserve.

The fishing season in Bristol Bay starts in early May. Due to this fact, the draft DCP/EIS deadline allows very little time for the public to react. The comment period should be extended until November. This would allow adequate time to research the draft plan and comment on it.

**No Action Alternative** - Please refer to pages 96-98 under Cultural Resources. This section shows that the NPS is well aware of the valuable archeological sites in the Brooks Camp area. Brooks Camp alone exists on top of four archeological sites. The NPS is also aware of the site damage that has occurred since 1931 when Katmai National Monument boundaries were expanded to include this area. The integrity of 11 sites is being destroyed due to construction activities, severe erosion from human sources, and fuel contamination by leaking fuel tanks and lines. Brooks Camp and

8a



8a. As stated on p. iii of the plan, the no action alternative was described in detail as required by NEPA and to provide a basis from which the reader could respond to the issues and proposals. It is not the NPS proposal.

## COMMENTS

associated construction should be removed from these valuable archeological sites before more damage is done. In the future, the NPS needs to strictly adhere to the requirements of Section 106 and 110(f) of the National Historic Preservation Act to preserve archeological sites in the park. The No Action Alternative should not be considered.

8b

**Alternative 1** - Minimum Requirements. Additional construction at the existing Brooks Camp would escalate the damage already done to the archeological sites. The construction of new pit toilets, enclosed food storage and preparation shelters, piping for potable water, new visitors center, barge dock, and an elevated foot bridge would add to the destruction. Alternative 1 should not be considered.

8c

**Alternative 2 and Alternative 3** - Beaver Pond Terrace and Iliuk Moraine Terrace Development. Although these alternatives would remove all facilities north of the Brooks River, the plans call for new roads and lodging facilities to be built in Katmai National Park. If either of these development plans were executed, large areas of natural old growth spruce forest would be destroyed and additional archeological sites could be destroyed.

On May 23, 1994, Secretary of the Interior Bruce Babbitt spoke at Independence National Historical Park in Philadelphia, Pennsylvania. He stated that the Park Service would not build additional roads or lodging facilities within the National Parks. Secretary Babbitt also stated that if the need arose for more overnight accommodations, it should be done outside the parks. The Secretary further stated that the gateway communities outside the parks should also serve as staging areas,



## RESPONSES

8b. Alternative 1 is not the NPS proposal, partly due to the impacts on archeological sites as listed by the commenter.

8c. Approximately 15 acres of white spruce forest would be cleared on the Beaver Pond terrace or the Iliuk Morraine terrace. There is no evidence that any archeological sites would be destroyed by new roads or lodging facilities proposed on the Beaver Pond terrace or the Iliuk Moraine terrace. Reconnaissance level archeological surveys of the areas proposed for future development have failed to locate archeological sites. The National Park Service believes there is very little likelihood that significant sites are in those locations. In environments similar to those of the study areas, buried sites without a surface manifestation, if they exist at all, tend to be very small, and can easily be avoided during comprehensive design of facilities.

## COMMENTS

where visitors can learn about the park and plan their excursions, all without adding to the congestion inside the National Parks.

We agree with Secretary Babbitt. The development of a new lodge site and new roads should not occur in Katmai National Park. The villages around Katmai National Park and Preserve should serve as the gateway communities to the Park and Preserve. This would help the Park Service come into compliance with Sec. 1306, 1307, and 1308 of the Alaska National Interest Land Conservation Act. These sections require a preference for local hire, local economic development and for Native Corporations to have a preference in concession contracts. This preference can no longer be ignored. Alternative 2 and 3 should not be considered.

8d

**Alternative 4** - Although this is the best of the alternatives given, it still has problems. This alternative focuses too much on Brown Bear viewing and doesn't focus enough on the purpose for which the Park was created. Its purpose was to preserve the living laboratory of the cataclysmic 1912 volcanic eruption, particularly the Valley of Ten Thousand Smokes. The National Park Service should put more focus on the road into the Valley of Ten Thousand Smokes. This aspect of the park has untapped tourism value. In addition, large bear viewing platforms should be scaled down along the Brooks River. It seems that other streams, creeks and rivers within Katmai could be used as additional bear viewing areas. This would help alleviate the overcrowded bear viewing platform problems now experienced at Brooks River.

8e

8f



## RESPONSES

8d. See response 2f.

8e. The plan calls for a maximum number of daily trips to the Valley of Ten Thousand Smokes and for improvements along the Valley Road.

8f. Construction of more bear viewing platforms in the park would not alleviate overcrowded viewing conditions on the platforms at Brooks River. Only limiting the number of people at one time on the platforms will resolve the crowding issue.

The Katmai National Park and Preserve Staff should take a hard look at modifying alternative 4 or consider an alternative 5. For example:

**Alternative 5** - Day Use Area and Camp Ground Facilities.

1. Concept Statement

This alternative could emphasize the Valley of Ten Thousand Smokes and bear viewing at Brooks River as well as other locations in the Park. This plan would remove all facilities north of the Brooks River and develop a day use facility and campground on the south side of the Brooks River. This plan would also call for tour boats on Naknek Lake to take tourists and supplies to a landing site south of the Brooks River.

8g

A cultural and educational site should be developed. The unique culture and religion of the people who lived the park for thousands of years should be emphasized.

2. Visitor Experience and Use Limits

Most visitors would arrive by boat and float plane on Naknek Lake beach somewhere south of the mouth of Brooks River. They would then go to a visitor contact station for an orientation of the unique characteristics of the Valley of Ten Thousand Smokes and Brooks River Area. A bear safety message would be included in this orientation. Alternate access could be at Lake Brooks when the weather makes landing on Naknek Lake unsafe. A contact station in the Old Log Cabin on Lake Brooks could be staffed at those times.



8g. Alternative 4 of the plan has been modified to include the potential development of a gateway community concept related to park visitation, lodging, tour boat access, and other service functions. However no developed campsite south of the river was included in the modification for reasons explained in the plan. The National Park Service intends that the culture and religion of the people who inhabited the Brooks River area for thousands of years would be interpreted in all of the plan alternatives. This theme has been recognized as significant in the park's 1993 *Interpretive Prospectus*. The suggested presence of 225 visitors plus an unknown number of park and concessions staff per day in the area could re-create the crowded and potentially dangerous visitor conditions that this plan is attempting to resolve by establishing reasonable use limits to preserve the wildlife viewing and sportfishing opportunities along the Brooks River.

After receiving the orientation and safety message, visitors could board a shuttle to be taken to the campground, day use shelter, or the Naknek Lake visitor contact station. Campgrounds could be made to accommodate up to one hundred and twenty-five people per day and tour boats could bring an additional one hundred visitors per day. Brooks River fishing should be catch and release only. This would leave no need to build a fish cleaning building.

3. Additional Concerns

Some of the problem areas that need to be addressed are tour boat and float plane access and dock location, a shuttle system, and a location for a Brooks River management support facility. Building trails on known archeological sites, remediation of the existing Brooks Camp, construction of bear viewing platforms, the long term preservation of archeological sites, and the potential impacts to salmon spawning habitat are other areas that need to be addressed.

The Natural Resources Department at the Bristol Bay Native Association would like to help in ironing out these problem areas with the Draft Development Concept Plan/Environmental Impact Statement for the Brooks River Area. Please don't hesitate to call me or my staff at 842-2743.

Sincerely,

H. Robin Samuelsen Jr.
Natural Resource Manager
Bristol Bay Native Association

cc: Secretary of the Interior, Bruce Babbitt
Assistant Secretary of the Interior, Ada Deere
Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young
Congressman Bruce Vento
Congressman George Miller
BBNC CEO, Tom Hawkins
King Salmon Village Council
Naknek Village Council
South Naknek Village Council

## COMMENTS

## RESPONSES

John Morehead,Regional Director
National Park Service
2525 Gambell St, Rm. 107
Anchorage, Ak 99503

April 30, 1994

Dear Mr. Morehead,

We are the Native Council for the Community of King Salmon. We are tribal members of the Alaska Federation of Natives and the Bristol Bay Native Association. Our members are Alaska Native and enrolled to the Bristol Bay Native Corporation.

9a Our request is two fold. We ask that you select alternative #4 in the draft environmental plan for the use of the Brooks River in the Katmai National Park and secondly, we ask that you designate King Salmon as the Gateway Community for the Katmai National Park.

9b The other three options, Beaver Pond, Iliuk Moraine, and the Brooks River site are not acceptable because any development would destroy the cultural significance of the three archaeological sites.

Sincerely,

Ralph Angasan Sr.
President, King Salmon Native Council

9a. See response 2f.

9b. No known archeological sites exist on the Beaver Pond terrace or Iliuk Moraine terrace. Alternatives 2, 3 and 4 remove modern development from the archeological resources at Brooks Camp. Impacts on known archeological sites under alternatives 2 and 3 would be no different than those under alternative 4.

PAUG-VIK INC. LTD.
P.O. BOX 61
NAKNEK, ALASKA 99633

TELEPHONE
MANAGER: (907) 246-4277
ACCOUNTING: (907) 246-4278
FAX (907) 246-4419

May 10, 1994

NATIONAL PARK & PRESERVE
JUN 02 1994
KING SALMON, AK

Mr. Bill Pierce, Superintendent
U. S. Department of the Interior
National Park Service
Katmai National Park
P. O. Box 7
King Salmon, Alaska 99613

Subject: Alternative 4: Day Use Area Only
Brooks River Area
Katmai National Park

Dear Bill:

Thank you for the opportunity to comment on the proposed Development Concept Plan by the National Park Service on the use, management, and development of the Brooks River Area, Katmai National Park.

Our comments reflect the position taken by the Board of Directors of Paug-Vik Inc. Ltd. the village corporation for Naknek and King Salmon, Alaska. The adopted resolution supporting alternative 4 is attached for the record.

We believe that among the alternatives presented under the concept plan, alternative 4 is the one most effective in preserving the park's natural and cultural resources. It also appears, that it is the least expensive proposition compared to the others in terms of construction and operating cost of maintaining the park system.

With King Salmon becoming the community gateway to Katmai National Park, more businesses will be attracted to the area thus, improving the local economy.

We again thank you for the opportunity to comment on the



10. Comments noted.

published draft DCP prepared by National Park Service.

Sincerely,

Cecil DePedro, Jr.
General Manager

cc: Board Members
Trefon Angasan, BBNC
Mary Jane Nielsen, APC
Terry Hoefferle, BBNA
Don Nielsen, SNVC
Ralph Angasan, Sr., KSNC

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RESOLUTION 94-03

WHEREAS, Paug-Vik Inc., Ltd. is the Village Corporation for the Village of Naknek, located adjacent to the southern boundary of the Katmai National Park, and

WHEREAS, Paug-Vik will be impacted by any action taken by the Park Service on use alternatives for the Katmai National Park, and

WHEREAS, the alternative #4, day-use-only is our preferred alternative with King Salmon designated as the gateway community, and

WHEREAS, King Salmon as the gateway community would preserve the Park as a Pure Park with no developments, and

10a

WHEREAS, the current location at Brooks, the Beaver Pond Terrace and Iliuk Moraine is in an archaeological area and any development would adversely impact the cultural significance of the area,

NOW, THEREFORE BE IT RESOLVED, Paug-Vik Inc., Ltd., a Corporation under ANSCA supports Alternative # 4 in the published draft for the Brooks River at the Katmai National Park.

BE IT FURTHER RESOLVED, this Resolution 94-03 was adopted this 31st day of MAY, 1994 at a Regular Board of Directors Meeting.

John C. Knutsen
President

Sally Leeman
Attest: Secretary





10a. See responses 2f and 9b.

## COMMENTS

John Morehead
Regional Director
National Park Service
2525 gambell Rm 107
Anchorage, AK 99503

May 5, 1994

Dear Mr. Morehead,

The village of South Naknek is within the Bristol Bay Borough and is located about 25 miles down river from the Katmai National Park. The Natives who reside at South Naknek are descendants from the people of the village of Savonoski, now abandoned because of the eruption of Mt. Katmai in 1912.

The Village of South Naknek is listed as a tribe on the Secretary of Interior's tribal list published in October, 1993. The village council is the governing body for the tribe at South Naknek.

We have had an opportunity to review the draft alternatives for the use of the Brooks River in the Katmai National Park. We have a special interest in the plans for Brooks River because many of our Native people travel there to harvest Red fish each year during the month of October.

11a The Brooks River area has been the location where our people have harvested salmon for at least 4000 years. A Native family in our community has claimed this area as a Native Allotment and the ownership is still unresolved.

11b We urge that the Brooks River be designated as a day-use only area and with the headquarters site relocated to King Salmon.

11c We strongly object to The Beaver Pond and Iliuk Moraine alternatives because they are archaeological sites and any development would destroy the quality of this area. The Park was created to preserve the cultural and natural resources. Development within the park would obliterate these qualities.

11d Finally, we suggest that you consider the concept of establishing tourboats for tours and transportation because airplanes disturb the aura or tranquility in the Park.

Sincerely,

Don Nielsen,
President,
South Naknek Village Council

## RESPONSES

11a. The validity of the native allotment claim on Brooks River was resolved on September 24, 1993. See response 5c.

11b. The Brooks River area would be designated a day use area in alternatives 2, 3, and 4 of the final plan. The headquarters of the park already is in King Salmon.

11c. There are no known archeological sites on the Beaver Pond terrace or the Iliuk Moraine terrace. See response 8c.

11d. See response 2f.

South Naknek Village Council
PO Box 70151
South Naknek, AK 99670

June 26, 1994

Bill Pierce, Superintendent
Katmai National Park
PO Box 7
King Salmon, AK 99613

Dear Bill:

Thank you for your recent visit to South Naknek. As you know, South Naknek is located about 25 miles down river from Katmai National Park. The natives who reside at South Naknek are descendants from the people of the village of Savonoski, now abandoned because of the eruption of Mt. Katmai in 1912.

The village of South Naknek is listed as a tribe on the Secretary of Interior's tribal list published in October, 1993. The village council is the governing body for the tribe at South Naknek.

We have had an opportunity to review the draft alternatives for the use of the Brooks River in the Katmai National Park. We have a special interest in the plans for Brooks River because many of our Native people travel there to harvest Red Fish each year during the month of October.

The Brooks River has been the location where our people have harvested salmon for at least 4000 years. A Native family in our community has claimed this area as a Native Allotment and the ownership is still unresolved.

We urge that the Brooks River be designated as a day-use only area and that the headquarters site be relocated to King Salmon.

12

We strongly object to the Beaver Pond and Iliuk Moraine alternatives because they are archaeological sites and any development would destroy the quality of this area. The Park was created to preserve the cultural and natural resources. The development within the Katmai National Park would obliterate these qualities.

Finally we suggest that you consider the concept of establishing tourboats for tours and transportation because airplanes disturb the aura of tranquility in the Park.

Sincerely,

Donald Nielsen, President
SOUTH NAKNEK VILLAGE COUNCIL





12. See responses 5c, 11b, 8c, 2f.

Angler's Paradise Lodges ALASKA

**Katmailand Inc.**

JUN 20 1994 KING SALMON, AK

June 13, 1994

Bill Pierce
Superintendent
Katmai National Park
Box 7
King Salmon AK 99613

Dear Bill,

13a

The NPS DCP for Brooks Camp has on page 4, table 1, statistics that show the increase in visitor use of the area. On Page 3 of the DCP it state "as day use climbs unchecked, the resources and visitor experience suffer". What it doesn't show is that since 1988 most of the the increased use has been during off peak periods; Periods for which no use limits are being proposed.

I have enclosed visitor use statistics that were provided to me by Dave Nemeth, the former Katmai concessions specialist. The statistics cover the period up to 1990 and break out visitation by month and type of visitor. I also have 1992 statistics broken out the same way, but for some reason have none from 1991. I have not seen any 1993 statistics at all.

Please see the attached exhibit 1. Use during July, the peak month, averaged 173 visitors per day in 1988 for both overnights and day users combined. It decreased to 140 and 134 per day respectively for 1989 and 1990. Now look at my attached exhibit 2. In 1992 July visits averaged 185 (Item 5). Item 7 indicates that the 185 was a 23% increase over 1991. That would put the 1991 July average at 150 visitor days.

An interesting side note is that the statistics in attached exhibit 3 shows total visitation at Brooks during 1992 to be 13,920. That is 660 less than the 14,580 shown on exhibit 2 item 5. So perhaps the peak season use for 1992 was a bit less than the 185 per day indicated by exhibit 2 item 5.

What's the point? It is that peak season visitor days appear to have leveled off. The reason is that all overnight facilities at Brooks Camp, King Salmon and the area's fishing lodges were at maximum capacity during July of 88 and probably again in 1992. Since day trips to Brooks from Anchorage are impractical for most people, dramatic increases beyond these levels should not be expected. The number of visitor days essentially has a limit of it's own, even without those being proposed by the DCP.

Increased use during shoulder periods should be viewed as positive by the NPS. Instead, it is used by those who wish to perpetuate the crisis mentality, that visitor use is sky rocketing out of control with no end in sight.

*Located in Katmai National Park*
4700 Aircraft Drive • Anchorage, Alaska 99502 • 907-243-5448 • Toll-Free Reservations 800-544-0551 • Fax (907)243-0649
BROOKS LODGE • KULIK LODGE • GROSVENOR • KATMAI AIR • KATMAI EXPEDITIONS

13a. The section on "Limits of Acceptable Change" in part two of the plan discusses the basic assumptions that were used to create indicators and standards for the four development alternatives, which helped determine the proposed use limits in each development alternative. Beyond a doubt July is the sustained high use period when greatest impacts on resources and visitor experience happen. That is why the focus for use limits is on peak use days in July. These proposed limits do not represent a significant reduction in visitation over the course of a season, because only on a few days in July would the limit ever be met. The use limits are essentially designed to control peak days when impacts reach unacceptable levels. Visitation statistics recorded at many national parks show a variable rise and fall over the years that is related to external influences such as the health of the economy, extreme or catastrophic weather events, or tourist safety concerns. Table 1 clearly illustrates that a growth trend is occurring at Brooks Camp that, in the absence of day use limits, has no end in sight. The columns representing day use show that the "low day use" of 1989 to 1991 were still higher than any year prior to 1988. Day trips from Anchorage to Brooks and return are happening every summer. A one day excursion to Brooks River could feasible be added to any Alaska package tour, and the day use numbers would increase accordingly. Increased visitor use during the shoulder season does not compensate for the crowded peak days in July, nor is it considered the reason for the proposed use limits.

You might be asking yourself why I would oppose day use limits at Brooks Camp. For one, they are unnecessary. They are also the main concern for certain hoteliers in King salmon that see removing the lodge as their only salvation within the DCP alternatives. If the lodge is gone, we're out of business. Besides, day users are an additional source of revenue for us, and thus helps us keep the cost of our operation from being shouldered entirely by our lodge guests.

Yes the area gets hectic during these peak use periods with the current facilities, but it is hardly the crisis some would have you believe. Areas of congestion are the bridge, lodge area and the falls viewing platform. These problem areas could easily be designed out of any new facility.

13b

Let's suppose a new facility is built with the proposed lodge and campground numbers. What's the point of limiting the number of day users around the lodge, restaurant and trading post. How would the number of people there or at the access site make any difference? Why would the number of people on the valley tour be seen as a problem? They're not even in the area that is supposed to have the problem. Limits on the number of people on each platform maybe, and perhaps the time they stay there, but at the camp, why?

These facilities need to be designed to accommodate the maximum expected use. This use maximum can be easily anticipated by looking at past peak years. Shoulder periods are always going to be a sales problem for King Salmon hotels. This makes it highly unlikely that additional hotel rooms will pop up there. Building another major facility in King Salmon would be akin to financial suicide.

We have thousands of visitors every year and negative comments about the experience are extremely rare. That's because no one has told them there's a crisis. I wish you and the rest of the park personnel had been allowed to make up your own minds as well. Unfortunately, you've all been told about the "serious conflict", "the potential for tragic incident" and "Irreparable impact on the bear population", etc., etc. It's very convincing.

Please try to ignore what you've heard and see for yourself. I know it will be hard, and sure you'll see some problems, then try to imagine it without the few areas of congestion. Even with them it's not that bad.

Sincerely;

Sonny Petersen

Sonny Petersen

13b. The three areas of visitor congestion mentioned — the floating bridge, the lodge, and the falls platform — are all being redesigned or removed depending on the alternative, to help reduce human/bear encounters and to improve the visitor experience. Visitor use limits are needed for the entire Brooks River area because everyone who visits will at some time go to the river. Table 2 displays the proposed number of visitors at one time on the platforms and the average time they could spend on the falls platform, etc. The lodge would be limited by the number of beds available to overnight guests, and the valley tour would be limited by the number of seats on the bus(es). The full capacity of the lodge or the valley tour bus(es) would be the de facto use limit for those aspects of the visitor experience.

Exhibit 1

*BROOKS CAMP RECREATIONAL VISITOR DAYS (DAY USE PLUS OVERNIGHTS)*

| 1990 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | DAY USE | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 32 | 320 | 10 | 10 | 50 | 70 | 422 | |
| June | 908 | 393 | 7 | 5 | 209 | 221 | 1522 | 51 |
| July | 1375 | 1295 | 45 | 158 | 1269 | 1472 | 4142 | 134 |
| Aug. | 1190 | 927 | 140 | 32 | 693 | 865 | 2982 | 96 |
| Sept. | 304 | 180 | 80 | 23 | 624 | 727 | 1211 | |
| Oct. | 0 | 18 | 6 | 20 | 20 | 46 | 84 | |
| TOTALS | 3809 | 3133 | 288 | 248 | 2865 | 3401 | 10343 | |

| 1989 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 21 | 25 | 0 | 5 | 31 | 36 | 82 | |
| June | 818 | 568 | 38 | 595 | 0 | 833 | 2019 | 67 |
| July | 1200 | 1430 | 223 | 1496 | 0 | 1719 | 4349 | 140 |
| Aug. | 1041 | 901 | 148 | 320 | 0 | 468 | 2410 | 78 |
| Sept. | 362 | 240 | 40 | 298 | 0 | 338 | 840 | |
| Oct. | 0 | 63 | 9 | 0 | 20 | 29 | 92 | |
| TOTALS | 3442 | 3227 | 458 | 2714 | 51 | 3223 | 9892 | |

| 1988 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 0 | 44 | 0 | 61 | 0 | 61 | 105 | |
| June | 704 | 376 | 16 | 918 | 0 | 934 | 2014 | 67 |
| July | 1152 | 2005 | 225 | 1990 | 0 | 2215 | 5372 | 173 |
| Aug. | 478 | 625 | 131 | 1018 | 0 | 1149 | 2252 | 73 |
| Sept. | 161 | 85 | 15 | 324 | 0 | 339 | 585 | |
| Oct. | 0 | 14 | 0 | 0 | 0 | 0 | 14 | |
| TOTALS | 2495 | 3149 | 387 | 4311 | 0 | 4698 | 10342 | |

| 1987 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 0 | 5 | 2 | 4 | 0 | 6 | 11 | |
| June | 840 | 401 | 12 | 301 | 0 | 313 | 1554 | 52 |
| July | 1287 | 1045 | 69 | 1129 | 0 | 1196 | 3530 | 114 |
| Aug. | 1293 | 626 | 135 | 337 | 0 | 472 | 2391 | 77 |
| Sept. | 354 | 135 | 20 | 319 | 0 | 339 | 828 | |
| Oct. | 0 | 41 | 2 | 44 | 0 | 46 | 87 | |
| TOTALS | 3774 | 2253 | 240 | 2134 | 0 | 2374 | 8401 | |

| 1986 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 32 | 9 | 0 | 6 | 0 | 6 | 47 | |
| June | 557 | 213 | 24 | 299 | 0 | 323 | 1093 | 36 |
| July | 1136 | 1152 | 16 | 1000 | 0 | 1016 | 3304 | 107 |
| Aug. | 744 | 851 | 107 | 361 | 0 | 468 | 2063 | 67 |
| Sept. | 92 | 143 | 97 | 169 | 0 | 266 | 501 | |
| Oct. | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| TOTALS | 2561 | 2368 | 244 | 1835 | 0 | 2079 | 7008 | |

| 1985 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 24 | 0 | 0 | 0 | 0 | 0 | 24 | |
| June | 577 | 322 | 46 | 211 | 0 | 257 | 1156 | 39 |
| July | 1361 | 1373 | 90 | 550 | 0 | 640 | 3374 | 109 |
| Aug. | 674 | 560 | 78 | 220 | 0 | 298 | 1532 | 49 |
| Sept. | 142 | 105 | 8 | 71 | 0 | 79 | 328 | |
| Oct. | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| TOTALS | 2778 | 2360 | 222 | 1052 | 0 | 1274 | 6412 | |

BROOKS CAMP RECREATIONAL VISITOR DAYS (DAY USE PLUS OVERNIGHTS)

| 1978 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 0 | 12 | 4 | 24 | 0 | 28 | 40 | |
| June | 484 | 153 | 0 | 64 | 0 | 64 | 701 | 23 |
| July | 788 | 964 | 30 | 52 | 0 | 82 | 1834 | 59 |
| Aug. | 600 | 742 | 28 | 26 | 0 | 54 | 1396 | 45 |
| Sept. | 138 | 186 | 0 | 73 | 0 | 73 | 397 | |
| Oct. | 0 | 15 | 0 | 12 | 0 | 12 | 27 | |
| TOTALS | 2010 | 2072 | 62 | 251 | 0 | 313 | 4395 | |

| 1977 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 0 | 2 | 4 | 0 | 0 | 4 | 6 | |
| June | 208 | 199 | 5 | 39 | 0 | 44 | 451 | 15 |
| July | 760 | 689 | 21 | 67 | 0 | 88 | 1537 | 50 |
| Aug. | 726 | 704 | 24 | 14 | 0 | 38 | 1468 | 47 |
| Sept. | 114 | 207 | 0 | 49 | 0 | 49 | 370 | |
| Oct. | 0 | 0 | 0 | 35 | 0 | 35 | 35 | |
| TOTALS | 1808 | 1801 | 54 | 204 | 0 | 258 | 3867 | |

| 1976 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 0 | 0 | 0 | 8 | 0 | 8 | 8 | |
| June | 250 | 158 | 7 | 7 | 0 | 14 | 422 | 14 |
| July | 810 | 560 | 12 | 22 | 0 | 34 | 1404 | 45 |
| Aug. | 622 | 482 | 22 | 17 | 0 | 39 | 1143 | 37 |
| Sept. | 178 | 122 | 5 | 29 | 0 | 34 | 334 | |
| Oct. | 0 | 18 | 1 | 7 | 0 | 8 | 26 | |
| TOTALS | 1860 | 1340 | 47 | 90 | 0 | 137 | 3337 | |

| 1975 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 38 | 0 | 0 | 2 | 0 | 2 | 40 | |
| June | 400 | 178 | 3 | 3 | 0 | 6 | 584 | 19 |
| July | 688 | 470 | 9 | 12 | 0 | 21 | 1179 | 38 |
| Aug. | 652 | 426 | 21 | 17 | 0 | 38 | 1116 | 36 |
| Sept. | 60 | 74 | 10 | 16 | 0 | 26 | 160 | |
| Oct. | 0 | 0 | 0 | 4 | 0 | 4 | 4 | |
| TOTALS | 1838 | 1148 | 43 | 54 | 0 | 97 | 3083 | |

| 1974 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 68 | 86 | 0 | 5 | 0 | 5 | 157 | |
| June | 338 | 134 | 4 | 9 | 0 | 13 | 485 | 16 |
| July | 614 | 252 | 17 | 20 | 0 | 37 | 903 | 29 |
| Aug. | 526 | 226 | 16 | 5 | 0 | 21 | 773 | 25 |
| Sept. | 202 | 52 | 1 | 18 | 0 | 19 | 273 | |
| Oct. | 0 | 0 | 0 | 6 | 0 | 6 | 6 | |
| TOTALS | 1746 | 750 | 38 | 63 | 0 | 101 | 2597 | |

| 1973 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Day Use | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 54 | 0 | 0 | 0 | 0 | 0 | 54 | |
| June | 374 | 50 | 5 | 3 | 0 | 8 | 432 | 14 |
| July | 668 | 290 | 7 | 5 | 0 | 12 | 970 | 31 |
| Aug. | 602 | 202 | 8 | 6 | 0 | 14 | 818 | 26 |
| Sept. | 46 | 20 | 6 | 15 | 0 | 21 | 87 | |
| Oct. | 0 | 0 | 4 | 8 | 0 | 12 | 12 | |
| TOTALS | 1744 | 562 | 30 | 37 | 0 | 67 | 2373 | |

EXIBIT 2

**1992 BROOKS CAMP RECREATIONAL USE (Preliminary Figures)** MPU-Data.WK1 10/28/92

1.

| VISITS 1992 | Lodge | Campground | DAY USE Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 27 | 30 | 0 | 10 | 50 | 60 | 117 | |
| June | 311 | 119 | 27 | 54 | 519 | 600 | 1030 | 34 |
| July | 580 | 390 | 203 | 125 | 2708 | 3036 | 3886 | 129 |
| Aug. | 472 | 440 | 205 | 68 | 1865 | 2128 | 3040 | 98 |
| Sept. | 210 | 121 | 102 | 29 | 648 | 779 | 1110 | |
| Oct. | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| TOTALS | 1580 | 1100 | 537 | 286 | 5780 | 6803 | 8283 | |

2.

| OVERNIGHTS 1992 | Lodge | Campground | DAY USE Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 27 | 90 | | | | | 117 | |
| June | 1003 | 470 | | | | | 1473 | 49 |
| July | 1384 | 1330 | | | | | 2714 | 88 |
| Aug. | 1233 | 1210 | | | | | 2443 | 79 |
| Sept. | 671 | 559 | | | | | 1230 | |
| Oct. | 0 | 0 | | | | | 0 | |
| TOTALS | 4318 | 3659 | 0 | 0 | 0 | | 7977 | |

3.

| HOURS (CALCULATED) 1992 | Lodge | Campground | DAY USE Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL |
|---|---|---|---|---|---|---|---|
| May | 648 | 2160 | 0 | 60 | 300 | 360 | 3168 |
| June | 24072 | 11280 | 216 | 432 | 4152 | 4800 | 40152 |
| July | 33216 | 31920 | 1824 | 1000 | 21664 | 24288 | 89424 |
| Aug. | 29592 | 29040 | 1640 | 544 | 14840 | 17024 | 76656 |
| Sept. | 16104 | 13416 | 612 | 174 | 3888 | 4674 | 34194 |
| Oct. | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTALS | 103632 | 87816 | 4092 | 2210 | 44844 | 51146 | 242594 |

4.

| AVERAGE LENGTH OF STAY (IN DAYS) 1992 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL |
|---|---|---|---|---|---|---|---|
| May | 1.00 | 3.00 | ERR | 0.25 | 0.25 | ERR | 1.13 |
| June | 3.23 | 3.95 | 0.33 | 0.33 | 0.33 | 0.33 | 1.42 |
| July | 2.47 | 3.41 | 0.33 | 0.33 | 0.33 | 0.33 | 0.93 |
| Aug. | 2.61 | 2.75 | 0.33 | 0.33 | 0.33 | 0.33 | 1.04 |
| Sept. | 3.20 | 4.62 | 0.25 | 0.25 | 0.25 | 0.25 | 1.28 |
| Oct. | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| TOTALS | 2.73 | 3.33 | 0.32 | 0.32 | 0.32 | 0.32 | 1.09 |

5.

| VISITOR DAYS #1 (DAY USE PLUS OVERNIGHTS) 1992 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 27 | 90 | 0 | 10 | 50 | 60 | 177 | |
| June | 1003 | 470 | 27 | 54 | 519 | 600 | 2073 | 69 |
| July | 1384 | 1330 | 203 | 125 | 2708 | 3036 | 5750 | 185 |
| Aug. | 1233 | 1210 | 205 | 68 | 1865 | 2128 | 4571 | 147 |
| Sept. | 671 | 559 | 102 | 29 | 648 | 779 | 2008 | |
| Oct. | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| TOTALS | 4318 | 3659 | 537 | 286 | 5780 | 6803 | 14580 | |

6.

| VISITOR DAYS #2 (HOURS DIVIDED BY 12) 1992 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL | AV/DAY |
|---|---|---|---|---|---|---|---|---|
| May | 54 | 180 | 0 | 5 | 25 | 30 | 264 | |
| June | 2006 | 940 | 18 | 36 | 346 | 400 | 3348 | 112 |
| July | 2768 | 2660 | 135 | 83 | 1805 | 2024 | 7452 | 240 |
| Aug. | 2466 | 2420 | 137 | 45 | 1237 | 1419 | 6306 | 203 |
| Sept. | 1342 | 1118 | 51 | 15 | 324 | 390 | 2850 | |
| Oct. | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| TOTALS | 8636 | 7318 | 341 | 184 | 3737 | 4282 | 20216 | |

7.

| PERCENT CHANGE IN USE FROM PREVIOUS YEAR (USING VISITOR DAYS #1) 1992 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL |
|---|---|---|---|---|---|---|---|
| May | 35.0% | 125.0% | -100.0% | 0.0% | 0.0% | -14.3% | 36.2% |
| June | 26.5% | -18.6% | 350.0% | 42.1% | 159.5% | 145.9% | 26.4% |
| July | 2.2% | 3.1% | -20.4% | 60.3% | 58.5% | 49.5% | 23.0% |
| Aug. | -11.2% | 1.5% | -4.7% | 112.5% | 119.3% | 84.7% | 24.4% |
| Sept. | 71.2% | 47.9% | 410.0% | -82.3% | 77.0% | 88.3% | 82.8% |
| Oct. | ERR | -100.0% | ERR | -100.0% | -100.0% | -100.0% | -100.0% |

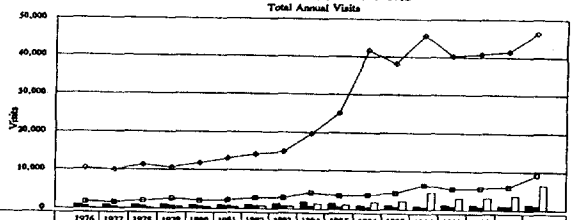
8.

| PERCENT CHANGE IN VISITOR DAYS (#1) OVER LAST "N" YEARS 1992 | Lodge | Campground | Pr. Boats | Pr. Planes | CUL's | Sub-Total | TOTAL |
|---|---|---|---|---|---|---|---|
| One Year | 9.4% | 2.7% | 6.1% | 19.7% | 82.3% | 68.7% | 27.6% |
| Five Years | 14.4% | 62.4% | 123.8% | -86.6% | ERR | 178.1% | 73.6% |
| Ten Years | 58.7% | 31.6% | 667.1% | -61.1% | ERR | 718.2% | 131.1% |
| Since 80 | 79.3% | 52.4% | 715.9% | -5.0% | ERR | 1301.9% | 176.1% |
| Since 71 | 170.2% | 847.9% | 616.0% | 286.7% | ERR | 4216.7% | 582.3% |
| Average Annual Change over past Five Years (Using Visitor Days #1) | | | | | | | |
| TOTALS | 2.7% | 10.2% | 17.5% | -33.1% | ERR | 22.7% | 11.057% |
| Average Annual Change over past Ten Years (Using Visitor Days #1) | | | | | | | |
| TOTALS | 4.7% | 2.8% | 22.6% | -9.0% | ERR | 23.4% | 8.7% |
| Average Annual Change over past Twenty Years (Using Visitor Days #1) | | | | | | | |
| TOTALS | 4.3% | 11.4% | 17.9% | 12.5% | ERR | 28.1% | 9.6% |

Exhibit 3

Katmai Recreational Visits

Total Annual Visits

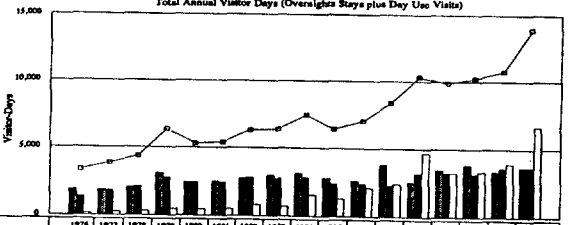



| | 1976 | 1977 | 1978 | 1979 | 1980 | 1981 | 1982 | 1983 | 1984 | 1985 | 1986 | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Brooks Lodge | 930 | 904 | 1005 | 1214 | 900 | 979 | 1123 | 1487 | 1931 | 1633 | 1128 | 1257 | 990 | 1353 | 1476 | 1155 | 1474 |
| Campground | 670 | 522 | 790 | 946 | 808 | 847 | 957 | 844 | 829 | 767 | 686 | 855 | 835 | 964 | 981 | 1086 | 1100 |
| Brooks Day Use | 137 | 258 | 313 | 496 | 471 | 503 | 806 | 702 | 1535 | 1274 | 2079 | 2374 | 4698 | 3223 | 3289 | 3915 | 6603 |
| Brooks Total | 1737 | 1684 | 2108 | 2656 | 2179 | 2329 | 2886 | 3033 | 4295 | 3674 | 3893 | 4486 | 6523 | 5540 | 5746 | 6166 | 9177 |
| Katmai Total | 10423 | 9985 | 11348 | 10659 | 11824 | 13140 | 14251 | 14948 | 19733 | 25142 | 41665 | 38212 | 45710 | 40347 | 40778 | 41417 | 46287 |

Source: NPS Monthly Public Use Reports and field logs. Total Katmai includes all recreational visits to park, preserve and Alagnak Wild River.
Preliminary 1992 data (except Brooks Camp) current as of 9/30/92.

Brooks Camp Visitor-Days

Total Annual Visitor Days (Overnights Stays plus Day Use Visits)




| | 1976 | 1977 | 1978 | 1979 | 1980 | 1981 | 1982 | 1983 | 1984 | 1985 | 1986 | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Brooks Lodge | 1860 | 1808 | 2010 | 3100 | 2408 | 2487 | 2721 | 2952 | 3127 | 2778 | 2561 | 3734 | 2695 | 3442 | 3809 | 3312 | 3658 |
| Campground | 1340 | 1801 | 2072 | 2746 | 2401 | 2396 | 2781 | 2742 | 3786 | 2540 | 2548 | 2253 | 3149 | 3227 | 3153 | 3566 | 3609 |
| Brooks Day Use | 137 | 258 | 313 | 496 | 471 | 503 | 806 | 702 | 1535 | 1274 | 2079 | 2374 | 4698 | 3223 | 3289 | 3915 | 6603 |
| Total Brooks | 3337 | 3867 | 4395 | 6342 | 5280 | 5386 | 6308 | 6396 | 8448 | 6412 | 7008 | 8401 | 10542 | 9892 | 10251 | 10791 | 13920 |

Source: Brooks Camp mylred logs, activity reports and field notes.
1992 data is current as of 9/30/92 and should be considered preliminary. For information contact Dave Neuzeth, Katmai National Park and Preserve.

Angler's Paradise Lodges Alaska Formed 1964

**Katmailand Inc.**

June 1994

KATMAI NATIONAL PARK & PRESERVE JUN 30 1994 KING SALMON, AK

Bill Pierce
Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Mr. Pierce,

I have in the past had opportunity to comment to you and others in the NPS, both verbally and in writing, in regards to the DCP for Brooks Camp. With the review period "deadline" of June 30 upon us, I wish to take this opportunity for further comment.

Katmailand Inc., as you know, has been the concessionaire at Katmai since 1982. The original concessions contract was negotiated by my father, Raymond I. Petersen, through his airline, Northern Consolidated Airlines in 1950. As a child I spent my summers at the Katmai Camps. As an adult have been involved in Katmai tourism from guiding for the lodges to operating Katmai Air beginning in 1974 to the present operating of the Park's only major concessions.

Obviously Katmailand has a tremendous stake in the final outcome of the Brooks DCP, so it comes as no surprise that I support the existence of lodging, camping and other visitor facilities there.

Our financial stake in the area aside, I strongly believe in the need for an overnight facilities at Brooks Camp, even if they were operated by someone besides my company. Therefore I will go on record as supporting the DCP proposed alternative two in respects to it's general locations and size.

There are areas, however, where I strongly disagree and others where I agree with the proposal and other alternatives as well. They are itemized in the following attached pages.

Once again thank you for opportunities I have had to comment. Hopefully you will find my Ideas informative and useful. I believe they reflect a my years of experience in Katmai.

Sincerely,

Raymond F. Petersen
president

*Located in Katmai National Park*

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BROOKS LODGE • KULIK LODGE • GROSVENOR • KATMAI AIR • KATMAI EXPEDITIONS

A CRISIS EXISTS AT BROOKS CAMP

This myth is the primary reason that a DCP is being developed for Brooks Camp. The DCP/EIS, was mandated by the Park's 1986 General Management Plan. Both documents state that there is "human intrusion", "serious conflict", potential for "tragic incident" and "irreparable impact on the bear population".

In short, the DCP and other documents paint a grim picture of Brooks Camp, I have watched these ideas being passed from one seasonal ranger to the next and from one superintendent to the next for close to two decades now. And, they continue to be perpetuated for the most part by those who have been convinced of the crisis myth before they made up there own minds.

Sure there are problems at Brooks, but use limits, restricted areas and sportfishing closures are far more drastic than what is necessary.

VISITOR INTERACTION WITH BEARS

Threatened bears: The depletion of the bear population world wide is what generates the emotion, but is really quite irrelevant to our situation here. Katmai's bear population is far from threatened. Habitat destruction is what has caused the depletion in the rest of the world. Brooks Camp, on the other hand, is an island of human activity in a vast protected bear habitat that stretches from Lake Clark Pass to Cold Bay.

13c

Archaeological sites in the area prove that bears and humans have been interacting at Brooks River for thousands of years. The Park should make bear/human interaction, both historic and present day, a major focus of there interpretation at Brooks Camp. NPS should be depicting the relationship yesterday's subsistence fishermen had with bears and compare it to today's sport fishermen and bear watchers. The similarities are many, in particular the fact that humans have always affected the bears behavior and feeding patterns. Instead, Humans are referred to as "intruders"

Threatened people: Another often mentioned "serious conflict" is the potential for a "tragic incident". The concern for visitor safety has led the NPS to abandon much of it's interpretative programs at brooks (at one time even on the valley tour) in favor of policing bear/human activity. Ironically, there have been several "tragic incidents" involving hikers in the valley who have died attempting to cross rivers. In contrast no visitor has ever been seriously injured by a bear at Brooks, let alone killed.

13c. Bears and people have both been present at Brooks River since salmon started jumping Brooks Falls. Being competitors for the same source of food implies that the interaction between people and bears was not always harmonious. Archeological and ethnographic evidence suggests that bears were important sources of fat and grease for aboriginal inhabitants. To obtain that food and to keep bears away from fish-drying racks, people killed bears whenever they were given the opportunity. The interaction between people and bears in prehistoric times, and for 98% of the time both species have been at Brooks River, often resulted in mortality for either a person or a bear.

Then, in 1912, this system of interaction was upset by the eruption of Novarupta. The temporary abandonment of the Brooks River area by humans resulted in a new ecological order. In the temporary absence of people, bears assumed the top position on the food chain. When people finally returned to the river, the human focus on the resources there had changed from consumptive to recreational uses.

The Congress has designated this area as a national park and mandates the protection of the resources. NPS policy prohibits the hunting or molestation of bears within the park, and seeks to ensure that bears are free to interact with their environment without undue interference by humans. Also, NPS management goals seek to reduce the potential for human injury by bears at Brooks River. By reducing the amount of development in prime bear habitat and limiting the amount of daily use along the river, the potential for human/bear interaction would be less than what occurs now.

## COMMENTS

A policy statement on the probability of a bear attack should be made before it happens. The statement should note that bear attacks occur occasionally in Alaska. It is one of the inherent risks associated with the wilderness here. Further, it should state that, therefore, if and when a bear incident occurs, it does not necessarily mean radical change in policy is required, or that the park erred in it's management. The NPS cannot "guarantee" visitor safety.

The NPS should provide more interpretive walks at Brooks with naturalist guides. This is the perfect way to make sure people do not have problem encounters with bears. They should coincide with times that visitors usually walk up river for bear viewing. They may leave every hour in the morning when day visitors arrive, and after lunch when newly arrived campers and lodge guests are apt to be ready to go.

13d

Most visitors would prefer to go up river bear watching with a ranger, especially for the first time. Along the way they would learn about bears from a naturalist rather than by trial and error. The practice of not taking guided walks to the falls for bear watching is illogical. People are going to go anyway so why not with a guide to keep them out of trouble

A common complaint I hear from people at Brooks is about rangers who were rude to them. Just think how much more positive the image of the Katmai ranger would be if he or she were a friendly guide instead of being seen as an enforcer cop barking orders. What a better use of park personnel and a more effective method of controlling the visitors interaction with bears.

**USE LIMITS**

**NPS statistics:** Nps statistics are another thing perpetuating the crisis mentality. This is my major disagreement with the proposed alternative. Day use limits, in particular, is the primary concern of those in King Salmon that see removing the lodge entirely as their only salvation within the DCP alternatives.

13e

**Day use is escalating out of control:** The NPS DCP for Brooks Camp has on page 4, table 1 statistics that show the increase in visitor use of the area. On Page 3 of the DCP it states "as day use climbs unchecked, the resources and visitor experience suffer". What it doesn't show is that since 1988 most of the increased use has been during off peak periods; periods for which no use limits are being proposed.

I have enclosed visitor use statistics that were provided to me by Dave Nemeth, the former Katmai concessions specialist. The statistics cover the period up to 1990 and break out visitation by

## RESPONSES

13d. Ranger led walks to the platforms could be implemented by park management when they determine it necessary to do so. That action can be taken independently from this DCP.

13e. See response 13a regarding these repetitive paragraphs on use limits.

month and type of visitor. I also have 1992 statistics broken out the same way, but for some reason have none from 1991. I have not seen any 1993 statistics at all.

Please see attached exhibit 1. Use during July, the peak month, averaged 173 visitors per day in 1988 for both overnights and day users combined. It decreased to 140 and 134 per day respectively for 1989 and 1990. Now look at my attached exhibit 2. In 1992 July visits averaged 185 (Item 5). Item 7 indicates that the 185 was a 23% increase over 1991. That would put the 1991 July average at 150 visitor days.

An interesting side note is that statistics in attached exhibit 3 shows a total visitation at Brooks during 1992 to be 13,920. That is 660 less than the 14,580 shown on exhibit 2 item 5. So perhaps the peak season use for 1992 was a bit less than the 185 per day indicated by exhibit 2 item 5.

What's the point? It is that peak season visitor days appear to have leveled off. The reason is that all overnight facilities at Brooks Camp, King Salmon and the area's fishing lodges were at maximum capacity during July of 88 and probably again in 1992. Since day trips to Brooks from Anchorage are impractical for most people, dramatic increases beyond these levels should not be expected. The number of visitor days essentially has a limit of it's own, even without those being proposed by the DCP.

Increased use during shoulder periods should be viewed as positive by the NPS. Instead, it is used by those who wish to perpetuate the crisis mentality, that visitor use is sky rocketing out of control with no end in sight.

You might be asking yourself why I would oppose day use limits at Brooks Camp. For one, they are unnecessary. They are also the main concern for those in King salmon that see removing the lodge as their only salvation within the DCP alternatives. If the lodge is gone, we're out of business. Besides, day users are an additional source of revenue for us, and thus helps us keep the cost of our operation from being shouldered entirely by our lodge guests.

**Degradation of visitor experience:** Yes the area gets hectic during these peak use periods with the current facilities, but it is hardly the crisis some would have you believe. Areas of congestion are the bridge, lodge area and the falls viewing platform. These problem areas could easily be designed out of any new facility.

We have thousands of visitors every year and negative comments about the experience are extremely rare. That's because no one

## COMMENTS

has told them there's a crisis. I wish you and the rest of the park personnel had been allowed to make up your own minds as well. Unfortunately, you've all been told about the "serious conflict", "the potential for tragic incident" and "Irreparable impact on the bear population", etc., etc. It's very convincing.

Please try to ignore what you've heard and see for yourself. I know it will be hard, and sure you'll see some problems, then try to imagine it without the few areas of congestion. Even with them it's not that bad.

13f

Let's suppose a new facility is built with the proposed lodge and campground numbers. What's the point of limiting the number of day users around the lodge, restaurant and trading post. How would the number of people there or at the access site make any difference? Why would the number of people on the valley tour be an issue? They're not even in the area that is supposed to have the problem. Limits on the number of people on each platform maybe, and perhaps the time they stay there, but at the camp, why?

These facilities need to be designed to accommodate the maximum expected use. This use maximum can be easily anticipated by looking at past peak years. Shoulder periods are always going to be a sales problem for King Salmon hotels. This makes it highly unlikely that additional hotel rooms will pop up there. Building another major facility in King Salmon would be akin to financial suicide.

The old days and old timers. I' m sure most that most of the comments you have received about degraded visitor experience have been from old timers relating stories of the good old days. At one DCP alternatives presentation by Larry Norris, he pointed out that people who have been there before compare today's Brooks Camp to their first visit.

13g

Times change, and the reasons for visiting Brooks Camp have changed with them. Most of these early visitors were sport fishermen. Bear watching is now the main draw for visitors.

As I stated earlier, negative comments about the Brooks Camp experience are extremely rare. We cannot expect *things to remain* the same forever. I also remember the old days, and while they have given many happy memories, their passing is not synonymous with crisis or disaster.

**DAY USE ONLY ALTERNATIVE**

Support for alternative 4, day use only, has been primarily from those who feel they have something to lose from the day use limits in the proposed alternative. While many may cite environmental or

## RESPONSES

13f. See response 13b regarding these repetitive paragraphs on use limits and design capacity.

13g. The National Park Service concurs. See comment and response 2a.

archaeological concerns as well, economics and the effect on "gateway communities", i.e. King Salmon, is by their own admission *the primary issue for most.*

**The affordable wilderness:** Please see the attached exhibit 4, a 1994 Brooks Lodge rate sheet. A two day one night double occupancy stay at Brooks Camp with transportation from Anchorage currently costs $516.00 ($526.00 in July). The valley tour can be added for $57.00. *Now look at the attached exhibit 5, a 1993 rate* sheet for the Quinnat Landing Hotel. Quinnat "option #1" includes transportation from Anchorage, a King Salmon tour and one unguided day at Brooks Camp for $575.00 per person. I don't know if their rate has gone up for 1994. Need I say more about cost.

Both of these tours are two days, one night. *On the Brooks Lodge* tour the visitor spends two part days at Brooks, arriving late morning of day one and departing the evening of day two. On the Quinnat tour the visitor spends much less time at Brooks. Should he want to spend part of his first day at Brooks, it would cost even more. Brooks offers more wilderness at lower cost and uses about the same amount of the visitors time.

**Access:** We sell a lot of Katmai tours, both with stays at Brooks Lodge, our fishing lodges and with stays in King Salmon. We also meet many of the other visitors that are visiting for the day. Invariably they would have preferred to stay at Brooks. While staying at King Salmon is a good alternative to having everyone stay at Brooks, day use only would be the ultimate degradation of visitor experience.

All day users, as I'm sure you know do not come from King Salmon. Many come from the areas fishing lodges. These lodges, like our own Kulik Lodge, are quite expensive when compared to Brooks or King Salmon Hotels. All day visitors are not people with less to spend. A good portion of them are those with the most to spend.

**Day use only is better for gateway communities:** As I pointed out previously, all day users do not come from King Salmon. Under a day use only alternative this would no doubt continue to be the case. Regardless, what are the economic impacts/benefits of a hotel room in King Salmon to the local economy?

1. The customer buys air fare to and from King Salmon. This benefits the local airport/airline industry at King Salmon.

2. The customer buys food at local restaurant or the hotel. All food comes by airline (bypass mail) from Anchorage or is barged from Seattle. Once again airline/airport and also barge companies/city dock industries benefit.

3. Hotel buys fuel to heat hotel rooms, benefiting the local bulk plant/fuel delivery industry.

4. Purchase of electricity by hotel benefits electric company.

With out question a hotel room at Brooks Camp generates the same economic activity in the local economy. All of the food and fuel to support a room at Brooks goes though King Salmon or Naknek. All the guests travel through the King Salmon airport. In fact, a room at Brooks Camp requires more logistics and transportation than one in King Salmon. All of which generates additional economic activity in the community.

Brooks Camp's electricity and utilities are provided by the Park Service. Many of the Parks maintenance and support people are permanent residents in King Salmon. Just as is the case with a hotel room, it takes more activity to generate a kilowatt or operate water and sewer systems at Brooks Camp than it does in King Salmon.

13h

Then there is the question of the hotel and restaurant jobs and who gets them. The King Salmon hotels and restaurants are basically seasonal operations just as Brooks Lodge. I would guess that most of their employees are not year round local residents. Furthermore, hotel and tourism jobs are generally low paying when compared to those provided by the commercial fishing industry.

I know we at Katmailand receive hundreds of job applications every year. I don't think we have received one application from someone in Southwest Alaska. We would like to hire local people for our operation, their interaction with our guests would add to the visitors experience. I would guess that most locals would rather work in the commercial fishing industry.

The only people who benefit more from a hotel in King Salmon than one in the park are the hotel owners themselves. This is not a King Salmon versus Brooks Camp issue. There is no reason why we cannot all benefit from The Brooks Lodge, for all practical purposes, is a local hotel. The Brooks Lodge has been in operation since 1950, longer than any hotel in King Salmon.

I don't see where it benefits the gateway community, King Salmon, to remove the lodge. In fact, Brooks DCP Alternative 4 calls for much less visitation than either alternative that has a lodge at Brooks Camp. It is likely, therefore, that its removal would result in less local economic activity.

Please carefully consider your position on this. The motives of many supporting day use only are clearly self serving and they are also very short sighted. The removal of a facility that has

13h. See comment and response 3b.

benefited the local economy for over forty years is in no one's best interests.

The interests of every one involved are best served by having both a facility at Brooks Camp and viable hotels in King Salmon as well. Unreasonable use limits in the park and particularly Brooks Camp, the biggest attraction in the park, are the threat. It isn't an either/or situation.

But above all let's understand that having a lodge at Brooks is good for the King Salmon hotels and that the hotels are good for Brooks Lodge. Both are good for the community.

**OTHER PARK ATTRACTIONS:**

Diversifying park attractions in Katmai would no doubt benefit gateway communities. But as Larry Norris so aptly pointed out at the various meetings, visitation to other parts of Katmai is not the issue here.

I support the diversification of visitor options in Katmai. But, the DCP is totally about Brooks Camp.

**Cultural attractions:** While I understand that the NPS cannot invest in visitor attractions outside of the park, they should none the less support and encourage the development of a native cultural center or exhibit in King Salmon. I would envision a actual functioning subsistence fish camp much the same as exist on individual native allotments in Southwest Alaska.

Visitors could observe the catching and preserving of salmon just as it occurs all over Alaska. It is feasible that they could even participate in the activity. At the very least, they could sample and purchase the dry fish and other native handicrafts such as baskets. Books on native culture and history could also be sold.

13i As I previously stated, the history of bear/human interaction should be a major part of Brooks Camp interpretation. A NPS constructed exhibit describing this history of interaction is a must. "The bears were here first" attitude is not only untrue, it is also hiding a story that needs to be told.

**SPORTFISHING**

**The sportfishing problem:** The question of what do about sportfishing at brooks River has been, like everything else, related to the bears. Sportfishing is managed by the state on a sustained yield basis. The populations of trout and salmon are in

13i. The detailed contents of interpretive exhibits are more properly addressed in the interpretive prospectus for the park, not in this plan. An interpretive prospectus was prepared in conjunction with the planning effort for the DCP, and printed in 1993. A number of the interpretive themes were identified in the prospectus. Several themes cover the story of human/bear interactions through time, including brown bear behavior and habituation, brown bear safety and management issues, and aboriginal use of the Katmai area.

no way endangered. The biggest threat to the parks salmon, and therefore the trout (not to mention the bears) is high seas fishing outside the jurisdiction of treaties.

The only place I can find fault with the state's management of the fisheries has been rectified. It took several years for area sportfishing guides to convince them that the areas trout populations have remained strong as a result of the catch and release policy the guides had voluntarily imposed upon themselves. The state has since made major restrictions on killing trout in Southwest Alaska the law.

There is a perception by sportfishermen and guides that the NPS proposals to restrict fishing at Brooks River will not stop there. The NPS is viewed by many as an enemy of sportfishing. The "bear thing" is the vehicle they see being used to exclude them from using the park. This is really unfortunate because these people are the parks greatest friends. They are for the most part conservationists who know how to visit the wilderness with minimal impact. They love the bears as much as the most vehement bear person, only more realistically. Many of them, myself included, resent the fact that they may appear as anti-conservation in their effort to obtain a reasonable approach to access issues.

Sportfishing is the one activity that is most similar to the activities of the areas prehistoric inhabitants, yet the bear study states that "angling is the most intrusive human activity in this prime habitat...Resolution of this conflict through bear management is difficult without a policy determination about the relative priority of bears versus fishing." This is an insult to both their integrity and intelligence of sportfishermen.

13j

The sportfishing solution: Catch and release fishing should be ~~implemented over the entire river effective immediately.~~ No further restrictions are necessary. Bear watchers and NPS personnel need to understand that fishermen interacting with bears has been occurring on the river since prehistoric times. This is part of the story that needs to be told. This interaction and its affects on the bears is a natural occurrence which bears are, and always were, quite capable of dealing with.

It is my understanding that the state fish and game opposes any further restrictions at Brooks. Their opposition to a catch and ~~release restriction is rooted in the belief~~ that any concessions on fishing access will only lead to further restrictions in the future, "give them an inch and they take a mile" appropriately describes their concern. I share this concern but it is out weighed by the advantages of catch and release.

One advantage is that people would no longer be walking around

13j. See response 13c.

with dead fish. The other is that people whose sole purpose for coming to Brooks is to fill their freezer would probably not come at all. I would not anticipate opposition to catch and release from area guides or sportfishermen. Consider that those opposed to catch and release may not be the type of visitor we want at Brooks anyway.

**PEOPLE FREE ZONE**

I expect that the amount of people traffic on the north side of the river will be extremely minimal with the lodge in the proposed location. Currently, there are almost no people wandering around the woods where there are no trails.

With access to the river and bear viewing on the south side of the river, The area proposed as a people free zone will, as a result, be people free without the mandatory closure.

13k

**For the bears:** Not an issue. People traffic in the zone will be so minimal that the bears will have it virtually to themselves.

**Archeology:** I would not expect that with the removal of the existing facilities that people would tamper with the archeological resources there. The more likely culprit to do that is our natural bull dozer, the bear.

My primary opposition to the zone is that it will unduly restrict the activities of sportfishermen. It is necessary to fish from the north side in many parts of the river. Also, hiking dumpling mountain is very popular now and, in my view, should continue as an option for Brooks visitors.

The people free zone is like the day use limit, with the new lodge location it is pointless.

**IN CONCLUSION**

In conclusion, I support the proposed alternative two with respects to it's size and location. Brooks Camp's current location, while not the crisis some would have you believe, does have some problems that would be rectified by the move.

The move alone, though, with the addition of more interpretation, both cultural and guided bear walks is what is needed.

Day use limits, sportfishing restrictions and people free zones are unnecessary. The facilities need to be designed to accommodate maximum expected use. This will eliminate areas of congestion which is really the only problem with the existing site.

13k. The boundary of the people-free zone as illustrated in alternatives 2, 3, and 4 has been redrawn to show fisherman access to the north bank and only emergency access in the proposed action and alternative 5. The Dumpling Mountain trail would remain open under all alternatives. The National Park Service concurs that the removal of facilities north of the river would essentially create a people-free zone. However, from a management perspective, visitor activities and movements in the core use area would be better defined by the formal designation of a people-free zone across the river.

Thank you for this opportunity to comment. It is my hope that you will find this useful. I look forward to discussing these ideas in the future, and hopefully they will be the basis for further constructive dialog.

**ATTACHMENTS**

Exhibit 1. ) Brooks Camp recreational visitor days 1973-1990. provided by Dave Nemeth, former Katmai Concessions specialist.

13l

Exhibit 2. ) 1992 Brooks Camp recreational visits. provided by Dave Nemeth.

Exhibit 3. ) Katmai recreational visits, graph, from DCP/EIS.

Exhibit 4. ) Brooks Lodge rate sheet 1994

Exhibit 5. ) Quinnat Landing Hotel 1993 Packages and rates.





13l. Exhibits 1-3 were reproduced with the concessioner letter of June 13, 1994, and are not replicated here. Exhibits 4 and 5 were xerox copies that were not legible at the reduced size. The referred to information was included in the text of the comment letter under the title "The affordable wilderness."

6266 Riverside Drive • Redding, CA 96001 • Telephone: (916) 241-6204 • Fax (916) 244-4618

4/25/94

Superintendent
Katmai National Park and Preserve
P. O. Box 7
King Salmon, Ak. 99613

Dear Sir;

I am writing to let you know my feelings regarding the five alternative plans for the Brooks River area. While it is my wish that the no action alternative route be taken, I do not think that it is likely that the NPS will follow that route. I therefore feel that the next least destructive choice would be alternative1 Minimum Requirements.

The Brooks River area has become more crowded in the twenty years that I have operated No See Um Lodge. I have seen the numbers of visitors rise in the area. However I do not feel that this growth will continue as the laws of human nature, specifically supply and demand will take over. If you do not create more camping and overnight space the numbers of overnight visitors will remain about the same due to the fact that there is not place to stay. If the numbers of day use visitors increases much more there will be so much crowding at the bear watching platform and at other areas around the river that people will elect to take their day use people elsewhere as I usually do to view bears in a less crowded atmosphere. If a party comes to Brooks to fish for the day and finds the river too crowded they don't stay but fly on to another spot. The problem of crowding will cure itself.

14a

I want it clearly understood however that I am against the day use being curtailed so that overnight visitors have more space. That would be totally unfair to park visitors who do not wish to stay at the Brooks lodge or at the campsite. I also want to register my strong wish that the fishing never be curtailed on the river. Sure there have been human bear encounters and problems because it is legal for people to kill a Salmon and carry it to the fish cleaning station. Stop the fish kill and you eliminate 99% of the problems between fishermen and bears. Make the entire river catch and release but keep it open to fishing. I do not want to see day use maximum numbers established. I think that the crowding problem will solve itself given time. It would be interesting to see how many lodges bring their guests to Brooks only to leave that day because of crowded conditions. Those people are still counted as being full day visitors adding to the high visitor numbers that we are seeing increasing each year even though many do not stay for the day.

I think that in building more platforms, docks, visitor centers, river overpasses ect. you are creating more reason for people to come to Brooks. You are creating more demand and will ultimately increase the number of visitors. You are also not making the place look very nice nor much like the natural state that Katmai was created for. Lets keep it the same, keep it small, keep it as natural as possible and keep it accessible for all. The numbers will take care of themselves.

Sincerely,
John W. Holman
John W. Holman Owner
No See Um Lodge





14a. Crowded platforms and crowded fishing conditions are not the visitor conditions sought by the National Park Service. The impacts on the natural and cultural resources that would occur under such conditions would be unacceptable.

HARTLEY, INC. d/b/a
BRANCH RIVER AIR SERVICE
P.O. Box 545
King Salmon, Alaska 99613
Ph. & Fax (907) 246-3437

June 29, 1994

Superintendent
Katmai National Park and Preserve
Post Office Box 7
king Salmon, Alaska 99613

Re: Brooks River Area Draft Development Concept Plan Review and Comment

Dear Sir,

I feel that I have not had adequate time to properly review the Concept Development Plan for the Brooks River Area. I feel that more time should have been allowed for those of us in the industry as this is our busiest time of the year and a time when all of us must make our livings.

As this type of use of our resources is my selected vocation it is with deep feelings that I must object to any cap of visitor use at the Brooks River Area. I have spent 11 seasons as Branch River Air Service catering primarily to recreational users of the resources available to the citizens and foreign visitors to Alaska and specifically to the Katmai National Park and Preserve. Building a business such as mine is not easily done and has taken many years of hard work and money to structure. Putting visitor caps on selected areas of the Park highly effects my ability to make a living and makes years and many thousands of dollars in advertising worthless.

Our country was built on the premise that growth is good and that creating jobs is essential to a strong economy. As a taxpayer both personally and corporately, I wish to say that all of us as citizens of this country do not relish any further Federal restrictions on our abilities to create Jobs and Incomes for ourselves and our employees. Putting user restrictions such as your desire to cap visitor use at Brooks creates economic hardships on a good many of us that have built businesses based on resource use. Tourism in this State of Alaska is a very strong industry and is far superior to Oil and Gas Development as a tool for creating Jobs and Income to a vast many people.

Visitor use at the Brooks River Area has increased greatly in months that precede and follow the Peak visitor month of July. This attention to Brooks has been promoted by the National Park Service and the State of Alaska as well as the many private businesses that rely on Tourism for their incomes. Capping visitor use at the Brooks River Area can best be done by other methods and these methods must be examined. I haven't seen any vast increase in Visitor use at Brooks in July since 1988, however there has been increased visitor use in June, August, and September. If the use at Brooks is being proposed for a cap by alleging that Bear/ Human interaction is



15. Comments noted.

causing problems or that it will cause a problem, I cannot see that it will if current use is maintained. If the campsites are relocated to other areas, or if the current site is maintained, The Park Service could allocate time spent on the River Area after people arrive.

I feel that a heavy burden to taxpayers and to current users of the Brooks River Area are being denied a time frame to exercise jurisprudence in the Development Concept Plan. To deny access to the resources and to deny jobs and incomes does not fit with the current Federal Administrations ideology.

I have no objections to moving the Lodge or campsite area, however, I feel that the cost is too much and that there is no accountability involved with this Development Plan. I highly object to any cap of visitor access to the Brooks River Area. I hope and pray that this cap will be deleted from the Development Plan because of the hardship that it places on a large number of U.S. citizens and other visitors to our Great State and the Federal Park System. I further hope and request that more time can be given to those interested in responding to this Development Plan. Thank you for your consideration to this request and response.

Sincerely,

Van Hartley

Van Hartley
President

## COMMENTS

Superintendent
Mr. Bill Pierce
Katmai National Park and Preserve
Post Office Box 7
King Salmon Alaska

RE: Developmental Concept Plan and Enviromental
Impact Study, Katami National Park and Preserve.

Bill,

I can't support any of the four alternatives that are listed in the DCP. I believe that a fifth alternative as suggested by Bristol Bay Native Corporation is the best way to proceed to develop Katmai National Park.

I'm still very concerned about the lack of time to respond to the DCP. I simply do not understand why the time extension for the public comment period could not have been extended to allow the local business owners to respond. I would like to schedule a meeting ASAP to discuss what if anything can be done to reconsider the decision.

Thank you.

Tom Scanlon
Quinnat Landing Hotel

## RESPONSES

16. Comments noted.

BREDESEN COMPANY
*Real Estate Planning & Marketing*

June 28, 1994

William Pierce
Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska 99613

Re: Comments and Proposal
Brooks River Area Development Concept Plan
DCP and EIS

Dear Mr. Pierce:

It was a pleasure for us to attend both public meetings (King Salmon and Anchorage) to hear and discuss the future development plans for the Brooks River area. The following comments and proposal are our response and request to have these considered as you prepare your final evaluation of the various alternatives depicted in the draft plan. Please note that we are proposing a new alternative which is designated as Alternative 4A - Gateway Proposal.

It is our belief that as you further review this draft plan that Alternative 4A best protects the existing bear population from the increasing human pressure that exists today. We must remember the described (Page 7) statement "Katmai National Park is the home of the largest protected population of brown bears in North America."

Additionally, our Alternative 4A plan puts the correct emphasis on the human resources used daily as future development proceeds.

It is our belief that more investigation must occur relating to various provisions found in ANILCA relating to land use and local hire.

LAND
COMMERCIAL
DEVELOPMENT

3003 Minnesota Drive, Suite 200 • Anchorage, Alaska 99503 • (907) 272-6999 • Fax (907) 278-5722

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17a

17a. This comment letter consisted of 57 pages of text and graphics. The letter of introduction, comments on the draft DCP/EIS and proposed "Alternative 4A - Gateway Alternative" sections are reproduced here in full for response. The other information, maps, and legal documents are not reproduced here because they do not contain comments on the draft DCP/EIS.

**DCP and EIS Comments**

At the center of our comments is the obvious discussion relating to the high development profile of a new lodge and dining facility and upgraded maintenance and housing facilities (Alternatives 2 and 3) at Brooks River and the mandated desire to impact as little as necessary a world class protected brown bear population.

We feel a much greater emphasis of on-site day use best protects the very bear resource which is mandated to be protected. Day use by definition provides for a less intense use because bear viewers leave the site within a few hours after they arrive. A lodge and upgraded housing and maintenance emphasis would exist on a full 24 hour basis.

**RELATIONSHIP OF THIS DEVELOPMENT CONCEPT PLAN (ALTERNATIVES 2 and 3) TO OTHER APPROVED PLANS**

**I. Management Objectives from the Statement for Management (NPS, 1983)**

17b

**1. Identify, protect and perpetuate the park's outstanding wildlife, vegetation, water, and volcanic features in their wilderness environment.**

This objective stresses protect and wildlife. Alternatives 2 and 3, because of their location, will continue to place pressure on the bear population. By moving the lodge, dining hall, employee housing and much of the maintenance function to Alternative 4A (or Alternative 4), this pressure can be greatly reduced.

17c

**2. Maintain the park and preserve as an area where brown bears can exist as naturally as possible with minimal adverse effects from humans.**

Key words in this management objective is "where brown bears can exist as naturally as possible, and "minimal effects".

By placing most of the commercial activity and land development totally away from the bears, this goal is best achieved. Alternative 4A and Alternative 4 are best alternatives to accomplish this goal.

**3. Identify, preserve, and protect the park and preserve's cultural resources in a manner consistent with historic preservation laws, NPS policies, ad the purpose of**



17b. The National Park Service believes that the relocation of facilities from the north side of the river, which is prime bear habitat, to the marginal bear habitat of the Beaver Pond terrace or Iliuk Moraine terrace will place much less pressure on the local bear population. Alternative 4 would remove the lodge function away from the river as well, but the location for the proposed lakeside visitor contact station would be in prime bear habitat. The proximity of the proposed management support facility that would have to be built to operate the day use area would have greater effects on prime bear habitat than alternatives 2 or 3.

17c. Constructing most of the commercial development away from prime bear habitat so that bears experience minimal effects from human use is central to alternatives 2, 3, and 4. Day use along the river corridor is the other major human influence that must be controlled for minimal effects on bears.

## COMMENTS

**the area. Particular attention will be paid to the known locations, such as the Brooks River Archeological District and National Historic Landmark.**

These cultural resources can be thought of as two entities:

(1) The physical and visual pit house themselves and other examples of past habitation by Native Alaska.

(2) Those areas where cultural activities occurred (i.e., Iliuk Moraine). You will be receiving letters from Native organizations asking that you respect old customs and activity areas.

By selecting Alternative 4A or Alternative 4, this goal will be best accomplished.

4. **Provide visitors with adequate means of access to and within the park, consistent with the wilderness character of the area.**

Generally there are two means to access Brooks River Area:

(1) float plane; and

(2) boat.

At the center of this goal is the question of air activity and noise and its impact on the protected bear population.

17d

It will greatly help achieve this goal to have greater emphasis on tour boat access. This means of transportation has not been mentioned in detail in this EIS. However, the shallow draft of a catamaran hull and its well known high water stability, forces its importance into this stated goal. Please review photos in this submittal. Also, we stand ready to discuss in depth this boat design. Alternative 4A and Alternative 4 become the best alternative selection which this form of transportation is included.

5. **Interpret the park and preserve through nonsophisticated, highly personal techniques and programs, consistent with the park's visitor use pattern.**

Alternative 4A and Alternative 4 both stress the park informational planning and ability to carry out this goal. Much of the informational activities contained within this goal could be accomplished at the lodge/visitor center combination or on the tour boat trip to Brooks River Area. With much of the park general information already communicated to the park user before arrival, the on-site staff can concentrate on specific information.



## RESPONSES

17d. Alternative 4 has been modified to reflect tour boats as the major mode of access to Brooks River.

BROOKS RIVER AREA PURPOSE STATEMENTS

II. **Stemming from the ANILCA legislation, the National Park Service has identified three primary purposes for the Brooks River Area. The Development Concept Plan proposals reflect these area purposes.**

Again, Alternatives 2 and 3 must be compared to Alternative 4A and Alternative 4 to determine which concept best meets these three primary purposes for the Brooks River Area.

1. **Protect habitats for, and populations of, fish and wildlife, including, but not limited to, high concentrations of brown bears and their denning areas and maintain the watersheds and habitat vital to red salmon spawning in an unimpaired condition.**

The key concept here is to protect as much as possible the habitat of the protected brown bear. We must remember that bear viewing is a central reason for the development of this DCP. If it is diminished, so is the reason for tourists to visit. The recent oil spill (on site) tells us that problems can occur. We feel that Alternative 4A and Alternative 4 best protect the protected bear population because most of the commercial and housing activities are located away from the greater bear viewing area. Alternatives 2 and 3 will place commercial activities near the bear population.

17e

2. **Provide for the general public resource-based recreation that does not impair natural and cultural resource values.**

Alternative 4A and Alternative 4 best protect the natural wilderness environment and the cultural resources which lie within. Most of the intense activity will occur 20 miles away from the protected wilderness area.

3. **Protect and interpret outstanding natural, cultural, geologic and scenic features.**

Alternative 4A and Alternative 4 best protect the truly outstanding wilderness, cultural, geological and scenic features. There are few places on earth where high ratings in each of the above mentioned items occur in one location. Add in the tremendous plus of bear watching and the Brooks River Area becomes one of the "Great Wonders of the World".



17e. Alternatives 2 and 3 would have less human influence on prime bear habitat, because all major construction is away from the river corridor. See response 17b.

## COMMENTS

III. ALASKA NATIONAL LANDS CONSERVATION ACT (1980)

**ANILCA redesignated the national monument to a national park and preserve, and significantly expanded the size of the protected area. The purpose of ANILCA, as stated in Section 101(b) is:**

1. **To preserve unrivaled scenic and geological values associated with natural landscapes.**

   Alternative 4A and Alternative 4 will have less development impact on the nature and landscape.

2. **To provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas.**

   This provision of ANILCA states clearly the inestimable value of sound habitat and wildlife (bear) populations to all Alaskans. It talks also to the need to maintain them. Alternative 4A and Alternative 4 provide the method and the way to maintain and protect those values which have inestimable value to all Alaskans (for today and tomorrow).

17f

3. **To preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coastal rainforest ecosystems.**

   Key words here are to preserve and natural. With commercial and housing development, mostly 20 miles from the Brooks River ecosystem, this provision is best fulfilled.

4. **To protect and preserve historic and archeological sites, rivers, and lands, and to preserve wilderness resource values and related recreational opportunities including but not limited to hiking, canoeing, fishing, and sport hunting.**

5. **Sections 1306, 1307, 1308. These sections address the need of this EIS and DCP to consider Native land and Native employment. Please restudy the purpose of these sections. Alternative 4A becomes a best location for the development of this DCP.**

   To protect and preserve the above mentioned resources will be best accomplished by selection of Alternative 4A or Alternative 4. Hiking, canoeing and fishing can be accessed near the hotel site as well as at Brooks River Area. Pressures will thereby be reduced or divided among other visitor desired activities.



## RESPONSES

17f. Actually, in reference to this purpose quote from the ANILCA, the no action alternative would have the least disturbance or direct impacts on the vegetation types of the Brooks River area.

IV. DESIRED FUTURES FOR THE BROOKS RIVER AREA

The true test for desired future benefits is best analyzed as they compare or fit with the management objectives stated in the 1983 Statement of Management.

NATURAL RESOURCES

1. ***Protect and maintain habitat vital to red salmon and rainbow trout spawning and juvenile development cycles.***

Low impact is the key concept to accomplishing this desired future. Also establishing a goal to reduce the importation into the Brooks River Area, those destructive elements (fuels and other toxins) which potentially could negatively impact the salmon and trout populations We do not have to look far into Alaska past to see the results caused by human error.

2. **Protect and maintain critical brown bear habitat.**

It must be remembered that this is protected brown bear population. Its habitat is best protected by increasing the use of low impact transportation and placing commercial and housing development 20 miles away from where they daily fish and live. Day use emphasis will provide greater control over bear viewing, thus the chance of unexpected human/bear encounter is lessened.

3. **Remediate and mitigate damage to the water table, soils, and vegetation caused by leaks in the fuel oil delivery system at Brooks Camp.**

Even with the best in planning, problems will potentially occur. To transport the causal elements of this desired goal into the general environment may be questioned, especially when it is not needed. By selecting Alternate 4A or Alternate 4, much of the fuel needs will remain in the King Salmon area.

CULTURAL RESOURCES

1. **Preserve cultural resource sites and remains that best illustrate the 4,500 years of Alaska Peninsula occupation.**

These cultural resources can be preserved with low impact development.

## COMMENTS

2. **Remediate and mitigate damage to cultural resources caused by leaks in the fuel oil delivery system at Brooks Camp.**

These goals should be further studied with the final conclusions and action plan approved by the local Natives who are the descendants of those who were buried at Brooks River Camp.

VISITOR EXPERIENCE/INTERPRETATION

1. **Encourage visitors to learn about the Brooks River Area natural and cultural resource values, and to experience a range of outdoor recreational activities such as viewing wildlife, sportfishing, sightseeing, hiking, boating, and camping.**

Alternative 4A and Alternative 4 best accomplish this goal. Visitors can learn about the Brooks River Area at the visitor center/lodge or on the boat trip to Brooks River.

2. **Enhance high quality recreation experiences in the Brooks River Area by maintaining low-to-moderate interaction levels between visitors; visits to Brooks should feature small groups, an unhurried atmosphere, and occasional opportunities for solitude.**

One could envision a concept definition that low interaction levels mean allowing visitors walking at random around the greater south Brooks River Area site. This would conflict with the desire to lessen human/bear encounters.

17g

The goal of small groups and an unhurried atmosphere calls for the need for an additional viewing platform. The argument that looking at another platform (or part of a platform) loses its validity when it is okay to see fishermen fishing). A fourth platform could easily be added to accomplish this future goal. Platform design and ease of access are key to this goal.

3. **Make brown bear habitat along Brooks River accessible for bear viewing and sportfishing in a manner as safe as possible for visitors and to the degree that it does not significantly interfere with wildlife use and behavior.**

Bear behavior must be considered first. It is obvious that the more people that are in the air on platforms, the less impact will occur on the bear. Rules of conduct to establish human behavior must be refined. An on-site lodging and housing development can only increase the interference factor with bear/human encounters.



## RESPONSES

17g. There are only four places on the south bank of Brooks River that meet the recommended criteria for bear viewing platforms listed in appendix C. Ten criteria are listed, only two of which deal with visibility between platforms.

4. **Focus visitor use and development in specific areas in order to minimize disturbance to natural, cultural, and scenic resources.**

   This goal states use and development will disturb wilderness, cultural resources. Therefore, it is best to select a specific area to be more impacted than that of the general area. It could further be reasoned the specific impact site could be away from the Brooks River Area.

5. **Interpret for visitors the significance of cultural resource sites that span a 4,500 year period of site occupation.**

   This is a very important goal and further identifies this area for its uniqueness. Care must be exercised.

6. **Encourage concessioner provided services and facilities related to overnight lodging, transportation, sportfishing, and tours of the Valley of Ten Thousand Smokes. Such services and facilities should be economically feasible, site-suitable, and necessary for appropriate public recreation.**

   Alternative 4A and Alternative 4 will solidly accomplish this goal. Additionally, with the location of concession activities closer to the King Salmon area, a diversity of services can be offered.

PUBLIC USE GOAL AND OBJECTIVES FOR BROOKS RIVER AREA.

**Goal. To provide wildlife and fish and cultural resource oriented recreation, interpretation, and educational opportunities consistent with the park's resource oriented purposes.**

**Objectives.**

1. **To ensure that public use programs are compatible with the biological diversity of park resources and habitats, visitor use limits will be assigned to the area and a program monitoring the impacts of visitor use will be established.**

   The compatibility and monitoring factors are best accomplished by heavier emphasis on day use visitors. Alternate 4A and Alternate 4 will allow greater control by park staff as the uses are more directed.

2. **Opportunities for wildlife viewing, photography, and fish oriented recreation that is low-density in nature will be provided.**

   Last season 6600 visitors toured Brooks River Area. To accomplish low impact opportunities, these specific recreation activities could be placed at locations other than the "immediate" Brooks River Area.

3. **The National Park Service and concessioner will develop and maintain facilities for recreational users which are consistent with park management concerns regarding wildlife, fish, biological diversity, preservation of cultural resources, and public safety.**

   It is stated throughout the EIS and the DCP that a primary goal is to protect and preserve the various resources found at Brooks River.

   The selection of Alternative 4A and Alternative 4 allows for reduced development in the "heart of bear country". This selection will be generally lower impact on the total protected bear population. Access to Brooks River can be accomplished by a low impact tour boat ride which will add another dimension to the visitor experience. The objectives of the park plan which are mandated by several forms of legislation direct a high value placed on the protection of the bear population. This protection is multi-faceted so caution on all levels is the goal of the selection process.

   A major advantage in the selection of Alternate 4A is the financial cost transfer of capital costs and operating and maintenance costs. These costs would be transferred from the Brooks River Area into Lake Camp Area and King Salmon. In many cases, capital costs will be decreased. These reduced costs are attractive and helpful with current NPS budget cuts and staffing cuts. With added concession responsibility to pay park operating expenses, it is reasonable and responsible to cut the costs before they occur.

## COMMENTS

RESTUDY OF NAKNEK WEST ALTERNATE 4A

**This alternative would have relocated visitor lodging and interpretive facilities from the Brooks River Area to a major development site somewhere along the northwest shore of Naknek Lake up lake of Lake Camp.**

A first comment when discussing this Alternative is the written suggestion that if the lodge and housing facilities were located somewhere on the west side of Naknek Lake that they would now be considered a major development site (P. 82). No where in the discussion of Alternatives 2 and 3 do these same activities bear the label of major development site. If in fact these activities meet major development criteria, then they should not be placed near the resource which is mandated to be protected.

MERITS OF NAKNEK WEST

17h The written discussion of Naknek West is very subjective, especially when considering a rather large area is included. To state that no site exists and do only minimal "Field searches by air and water" suggests more effort is needed. A thorough land survey is needed before the following written statements can stand. DCP Statement, P. 83.

1. **Any road that would connect the proposed development site to King Salmon would require massive filling in of wetlands and disturbance of natural drainage patterns and wildlife habitat.**

   Massive fillings of wetlands will be avoided with the careful evaluation of property lines (Alterative 4A) and the existing topography. Currently, a dry road accesses these Native inholdings.

2. **Higher areas farther east along the north shore of Naknek Lake that might have enough space for the development relocation are inside a recommended wilderness area. NPS Management Policies prohibit proposing development in recommended wilderness areas. The connecting road would be even more environmentally destructive.**

17i Native inholdings are mandated by law to have development Rights. An Evaluation on the west side of Naknek Lake where development can occur is in order.

3. **Drainage requirements for septic systems could not be met in any of the shoreline areas. The land is just too low and boggy.**

   Alternative 4A proposes lodge location on a gentle knoll approximately 75 feet in height from shoreline.



## RESPONSES

17h. The "Naknek West" discussion in the document certainly is not subjective. The planning team conducted an overflight of the entire northwest shore of Naknek Lake from the former NPS boat dock at Lake Camp up lake to a point on the north shore north of Dumpling Mountain and east of the large recessional moraines that jut south from the north shore. The islands in Naknek Lake northwest of Dumpling Mountain were also flown. Potential harbor and lodge sites were photographed and subsequently investigated by boat. The fact is that no qualified relocation site exists for Brooks Camp facilities within the search area. The development site proposed in this comment letter for alternative 4A is not on Naknek Lake, but is nearly 1.5 miles downriver from the mouth of Naknek Lake. The National Park Service never considered development sites along the river because of the potential dredging that would have to be done to maintain variable water level access to sites subject to the river current and channel bottom changes.

17i. An evaluation of the (north)west shore of Naknek Lake for relocation sites for Brooks Camp facilities using the seven relocation criteria developed for this plan was completed in August 1990.

## COMMENTS

Currently, there are several septic management systems available to safely answer the development question of correct septic disposal.

4. **No good natural harbors or protected bays were located along the shoreline. Harbor conditions and areas with higher ground were investigated around the moraines and islands near the north shore. These waters were choked with glacially transported boulders. Major dredging would be required to open up access to even the best of these sites.**

17j The enclosed air photo will lay to rest the belief that no good natural harbors or bays exist at West Naknek. A very successful boat launch now exists at this location.

Major dredging would not be necessary to open up access from West Naknek Lake. The already highly successful catamaran hull design allows for shallow water operation. Additionally, the current water route is already marked by buoys. In the worst case, a few close to surface (only at time of early spring) boulders could be plucked from the chosen route - a very minor work effort and because there would be no dredging, only moving boulders, no environmental damage will occur.

5. **Another factor that worked against this alternative was the obvious negative effect to the visitor experience. All of the northwest shore of Naknek Lake is low and lacks the scenery necessary to make a resort lodge commercially viable. Visitors at such a development would indeed be in the park, but that is about all. The core use areas for wildlife viewing and sportfishing are still a long ways from Naknek West.**

It is suggested by this paragraph that no pleasing scenery exists at West Naknek. This is not true. The Gateway property is the site of significant raised terrain offering scenic views. It also suggests that to be commercially viable a bear viewing experience is important. If that is true, it must be protected from major development activities suggested in Alternatives 2 and 3. If this viewing experience is diminished or bears are forced from the Brooks River Area, the visitor experience becomes negative. Selection of Alterative 4A allows the ability not to gamble about the future affect of major development activities near prime protected bear habitat.

17k We request a complete impartial restudy of Alternative 4A and the evaluation of the cumulative positive effects of this site:

1. Financial advantages.
2. Environmental savings.
3. "No gamble effect" on future bear habitat, populations, and behavior.



## RESPONSES

17j. The quoted statement from the DCP is accurate. No good natural harbors or protected bays were located along the shoreline of Naknek Lake. "The very successful boat launch" mentioned in this comment letter is in the Naknek River and cannot be construed as being part of the Naknek West alternative that has been considered and rejected by the planning team. The Naknek River is part of an internationally significant salmon fishery. The National Park Service would avoid sites that require "boulder plucking" and dredging. To state that moving boulders in a main river of a world class salmon fishery would have "no environmental damage" is presumptuous.

17k. Alternative 4 in the final plan has been modified to include the gateway community concept. Information on the lodging and restaurant capacities in Naknek and King Salmon have been included also. The final plan does not evaluate the "financial advantages" to private enterprise in alternative 4, but does compare the federal and concessions implementation costs to the other alternatives as required. "Environmental savings" (impacts) are compared between alternatives for proposed actions on federal land. The final plan does not discuss potential impacts on the various private parcels that could conceivably become involved in providing lodging, hostel, campground, and access services to Brooks Camp visitors in alternative 4. The draft plan was quite clear that development in alternatives 2, 3, and 4 would be away from prime bear habitat. The first of the seven relocation criteria for Brooks Camp facilities used in selecting sites for alternative 2, 3, and 4 stated that "the alternate site must be in an area little used by bears." The "no gamble effect" mentioned is just as true of alternatives 2 and 3 as it is of alternative 4 or the commenter's 4A.

4. Other uses of facilities during off season.

5. Local resident economic advantages.

6. Development rights of Native inholdings.

7. Reduction of Brooks River employee housing allows greater visitor use within the ceiling imposed by DPC.

**TOUR BOAT FEASIBILITY**

The day use concept present in Alternative 4A and Alternative 4 features the mixed use of float plane and tour boat transportation.

Access to Brooks River Area by tour boats has many advantages. The use of a catamaran type hull design further completes the viability of water transportation. Photos included in this proposal show a vessel length of 40 feet and is designed to use only 24 inches of water (draft). It is believed by the current boat owner that with the inclusion of jet units 18 inches of draft could be achieved. Photos show an 18 foot wide boat designed for charter fishing. Greater stability in rough seas is obtained with the catamaran hull design. With shallow water capability and greater stability water transportation is the all-weather choice of transportation.

Catamaran hull design advantages:

1. Stable in rough water.
2. Shallow draft.
3. Boulders at Naknek River mouth no longer a problem.
4. Excellent time (with all visitors assembled) to communicate Brooks River information to group with full attention directed toward staff presentation.
5. Low noise level present.
6. Better group control because larger groups can travel on one trip.

**OFF SEASON USE OF THE GATEWAY LODGE AND CABINS**

By selecting Alternative 4A is possible to use this facility before and after the visitor season starts. This site is much easier to access by car from King Salmon than Alternatives 2 or 3. A number of off season uses have been discussed and will be available should the request for this information be submitted.

LOCAL EMPLOYMENT

After careful review of this DCP and EIS, it is felt more discussion should have occurred relating to local employment and job training. There are many advantages:

1. Local people are more aware of the Brooks River Area and other adjacent areas. They are current and historical information banks that are interesting to visitors.

17l

2. They live in the area and may already have housing.

3. Bear and cultural information may be more interesting when given by someone with local understanding of history and customs.

4. Their wages stay in the local community.

5. See, ANILCA - 16 USC Sec. 3198, the local hire requirement.

FINANCIAL GOALS

It is a fact of life today, that government agencies are experiencing budget cuts and staffing reductions. Accepting this fact, we suggest keeping the annual operating expenses as well as the initial capital costs to a realistic minimum.

The greater King Salmon area already has many of the improvements requested to be built in Alternatives 2 and 3. This would be costly and would be a duplication of improvements. The road is built to the shore of Naknek Lake. Housing and dining facilities are built or could be built to serve a larger market. General operations costs would be higher because of the remote location found in Alternatives 2 and 3. Loss of flexibility would also add to operating costs.



17l. Local employment and job training were not planning issues identified in the development of this DCP. Local employment and job training would be an independent action by park management and/or the concessioner that would not affect the planning process of the DCP. See comment 13h.

## COMMENTS

**IF ALTERNATE 2 OR 3 IS SELECTED**

17m

It is our request that NPS designate a well located (additional) platform to be fully handicapped accessible. We would request that at least 45 slots be made available on a priority basis for those visitors who are handicapped.

Activities that would need a handicapped access and use plan are as follows:

1. Bear viewing - emphasis on hearing and smelling as well as viewing is important.
2. Photography.
3. Cultural viewing and information.
4. Selected fishing site for ten fishermen - access is very important and location will be close to the path of migrating salmon. 17n
5. Food service.
6. Toilets.
7. Shuttles which are handicapped approved.
8. Barge docks at Lake Camp and Brooks River which are fully handicapped accessible and useable.
   (A) A maintenance plan in place.
9. Other activities that are reasonable and available to other visitors.



## RESPONSES

17m. The narrows platform is fully accessible. The falls platform is not. Ease of access and available level space at the narrows platform dictated that it be the platform designed for disabled viewers' access.

17n. New construction for NPS and concessions facilities would be designed to meet the legal access requirements of disabled park visitors.

ALTERNATIVE 4A

GATEWAY ALTERNATIVE

16

**PREFACE**

This proposal for development of 225 acres of land is made by the Gateway Family Heritage Group (GFHG). The GFHG represents 8 descendants of Pom Peters, an Alaska Eskimo who obtained title to her Native allotment adjacent to the Lake Camp and contiguous to the Katmai Park boundary.[1] The goal of the family is to preserve the local cultural, archaeological and environmental values of their heritage lands as well as provide a positive impact for the economy of the local people.

The proposal represents the best of all the alternatives so far considered by the NPS. It offers additional benefits also.

- This alternative removes the majority of construction noise and activity away from the protected bear habitat, mitigating the harmful effects on bear migration and feeding.
- Lodge development is located adjacent to the Park boundary, minimizing people-bear conflicts.
- Lodge facilities are located near the King Salmon utilities and road terminus, greatly reducing operational and development expenses.
- Lodge facilities are located in a wilderness setting, on a high knoll, with pleasing vistas of the Lake, river and mountains.
- Location of the Lodge allows for reduction in need for in-Park employee housing, resulting in a 30% increase in allowance for daily visitors.
- This proposal promotes the goals of the Alaska National Interests Lands Conservation Act (ANILCA), the Wilderness Act and other laws including the Americans with Disabilities Act (ADA)
- This proposal provides for access and use of the Park by disabled visitors with the addition of a handicap access viewing platform and other access amenities.

[1] The descendants are Michael O'Neill, Laurence O'Neill, Raymond O'Neill, Dolly Hills, Henry Fischer, Judy Fischer, Elizabeth Hester, and Jerry Bigelow. All members are Alaska residents and members of the local and regional ANCSA Native corporations.

ALTERNATIVE 4A: GATEWAY PROPOSAL
*from the*
Gateway Family Heritage Group

I. CONCEPT STATEMENT

Alternative 4A provides the best alternative for development of visitor use of the Brooks River Area. The Lodge is located on private property outside the Brooks River Area. The underlying concept for this alternative is that all facilities and visitor use in the area are located to provide the lowest possible human impact on bear habitat, to protect the nationally significant archeological sites, and to reduce the cost of operations while at the same time providing visitors with a pleasing experience. In this alternative, the National Park Service would move the Brooks Camp and all other facilities (except the day facilities) to the west shore of Naknek Lake near the confluence of Naknek River and Naknek Lake, near Lake Camp. A lodge, the "Gateway Lodge" would provide overnight housing for guests. The location allows for substantial expansion of facilities with substantial reduction in operation costs. The lodge facilities are located near road access to King Salmon and the local pubic electric utilities service. Locating employee and support personnel housing outside the Brooks River Area allows for more visitor access and provides the least people-bear conflict potential of all the alternatives.

Development on the site is on a high ridge providing the visitor with a pleasing vista. This alternative meets the seven criteria (listed in Alternatives 2 & 3) for location of the Brooks Camp development. 17o

Finally, the location offers a location allowing development with minimum environmental impact:

- Existing road access could be expanded without wetlands filling or disturbance of natural drainage or wildlife habitat.
- Development would not conflict with NPS management policies since development would be done on private land. 17p
- Land elevation permits drainage and septic systems
- Existing protected boat landings are available with the added potential for providing handicap access.

Alternative 4A is preferable over Alternatives 2 and 3 because it results in the fewest resource impacts and provides the best visitor experience. Added benefits are accessibility, lower



17o. The site described fails to meet criterion 5; it must be reasonably close to the prime resource area of Brooks River, and criterion 3; it must have a scenic setting.

17p. The Gateway Lodge parcel is entirely surrounded by Katmai NPP land. NPS *Management Policies* regarding protection of resources and development rights on inholdings would apply. Other federal and state regulations, laws, and permit requirements may also apply.

## COMMENTS

operational costs, and greater daily visitor capacity.

II. VISITOR EXPERIENCE AND USE LIMITS

Most visitors would arrive at the facility by road access from King Salmon. They would stay in the lodge facilities located on a ridge, providing an excellent view. Visitor would then travel by existing road for a distance of one quarter mile to the boat landing. This access favors handicap use since boarding a boat would be relatively easier than boarding a plane. The visitors would then travel by watercraft to a dock at Naknek Lake Beach south of the mouth of the Brooks River where they would be met by a Park Ranger and led to the visitor contact station adjacent to the dock. At this station the visitors could view exhibits offering information on the terrain, habitat, flora and fauna of the Park. After receiving bear safety instructions and other information, visitors would walk along a boardwalk or use a shuttle to the day shelter and trailhead. Foot trails would connect the shelter to the viewing platforms. The shelter would house food and equipment storage, picnic area, and restroom facilities.

Visitors would have a choice of four bear viewing platforms: The Narrows Platform, the Narrows Two platform (proposed), the Cutbank Platform (proposed), and the Falls Platform. An appropriate number of information panels would be located near the platforms for the education of the visitors. Each platform would allow prime opportunity for viewing and photography of bears in their habitat. At the conclusion of the day, visitors and staff on shift changes would be transported by boat to the Gateway lodge.

17q

Visitor use can be expanded by almost 30% under this alternative, since Park employees permanent housing would be relocated outside the park, permitting an equal number of additional visitors to use the park. To provide the desired Brooks River experience for a maximum number of bear viewers, photographers and anglers, the following limits would be established for the peak months:

| | July | September |
|---|---|---|
| lodge guests | 0 | 0 |
| campground users | 75 | 75 |
| day users | 175 | 175 |
| staff (day presence) | 40 | 40 |
| Total | 290 | 290 |

The Gateway Lodge is located on a raised knoll providing an excellent view of the Lake, River and Park. Facilities such as the lodge, view deck and cabins would be located to take full advantage of the landform The lodge and its dining and lounge facilities offers visitors scenic views while the cabins utilizing topography for desirable solar exposure, views and privacy. The lodge would be the primary location of information and education facilities. Visitors could attend lectures, view films and exhibits on the wildlife and habitat of the Park and obtain archaeological and interpretive information.



## RESPONSES

17q. Two hundred fifty day users spread between three platforms equals 75 people per platform for most of the day. If 50 day users were gone all day on the valley tour, there would still be 66 people per platform. Even if another 50 went fishing all day that would leave 50 people per platform. The point to use limits is not to crowd in as many people as physically possible with no regard for the environment along the river corridor, but it is to arrive at a level of use that maintains an acceptable visitor experience while not stressing the wildlife along the river. The fact that, without a lodge nearby, the visitors will have nowhere to go but the river and the viewing platforms the day use limits must be much less than this proposal. That is why alternative 4 has a day use limit of 90 visitors. With some people on the valley tour and fishing, no viewing platform would have more that 20-25 people at any given time, unless the bears are really active at the falls. The point to be realized here is that any day use only alternative will necessarily have lower use limits. The private entrepreneur needs to be aware of this when considering capital outlays for construction or purchase of tour boats and floatplanes.

The visitors would enjoy panoramic views from the lodge where visitors could relax and choose to participate in various educational offerings. The location of the facilities across the Lake from the viewing areas provides the greatest protection for the sensitive habitat of the park and maximizes the wilderness experience. The need for hotel access trail expansion is either limited or eliminated.

III. PROPOSED DEVELOPMENT

A. **Remove All In Park Facilities Other Than Day Facilities.** Under this alternative, the lodge would be located on private land near Lake Camp. Employee housing would either be located at the Lodge or in King Salmon. Day use facilities would be the only necessary structures inside the Park itself.

B. **Fish Cleaning Building And Waste Collection Facility Constructed.** near the A fish cleaning and fish waste collection facility would be operated at Brooks River and at the Gateway Lodge landing. The Gateway Group will construct a fish cleaning facility and fishing site near the Gateway Lodge dock facility. In this way, visitors have the option of excellent fishing at the Lodge and at Brooks River. They can also choose to save their fish cleaning until they reach the Lodge. Appropriate permitted facilities would be set up to deal with fish waste.

C. **Proposed Visitor Contact Station and Trailhead.** The orientation center for all visitor use at Brooks River would be located at the Gateway Lodge. Additional visitor orientation would be conducted aboard the watercraft in transit to the Park viewing area.

D. **Construct Dock Landing.** The existing dock would be removed and new facilities would be constructed at Naknek Lake south of the Brooks river mouth. This would avoid prime bear habitat and major travel corridors. The new facilities would provide handicap access from the watercraft across the dock to the shuttle.

17r

E. **Shuttle System.** A shuttle system would be incorporated for visitor access to the core use are. Visitors would be shuttled to and from the dock landing to the trailheads. One van on each rout would be handicapped accessible.

F. **Beaver Pond Terrace Development.** This development would not be necessary since the concession facilities will be located at the Gateway lodge.

17s

G. **Narrows Two Platform.** A new platform with full handicap accessibility would be constructed and located upriver from the existing Narrows viewing platform. This proposed platform could be easily relocated by the Park Service if an alternate area is preferred in the Lower Brooks River area.



17r. See comment 17m regarding 45 priority spaces on the bear viewing platforms for disabled people. One handicap accessible van on each route may not be enough.

17s. No sites except the cutbank site meet the placement criteria for boardwalks and platforms set forth in appendix C. Platforms that hold up to 25-30 people are not easily relocated.

IV. RESOURCE MANAGEMENT

Bear management is enhanced under this proposal reducing bear/human encounters. A method would be established to assure equitable viewing opportunities for all visitors. Bear free areas would be established around the visitor contact station and trailhead, and the other viewing and camping areas. With reduction in employee housing, conflict potential is further reduced.

Remediation efforts will continue and monitored to protect the existing habitat and ensure a minimum of human influence.

The removal of facilities benefits the long-term preservation of archeological sites in the Brooks River area. Existing sites would be surveyed to determine a preservation strategy. Various groups would be consulted such as the Native American groups, local and area Native corporations, the State Historic Preservation Office, and the Advisory Council on Historic Preservation.

The proposed pit house model and exhibit at the end of the shuttle road would be located away from all archeological sites. The trail to the proposed Cutbank bear viewing platform would pass through an area with a large number of pit houses. The trail would be located to avoid conflict with the houses.

V. AREA OPERATIONS

The Gateway Lodge would offer all the same services currently offered by the Brooks Lodge but the services would be expanded. Lodging rooms would double to at least 50, placed in single cabins, duplexes and quad configurations.[1] The Gateway lodge, dining facilities, camp store and concessions office would be increased in size to accommodate larger numbers of visitors. Due to the location, significantly greater expansion could be accomplished with little impact on the ecosystem of the Brooks River Area.

The concessioner would provide shuttle service for guests and their luggage from King Salmon to the lodge. The concessioner would also provide a boat ferry service from the lodge to the viewing area. The concessioner would assure handicap accessibility in the Lodge, shuttles and watercraft. Full and half-day trips would be arranged to the Valley of Ten Thousand Smokes. Fishing equipment, boat rental and guide services would continue to be available so long as existing regulations permit such activities.

The concessioner would promote the hire of minority employees and contractors in a manner consistent with ANILCA and other laws and regulations. The concession would be constructed and operated to provide the maximum reasonable access consistent with the Americans With

[1] Another possible option is to construct a main lodge containing dining, viewing, lounge and lecture room facilities. Visitor housing could be maintained in two wings attached to the main lodge with 40 rooms each.

Disabilities Act (ADA) to all people with disabilities including employees.

*VI. PHASING SCHEDULE*

Construction phasing would be substantial but less complicated than other alternatives. The accessibility to King Salmon resolves the major time limitations for construction materials transportation. Construction of the Gateway lodge would therefor be accomplished with relative ease. Construction of the day use facilities at the Brooks River area is facilitated under this alternative since the transportation of materials would be much more limited. In park construction would take place during the summer visitor season. The Gateway lodge construction season would be expanded without the problem of limited access. With the more limited in Park construction, there is less need to mitigate bear conflict by phasing construction timing to avoid bear movement through the area.

**Great Bear Foundation**
*P.O. Box 1289 • Bozeman, Montana 59771-1289*
*Phone: (406) 586-5533*

DATE: 28 June, 1994

TO: Bill Pierce, Superintendent, Katmai National Park.

FROM: Matt Reid, Executive Director, Great Bear Foundation.

REF: BROOKS RIVER AREA, DCP AND EIS.

On behalf of the Great Bear Foundation's constituency, we support an Alternative Development Concept Plan. This alternative, though not included in the EIS, should be incorporated into any final EIS. I worked in Katmai National Park in 1977 and felt that the Brooks River Camp-Falls area had serious potential for bear human conflicts. The increased visitation to the area has "skyrocketed". Regulations focusing on the bear (to a much greater extent) are needed.

Our comments are as follows;

18a

1. Bring visitors into the Brooks River bear concentration area on specially designed tour boats. Incorporate an informative NPS interpretive program with the tour boat operation.
2. Move overnight lodging to the community of King Salmon or secondarily to the west end of Naknek Lake.
3. Build a new campground, away form bear use areas, including travel corridors.

Thank you for the opportunity to comment. Please send a copy of the EIS to the Great Bear Foundation at the above address.

Sincerely yours,

Matt Reid
Executive Director
Great Bear Foundation



18a. Alternative 4 of the plan has been modified to include the potential development of a gateway community concept related to park visitation, lodging, tour boat access, and other service functions, however, no developed campsite south of the river was included in the modification for reasons explained in the plan.

**The Alaska Wildlife Alliance**
PO Box 202022
Anchorage, AK 99520
(907) 277-0897

June 6, 1994

Bill Pierce, Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

**RE: Brooks River Area Draft Development Concept Plan and EIS**

Dear Mr. Pierce,

Thank you for this opportunity to participate in deciding the future of the Brooks River area in Katmai National Park and Preserve (KNPP). We have followed the history and development of the DCP with great interest, as we believe that Brooks River is truly a unique asset of the National Park System. We hope it will remain so.

The Alliance is a nonprofit group which promotes protection of wildlife, most notably wild predators, on all public lands in Alaska. Our members work for equitable representation of nonconsumptive uses of wildlife, and for improvement of the wildlife policy public process. Although most often identified with the issue of depredation programs, such as wolf "control", we also work for better vessel management in Glacier Bay National Park, protection of marine wildlife, and many other wildlife and habitat issues in the state.

GENERAL COMMENTS

We commend the NPS for putting forward the idea of removing all facilities north of the river, to protect both cultural resources, brown bears and people. We also compliment the concept of the "people-free" zone, including the zone's rehabilitation, the detailed maps within the DCP, and the easy-to-read format of the document.

19a

There are some concerns as to the status of the Native land claim within the Brooks Camp area. We assume that the NPS is closely following the progress of this claim, and acting in a way that will prevent an ownership and/or legal mess from developing in the future.

In our view, the goal of KNPP management should be protection of wildlife, ensuring the long-term health of the park ecosystem, preservation of the park's wilderness character, and equal attention to all KNPP resources, not just Brooks Camp. While it may be a mandate of the NPS to provide tourist and sport opportunities, these goals are of secondary concern, and should be provided only after these initial priorities are met and guaranteed. Of least concern is private concessionaire profits derived from public park resources, though we recognize that this will be a component of any overall park plan.

We have been presented with 4 alternatives from which to choose our preference. This is somewhat difficult, as the scenario which we believe best suits Brooks River is not included in the DCP. Increasingly, we encounter this basic flaw: a handful of alternatives are given, often





19a. See response 5c.

## COMMENTS



with the agency preference noticeably propped up. Minor changes are made as a result of pages of paper such as these, but the agency preferred alternative is almost always chosen. It seems that the public process has lost meaning somewhere along the way, and that we are simply going through the motions. This is not a criticism of any individual or group of people who worked on this particular DCP. Rather, we are interested in determining the reality of this dysfunction, and starting a dialogue on possible improvements.

**NO ACTION ALTERNATIVE**

We do not support taking no action, as the exponential increase in visitation to Brooks Camp is a very real threat to both cultural, wildlife and wilderness resources in the area.

**ALTERNATIVE #1 - Minimum Requirements**

We do not support Alternative #1 because it is imperative to remove all facilities north of the river. These facilities are inappropriate human intrusions on prime bear habitat and nationally significant archeological sites.

**ALTERNATIVES #2 and #3 - Beaver Pond Terrace and Ilnik Moraine Terrace**

We do not support these alternatives because they require considerable development in the park, which is neither necessary nor appropriate. This construction, road-widening and development will likely negatively impact the park's wilderness character, long-term ecosystem health and local wildlife populations. Constructing and maintaining a lodge, dining room, guest cabins, showers, visitor center, campground and other facilities, with ability to house 290 people overnight, translates into more water and wastewater infrastructure, more garbage transport and disposal, more air and road traffic to provide supplies and maintenance, and an encouraged erosion of the area's health and character.

19b

Realizing that the Beaver Pond Terrace is the NPS preference, we question philosophical inconsistencies presented in the DCP in regard to this alternative. Removal of facilities north of the river is lauded with phrases such as "wildlife would benefit from the absence of human activity", and "the area would have a more natural setting", to name a few. Yet, the NPS goes on to propose clearing white spruce forest, and development near a pond (an inherently fragile area used intensively by waterfowl and other wildlife), to build human-use and convenience facilities. While it is true that Brooks Camp is most known for its bears, other habitats and wildlife in the area should be valued and protected equally.

19c

It is also common knowledge that alternative #2 (or 3) is supported by the Alaska congressional delegation. To some, our National Parks are "locked up", and we must exploit them for maximum visitation and flow of dollars. We maintain that the NPS should make choices for our parks based primarily on biological parameters, ecological integrity, public acceptance and local communities, not on political support or congressional agendas.

19d

## RESPONSES

19b. The maximum overnight use is in alternative 3 at 230 people during July peak periods. The 60 day users would have left the area.

19c. The plan acknowledges that larger development has greater impacts. The choice is between further impacting prime bear habitat and a world class sportfishing area as proposed in no action and alternative 1, or relocating those impacts to less sensitive resource areas as proposed in alternatives 2 and 3, or to keep some development in the core use area, but scale way back on visitation and larger facilities as proposed in alternative 4. The National Park Service believes this represents a reasonable range of alternatives. No development will occur near the Beaver Pond as discussed in the plan.

19d. As of the date of this comment letter, the NPS planning team has not received any communication (letter, phone, or FAX) from the Alaska congressional delegation regarding the development of these alternatives. The choices made in this plan reflect a concern to limit the unacceptable impacts on the natural and cultural resources of the Brooks River area, and, while doing so, to provide for a safe and enjoyable outdoor experience.

**ALTERNATIVE #4 - Day-Use-Area-Only**

We cannot support Alternative #4 as written, even though it is the closest to what we believe is best for Brooks Camp. Substantial modifications are required; perhaps even a supplemental EIS with a 5th alternative is needed. Our basic concern is this: After removing facilities north of the river, the only alternatives given are large-scale visitor services within the park, or day-use-only with minimal support, with nothing in between. The option that is missing is that overnight use can be accommodated while keeping facilities small-scale and primitive.

The Alliance supports making the town of King Salmon a "gateway community" of KNPP, and relocating the lodge, dining room, showers, visitor center, guest cabins and other such facilities outside the park. This "gateway" concept is supported by Secretary of the Interior Bruce Babbitt as a means of reducing visitor and infrastructure impacts to National Parks, and providing economic growth based on park presence but not directly exploiting park resources. Such an arrangement will provide optimal protection for park assets, provide economic incentives for the King Salmon community to support park protection, and provide the necessary visitor services.

Other aspects of alternative #4 we support are:

- relocation of management and maintainence facilities to the Valley Road
- removal of the floating bridge, retain Narrows viewing platform
- relocating floatplane access to south of the river mouth, improve dock
- replace The Falls Platform

Our concurrence with alternative #4 stops with the relocation of main visitor services to King Salmon, and the other aspects listed above. From there the following modifications are required:

19e

- **Transport.** All alternatives presented assumed continuation of unlimited floatplane access. Reliance on aircraft as the primary visitor transport into Brooks Camp should be substantially reduced. Park rangers are unable to make sure all visitors receive bear safety information due to the irregular arrival of float planes. Noise from the taxiing, takeoffs and flying of aircraft undoubtedly creates stress for bears and other wildlife, as well as diminishing the wilderness experience (we have heard of tour pilots "buzzing" bears so tourists can get a closer look). Bears would have free access to the river mouth once the presence of floatplanes and associated human activity is discontinued.

We suggest that boat service from King Salmon be encouraged as the primary method of visitor arrival. Not only would noise and wildlife harassment be reduced, but interpretation and safety-information transfer from on-board NPS rangers to visitors would be heightened. Appreciation of the area and the wilderness experience would be enhanced. Docking would take place at the site identified as the "proposed primary access site" in alternative #3, on the shore of Naknek Lake.

Aircraft could still be used for regularly scheduled supply trips and emergencies. Any business lost to air taxi operators would be gained by boat operators. It might be argued that rough water may often postpone boat traffic. This argument seems somewhat hollow, as weather just as often postpones air traffic in and out of Brooks Camp. Boat service initiated on

19e. See response 18a.

## COMMENTS



the Katmai Lady by the Quinnat Landing Hotel last summer has proved successful, and negotiation of the channel and shore landing has also proven highly feasible.

- **Lodging, shelter and interpretation.** A basic campground should be developed for those who are willing to "rough it" for a day or two, with a suggested size of 20-40 campsites. Bear-proof storage containers (much like in Denali), a basic covered cooking/picnic area (well away from bears and the campground), and proper garbage storage and removal would be provided. Administration and fee-collecting of the campground by the NPS is preferable, but contracting a concessionaire to do so is acceptable.

Visitors need somewhere to retreat when the weather is bad, and perhaps something else to do during their visit (older visitors cannot be expected to stand on the bear-viewing platforms for several hours). The visitor contact station proposed in alternative #4 could be a place for interpretation, information and getting a cup of coffee. This combination ranger/contact station is more appropriate to the Brooks experience than a full-scale visitor center and dining room.

- **Limits.** A major theme in the DCP is accommodating the 900% visitation increase to Brooks Camp in recent years. A DCP team member at the public meeting in Anchorage accurately described how the pleasant and relaxed experience at Brooks has changed dramatically for the worse. In 1991, 494 undesirable bear-human incidents were recorded.

19f

Rather than try to indulge such detrimental visitation levels, the NPS should cap visitation to 1985 levels (approximately 700 visitors over the course of the season). A drawing permit approach, much like at the McNeil State Game Sanctuary, should be explored. Keeping visitors at a manageable level will protect the bears and other wildlife, protect visitors and the visitor experience, lessen stress levels of park personnel and facilities, and keep human impact on the area to a minimum.

Degradation of wilderness charm and quality in many National Parks is a well-known reality. Brooks Camp offers an opportunity for the NPS to make proactive choices, and avoid sealing such a fate for KNPP. Visitor demand can be reasonably accommodated while at the same time protecting the integrity of the park.

Thank you again for this opportunity to present our views. We trust that our comments will not only be added to the public records, but will be meaningfully incorporated as well. Please call us at any time should you wish to further discuss the future of Brooks Camp, or to let us know if there is anything we can do to help with this process.

Sincerely,

Sandra Arnold
Staff Representative

cc: Roger Kennedy

## RESPONSES

19f. The DCP does not attempt to accommodate the 900% visitation that has occurred at Brooks River over the past decade. Rather the proposed use limits in each alternative were designed to control only the peak days in July and September when bear activity on the river is greatest. These use limits would work in conjunction with the design capacity of the new facilities to ensure that it would be difficult to relax use limits in the future beyond the recommended range. See the section "Limits of Acceptable Change" for the discussion of how the use limits were determined. Establishment of use limits implies that an operational permit system must be implemented.

National Parks
and Conservation Association

ALASKA REGIONAL OFFICE

June 30, 1994

Bill Pierce, Superintendent
Katmai National Park and Preserve
P. O. Box 7
King Salmon, Alaska 99613

**Re: Comments on Draft Development Concept Plan and Environmental Impact Statement (DCP/EIS) for the Brooks River Area, Katmai National Park and Preserve (Katmai)**

Dear Superintendent Pierce:

***Introduction***

This letter represents the comments of the National Parks and Conservation Association (NPCA) regarding the Brooks River Area DCP/EIS. NPCA is America's only private non-profit citizen organization dedicated solely to protecting, preserving and enhancing the U.S. National Park System. Founded in 1919, and this year celebrating its 75th Anniversary as an association of "Citizens Protecting America's Parks, NPCA has more than 400,000 members. On behalf of our members throughout the nation and Alaska, NPCA appreciates the opportunity to participate in this important planning effort which focuses on one of the most magnificent wildlife viewing opportunities in our National Park System.

The Brooks River is truly a phenomenon. The incredible salmon resources of the Bristol Bay area, the setting of a short stretch of river between two lakes, the occurrence of a natural falls, and the mid-summer/late season availability of salmon combine to create an attraction for large numbers of brown bears. The location of these features within a National Park, and the area's relative accessibility (in Alaska and international terms), combine to make the Brooks River one of the most significant sites on the planet for the viewing of wild brown bears in their natural habitat. As more and more people seek this experience, the National Park Service (NPS) deserves credit for tackling the difficult issue of finding an improved management and development scheme which will "preserve unimpaired" the natural and cultural resources of the Brooks River area for the enjoyment of present and future generations. It is vitally important that this process move forward. *Left to happenstance, the present trends at Brooks River will inevitably result in* degradation of the wildlife resource and the visitor experience.

***Background***

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Brooks River Draft DCP/EIS

The lives of humans and bears have been intertwined in the Brooks River area for thousands of years. Ironically, though the major concern at Brooks is the impact to bears from the dramatically increasing numbers of people wishing to view these magnificent animals, the human interest in wildlife observation has likely been a substantial contributing factor to the increased numbers of bears which utilize Brooks River today.

Though it would be impossible to document, it is quite likely there are more bears using more of the Brooks River during longer periods of the day than during any previous period of human history and occupation at Brooks. Archaeological research confirms the size and importance of human settlements at Brooks River over a long period. Because the lives of people, as well as bears, depended on access to the most productive fisheries sites, these settlements were constructed virtually on top of what biologists now consider to be the prime brown bear habitat along the river corridor. As with contemporary subsistence practices, bears which were encountered in the area were undoubtedly "caught" for food and other subsistence uses. It is quite likely that bears were relatively scarce in the Brooks River area for thousands of years. Most certainly, they were extremely shy and reclusive, avoiding prime fishing sites and times when humans were present.

This situation persisted into modern times. When the existing lodge was constructed at Brooks River, it too was built on top of significant cultural sites and prime bear habitat. Brooks River was "Angler's Paradise" and fishing for trout and salmon was the primary interest of the visitors. There still exists a photo, taken during the 1950s, of a salmon cookout at the base of Brooks falls in July. There are no bears in the picture and anglers who fished years ago report seeing few bears in the area. Moreover, for much of its early years, Katmai was virtually unmanaged. The superintendent of Mt. McKinley was also responsible for Katmai. Stories from some of the old guides tell of continued hunting for bears, even in the heart of the park. However, with improvements in wildlife law, expanded state and federal management in the region, increased field presence by NPS at Brooks, and the growing interest of visitors in observing bears, the situation gradually changed.

The challenges faced by NPS today at Brooks River are born of management success, not failure, and of the changing interests of our society. Protecting and viewing bears has become more important than catching salmon at Brooks. Moreover, society's interest in the historic role of indigenous peoples as part of the ecosystem has greatly increased over the past several decades. The situation at Brooks River presents NPS with an historic opportunity - the chance to develop a workable plan for the future of Brooks River which truly reflects the area's resources, society's emerging views of the value of those resources, and integrates resource protection and public use of Brooks River with the larger Katmai ecosystem and adjacent human community. The Brooks River DCP/EIS is the logical and central platform from which to articulate the future management direction of Katmai well into the next century, and NPS can do so in a way which both reflects the realities and interests of Alaska, and the overall trends in resource and visitor management throughout

the National Park System. This is not too tall an order. Unfortunately, while the DCP/EIS takes some good steps in the right direction, the plan fails to grasp the bigger picture. As a result, the DCP/EIS misses both a workable alternative and an important opportunity.

**Science and Resource Monitoring**

A good science and resource monitoring program should form the basis of any ongoing bear/human management at Brooks River. A cursory comparison of the growth in visitation with the increased numbers of bears using the river in recent years might lead to the simplistic conclusion that people are good for bears and the more people we can bring to Brooks River, the more bears we will have. However, while there may well be a corollary between society's growing interests in viewing bears, and improved management presence and protection over time (as has been suggested above), no one would seriously suggest a management plan based on "more people equals more bears". However, a review of the DCP/EIS indicators in Table 2 would lead to an equally absurd conclusion that "no bears equals management success" at Brooks. This is due to the fact that all the indicators focus on human experiences or human/bear interactions. While these factors are important, they are not the only factors on which the alternatives should be formulated and judged, or by which any alternative should be monitored for success once implemented. The amount of time a bear must wait to fish (especially if the cause is disturbance or displacement by humans) is certainly as important as the time a person must wait to access a platform to watch bears fish.

20a

To put the discussion in wildlife management terms, the goal of the DCP/EIS should be to achieve a low density dynamic equilibrium between bears and humans at Brooks River, in which the bears are allowed to reach their K carrying capacity along the river and the human visitation is managed to enable this natural system to maintain. Part of this task involves numbers of bears, but it also involves monitoring various classes (or cohorts) of bears, because one of our primary goals should be to preserve, as nearly as possible given some inevitable effects from human presence, the natural (or unhabituated) patterns of bears along the river. The lack of such bear oriented indicators is not consistent with NPS's stated goals of avoiding adverse impacts to the "natural dynamics" of the local brown bear population, and it conveys an incomplete view of NPS's mission to the public.

Lastly, while NPCA strongly commends NPS's straightforward acknowledgment of the need to protect the quality of the visitor experience at Brooks River, the blanket statement that "the quality visitor experience is the resource at greatest risk in the Brooks River area" seems a bit lopsided. There are more bears at Brooks River than there were only a few decades ago. Do we really know what bear population numbers and composition will be like at Brooks several decades from now? NPS has stated the laudable goal of ensuring that the bear population remains "naturally regulated". It seems reasonable that with increased human use, bear displacement and/or growing bear habituation, a "naturally regulated" bear population may be (or become) a resource equally at risk with quality visitor experiences. Studies conducted specifically to study the use of the Brooks River







20a. An explanation as to why natural indicators that are beyond NPS control could not be used to monitor visitor impacts on the resources has been included in the section on "Limits of Acceptable Change." The example given: "The amount of time a bear must wait to fish" is a perfect example of why individual occurrences of animals cannot be used as indicators. Did the bear wait to fish because too many people were on the platform? Was there a dominant male nearby? Were the cubs not yet treed safely? The National Park Service must use indicators that are measurable and not open to variables. For instance, if management can document that during a certain period of time bear trespass incidents were down, no bluff charges occurred in July and property damage by bears was down, but many bears were still being seen at the falls and juvenile bears were still working the Oxbow, the assumption could be made that the indicators and standards were working. The public use objectives in part one of this plan speak to the writer's concern.

# COMMENTS



area by bears have documented the displacement of bears by increased human use. Brooks River is about bears and NPS should make certain to keep bears in the equation at every step.

**Relocation of Lodge Facilities to the "Gateway" Community**

NPS is to be congratulated for crossing an important threshold and coming to grips with the need to move Brooks Lodge off of a nationally significant archeological site and away from prime bear habitat along the river. However, having reached that point in its draft recommendations (the proposed action relocates the lodge), the DCP/EIS should consider the full range of options regarding relocation of developed hotel/lodge facilities and their relationship to the Brooks River area, the larger "core area" of the park and the adjacent community. The present situation provides an ideal opportunity to pursue an alternative which could advance a number of management and policy goals for Katmai and the national park system as a whole - that of working with Alaska Native corporations and the adjacent community to provide private hotel/lodge style lodging in King Salmon as part of a "Gateway Community" concept. The failure to consider such an alternative, together with its attendant implications regarding visitor access to Brooks River and other areas within the core of the park, is the single most significant deficiency in the DCP/EIS. In light of the positive implications for long term park management and policy, and considering the specific interest in working cooperatively with NPS toward the development of such an alternative which has been previously expressed (in a letter to Secretary Babbitt) by Bristol Bay Native Corporation, the DCP/EIS can not be considered sufficient unless it can incorporate such a revised alternative. It should be pointed out that this is not the same approach as the "Alternative Considered But Rejected - Naknek West" which is briefly described and dismissed on pages 82 and 83 of the current document, associated management actions (such as boat access to Brooks) would be similar.

20b

By pursuing a "Gateway" concept for overnight hotel/lodge style facilities, NPS could avoid construction of major new facilities inside a national park (particularly near a highly sensitive wildlife area), engage in partnership planning with local Alaska Native corporations, contribute to the local economy, facilitate the establishment of new visitor opportunities in the park, and better protect park resources within realistic staff and budget constraints. The government price tags alone for Alternatives 2 and 3 render them little more than wishful thinking. Moreover, the increased staff required to manage these alternatives seems directly at odds with current personell reductions.

**Establishment of Boat Access**

A "Gateway" approach would facilitate the establishment of a system of boat access to Brooks River. Such a system could provide an alternative to the increasing amount of aviation traffic. Moreover, a boat access system could provide drop off opportunities for hikers, canoeists and other users in the core area of the park. Boat access is consistent with the "transit" style of access which is used with success in Denali and is being increasingly pursued as a matter of public policy throughout the national park system.



# RESPONSES

20b. See response 2f.

Most important, a system of boat access provides expanded opportunities to both protect and interpret the park's resources - from bears, to cultural resources, to the very ecosystem of which the park is a part.

The people come to Brooks River because of the brown bears. The bears are there because of the sockeye salmon. And the salmon are there because of the region's river and lake systems. The Naknek River is one of four major rivers comprising the richest natural salmon fishery in the world. As Secretary Babbitt has pointed out, national parks are not about entertainment. He has stated that, "National parks are the windows through which the American people can rediscover and renew (their) connection to the natural world." The natural world of Katmai is founded on a system of rivers and lakes. What better way to introduce the visitor to the fascinating context and interconnections of the Katmai ecosystem than to approach Brooks River by boat. Within the true meaning of the national park system, such an option seems preferable to plopping the visitor down on the beach. The boat trip itself can contribute to the sense of adventure and discovery which should be a goal throughout our national park system. It affords opportunity for interpretation and orientation to the bears prior to arrival at Brooks River. As such, boat access can serve as an important management, as well as interpretive tool.

**Cultural Resource Interpretation**

Regarding other aspects of the DCP/EIS, greater emphasis should be placed on the interpretation of cultural resources and the history of indigenous people in the core area of Katmai. NPS should make a concerted effort to involve local people in the development and implementation of an expanded cultural resource program at the park. The "Gateway" concept and boat access option provide natural opportunities for this kind of expanded relationship between NPS and Native residents.

**Continuance and Management of Sportfishing**

While bears are the natural resource of primary interest, Brooks River has long provided wonderful sportfishing opportunities and, certain sportfishing activities should be able to continue over the long term, if carefully managed. Few bears are present along the river during June, when fly fishing enthusiasts pursue early season rainbow trout. In addition, the trout fishery is a "catch and release" fishery which does not give rise to the problems associated with bears being attracted to caught and carried fish. A "catch and release" regulation should be implemented immediately for salmon throughout the season, and "no fishing" periods should be implemented for certain key sections of the river during July and later in September. The DCP/EIS does a generally good job of pursuing this approach, with the exception that a stronger and certain commitment should be made to establishing a "catch and release" policy for salmon. In addition to eliminating problems along the river, a "catch and release" policy for salmon would eliminate the necessity of an elaborate fish cleaning plant and the problems of waste disposal.

**Development of Campgrounds**

## COMMENTS



20c

Locating developed lodge/hotel facilities in King Salmon under a "Gateway" concept and improving management of Brooks River as a "day use" area, does not presuppose that no overnight opportunities should exist in the park. A revised alternative should include one or several developed campgrounds which include hardened sites, food storage lockers, central cooking shelters, and sanitation and washroom facilities. Such development(s) would meet the needs of more active visitors who wish to hike in the area, stay overnight and move on to other camping or hiking opportunities in the park (such as the Valley of Ten Thousand Smokes), or visitors who stay several days to fish (a common pattern of use among trout fishermen). Campgrounds would meet the needs of those who wish to get a little "closer to the ground" than a developed lodge, but would do so in a more managed setting. Lastly, a developed campground would increase the spectrum of opportunity for those who might relish the opportunity to camp in the national park, but might not be prepared for Alaskan wilderness. There is a legitimate role for good quality "front country" camping in the Brooks River area. The Beaver Pond Terrace in the DCP/EIS Alternative 2 seems to provide a good option. This could even be somewhat expanded in place of lodge development.

**Summary**

There are many good elements in the DCP/EIS. The proposal to remove all facilities north of the river and establish the area as a "people free zone" is a major step forward in the management of Brooks River. The recognition that Brooks River, despite its popularity and the need to provide certain developments, should offer visitors an "uncrowded, unhurried experience in a pristine, natural setting" is equally important. Brooks River may be an international focal point for bear viewing and visitation to Katmai, but it must always convey a sense of discovery and wildness. We can and should provide many opportunities without losing the essence of the Alaska national parks. Over the past fifteen years, I have visited Brooks River during the months of June, July and September. During that time, the use of the area has dramatically increased. The plain fact is that the situation at Brooks River is significantly changed and our management must also change if we are to preserve this phenomenal resource unimpaired for the enjoyment of present and future visitors. That the DCP/EIS confronts this issue is commendable.

However, the DCP/EIS falls short on two accounts. First, the resource monitoring indicators which are used to formulate and judge the various alternatives are dramatically human-biased. A much more thorough set of bear-oriented indicators must be built into the final document and carried forward in the monitoring and assessment of ongoing management at Brooks River.

Second, the DCP/EIS fails to grasp the opportunity to think broadly about the future management of the "core of the park" as described in the General Management Plan. The document dismisses with a few paragraphs the West Naknek alternative as unworkable.

20d

However, there is no consideration of a more workable "Gateway" alternative at King



## RESPONSES

20c. A campground in alternative 4 is inconsistent with the concept of a day use area only. If a campground is acceptable on the Beaver Pond Terrace, then a lodge must be acceptable also, and this concept has been proposed in alternatives 2 and 3. The converse of this comment is that only a lodge is acceptable inside the park in alternative 4, and a campground is not. No alternative can prejudice one form of overnight use against another within the park. Campground facilities in alternative 4 would be supplied by the gateway community, just like the lodge facilities would be provided.

20d. In the summary of alternatives on p. iv of the draft DCP/EIS it clearly states under alternative 4 that "Lodging and commercial campgrounds would be provided by private enterprise in King Salmon, Naknek, and surrounding area lodges." This should have been reiterated and expounded upon in the detailed description of alternative 4 in part two of the draft plan. The private enterprise concept for provision of lodging facilities was not rejected or overlooked. The text has been amended to deal with this concern.

Salmon. Such an alternative was suggested in writing to NPS by certain conservation groups and Native corporations nearly a year ago. Consideration of such an alternative would reflect a number of the policy directions being set throughout the national park system. It would respond to special circumstances in Alaska and would promote other visitor opportunities consistent with the national park mission. The absence of such an alternative is disappointing and unacceptable.

Perhaps the absence of such an alternative is due to the fact that it does not fall easily or completely under the control of government planners. It may not be ripe to be neatly packaged as a ready made alternative. It is much more likely a process which will require on-the-ground, roll-up-your-sleeves, difficult work. It is planning close to the resource and face to face work with various parties. It is, however, exactly what NPS is talking about in all of its "ecosystem", "partnering" and "streamlining" efforts. It is the kind of effort which can produce results that have long term positive effects on the resources and visitor experiences at Brooks River, and on system as a whole. NPCA believes our national parks deserve no less than this sort of effort.

Because of controversies surrounding Denali National Park and Preserve, including the recent South Slope DCP/EIS, Secretary Babbitt established a working group to sit down and wrestle with the issues in an experiment to find some common ground. NPCA is participating in that process. An agreement was recently achieved in Gates of the Arctic National Park and Preserve to address park management and Native subsistence needs. It is accompanied by an EIS, but the real agreement was achieved with a great deal of communication and cooperative effort, and must still be adopted by congress. While imperfect as all human endeavors are imperfect, these kind of efforts have the best chance of success for the national park system. NPS must build on the good foundation of the draft DCP/EIS, engage the various interests in Alaska, and build a revised and workable "Gateway" alternative. The resources at Brooks River demand such an effort.

Sincerely,

Chip Dennerlein
Alaska Regional Director

cc NPCA, Washington, D.C.
NPS, Alaska Regional Office
Alaska Conservation Organizations
Bristol Bay Native Corporation
Alaska Congressional Delegation

# THE WILDERNESS SOCIETY

**Mr. Bill Pierce, Superintendent**
**Katmai National Park & Preserve**
**P.O. Box 7**
**King Salmon, AK 99613**

**June 30, 1994**

**REF: COMMENTS ON DRAFT DEVELOPMENT CONCEPT PLAN & ENVIRONMENTAL IMPACT STATEMENT - BROOKS RIVER AREA OF KATMAI NATIONAL PARK & PRESERVE**

Dear Mr. Pierce:

**INTRODUCTION:**

The Wilderness Society appreciates the opportunity to comment on the Draft Development Concept Plan/Draft Environmental Impact Statement (DCP/DEIS) for the Brooks River Area of Katmai National Park & Preserve. The National Park Service is to be commended for undertaking this critical public environmental planning and review process to determine the future protection of the wildlife and wilderness resources in the Brooks River Area of Katmai.

As a national nonprofit land conservation organization with 300,000 members nationwide, 1,200 of whom live in Alaska, The Wilderness Society is devoted to preserving wilderness and wildlife, protecting America's prime forests, parks, rivers, deserts, and shorelands, and fostering an American land ethic. The Wilderness Society, and its members, have had a longstanding involvement in the protection of the world renowned wilderness, wildlife, scenic, and cultural resources of Katmai National Park and Preserve.

**BACKGROUND:**

As we have previously stated, The Wilderness Society believes that the wildlife and wilderness resources in Katmai National Park and Preserve are of an extraordinary quality and international value that make them worthy of protecting with the highest standard that the National Park Service can apply. Further, we have studied these resources and issues and have consulted extensively with NPS over the years on various protection strategies for the Park. The Wilderness Society continues to believe that Brooks Camp could not have been sited in a more inappropriate place, and that it should be phased out and removed to resolve the bear/human conflicts that can only become more serious as increased use of the area places more pressure on the park.

ALASKA REGION
430 WEST 7TH AVENUE, ANCHORAGE, AK 99501
TEL. (907) 272-9453 FAX (907) [redacted] 272-1670

**SUMMARY OVERVIEW:**

While much has gone into the planning for the Brooks River Area over the last four years since this effort was undertaken, we fear that the NPS has missed several key aspects of the opportunities presented by it, and has missed the true wilderness context of Brooks River Area to accessing and interpreting Katmai National Park & Preserve from King Salmon. King Salmon should be the gateway to Katmai, not the Brooks River Area itself. The narrow scope of the planning area used by NPS has unfortunately foreclosed an examination of all feasible transportation access and visitor interpretation plans utilizing watercraft that would flow from such a context, and therefore, NPS has not yet presented and responded to a full range of legitimate DCP alternatives for Brooks River Area planning as was suggested by The Wilderness Society and many others during the DCP scoping process. None of the alternatives presented are fully responsive to the resource wilderness and wildlife protection requirements that flow from the stated purpose and need for the plan, and none are responsive to the larger wilderness park context that the Brooks River Area should be viewed in. Further, the two alternatives to relocate and rebuild Brooks Camp are not fiscally feasible or viable in their staffing and operational maintenance requirements in a federal budget appropriations climate that is substantially cutting the operating budgets and staffing level FTE's of the NPS. As a result, The Wilderness Society firmly believes that the DCP/DEIS lacks sufficiency and fails to meet its purposes, and that the NPS should prepare a Supplemental DCP/DEIS for public comment that meets those needs.

**EVALUATION OF DRAFT DCP/DEIS:**

(A) PLANNING AREA STILL TOO SMALL - NPS MISSED THE BOAT:

21a

As stated above, King Salmon should be the gateway to Katmai, not the Brooks River Area. Such a context and view allows a broader range of alternatives for access, interpretation of park resources, visitor experiences, dispersal of visiter use, and lessening of impacts on the wildlife at Brooks River and the surrounding wilderness areas. The alternatives presented in the DCP/DEIS all essentially assume primary access to the Brooks River Area by aircraft. As a result, NPS has "missed the boat" and not developed alternatives that use watercraft for access from the King Salmon and Lake Camp area.

21b

The study area depicted in the Brooks River Area DCP/DEIS should be expanded to include the area shown as the "park core area" in the NPS General Management Plan/FEIS of 11/7/86 plus all of Naknek Lake and Brooks Lake in order to be inclusive of all of the zones that will be influenced by the decisions at Brooks Camp, and to encourage a full range of DCP alternatives. The DCP study area should include Naknek Lake, Bay of Islands, Brooks Lake, Connie Lake, Grosvenor Lake and River, and Savanoski River since many of the uses of those areas are staged out of King Salmon and Brooks Camp and the access for NPS water patrol and backcountry crew changes is also staged from King Salmon and Brooks Camp. Brooks Camp decisions will radiate to all of these areas and failure to consider that will lead to unplanned influences outside of the presently stated planning area by default.

21a. See response 2f.

21b. The scope of the DCP/EIS for the Brooks River area is just what the name implies. The National Park Service has general management plans, backcountry management plans, resource management plans, and wilderness management plans that speak to greater parkwide management issues. DCPs focus on small geographic areas where development is considered necessary.

## COMMENTS

TWS Comments on Katmai Brooks River Area DCP/DEIS, 6/30/94, Page 3.

(B) BROWN BEAR PROTECTION - IMPACTS OF ALTERNATIVES:

While the Draft General Management Plan/Environmental Assessment proposed a phased relocation of all Brooks Camp facilities to reduce the number and frequency of bear/human encounters, the General Management Plan/ Final EIS deferred making any decision on relocation of Brooks Camp "until the results of current studies on bear/human interactions in the Brooks Camp area have been completed." (Pg 32, par 3). Those studies were completed and published for NPS by Olson, Gilbert, and Fitkin on June 1, 1990, and have been released to the public. Subsequent studies by Olson, et al have added to the body of evidence that brown bears are displaced by increasing use of the Brooks River Area and increasing the length of the season of use.

However, the information developed in those bear/human interaction studies, which clearly shows the impact of increasing numbers of humans displacing bears, does not appear to be prominently incorporated into the design of the alternatives displayed in the Brooks River Area DCP/DEIS. Instead, NPS states that: "A critical resource management issue in the Brooks River Area is how to accommodate the growing numbers of anglers, photographers, and bear viewers without impacting the natural dynamics of the local brown bear population, or severely degrading the visitor experience" (page 3), ignores the issue of human use limits to protect the bears throughout the DCP/DEIS, and constructs a set of Human/Bear Interaction Indicators in Table 2 on page 29 that place no values on protecting the bears or their behavior and habitat. Conceivably, success could be defined as eliminating any bears on the Brooks River as the way of meeting the standards portrayed in Table 2. In short, the emphasis is on accommodating more people rather than protecting bears, and the DCP/DEIS fails to really address and meet the NPS stated objectives to protect bears.

21c

The DCP/DEIS fails to map or otherwise detail any identified brown bear habitat and use patterns as key information required to design and evaluate the impacts of legitimate alternatives, nor is that information sufficiently summarized and displayed in a manner that helps to answer the fundamental question of where any facilities can be placed in the Brooks River Area without impacting the bears. A matrix of that research needs to be explicitly mapped as a basis of planning and all alternatives should be structured in the DCP/DEIS to allow the reader the ability to see how the conclusions of that research shaped each alternative. Failure to show how each alternative relates to the bear research casts doubt on the integrity of the alternatives and the sufficiency of the DCP/DEIS.

(C) IMPACTS OF ALTERNATIVES ON DESIGNATED PARK WILDERNESS:

Katmai National Park & Preserve is essentially a wilderness park in the spirit of the Alaska National Interest Lands Conservation Act (ANILCA) of 1980 and the purposes of that Act to protect these wilderness values. Brooks River Area is an island of development completely surrounded by that designated park wilderness. The Brooks River Area is a transition zone from the front country of King Salmon to the back country of Katmai's designated park wilderness, and should not be viewed as front country to develop without considering impacts on the adjacent park wilderness.

21d

## RESPONSES

21c. The National Park Service certainly does not ignore the issue of human use limits to protect bears in this DCP. Human use limits are in every development alternative, and were arrived at through the recommendations of the Bear Research Committee and a special NPS workshop on limits of acceptable change. See comment 20a as to why no uncontrolled natural indicators were used. It is absurd for the Wilderness Society to construe that table 2 is defining management success as eliminating bears on Brooks River and accommodating more visitors at the bears' expense. The use limits that were determined through the limits of acceptable change methodology do not accommodate more growth in visitation at Brooks River; that is why three of the four development alternatives have use limits that are below current common peak days in July (table 3).

The decision to not include quantities of graphs, tables, and matrices that depict a season's distribution of brown bears on the river, or the probable age classes in the "local population" for any given year may be considered by some as a lack of information for analysis by the lay person. Because the bear population on Brooks River is dynamic and changes from year to year, the planning team decided to not produce graphs of old data sets that might not resemble the current situation, but rather to plan from those recurring, general patterns of bear use on the river that everyone familiar with the river already knows. An example of this is: bear use is generally greatest at the falls in July and greatest in the lower river in September. It is not necessary to reproduce tables from studies a half a decade old to convince the reader of this. It is an acknowledged fact. And so the team planned accordingly.

After the 1991 *Alternatives Workbook* comment period, at the request of the conservation community, a Bear Research Committee was specially assembled by the National Park Service to review a decade's worth of bear studies on Brooks River and to independently review the proposed relocation sites for potential effects on prime bear habitat. The committee also served as an oversight committee to the planning team advising on the pros and cons of the proposed actions as they related to bear biology and bear use in the Brooks River area. They also summarized for the planning team all of the management recommendations by all the Brooks River bear researchers from the past decade. The planning team took the committee's recommendations into account and the development alternatives reflect this. See the "Selected References" section for a list of all the documents and studies that were consulted in the development of this plan.

21d. The text in the final plan has been modified to accommodate this concern about impacts on adjacent designated wilderness.

At the same time, the growing use and development pressures on Brooks River Area are already up against the adjacent wilderness boundaries in a way that impacts negatively on that wilderness. Yet NPS flatly states in every alternative under Part Four: Description and Environmental Consequences of the Proposal and Alternatives that: "No federally designated or recommended wilderness would be affected by this [these] alternative[s]" without any supporting statements, analysis, or documentation. We find this to be a gratuitous denial of the facts and a case of NEPA segmenting that is inexcusable. All of the alternatives, including No Action, impact on the adjacent wilderness at some level. Even though the planned actions are not actually in designated wilderness, the affects of those plans will be felt in the wilderness. The DCP/DEIS is significantly flawed in not addressing and assessing those impacts. We believe that NEPA and ANILCA require such an assessment.

**(D) FISCAL FEASIBILITY OF THE ALTERNATIVES:**

It is foolhardy to pursue alternatives and preferred actions that are not fiscally viable. Alternative 2: Proposal, Beaver Pond Terrace and Alternative 3:Illiuk Moraine Terrace both suffer from this shortcoming. Both of these alternatives to relocate and rebuild Brooks Camp within the Brooks River area are not likely to be able to get sufficient funding to execute. Further, in this austere federal budget appropriation climate when NPS operations and maintenance budgets and FTE's are being significantly cut back, it is totally unrealistic to pursue such alternatives. NPS should not hitch its expectations to a plan that cannot go anywhere or that cannot be maintained once built.

**(E) EVALUATION OF THE ALTERNATIVES:**

The Wilderness Society does not believe that any of the alternatives presented meet the tests of the Purpose and Need for the Plan. Clearly, the No Action Alternative is not feasible since action is required to mitigate and correct the site impacts that now exist at Brooks Camp. Alternative 1: Minimum Requirements suffers from the same problems as no action. Alternative 2: Proposal, Beaver Pond Terrace and Alternative 3: Iliuk Moraine Terrace both have significant problems in that they transfer the Brooks Camp impact problem to another site within the same area without getting it out of there to reduce the environmental impacts; they do not reduce the impacts on bear habitat from facilities construction and high levels of human use; and they are fiscally not viable. Alternative 4: Day-Use-Area-Only begins to approach an acceptable alternative, but fails to incorporate several aspects of such an approach that would make it attractive to the public and manageable for NPS. None of these alternatives comes to grips with limiting human use and aircraft use at Brooks Camp to protect the bears and the visitor experience that flows from viewing a population of wild bears in a natural setting. None of the alternatives have put the bears first and human use second. No alternative will succeed unless it addresses limits to human use and limits to the intrusions of human technology on the bears. This has been recognized by Alaska Department of Fish & Game for McNiel River, by the US Forest Service for Pack Creek on Admiralty Island in the Tongass National Forest, and by the US Fish & Wildlife Service at O'Malley Creek in Kodiak National Wildlife Refuge. Failure to recognize that here will only degrade the wild natural character of the Brooks river bears and the visitor experience.

TWS Comments on Katmai Brooks River Area DCP/DEIS, 6/30/94, Page 5.

BROOKS RIVER AREA DCP - TWS VISION OF A PREFERRED ALTERNATIVE:

The Wilderness Society believes that the viable DCP alternative exists for the Brooks River Area in a vision that results from changing the focus of what we are trying to do at Brooks River Area to the broader context of where the area fits in the overall park, and to expand the scope of the planning area to accommodate that context.

First, it is important to establish that King Salmon, not Brooks Camp, is the gateway to Katmai. Once this is establish, the concepts of access and use can be more readily proposed than the DCP/DEIS presently does. King Salmon is the front country, not Brooks River Area. King Salmon is where visitors should "enter the park" and where the visitor center should be. Any resort development should be encouraged to be provided by the local community in King Salmon, not by the NPS at Brooks River. A system of access can then be developed that uses watercraft originating at Lake Camp or King Salmon and aircraft, but allows for pulling back the present levels of aircraft use and the resulting intrusion on the bears. This would have the added benefit of disbursing use to other parts of the park by boat and broadening the types of visitor experiences that are made available in the park.

A second important principle in protecting the bears and visitor experience at Brooks River is to set limits to use that favor the bears, as is done at McNiel River, Pack Creek, and O'Malley Creek. NPS must do this or risk losing the bears and the visitor experience at Brooks River. Use could also be spread out in time so that the quality of each individual visitor's use would be maintained and the bears would not be crowded.

21e

A third consideration is the extent to which facilities are allowed at Brooks River and what type of activities are allowed there. Brooks Camp should be phased out and removed in connection with the concession contract expiration. However, that does not mean that another facility of equal or greater impact should take its place in another nearby location at Brooks River. This is a fragile area that has taken enough environmental impacts from site disturbances and contaminations. It is time to back off from that type of development here and take much lower impact approach. That does not mean go all the way to just day-use-only, which has an intensive transportation access side to it. Rather, what is called for is a combination of low impact camp sites in a designated setting and day use. This has the advantage of lower impacts in facility, transportation access, cost of construction, and cost of maintenance. The only cabin facilities that should remain would be those minimally required for a NPS staff and maintenance presence.

Fourth, the interpretation of the park resource should be of low impact and low cost itself. This can be achieved by siting a major visitor center at King Salmon, not near Brooks River Area, to provide the linkage to using the park at King Salmon, not at Brooks Camp as presently happens. Interpretative programs requiring electricity such as movies or slides should all be sited at the visitor center in King Salmon to avoid generator requirements near the Brooks River area or at Three Forks Overlook.

21e. See response 18a.

Fifth, there are several things that can be done at the Brooks River Area to minimize bear/human encounters, protect the bears from crowding, improve the interpretation of important cultural and natural resources, and improve the visitor experience:

*Visitor access to the immediate area of Brooks Falls during peak bear use periods should be allocated by some procedure (e.g. McNeil River model) to prevent interruption of the bears feeding patterns, to maintain the quality of the visitor experience, and to maintain human safety.

*Placement of any proposed raised boardwalk viewing facilities along the South side of the Brooks River should take account of bear use patterns as well in the design of alternatives.

*Sport fishing in the Brooks River should be catch and release only instead of the one fish limit now, and should be curtailed during peak bear activity in the Brooks River to avoid conflicts.

*Floatplane access should be moved away from the beach at Brooks Camp, since it too is one of the displacing influences on the bears.

*Design of new roads should be minimal and limited to use of existing layout.

*No designated Wilderness should be declassified to allow new road construction.

*No designated Wilderness should be declassified to relocate Brooks Camp or any other facilities.

*NPS should insist on having Park Service naturalists on the bus to Three Forks Overlook, which would also provide a means of ranger patrol between Brooks River and the Overlook, and naturalist staffing and crew changes at the Overlook.

*The archaeological resources in the Brooks River area are a very special resource that should be protected from any facilities relocation and development actions taken there, and should be properly interpreted to the public by local Native residents.

Finally, The Wilderness Society believes that the NPS could develop a much better sense of cooperative relationships with the communities of King Salmon and Naknek in planning for access to and interpretation of park resources. The quality of the plan and the local ownership of the park and its values will be greatly advanced by it and the local communities will realize the access to the Title XIII provisions of ANILCA that hold the promise to develop those partnerships.

CONCLUSION:

The Brooks River Area DCP/DEIS does not meet its own stated purposes and needs for the plan. NPS needs to do a Supplemental DEIS with at least on more alternative (5) as we have outlined above. This is needed to correct several deficiencies in the draft plan and to assess missing elements to sufficiently comply with NEPA. The rapid growth of visitation in the area can not be sustained; the bears will clearly suffer and the visitor experience will ultimately be lost. The alternative we have outlined above combines several aspects of protecting and interpreting the resources of the Brooks River Area that meets the needs to protect the bears and maintain the quality of the visitor experience.

## COMMENTS

TWS Comments on Katmai Brooks River Area DCP/DEIS, 6/30/94, Page 7.

The goal of a "high quality" visitor experience in this outstanding national park should be how rewarding the contact with nature is there without impairing the resource, not how quickly day tours can access and exit the park. While it is true that single day tours are in demand, that is far from sufficient reason to push more people through the area more quickly and reduce the quality of their experience in this magnificent area. It

21f certainly is insufficient justification to contemplate sacrificing these great park values to accommodate increasing levels of use.

The Wilderness Society appreciates the opportunity to comment on this critical planning process at Brooks River. Thank you.

Sincerely yours,

Allen E. Smith
Alaska Regional Director

CC: Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young
Jack Morehead, Director, Alaska Region, National Park Service
Pam Miller, Alaska Program Director, The Wilderness Society
Karl Gawell, Parks Program Director, The Wilderness Society
Alaska Conservation Groups

## RESPONSES

21f. The DCP does not "contemplate sacrificing...great park values to accommodate increasing levels of use." The use limits that were determined through the limits of acceptable change methodology do not accommodate more growth in visitation at Brooks River, that is why three of the four development alternatives have use limits that are below current common peak days in July (table 3).

June 30, 1994

Mr. Bill Pierce, Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

Re: Draft Development Concept Plan/Environmental Impact Statement for Brooks River Area

Dear Mr. Pierce:

Earlier I submitted comments in a letter dated September 3, 1993, and in a summary statement submitted at the public meeting on the DCCP held on May 18 of this year. This letter is intended to supplement my earlier statements, copies of which are attached. Please consider the three letters as one set of comments on the Draft DCCP/EIS.

22a

Need for a Supplemental Environmental Impact Statement

As pointed out in my earlier statements, the Draft Development Concept Plan (DDCP or Draft) lacks an alternative that would (a) replace the current and proposed float plane transportation system with a tour boat or ferry system, with all visitors departing from the King Salmon area, (b) replace the current visitor bear-viewing arrangements at Brooks River with scheduled walks to the bear viewing areas led by park ranger-interpreters, and (c) provide for modern camping facilities in the Brooks River area, well away from bear concentration areas and travel routes, for those visitors who are preparing for back-country travel after viewing the bears, or who may wish to stay more than one day in the Brooks River area.

This lack of a fifth alternative means that the Draft is not in compliance with the National Environmental Policy Act, which requires a federal agency to consider the full range of alternatives. A supplemental DEIS (SDEIS) is in order.

A second reason for a SDEIS is that alternatives 2 (the proposal) and 3 have been overtaken and rendered obsolete by policy changes at the national level. The first and most important is Secretary Bruce Babbitt's policy speech of May 23, 1994 in which he "... [concurs] with the recommendations of the experts who wrote the Vail Agenda that the 'primary responsibility of the National Park Service must be protection of park resources.'" He then follows with this pledge:

> On my watch, the Park Service will not build additional lodging facilities within the parks.

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22a. See response 18a.

> If the need arises for more overnight accommodations, then it should be done outside the parks. The Gateway communities outside the parks can also serve as staging areas, where visitors can learn about the park and plan their excursions--all without adding to the congestion inside.[1]

Alternatives 2 and 3 each call for a proposed new lodge with a capacity 25 percent larger than the existing lodge. Because both alternatives would relocate the existing lodge facilities to the south side of Brooks River, for all practical purposes the proposed new lodge is the kind of new facility ruled out by Secretary Babbitt, especially in view of the availability of existing facilities, and the prospect of new ones if needed, in the nearby "gateway community" of King Salmon.

A second compelling policy shift than renders alternatives 2 and 3 as little more than academic possibilities is the Administration's emphasis on "Reinventing Government." Pursuant to this directive, overall federal spending is to be reduced, and unnecessary and wasteful federal spending is to be avoided.

In Alaska the new policy has already prompted a regional office reorganization that will reduce the number of regional office employees, and probably the budget for Alaska operations. Similar budgetary restraints are evident in Congress, as well.

Despite the new national fiscal policy of the Administration, which was promulgated well in advance of publication of the DDCP, the Park Service is proposing to spend an estimated $27.4 million on new construction at Brooks River, not counting increased personnel, operational, and maintenance costs, or the subsidy and compensation to the concessioner. But facilities already exist in King Salmon (or could be added, if necessary), and King Salmon businesses and Alaska Native corporations and individuals are eager to provide visitor services and facilities.

Thus the National Park Service's preferred alternative, having been in effect overridden by new national policies and priorities, has a distinct air of unreality about it, with the public being drawn into an academic discussion over a proposed alternative that is not viable on economic and national park policy grounds alone.

22b Inadequate environmental impact analysis is the third reason why a SDEIS is required. The Draft fails to make adequate use of the

[1] Babbitt, Bruce, "America's National Parks: The Welcome Sign is Out, Speech given at Independence National Historical Park, May 23, 1994, pp.1-2. Nor, added the Secretary, will the Park Service be "...in the road-building business" (p.2). Alternative 2 would require one new and several short spur roads, alternative 3, two new roads plus spur roads.

22b. See response 21c.

findings of numerous scientific studies made of bear behavior and habitat requirements at Brooks River over the past several years, including studies commissioned and financed by the Park Service itself. These studies describe in detailed, quantitative terms the effects of bear viewing and sport fishing on bears feeding in, and attempting to feed in, Brooks River. By relating these findings to the alternatives' use limits and proposed facilities, a quantitative impact analysis could readily be provided for each of the alternatives.

Because the scientific research findings have not been fully utilized, the impact analysis on bear behavior, feeding, and other habitat requirements is remarkably brief, general, and superficial.

For example, alternatives 2 and 3 each have one paragraph on the environmental impact on bears, and one paragraph on the reduction of "human/bear conflicts." Alternative 4 gets similar treatment with the paragraphs edited to account for the difference in the number of facilities. This impressionistic treatment is of little or no utility to the reader interested in comparing the impacts of the alternatives on bears, and in the fundamental question posed by the current situation at Brooks River: What is the level of human use that is most consistent with the purposes of the park/preserve as set by Congress?

Many of the findings of a 1990 study that are cited in part two, description of the alternatives, pp. 42-44, have direct relevance for the environmental impact analysis, yet are ignored in that analysis. For example, one finding is that "the relative impact on bears of structures and activities in forested areas at a distance from the river is infinitely smaller than similar development near the river, which disturbs a myriad of ecological processes based on salmon consumption [p. 104]" (p.44).

22c This finding suggests that bear viewing platforms and capacities be designed and located so as to minimize disturbance to feeding bears and bears trying to reach the river.

In their publication Brown Bears of Brooks River (1993), authors Ronald Squibb and Tamara Olson, drawing on their own research and that of other investigators, note that the existing Falls platform is having an adverse effect on non-habituated bears:

> ...The bears that are least tolerant of people still tend to stay away from people on the viewing platform by using the north side of the falls. More tolerant bears use the south side, which incidentally has the better fishing...Brooks Falls is a powerful attraction for bears during July. Nevertheless, several of the non-habituated adults still cannot tolerate a full viewing platform, and will fish there only during the odd hours when few

22c. Which they were, as recommended by the Bear Research Committee in appendix C.

## COMMENTS

people are there.[2]

22d

This suggests that the existing Falls platform be moved further back from the river, and its capacity analyzed in terms of the likely effect on the bears. But the preferred alternative, and alternatives 3 and 4, would retain and expand the existing Brooks Falls platform, which is on the south bank within a few feet of the Falls, and construct a new platform at the Cutbank, which overlooks another key bear concentration area on the river.

22e

Similarly, another finding of the 1990 study cited in the Draft suggests that the existing and proposed reliance on a float plane transportation system is also having adverse effects on the bears:

> Noise produced by aircraft, boats, and construction, constitutes intrusive stimuli which may be differentially experienced by the various age-sex classes of bears frequenting the river. Displacement of family groups in particular could have population-level effects [p.14]." (p.44).

Yet no consideration whatever is given in the Draft to replacing the float plane system with specially designed and quiet tour boats that would dramatically reduce noise disturbance to bears.

Recommendations

1. In a supplemental environmental impact statement, the Park Service should give consideration to a fifth alternative as described above, or one comparable to it.

2. The supplemental statement should also include a detailed description of bear biology and habitat requirements at Brooks River. An excellent recent discussion in non-technical terms is Brown Bears of Brooks River by Ronald Squibb and Tamara Olson (cited above), former NPS brown bear researchers at Brooks River and Katmai NNP. This kind of basic information is necessary for a full understanding of the environmental effects of proposed development and policies at Brooks River.

A full discussion of habitat requirements would include brown bear concentration areas near Brooks River such as Margot Creek and Research Bay, and the salmon spawning streams entering Brooks Lake. Bear travel patterns should be discussed, including

22f

movement between Brooks River and these other salmon streams and areas, and across Naknek Lake-Iliuk Arm via Iliuk Moraine (a path apparently not known to the authors of the Draft). This discussion would enable the environmental impact analysis to consider the effects of various levels of development at Brooks

[2] Squibb, R., and Olson, T., Brown Bears of Brooks River, Salt Lake City, Lorraine Press, 1993, p. 15.

## RESPONSES

22d. See criterion 3 in appendix C.

22e. The park has requested the FAA to publish in its "Notice to Pilots" that except for landings and take-offs, aircraft must maintain an elevation of at least 1,000 feet (1,100 feet MSL) above ground level in the vicinity of Brooks Camp. Tour boat access is recommended in alternative 4, and would be feasible in any of the alternatives.

22f. Bear travel patterns were considered in the development of the alternatives. The planning team and Bear Research Committee jointly investigated the level of bear use on Iliuk Moraine, Iliuk Moraine Terrace, and the Beaver Pond Terrace prior to writing the draft DCP. All development proposal areas were placed well away from bear travel corridors, except, of course, the primary access area on the Naknek lakeshore.

River on bear movements to and from the river, particularly on the south side.

22g

3. A full discussion of bear research findings should be made the basis of a revised, quantitative environmental impact analysis. These findings are critical to the determination of the level of visitor use and development that is most consistent with the welfare of the brown bears and park visitors.

Specific comments on the Draft DCP

Page(s)

5-6. The National Park Service recognized the need to relocate the Brooks Camp/NPS facilities complex in its 1971 Wilderness Recommendation for the former monument. There may have been an earlier official recognition, but the 1971 action should be included in the SDEIS.

7. Squibb and Olson, op. cit., state that as many as 25 bears are present in the river during the mid-july peak.

13. In the next to last paragraph, please define what is meant by "not significantly interfere with."

22h

18. Please explain why the Park Service intends to recommend to the State of Alaska the establishment of use limits and seasonal [sport fishing] closures. Does not the NPS have full authority to take these actions on its own? What would be the NPS's response to a state rejection of the recommendation?

22i

23. Bear-free and people-free zones. Granted the need to separate bears and people, the revised environmental impact analysis should discuss the effects on bears of current practices that create the present "bear-free" zones, and what level and location of development would minimize the number and size of the zones.

22j

25. Retention of old Log Cabin on Brooks Lake. The revised environmental analysis should consider as one alternative the removal or relocation of the cabin, dock, related facilities, and the road connecting the cabin to the Valley Road. These facilities are on a major bear and wildlife travel route along the lake. Bears use this route between Brooks River and the salmon spawning streams feeding into the lake.

22k

30-31. Discussion of day-use alternative. This discussion presupposes the continuation of the present float plane transportation system, and no camping facilities. If a tour boat/ferry system plus new modern camping facilities are utilized under a fifth alternative, all of the negative findings on pp. 30-31 are no longer valid. For example, higher float plane traffic and attendant noise levels are largely eliminated. Scheduled arrivals and departures of tour boats eliminates the

22g. See response 21c.

22h. The National Park Service would recommend to the state of Alaska that temporary closures are necessary along the Brooks River when bear use is intense because the agency always consults with the state in establishing regulations and procedures that would affect sportfishing and wildlife observation opportunities.

22i. This DCP/EIS does not attempt to analyze the "effects on bears of current practices" that have been approved in the park's bear management plan/resource management plan. The number and size of bear-free development zones are kept to a functional minimum in each alternative. For example, maintenance areas were consolidated, housing was consolidated, and utilities were consolidated to reduce the impacts of the alternative and to reduce the number of bear-free zones that would have to be managed. Relocating to habitats that have little value to bears would also help in the maintenance of a bear-free zone.

22j. In alternatives 2, 3, and 4, all facilities except the Old Log Cabin and floatplane tie-downs would be removed from the Brooks Lake shore. The existing development has not caused the route to be abandoned by bears, even with an open generator house in full operation. The Old Log Cabin, which has had bears walking by it for over 50 years, poses no threat to the continued use of the route by bears.

22k. See response 18a.

## COMMENTS

concentration of use in the middle of the day. Travel time to Brooks River on tour boats could be used by ranger interpreters to fully educate visitors on what to expect. And so on.

22l

31. In three of the four development alternatives, use limits are lower than existing use, at least on peak days." This statement is misleading. Table 3 clearly indicates that for the July average, alternative 1, 2, and 3 have higher use limits, with the preferred alternative nearly 20 percent higher.

32. In the first paragraph, the discussion should include the reasons why visitor use levels at Pack Creek, O'Malley River, and McNeil River are far lower than what the NPS envisions under all of the Draft alternatives.

32. Commercial use licenses. How many CULs have been issued? Does the NPS intend to stop issuing licenses on demand? Impose operational restrictions and other conditions? Go to a concession system?

41. Before replacing the existing Falls platform with a new enlarged version, the environmental impacts should be thoroughly discussed using scientific research data.

57. A "safe haven" would be constructed at the mouth of Brooks River. What is a safe haven?

22m

65. "Iliuk Moraine is in a less sensitive bear use area where human/bear conflicts would be minimized as would impacts to archeological resources." Iliuk Moraine serves as a travel corridor for bears and probably other wildlife moving between the north and south sides of Naknek Lake/Iliuk Arm. (personal observation). It is also apparently an area of cultural significance to local Alaska Natives. The revised environmental analysis should address the impact of constructing a new lodge complex, roads, trails etc on these resources and park values.

66. What percentage of visitors to Brooks River arrive by float plane? What percentage from scheduled or chartered flights from King Salmon, and what percentage from lodges or other operators holding commercial use licenses? How many floatplanes have been counted at any one time tied off or drawn up on the beach near the mouth of Brooks River or at the beach at Brooks Camp? On the average, how many flights arrive and depart daily during the summer visitor season?

22n

73. Arrival area for alternatives 2 and 3 in protected bay south of Brooks River. Why is this site not utilized for alternative 4? A lower visitor use level under alternative 4 is not a satisfactory answer, since float planes and docking facilities near the mouth of Brooks River and at the beach at Brooks Camp is incompatible with bear requirements even under a reduced visitor level, which in the case of alternative 4 is 120 persons per day.

## RESPONSES

22l. The focus of the use limits is to prevent overcrowding on July and September peak days. During most of the summer season the normal visitor use would be low enough that it would not exceed the limit.

22m. The sentence has been corrected in the final plan to read "Iliuk Moraine terrace is a less sensitive bear use area." No development other than a hiking trail and view point are proposed for Iliuk Moraine. The development is proposed to occur high on the terrace, which is obvious from the detailed alternative description and map.

22n. The National Park Service does not propose development where none is needed. Lower use levels tied to day use only is a satisfactory reason. Only 90 day users would come in and out in a day. Since in the revised alternative 4, tour boats would be bringing most of the visitors in, a large facility and new roads are not needed.

82-83. Naknek West Alternative rejection. In the revised DEIS, this alternative, if retained, can be called the Red Herring, as no one, to my knowledge has ever suggested this area as the site for a relocated Brooks River lodge and NPS facilities complex. It would be preferable to delete this section in the SDEIS.

However, the Paug-Vik corporation, the Bristol Bay Native (regional) Corporation, and individual Native allotment owners have all expressed interest in providing land for a relocated complex in the Lake Camp area at the west end of Naknek Lake. This area, connected by a maintained gravel road, is twenty minutes from King Salmon, and could serve as the site of a relocated complex and visitor departure point for tour boats destined for Brooks Camp and other points in the Naknek Lake system. It should be given full consideration as part of the discussion of a fifth alternative as noted above.

22o

101. Under the four alternatives discussed, the "scattered visitor use pattern" will continue, which "...often result[s] in rangers not being able to warn visitors of an approaching bear and to direct them to move out of the area." Why is there no alternative that in part calls for ranger-interpreters escorting groups of visitors to bear viewing areas on a scheduled basis only, i.e., no "scattered visitor use pattern"? This more orderly arrangement would greatly reduce bear-human conflicts and the number of "incidents" that now make a visit to Brooks River one filled with anxiety and even fear for many visitors. It would also further the primary goal of reducing disturbance to bears to a minimum, as the predictability involved in scheduled group walks would soon be learned by the bears.

22p

118. A claim is made that development on the Beaver Pond Terrace and along the Valley Road pursuant to alternative 2 " would have very little impact on brown bear habitat and population in the Brooks River Area." This assertion is not supported by any evidence. The Naknek Lake beach south of the mouth of Brooks River is a known bear travel corridor, and bear trails indicate that bears may use this entire area as they travel between Brooks River and Research Bay and Margot Creek.

22q

A dock would be built under alternative 2 at the beach. A new road would connect the beach with the new lodge and the Valley Road. Relocating the lodge and related facilities on the Terrace could expose the Beaver Pond and associated woodlands to contamination from any fuel spills or underground fuel line and storage tank leaks similar to the one recently experienced at Brooks Camp. In the absence of data on bear and other wildlife use of the general area south of Brooks River, the claim that alternative 2 would have very little impact on brown bears and their habitat should be replaced with the statement that the environmental impacts can only be surmised under the circumstances.

On page 124, an identical claim is made with regard to the impact

22o. See response 13d.

22p. This statement is accurate as stands. The Beaver Pond terrace has very little bear use and the development would be far from the prime bear habitat along the river.

22q. Development along any lakeshore obviously places a human intrusion on a bear travel route because bears travel the beaches looking for food that has washed up on shore. The point to consider, in any of the proposed relocation sites, is that by removing facilities north of the river, the bears would gain more habitat and access to the prime resource than they would lose to development on any outlying beach or in any dense spruce forest. Only anecdotal data exist for this statement, no quantitative studies have been done in the dense spruce forest south of the river because the scientists all know that the bears are down at the river.

## COMMENTS

of alternative 3 on bears and their habitat. Again, this assertion must be either substantiated or reworded to acknowledge the lack of scientific data needed to reach such a conclusion.

22r

120. Effect of visitor use limits. Under alternative 2, the 260-person limit is described as "somewhat more crowded than now occurs." In terms of the July average, the new level of use would be nearly 20 percent higher than at present. This increase should be acknowledged, and not obscured by vague phrases such as "somewhat more crowded."

Similarly, on page 126, in describing alternative 3's 290 persons per day limit, the statement is made that "this is more crowded than now occurs." Yes, nearly one-third more crowded. Please use the percentage increase.

22s

121. Compensation for the concessioner's interest in and removal of existing facilities; subsidy to concessioner for relocation. When does the existing concession contract come up for renewal? Will competitive bidding be used? What are the estimated costs of the compensation and subsidy?

22t

Under all alternatives, what are the estimated *increases/decreases* in operational, personnel, and maintenance costs?

22u

131-2. An assertion is made that under alternative 4 the Brooks River Area would be more less quiet compared to alternatives 2 and 3. However, if alternative 4 utilized the same arrival facilities as under alternatives 2 and 3, it would be more quiet than its competitors, because there would be less float plane traffic. Alternative 4 is plainly designed to discourage support for an alternative that would relocate overnight lodging and most of the NPS complex to the King Salmon/Lake Camp area. It is an obviously biased alternative that reflects the planners' pre-conceived preference for alternatives that would retain the existing complex in the Brooks River area.

Thank you for this opportunity to submit these views.

Sincerely,

Jack Hession

Jack Hession
Alaska Representative

## RESPONSES

22r. The sentences have been revised.

22s. The amount of compensation to the concessioner is undetermined at this time. As stated in the plan, the compensation would be governed by concession contract provisions.

22t. These costs have not been determined at this time.

22u. See response 2f.

**Sierra Club**
Alaska Field Office
241 E. Fifth Avenue, Suite 205, Anchorage, Alaska 99501
(907) 276-4048 • FAX (907) 258-6807

by Wilbur Mills

September 8, 1993

Mr. John Morehead
Alaska Regional Director
National Park Service
2525 Gambell
Anchorage, Alaska 99503

Re: Brooks River Area Draft Development Concept Plan (DCP), Katmai National Park and Preserve

Dear Mr. Morehead:

I recently visited Brooks River in order to observe the park operation and that of Katmailand's Brooks Camp Lodge. I wanted to evaluate the four alternatives described in the park's 1991 publication, Brooks River Area Development Concept Plan, Alternatives Workbook Summer 1991, prior to the publication this fall of the Brooks River Area Draft DCP.

I spoke to park staff in King Salmon and at Brooks Camp. A trip from Lake Camp to Brooks Camp in the park launch on one of its regular runs allowed me to assess the option of tour boat service to Brooks River. My thanks to Acting Superintendent Steve Hurd, Resources Chief Rick Potts, and Brooks River Manager Mark Wagner for their assistance in providing resource information, and in general making my visit a pleasant and productive one.

The Workbook does not include an alternative for tour boat service, although on the basis of my recent observations I believe such service is feasible, economical, and more consistent with the purposes of the park than the four described in the Workbook. Therefore I request that you include a fifth alternative in the forthcoming Draft DCP in order to give the public an opportunity to examine and comment on a more complete range of alternatives, as required by NEPA.

This proposed alternative 5 would provide a visitor transportation and accommodation system comparable to those at Denali and Glacier Bay national parks, the other two heavily visited "crown jewels" of the Alaska national park system. It would utilize specially designed tour boats to bring visitors to



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Brooks River; existing floatplane access by commercial and private operators would be discontinued. A tour boat transportation system sets apart this alternative from the other four, all of which assume the continuation of unlimited floatplane access.

Proposed alternative 5 would not be a mere day-use alternative, because it would provide for modern, safe, comfortable camping facilities for those who wished to stay more than one day in the Brooks River area. Overnight lodge facilities and the bulk of NPS facilities would be moved to King Salmon or perhaps to Native corporation land near Lake Camp.

22v

New NPS facilities and public camping in the Brooks River area would be located south of the river and away from bear travel corridors and other bear habitat. No facilities would remain on the north side of the river, and disturbed sites would be returned to a natural condition. The existing pontoon bridge would be removed. Visitors would not be allowed to enter the critically important bear concentration and feeding areas on the north side of the river.

Key elements and advantages of proposed alternative 5 are outlined below.

**Elements of proposed alternative 5**

**1. Naknek Lake ferry system.**

Visitors arriving in King Salmon would take specially designed concessionaire tour boats from Lake Camp to Brooks River. Those visitors whose primary or sole reason for visiting Brooks River is sport fishing, such as guided clients of commercial sport fishing lodges throughout the Bristol Bay region, would also take the tour boats.

Existing floatplane access to Brooks Camp, both commercial and private, would be discontinued except in emergencies, such as accidents or illness requiring rapid evacuation. Local residents would continue to use their own vessels for private, non-commercial visits to the Camp.

Park tour boats would depart from Lake Camp, a twenty-minute trip from King Salmon on the existing well-maintained gravel road. A National Park Service ranger could be on board to describe the park's features, answer questions, and brief visitors on procedures used at Brooks River to ensure their safety and the welfare of the bears.

Tour boat service is not merely a theoretical planning option. This summer Quinnat Landing Hotel in King Salmon inaugurated boat service for its guests from Lake Camp to Brooks Camp in a new 16-



22v. See comments 22p and 22q.

passenger boat built for this purpose. According to skipper Alan Martin of the Katmai Lady, the trip takes one hour each way. His vessel is designed to accommodate 24 persons including the captain and crewman, but is currently fitted out for 16 passengers.

Tour boats larger than the Katmai Lady might be desirable, with the size and number of boats determined by visitor limits pursuant to a Brooks River area carrying capacity based on scientific studies already conducted by the Park Service. But it is clear from this summer's trial run that boat service is feasible and economically competitive with commercial floatplane traffic. Moreover, boats can operate when low clouds and fog prevent floatplane operations, as shown by the Katmai Lady, and probably by the park's own vessels.

Let me anticipate a counter-argument that ferry service might be impractical because of shallow water near the outlet of Naknek Lake. The skipper of the park launch had no difficulty negotiating the well-marked river channel leading out of Lake Camp to the deeper waters of Naknek Lake, nor, apparently, does the Katmai Lady. It should be possible to design a larger shallow-draft vessel capable of navigating the existing channel(s), but if a larger vessel required a deeper or wider channel, I doubt there would be any objections to some minimal dredging.

At Brooks River, tour boats would dock at the site identified in Workbook Alternative 3, which is on the shore of Naknek Lake opposite the northeast corner of Beaver Pond. Visitors would walk or take shuttle buses to the Brooks River orientation/ contact station, to the campground(s), and to connections with the Valley tour buses. Some day-use visitors might prefer to be escorted by a park ranger from the dock to the bear viewing areas along Brooks River via the beach or perhaps on a shoreline trail, if a trail can be built that does not interfere with bear feeding, resting, and travel requirements.

**2. Public camping**

A campground or campgrounds south of Brooks River would be provided for those visitors wishing to stay more than one day. Perhaps under concession, and with a daily fee, the campground(s) would be carefully located to avoid bear travel corridors and other vital bear and wildlife habitat. The campground(s) would include modern toilet and shower facilities, and separate kitchen and food storage facilities. Level, well-separated campsites, each with a picnic table, gravel pad, and campfire grate would be provided.

There would be no lodge or other overnight facilities other than the emergency overnight shelter component of the day-use shelter.

Overnight lodging would be provided by the existing hotels and lodges in King Salmon for those who prefer or require such accommodations.

**Advantages of the proposed alternative 5**

**a. Disturbance of bears reduced; park purposes accomplished**

- Ending the current reliance on commercial and private floatplanes as the primary means of visitor access to Brooks River would result in a lower level of disturbance to bears from this source, in keeping with the bear sanctuary and habitat protection purposes of the park as set forth in the Alaska Lands Act.

  As shown in studies by Dr. Barry Gilbert and his colleagues, as well as park staff, the noise and presence of floatplanes contributes to human pressure on the bears. When tied off the Naknek Lake beach on both sides of the mouth of Brooks River, the floatplanes, with their associated traffic of passengers and pilots, interfere with bears attempting to feed in the river mouth area, and bears attempting to travel along the beaches.

  Noise from constant landings, taxiing, takeoffs, and flights in the vicinity of Brooks Camp is also contributing to the overall level of disturbance to the bears. Apparently some commercial sport fishing guides 'buzz' the bears feeding at nearby Margot Creek before landing their clients at the mouth of the creek.

- Shifting the overnight lodging and the NPS operations that support it to King Salmon or another suitable site on the western end of the park would also benefit the bears by reducing the amount of human activity associated with maintaining such elaborate facilities in the general area of Brooks River.

- A tour boat access system would also allow the Park Service to better manage visitor use by scheduling arrivals/departures, and escorting groups to the bear *viewing platforms and other facilities.* This procedure would benefit both the bears, who are now subject to the unpredictable, chaotic and unsafe comings and goings of visitors, and the visitors, who would surely appreciate and enjoy the security of escorted group walks to the bear-viewing platforms.

**b. Quality park experience; reduced environmental impacts**

- Replacing the floatplanes with far fewer and quieter vessels would also provide a greater degree of solitude for park

visitors to Brooks River, many of whom expect peace and quiet when visiting a national park, especially a wilderness national park of Katmai's status. Currently, the lower Brooks River area during the summer visitor season resembles a busy floatplane base. Vessels arriving and departing would go largely unnoticed by visitors out of sight of the dock area.

- Ferry service to Brooks River would also promote a quality overall visit to the park. On good weather days as their tour boat moved east up beautiful Naknek Lake, passengers would enjoy increasingly impressive views of the park, and perhaps sight wildlife, just as visitors to Denali and Glacier Bay enjoy viewing wildlife and diverse landscapes or seascapes as they gradually enter the distant reaches of the parks.

  Currently, most Brooks River visitors are flown in quickly by floatplane and plopped abruptly on the beach at Brooks Camp. A more relaxed, interpretive, and scenically diverse introduction to the park afforded by ferry would be far more consistent with a wilderness national park experience than the current system.

- Visitor safety would also be improved. Floatplanes are inherently more hazardous than travel in a modern vessel or vessels specially designed for park waters.

- Tour boats could drop off and pick up hikers, campers, canoeists, and kayakers at other points on Naknek Lake, thereby assisting those interested in exploring the park's lakes and backcountry, e.g., the Naknek-Grosvenor-Savonoski loop trip. This service would enhance the park experience, and, by distributing use and impacts over a wider area of the park, would benefit Brooks River management and enhance the visitor experience there.

  Glacier Bay tour boats now provide drop-off and pick-up service to backcountry and up-Bay visitors to that park, while shuttle buses do the same for backpackers and hikers headed for Denali's backcountry.

- Fewer adverse environmental impacts at Brooks River could be expected. There would be less intrusion on the forest, on important habitat, and on wildlife travel corridors,[1] and

[1] On a short stroll from the new viewing platform at the lower river (known locally as "Fort Stevens") to the NPS facilities at Brooks Lake along the road, I counted 30 bear and other wildlife trails intersected by the road. About 19 appeared to be currently used, with 11 occasionally or seldom used. All

fewer adverse effects on cultural and archaeological resources. Because lower quantities of fuel would have to be barged in, transported and stored to service fewer facilities, there would be less impact from any spills that might occur.

- Interpretive services would be improved by locating the main park interpretive center in King Salmon or Lake Camp. Currently the Park Service and the U.S. Fish and Wildlife Service are developing a visitor contact station at the King Salmon airport, a venture in which the Bristol Bay Borough government is also participating. This effort could be expanded and the Alaska Department of Fish and Game and local Native organizations invited to participate.

**c. Lower cost and "reinventing government"**

- A key advantage of proposed alternative 5 is the greatly reduced cost of building, staffing, and maintaining new, scaled-down NPS and public use facilities at a new site south of Brooks River as compared to the full-scale hotel/interpretive center/NPS facilities complex as envisioned in Workbook Alternative 3.

  Workbook Alternative 4, the day-use option, would require "about 15-20 NPS employees." Proposed Alternative 5 would probably require about the same number, assuming the public camping facilities were under concession. Currently, the Park Service has 50-60 employees on site attempting to cope with up to 60 lodge guests, up to 60 campers, scores of day-use visitors flown in by Brooks Camp Lodge and numerous floatplanes under commercial use licenses, and the occasional private floatplane. Significant NPS maintenance and personnel expenses are involved in this operation, much of which supports the Brooks Camp Lodge, and thus is in effect a federal subsidy to the concessionaire.

- Another very important benefit of proposed alternative 5 is better, more efficient use of the park's budget for overall park management. By significantly reducing the cost of the Brooks River operation, alternative 5 would free more of the park's budget for other Katmai management, and for the orphan units of Aniakchak National Monument and Preserve, and Alagnak Wild River. With more than 90 percent of the park's budget now consumed by the Brooks River operation, including services provided at no cost to the concessioner,

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trend in the general direction of Margot Creek and Research Bay. This of course was a casual survey, but sufficient to suggest that careful planning is required for the location of new facilities south of Brooks River.

park staff are unable to adequately manage the rest of the park, Aniakchak, and the Alagnak.

To take just one example, the Shelikof Strait coast of Katmai has been "discovered" by bear watchers and other recreationists as a result of the post-Exxon Valdez oil spill clean-up and research activities, according to former Katmai Superintendent Alan Eliason. Yet there is only limited, occasional NPS presence on the coast, now known to contain the densest concentration of brown/grizzly bears in Alaska. In the absence of NPS monitoring and enforcement, the bears and other wildlife are subject to poaching, recently discovered archaeological resources are left unprotected, and occupancy trespass (squatters) and unauthorized sport fish camps are a problem.

Backcountry rangers, usually assigned to one small stretch of the coast during the summer season, were not dispatched to the coast this summer. When the Sierra Club learned of this fact, it requested that seasonal rangers be stationed on the coast for the balance of the sport fishing and hunting seasons (the latter outside the park, of course). Supt. Eliason said he did not have the funds to do so.

- Reducing Brooks River operating and maintenance costs, improving management efficiency, and streamlining park operations in general would help accomplish the Clinton-Gore administration's emphasis on "reinventing government."

  A precedent for the significant cost savings of proposed alternative 5 is the Park Service's decision not to spend up to $65 million for a new federally financed hotel/ visitor center/interpretive complex at McKinley Station in Denali National Park and Preserve, following the D.O.I. Inspector General's finding that privately owned hotels, lodges, and campgrounds near the park already offer sufficient visitor accommodations at no cost to the Park Service.

  Close by the boundary of Katmai, King Salmon has hotels and lodges, while the local Native corporation and individuals have expressed interest in providing land for new NPS and lodging facilities in the general area of Lake Camp.

- It is possible that tour boats would lower visitor costs through lower round-trip fares to Brooks River. And with King Salmon as the jumping-off point for the park, new lodging, food, and other services might be developed there, thus increasing the degree of competition and, in theory, lowering the cost to visitors. In any event, King Salmon as the hub of visitor accommodations would bring additional economic benefits to local businesses and the Native corporation.

**d. National Park Service policy affirmed.**

A less tangible but nevertheless important advantage of proposed alternative 5 is consistency with National Park Service policy. In relocating overnight lodging and most NPS facilities to King Salmon (or other suitable sites outside the park such as at Lake Camp), the Park Service would be adhering to its policy that precludes locating major visitor and NPS facilities within national parks generally, and wilderness national parks in particular.

This policy has long been in effect at Denali and Glacier Bay national parks, where hotels, inns, lodges and other overnight accommodations are in nearby communities. The federally funded Denali Park Hotel and Glacier Bay Lodge are located on the boundaries of the units. This enables both parks to utilize controlled visitor access systems--tour buses and tour boats, respectively--to move visitors into the interiors of these largely wilderness units.

Summary

I have described in conceptual terms a proposed fifth alternative with key features--controlled, low-impact visitor access and accommodations--comparable to the visitor transportation systems successfully used in Glacier Bay and Denali national parks. Accordingly, I request that you include a more detailed version in your forthcoming Draft DCP in order to give the public an opportunity to consider a full range of alternatives. Please let me know if are willing to do so; I stand ready to assist you in formulating a comprehensive version in the appropriate DCP format.

Thank you for your consideration of this request.

Sincerely,

Jack Hession

Jack Hession
Alaska Representative

cc: George Frampton, Assistant Secretary
Roger Kennedy, Director, National Park Service
Frank Norris, [redacted] area DCP
Katmai NPP staff, King Salmon

Statement of the Sierra Club
on
Draft Development Concept Plan/Environmental Impact Statement
Brooks River Area, Katmai National Park and Preserve
Anchorage, Alaska
May 12, 1994

Good evening. I am Jack Hession, Alaska Representative of the Sierra Club. The Sierra Club is a national environmental organization of more than 500,000 members with chapters and groups in nearly every state, including Alaska.

I appreciate this opportunity to comment on the proposed plan. The selection of a management and development plan for the Brooks River area is the most important administrative decision in the nearly 70-year history of the park, one that will determine the management direction of the entire park for many years to come.

The Sierra Club recommends adoption of an alternative not included in the draft plan. This alternative would (1) relocate the existing Brooks Camp overnight lodging and most of the NPS facilities complex to the King Salmon area, (2) replace float planes with tour boats as the primary means of access to Brooks River, and (3) provide for modern camping facilities south of Brooks River.

This fifth alternative is not entirely different from the four considered in the draft. Although it does not call for day use only, it shares with the Day Use Only alternative the relocation of most existing facilities to the King Salmon area. In common with the Beaver Pond and Iliuk Moraine alternatives, it includes a new campground south of Brooks River, which is why it is not a day-use plan.

Use of specially designed passenger vessels in lieu of float planes is the primary difference between this fifth alternative and the draft plan's four alternatives, all four of which assume the continued use of float planes as the primary means of getting visitors to and from Brooks River. According to the Park Service, 88 percent of 1992 visitors to Brooks River arrived by float plane. Under the suggested fifth alternative, float planes would continue to be used by park staff, for medical evacuations or other emergencies, and if Naknek Lake weather and water conditions temporarily ruled out access by water. In the latter case, flights would originate in King Salmon and be under permit from the Park Service.

Without explanation, park planners chose not to include a passenger vessel alternative that, after all, is obvious--Brooks River empties into Naknek Lake at Brooks Camp, and boats have been delivering visitors to the river for many years. Tour boats are used in Glacier Bay National Park, and at Denali National

Park visitors ride tour buses, which are the land equivalent of tour boats.

Park planners did not simply overlook this obvious alternative. Last summer, I submitted a detailed description of a proposed alternative 5 to park planners of the Alaska Regional Office of the National Park Service and the NPS Denver Service Center, with the request that it or a comparable alternative be included in the Draft DCP. A copy of my letter is attached to this statement.

22w

Now, because the Draft DCCP lacks this fifth alternative or a comparable one, the public is being denied the opportunity in this version of the draft to evaluate a logical, traditional, and practical transportation system alternative. This omission also means that the Park Service has not fully complied with the National Environmental Policy Act, which requires that a full range of alternatives be considered. Accordingly, I recommend that the Park Service publish a supplemental environmental impact statement for public review and comment prior to making a final decision on the development plan.

Citizens should have the opportunity to consider this fifth alternative, as it offers advantages that make it more consistent with the purposes of the park than the four alternatives of the draft plan. It is based on Congress's directive that Katmai be managed as a park where "...fish and wildlife may roam freely, developing their social structures and evolving over time as nearly as possible without the changes that human activities would cause." (Senate Report 96-413, p. 137).

In summary, the advantages of this fifth alternative include:

- A much lower level of disturbance to bears. Replacing float planes with passenger vessels would substantially reduce the disturbance caused by overflights and aircraft noise. The overall level of human activity and hence the potential for disturbance would be diminished if overnight lodging and most NPS facilities are located in the King Salmon area.

- Substantially decreased overall environmental impacts. This includes less modification of the Brooks River area for lodging, new roads, shuttle bus service, and related facilities; less fuel transportation and storage and hence a decreased risk of spills; and less disturbance to wildlife and archeological resources.

- Better, more enjoyable bear viewing and interpretive services. A King Salmon visitor/interpretative center combined with park ranger-interpreters aboard tour boats would allow the Park Service to better inform visitors about bears and other park resources in advance of arrival at Brooks River.

- A higher quality park experience. Vessels would displace the constant arrival and departure of float planes at Brooks Camp,

22w. See response 2f.

which is now a busy float plane base during the visitor season. Peace and quiet, which are fundamental national park values, would be enhanced for park visitors. Vessels would also gradually introduce visitors to the park, as opposed to the current method of depositing visitors abruptly on the beach at Brooks Camp.

■ A greater degree of visitor safety. Well-designed and constructed passenger vessels are safer than float planes, and can operate when low ceilings rule out air travel.

■ Improved Brooks River visitor management. Groups arriving on a scheduled basis could be more readily and safely escorted to and from the viewing platforms and other facilities.

■ Improved park management. Some NPS staff now needed at Brooks River could be reassigned to other park tasks and needs. Currently, the NPS's Brooks River operation consumes about 90 percent of the park's entire budget, which means that other vital park management needs are not being adequately covered.

■ Affirmation of National Park Service policy on visitor services and concessions. Building expensive new and unnecessary facilities inside the park under the preferred alternative or alternative 3 is incompatible with NPS policy that calls for major visitor facilities to be located in a gateway community or elsewhere outside the park.

■ Less cost to taxpayers. If businesses in King Salmon provide overnight lodging and other visitor services, the Park Service would be spared the expense of subsidizing the same services, and have lower operating and personnel costs at Brooks River. Increased competition in King Salmon could result in lower prices to visitors. Alternative 4, which would also relocate overnight lodging and most NPS facilities to King Salmon, has estimated construction costs of $13 million, versus $27.3 million plus additional compensation and subsidy costs to the concessioner under the preferred alternative.

■ Benefits to the local economy. As the Bristol Bay fishery encounters troubled times, and the King Salmon Air Force base is mothballed, the local economy would benefit from the location of major visitor facilities and services in King Salmon.

■ Potential economic benefits to local Native corporations and individuals. If new concession facilities are built in the King Salmon area, and a tour boat concession put in place, Native corporations and individuals could benefit under the preference right provision (Sec. 1307 (b)) of the Alaska Lands Act.

In conclusion, I look forward to your supplemental environmental impact statement. Thank you for the opportunity to submit these views.

UNIVERSITY OF OREGON

April 18, 1994

KATMAI NATIONAL PARK & PRESERVE
APR 21 1994
KING SALMON, AK

Mr. Bill Pierce,Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Mr. Pierce:

I have just read the draft Development Concept Plan and Environmental Impact Statement for the Brooks River area of Katmai National Park. Needless to say, I am personally strongly in favor of any alternative that will move Park headquarters and the concessioner off of the cultural resources just north of the mouth of Brooks River, and I can only feel it will lessen the very real danger of having somebody seriously mauled by one or more of the increasingly domesticated bears. Of all the alternatives, however, the proposal to move to the terrace above the so-called Beaver Pond (which may have beavers in it, but was certainly not created by them) seems like the most reasonable compromise between safety, conservation, and maintenance of access by the public. If votes are being counted, my vote must go for the proposal.

Yours sincerely,

Dan E. Dumond
Professor

cc: L. Norris, Planning Team, DSC

DEPARTMENT OF ANTHROPOLOGY
College of Arts and Sciences - Eugene OR 97403-1218 - (503) 346-5102 - Fax (503) 346-0668

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23. Comments noted.

June 25, 1994

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Sir:

My comments regard the Developmental Concept Plan proposal for Brooks Camp within Katmai National Park.

I have lived and worked in Alaska for nearly 20 years. While I am currently employed by the National Park Service at Katmai National Park, my comments are my own and do not necessarily represent the views of that agency.

Similar to many other areas in the United States, the original construction at Brooks Camp was started many years prior to the passage of legislation protecting cultural resources--namely, the National Historic Preservation Act and the Native American Graves Repatriation Act. It is not practical, feasible or wise to remove all structures built in the past 200 years in America in order to meet the conditions of this relatively recent legislation.

24a

While I am sensitive to the cultural resources located in the Brooks Camp area, I feel that it is ludicrous to suggest spending multi-millions of taxpayer's dollars to move the camp. I feel the term "nationally significant archaeological sites" is bantered about freely wherever it can be useful to serve a purpose. As Division Chief responsible for Cultural Resources with both the BLM and NPS, I find overly zealous (but well-intended) archaeologist often overplay the significance of sites.

I believe that mitigation measures at the camp's present location which will prevent further degradation of the cultural resources, provide a haven for bears and provide a unique experience for visitors. For this reason, I support a modified version of Alternative #1. I strongly support use limitations on day-users. It is this growth that is presently out of control and is beyond the ability of the NPS to manage. Such limitations will allow a quality experience by all users and remove the "carnival" atmosphere presently found at Brooks Camp.

There is a self-serving move afoot by local business leaders and native corporations to support Alternative 4---removing all overnight lodging facilities and designate the area as "day-use only". Their reason, of course, is intended to funnel more money and lodges. There are several problems with this approach.

24a. The national significance of the Brooks River Archeological District has been formally recognized in its designation as a national historical landmark. That designation is a formal recognition by the Department of the Interior and the federal government of its extraordinary importance. The designation also mandates, by law, protection and preservation of the resources.

Page 2

Allowing only day-users at Brooks will perpetuate the hurried approach of visitors who want to take in all sights in a short amount of time. Brooks Camp will then be similar to the jungle cruise at Disneyland. By removing lodging facilities there, many visitors will never again have the opportunity to enjoy the solitude and the unique experience of living amongst the largest concentration of Brown bears in the world.

I urge the National Park Service to continue to allow controlled overnight use at Brooks, restrict day use to the numbers shown in Alternative 1, and mitigate (to the extent practical) the impacts to cultural and natural resources. This, of course, requires additional staff and funding for operational needs. But, Brooks Camp is a truly unique area in the world and it should be recognized, and managed, as such.

Thank you for your consideration of my comments.

Sincerely,

Cary Brown
[redacted]

cc: Alaska Congressional Delegation

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

June 30, 1994

Dear Superintendent:

My comments regarding the Development Concept Plan for Brooks Camp include my concern for preserving and protecting the resource while providing a unique wilderness experience for the visitor. It is for this reason, I believe the most sensible choice in the DCP is a modified version of Alternative #1.

The most important concern is that the natural resource will not be exploited for the sake of the mighty dollar. Unlike most of the lower 48, Brooks Camp provides prime habitat for a variety of wildlife to subsist. We, as government employees and taxpayers, have a responsibility to protect the habitat while at the same time, providing visitor enjoyment. The opportunity to experience the bear/human interaction is a truly unique opportunity. An opportunity that must not be abused, but savored and shared with future generations.

As described in the preferred alternative, relocating the lodge and park facilities will cost an enormous amount of taxpayer's money. Money which could be better spent on managing the Brooks area, in addition to the remaining 4 million acres of Katmai National Park. By limiting day use, whether by boat or plane, the wilderness experience is enriched for the visitor. The solitude of a wilderness experience is lessened by the constant air traffic caused by unlimited day use. Other concerns that would be eliminated by limiting day use are the problems with unattended boats and planes on the beach. Boat and plane tie up lines create obstacles for bears whose natural pattern of travel is on the beach. The result of this situation leads to the bears avoiding the obstacles by walking through the campground increasing bear/human encounters.

Fishing in Brooks River should be closed during the peak of the season to prevent avoidable bear/human encounters. A strictly enforced catch-and-release policy would eliminate the need for a fish cleaning house, in addition to preventing an enticing area for the bears to explore.

Guided tours to the falls and other popular areas should be led by interpretive rangers. Besides controlling crowds, the visitor experience would be enriched through education of the natural and cultural aspects of Brooks Camp.

A more rigid reservation system for the campground must be introduced either by NPS or the concessioner to ensure the visitors a quality stay.

Thank you for your time,

Debra Brown

25. Comments noted.

## Comments on the Draft Environmental Impact Statement Development Concept Plan, Brooks Camp

Within the last five years there has been a movement in the National Park Service to move away from development inside the parks so that gateway communities can serve as staging areas and the resources of the park can remain unimpaired. The Park Service has a unique opportunity at Brooks Camp to demonstrate its support of this movement and make what may be the most important decision in the recent history of Katmai National Park.

Brooks Camp started as a small fishing camp where visitors were few and historically bears were not as numerous. However, due to changes in the parks' bear management philosophy, in public sentiment, and perhaps in the bear population itself, the camp is now primarily a bear viewing area that received nearly 15 thousand visitor days in 1993. The majority of serious fishing is done in June, before the bears arrive and, to a lesser extent in September, when bears are present.

It is time for the Park Service to make a stand for the resource and not bend to political pressure. It is for this reason that I support a very modified version of Alternative #2, the proposed alternative. I will address each element in the DEIS as it is listed under this proposal.

**Remove all of the facilities North of the River**

I agree with this element of the DEIS. Now that you have such a popular bear viewing area, the camp could not be in a worse place with regard to bear incidents. Approximately 90% of the park's budget and employees goes towards maintaining and managing Brooks Camp. The reason for this is due to its location in the middle of prime bear habitat and the lack of restrictions on visitors. This is a very small part of the park's 4 million acres. Brooks camp also sits directly on an area of dense archaeological resources. Not a hole can be dug without administrative clearance, making sub-surface maintenance work costly and time-consuming.

**Remove Barge Dock and Tie-Downs, Construct River Mouth Safe Haven**

I agree with the removal of the Barge Dock and Tie Downs, they are presently too close the river. I do not support the construction of a safe haven at the river mouth. In the eyes of the public, this is only another name for small viewing platform, and will be treated as such. A platform-like structure at the river mouth will only draw attention to the area as an additional place to view and photograph bears.

**Provide Fish Cleaning Building**

If sport fishing continues under the one fish limit, I support the construction of a fish cleaning building. The location selected in the proposed alternative is a good general area for the building.

**Proposed Visitor Contact Station and Trailhead**

I disagree with having the visitor orientation center at the falls trailhead. This area is right on the road, and with all the people traffic and proposed shuttle traffic I feel it would get quite congested. An added concern is that bears tend to use the road for travel from time to time and all the people in this area would have no place to go but back into the woods to maintain the required distances. A better place for the orientation center would be where the parking area and fuel storage are now.

It is already a cleared area so minimal clearing would have to be done as opposed to the proposed site. In addition, it is somewhat off the main road and yet is still only a minute or two walk to the falls trailhead. The only negative aspect of this idea is that a small section of the road would have to be left in. Please consider this suggestion.

**Rehabilitate Trail to Brooks Falls and Construct New Bear Viewing Platforms**

I think the continued rehabilitation of the trail is great but disagree with some of the proposed platform ideas. I think that it is unnecessary to build two platforms at the falls. First, the bank area of the falls where the existing platform sits is small. Bears use the area all around the platform as a place from which to fish and to eat. Two platforms only makes less room on the bank for the bears. Secondly, the falls area is a primary fishing spot for bears and research has shown one at which they are very successful. Increasing the capacity to be able to handle 40 people, many with large tripods for their cameras, would be an unmitigatable impact on this sensitive area. A good solution would be to build a new platform with comfortable room for 30 people but with a separate entrance and exit as this is a good idea to reduce the disruptiveness as people leave.

I feel a new cutbank platform should not be built. However, as a compromise if it is built, I propose the following two suggestions: 1) build it to hold a maximum of 20 people. 2) Have the land area between all 3 platforms (excluding their trails), on the south side of the river a "people-free zone." If the National Park Service is going to provide increased viewing at two sites on the river then a mitigating factor should be provided for the bears. I feel strongly about this because the cutbank area has been favored by sows with young in the past. If easy access to this area is provided then people should not be allowed to freely wander up and down the bank, especially if fishing restrictions are put into place. It would be contradictory to eliminate fishing in this area in July and yet allow the public to roam the banks at will.

26a

**Remove Lake Brooks Facilities**

I agree that most Brooks Lake facilities should be removed except for the old log cabin. However, one or both of the remaining residences (BL-1 or BL-2) might want to be kept (see below).

**Proposed Primary Access Site and Facilities**

I feel that Brooks Lake, not Naknek Lake should be the primary access for Brooks Camp. This is more practical for a number of reasons: 1) There are already large structures built at Brooks Lake right off the beach. No new ones would have to be built. On the Naknek side where no buildings exist, a new contact station would have to be constructed. 2) There is traditionally less bear use on the Brooks Lake end of the river. It makes more sense to shift the primary access to an already developed site with less bear use. 3) Many fly in anglers land on Brooks Lake and fish the upper river, never receiving the required bear speech. A contact station on Brooks Lake will eliminate this problem. 4) Air traffic could be funnelled from King Salmon between and over Brooks and Dumpling Mountains, thus airplane noise and sightings would be drastically reduced over the high human use areas.

26b

On days when the water is too rough to land at Brooks, airplanes could land on the Naknek side at the site proposed in alternative #2 with the appropriate tie downs. However, there would be no contact station, just a shuttle stop where arrivals would be picked up and taken to the new visitor center and overlook above the beaver pond. Boats would also be highly encourage to use this



26a. The proposed cutbank platform is a controversial proposal, and probably would be implemented only after much debate. It is needed in Alternative 2 as the use limits were developed with certain facility design capacity in mind. The land between the three south bank platforms would not be designated as a people-free zone, but the riparian corridor would be closed to all entry during times of high bear use as described in the plan under "River Corridor Management." A people-free zone along the south bank would not be needed for mitigation, since the entire north side of the river would have been designated as a people-free zone.

26b. All of the floatplane pilots that the planning team talked to preferred landing in Naknek Lake, because winds and waves on Lake Brooks are often dangerous for landings. Controlled access to both lakeshores is needed.

method to access Brooks Camp as well. Boats with long built in off loading ramps like they use at Glacier Bay might be effective. The boat could then be anchored off shore. Alternatively, boats could be somewhat smaller, allowing beach access to the Naknek side. I feel that these areas could be utilized without dredging, as the Park Service states would have to be done to allow access. The barge is able to access the south side without dredging. At the very least, airplanes could be used until the water level comes up near the middle of June, only a few weeks after the lodge opens. The necessary boat tie downs and the NPS barge wharf would remain as in the proposal.

**Proposed Facility Access Road**

I agree that this road is necessary to allow access from the Naknek Lake side in an area that is away from the Brooks River. It could probably be narrower than in the proposal, because people could catch the valley bus at the new visitor center. The bus would not need to travel between the visitor center and Naknek Lake.

**Proposed Shuttle System**

I agree that a fleet of 11 passenger vans or whatever is the most practical and economical should be used. The vans should run on the least environmentally damaging fuel that is possible given the remote location. Perhaps natural gas or propane could be used. Electric vehicles should not be quickly dismissed either, although I realize that the electrical power to fuel them would probably come from a diesel generator.

**Proposed Beaver Pond Terrace Development Area**

26c

I feel that only a visitor center, bathroom facilities, and an overlook be constructed at the beaver pond terrace site. In a recent speech, Secretary of the Interior Bruce Babbit said that: "*On my watch, the Park Service will not build additional lodging facilities within the parks. If the need arises for more overnight accommodations, then it should be done outside the parks.*" I realize that the new lodge would only be replacing an existing facility, so it could be argued that a new lodge is in line with Babbit's statement. Even in this case, the new lodge could hold no more pillows or that would constitute an increase in overnight accommodations, something that is not in line with current Park Service thinking. However, at Katmai, the Park Service has a unique opportunity to remove facilities from a national park and not replace them in the park. All over the National Park System the NPS is realizing that they created a monster when over-development was allowed at places like Fishing Bridge in Yellowstone and the Yosemite Valley. In these areas the Park Service is now faced with the monumental task of trying to de-develop areas because of the crowding and resource impacts that have resulted from their existence. If the Park Service does this at Katmai now, then there will never be a push to incrementally increase facilities at the proposed site because a decision would have been made that no lodge is going to be built in the Brooks Camp area period.

I feel that the new facilities should be located in or near King Salmon, because the benefits of having them there far outweigh the benefits of having them above the beaver pond. Relocating the lodge to the King Salmon would greatly benefit the local economy. The closure of the air force base has negatively affected the area and increased facilities in King Salmon would help replace lost jobs. Native corporations and individuals could benefit as well under the preference right provision of the Alaska Lands Act if new facilities are built in King Salmon along with the relocated lodge. If no new lodge is built the beaver pond terrace area will have a much smaller imprint, making it an easier area from which to exclude bears. In addition, the NPS will save tax payer money by relocating the lodge to King Salmon. In the age of downsizing and budget cutting the



26c. See response 2f.

26d

NPS can ill afford the expense of constructing a new lodge at such a remote location. The construction impacts of such a lodge and all its associated buildings are unimaginable. The construction of one visitor center, an observation deck, and a bathroom are much less.

In order to avoid the in and out experience that a day user would have, I do agree that an new campground should be built on the south side of the river, as proposed in alternative #2. This can be a modern campground that would effectively hold 40 to 60 people. In this way, visitors can get the whole experience; bears, the Valley of Ten Thousand Smokes and perhaps fishing. The campground can be modern enough to attract a wide variety of users. A food cache, gear cache, dishwashing facility, flush toilets, and even perhaps a shower or two would accommodate people unused to primitive camping.

**Resource Management**

26e

Bear management would be greatly assisted by removing all facilities from the north of the river. I concur that a method for monitoring use of the platforms to *ensure equitable viewing time for all* should be implemented. Bear-free areas would be established around the Beaver Pond Terrace developments, the visitor contact station at Brooks Lake, the campground and the management support facilities. A bear-free area would not need to be established at the trailhead. This is on a travel route and is impractical to exclude bears from an area so small. I agree that a monitoring program should be established to document a gradual return of the bears to the north side of the river. *Water quality monitoring should be done for both the new and old sites.* The new pithouse exhibit would remain as in the proposal.

**Area Operations**

26f

If the lodge was relocated to King Salmon, it would be allowed to greatly expand in size. The *concession could operate a shuttle system* in combination with the campground and Valley tour bus. Perhaps boat rentals and fishing guides would still be available as in the proposal, but there should be no half-day Valley tour. A half-day tour is too "quick" and would unnecessarily increase the traffic on the road. There would still be a "Brooks Camp experience" but it would be a different one, more in harmony with the area and its inhabitants.

**Phasing Schedule**

The phasing schedule would be similar to alternative #2, but the construction impacts and difficulties would be far less because no new lodge and its supporting structures would need be built. The disruption to the bears would be far less in this scenario as well.

Thank you for considering my comments on the Developmental Environmental Impact Statement. I appreciate being a part of the democratic process that allows for knowledgeable public input to be taken seriously. According to the Vail Agenda, the primary responsibility of the National Park Service should be to protect the resource. If a conflict of use arises, remembering this will ensure that we do the right thing, and are not cursed by future generations for compromising their heritage.

Brian R. Holmes

**Brian Holmes,** [redacted]

[redacted]

**June 29, 1994**



26d. *See response 20c.*

26e. The text in the final plan has been changed accordingly.

26f. Not every one who takes the valley tour hikes down to Ukak Falls. There is a significant stretch of downtime for them as they wait for the hikers to return. A half day tour would be advertised as a nonhiking tour. The van or bus would go out to Three Forks overlook and while the visitors are enjoying the view they could also be given a presentation by the tour-guide (National Park Service or concession) on the geological history of the area that explains the scene of devastation before them. Other themes are identified in the *Interpretive Prospectus*. Then they would return for bear viewing or sportfishing. It is presumed that the half-day trip will be most popular with the day user, however, until it is offered as a visitor activity, the National Park Service and concessioner will never know if the demand for a half day trip to the Valley of Ten Thousand Smokes will be popular.

May 21, 1994

Superintendent
Katmai National Park
P.O. Box 7
King Salmon, Alaska 99613

Dear Sir:

I wish to make a few comments on thwe Draft Development Concept Plan for the Brooks River Area. As a biologist for the NPS I conducted some brown bear studies in the Brooks River area in Katmai from 1974 through 1981. I again visited Brooks in July 1992 for a short period as a consultant to the Planning Team conducting this study.

During my absence of some 10+ years from the Brooks area I was immediatedly struck by two obvious changes that had occurred. 1. I was shocked by the vast increase of day visitors to the area. 2. I was also surprised at the number of bears that used the Brooks Falls area.

During the late 1970's, day visitors were rather rare and few bears could be found around Brooks falls in July. Naturalists often had problems showing visitors bears. Of course in late September and October we did have large numbers of bears. One must conclude that at least some bears will adapt to people if people are managed to create a minimum impact on the animals. Obviously though, there is a limit to the number of people that can be accomodated in a heavily used wild bear area.

After reading the Plan, I favor Alternative #2. I believe this alternative will allow maximum use by people with a minimum impact on bears.

During my studies in the 70's I often watched bears come out to the edge of the river bank and if the river was occupied by fishermen, continue along the bank until they were past the fishermen At least some bears try to avoid people or are people shy. It was also obvious, as I poiated out in one of my field reports that the bears natural feeding path was to fish down the river then follow the shoreline of the lake to the campground or cut across from the Oxbow to the Lake. This natural movement of bears forced bears to pass through Brooks Camp. Having a people free area on the north side of the river will permit bears to follow this natural route of travel without being forced to intrude on a people camp.

Most bears do move into the Brooks River area from the south. In the late fall (mid-Sept. & Oct.) I observed a movement of

27. Comments noted.

of bears in and out of Brooks along the Naknek shore toward Margot Creek. Parked airplanes along this beach during this period could have detrimental impacts. If you ever plan to allow large numbers of people in Brooks in the late fall it might be prudent to use the Brooks Lake beach for airplane landings as much as possible.

There is no doubt that most of the bear-people problems at Brooks have always been fishermen-bear problems. Sometime in the future you may have to eliminate all fishing on the Brooks during period of heavy bear use.

I was glad to see the platforms in use. I proposed them many years ago but did not see the results till 1992. It certainly reduces the people impact on bears.

The popularity of viewing bears in the wild will continue to grow. I'm sure you are aware that in Katmai people are already going to other bear populated areas to see these noble animals. Soon you will have to give these other areas some attention and inevitably some restrictions will be necessary.

Good luck in getting this Plan implimented. It will be a real accomplishment.

Sincerely,

Will Troyer [redacted]

[redacted]

## COMMENTS

COMMENTS : DEVELOPMENT CONCEPT PLAN/EIS FOR THE BROOKS RIVER AREA, KATMAI NATIONAL PARK

SUBMITTED BY: BARRIE K. GILBERT

[redacted]

19 JUNE 1994

This draft DCP/EIS is fundamentally and significantly flawed as a document to make choices about the future of the Brooks River area. My comments are based on 10 years of scientific research, review of legislation, management plans and living on the site. I have concerns about the premises on which issues are discussed as well as the failure of this document to provide specific information about the consequences of each of the options on the park's resources. I offer the following specifics for your consideration.

1. After providing a summary of the central importance of the ecological integrity of the salmon, bears and other wildlife in the legal and management history of this park the draft fails to utilize an extensive data base to predict the impacts of each of the alternatives. This is particularly disturbing because the formal biological studies specifically commissioned to study the influence of increasing human numbers and their impacts on bear ecology have not been applied to explain likely outcomes to the public.

28a

2. The planning team and the report of the Bear Research Committee present a flawed analysis of the series of studies contracted to Utah State University (in which I served as principal investigator) and the Park's studies which followed. Specifically there is a misinterpretation of the effects of people wherein a given number of bears is considered in a simplistic fashion to be evidence of satisfactory interactions and effective management of visitors. Furthermore the authors seem unaware that federal law and the Service's own General Management Plans address the need to protect and conserve ecological processes, including foraging behavior and behavioral traditions of wildlife as part of the ecological fabric that we refer to as system integrity. In place of such consideration the draft DCP/EIS diverts the issues to anthropocentric considerations of "visitor experiences" and "limits of acceptable change". The final draft needs to present a table of indicators and standards relating to impacts on bears and other wildlife similar to the table (p.29) of experience oriented indicators.

3. I miss a clear statement of the truly unique aspects of the cultural and ecological processes that have set this small area apart over the last

## RESPONSES

28a. The NPS contracted study (1990a) was most certainly used as a resource document from which to help fashion the proposed development alternatives for the Brooks River area. The National Park Service also considered 14 other reports and studies conducted on Brooks River between 1980 and 1991 to be better informed on bear ecology and bear use and distribution along Brooks River. The recommendations of these researchers were not misinterpreted as implied, nor was a certain number of bears given in the DCP "in a simplistic fashion to be evidence of satisfactory interactions and effective management of visitors." The authors of the plan are certainly aware of the legal requirements to protect bears and other wildlife, which is why they took the time to present these mandates in two sections of the draft DCP (see "Relationship of this Development Concept Plan to Other Approved Plans" and "Legislation Affecting the Brooks River Area").

After the 1991 *Alternatives Workbook* comment period, at the request of the conservation community, a Bear Research Committee was specially assembled by the National Park Service to review a decade's worth of bear studies on Brooks River and to independently review the proposed relocation sites for potential effects on prime bear habitat. The committee also served as an oversight committee to the planning team advising on the pros and cons of the proposed actions as they related to bear biology and bear use in the Brooks River area. They also summarized for the planning team all of the management recommendations by all the Brooks River bear researchers from the past decade. The planning team took the committee's recommendations into account and the development alternatives reflect this. See the "Selected References" section for a list of all the documents and studies that were consulted in the development of this plan.

In the purest wilderness sense, ecosystem integrity cannot be achieved with any presence of humans on the river. Since no one is proposing an alternative that totally removes the human presence from the Brooks River area, some habituation of bears and influence on foraging behavior must be accepted in each alternative. See response 2d regarding NPS *Management Policies* on human/animal interactions. The decision is to focus on managing people, and limits of acceptable change is an appropriate methodology to do so.

4,000 or more years. A combination of unusual lake and river hydrology combined with an extraordinarily long period of salmon abundance for bears and aboriginal people present us with a valuable laboratory for future insights into relationships connecting land and sea as well as human occupation and migratory patterns. In far too many instances we construct facilities almost on top of the resources that we claim to protect. Katmai does not have to repeat the Fishing Bridge fiasco suffered in Yellowstone National Park. There a large center was built on a site, similar to Brooks Camp, where a fishing culture settled on the banks of a lake and river, finally growing into a major development for NPS and visitor use. Within this historical context it is clear that removing all facilities away from Brooks River will benefit the protection of all resources.

4. The focus on "visitor experience" is excessive, pandering to the current fads for sociological emphases in our parks. This is both ill-advised and in conflict with policy or statuatory mandates. With a clearer linkage to ecological processes (i. e. ecological integrity, etc.) issues of visitor experience could evolve into questions of visitor entertainment, comfort or whatever. Only a clear statement of the central resources being protected will prevent the degradation, loss and eventual ignorance of the historically significant features that set this area apart.

28b

5. Missing from the options is one that has a boat-based system of transportation both from the Lake Camp area to the new campsite but also delivers day-users to the Brooks River area. Modern catamarans are capable of high speed, all-weather transport without the facilities required for aircraft. In addition there is a real need to draw the primary and sometimes sole interest away from the bears at Brooks River. Planners might well investigate the successful use of boats in the challenging marine environment of the Great Barrier Reef. There large numbers of people are transported relatively long distances in the face of high wind and choppy seas.

28c

6. The draft paper is deficient in presenting quantitative predictions of the impact of the estimated numbers of people on bear use of the prime Brooks River habitat, particularly during the fall period of hyperphasia so important to overwinter survival. The planning team has at its disposal detailed results of a series of formal scientific investigations aimed specifically at these questions. Without this information the public can not compare the effect of various options on bear foraging ecology.

28d

7. Current NPS planners appear to be complacent about bears in this system because of their apparent increase in numbers. Without citing any

28b. The central resources being protected are mentioned repeatedly. See the following sections: "Overview of the Park and Preserve and the Brooks River Area," Brooks River Area Purpose Statements," Brooks River Area Significant Resource Statements," and Desired Futures for the Brooks River Area."

28c. See response 2f.

28d. Table 3 displays the reduction in visitor use limits for the month of September in parenthesis. These reductions in the use limits were made because of the known increase in bear use on the lower river in the fall prior to denning. The DCP calls for a monitoring plan that would document human/bear interactions on the river and recommend appropriate changes in use limits (up or down). If the lodge and other facilities are removed from north of the river, as in the proposed action, there would obviously be fewer people on the river in September than now occurs. If Brooks Camp were to remain located close to the river, in prime bear habitat, the monitoring plan would recommend appropriate use levels for that scenario.

## COMMENTS

evidence one document speculated that bears may be at their highest numbers in 4000 years and, further, that this salubrious state of affairs quite likely was due to successful NPS management! Apart from the fact that salmon abundance is near the highest in the century these statements point to a certain hubris that is unwarranted in a location with the highest human intrusion into prime bear habitat, the least constraint on human behavior of any bear-viewing program in Alaska and which has experienced a 900% growth in visitation in the last decade. The DCP/EIS needs to be aligned with ANILCA, other federal legislation and the General Management Plan especially in protecting brown bear habitat. Habitat includes wildlife access to the food resource, a process not sufficiently protected at present nor adequately addressed in the draft document.

28e

8. In view of the high costs of camp removal and recent trends in NPS budgets it would be useful to present a lower cost option for a phased transition to a new site away from the river. Both the cultural and biological resources dictate removal of all facilities north of the river. With this and other alternatives there is missing a plan to minimize the disturbance of camp relocation including a seasonal schedule of activities.

28f

9. Absent from the presentation is consideration of additional wildlife species known in the past to inhabit the area. For example, in the mid 80s I saw river otters and eagles along the Brooks River. Counts, sightings and inferred trends needs to be included. Without an account of the past biological diversity of this ecosystem the degree to which current and future management is maintaining ecosystem integrity cannot be monitored.

28g

## RESPONSES

28e. The proposal calls for removing all facilities north of the river and establishing a people-free zone on the north side of the river, thus guaranteeing, in a geographic sense, unobstructed bear access to the entire river.

28f. See "Phasing Schedule" in each alternative.

28g. A short summary of wildlife inhabiting the Brooks River area is presented in part three of the plan. The park's Resource Management and Research Division conducts periodic surveys of various wildlife species using the river. Data on biological diversity are being collected that will assist management in the future.

24 June 1994

Superintendent
Katmai National Park and Preserve
PO Box 7
King Salmon, AK 99613

Dear Sir,

This is in response to the Brooks River Area DCP-EIS. I was the first of Dr. Barrie Gilbert's students to have the privilege of conducting brown bear research on Brooks River, during the summers of 1985-86. As such I am writing as a private citizen with perhaps a better than average knowledge both of the area and of its ursine residents.

I was pleased to see that the Service's preferred alternative is to remove facilities from the north side of the river, and to establish a human-free zone. The need for this has long been clear. I am also thrilled to see use limits proposed. This will reduce the sometimes unbelievable number of flights coming into Brooks, which can only benefit the wildlife, as well as visitors.

I do have several concerns. The Iliuk Moraine alternative seems to me the most sensible of the four (the No-Action being utterly unacceptable!!). My reasons are these:

29a

1) The Beaver Pond area is a sensitive one for wildlife. Bears frequently nap there, and I often observed the few females with cubs who used the river retreating to the Beaver Pond to nurse. At least during the mid-1980's, loons nested on the Beaver Pond, and osprey nested nearby. Increasing disturbance in that vicinity could preclude loons' use of it and the presence of ospreys above it. Building facilities in the immediate vicinity of the Beaver Pond and its related wetland would simply move the impacts of the camp from one *sensitive* area to another.

2) The Iliuk Arm alternative places the human disturbance that much further from the ursine supermarket that is Brooks River. As explained in the first Concern listed below, the distance of the Moraine from Brooks River would also assist in providing the bears a regularly scheduled, *temporal/spatial removal from human pressures on the river.*

3) I would readily support the day-use-only concept, but only if stringent levels were placed on the number of in-coming flights per day. I doubt an even steadier roar of float planes would be an improvement over the present. It would also be more difficult to enforce the scheduling of human activity on the river, which is needed to allow non-habituated bears, such as females with young, better access to it. I do feel a well-managed camp at Brooks provides an invaluable opportunity to educate people about the magnificence of the Alaskan wild and its inhabitants.

All of the alternatives concerned me on various points. The No Action alternative is simply inappropriate, of course. I realize this is a required alternative under NEPA, but it should NOT go further than this! The rest of my concerns, in no particular order:

29b

++ The results of my research and those of Tammy Olson speak clearly to the need to regulate human use of Brooks River temporally and spatially. It was clear that certain age groups and classes of bears (subadults, and mothers with young in particular) were affected by the high levels of human use on the river. I encourage you to ask the state to limit sportfishing seasons on the river to May-early June and

29a. The National Park Service agrees. That is why the proposed action and alternatives 2 and 5 stay well away from the Beaver Pond. The development would be 100 feet above the pond, up on the terrace and about a quarter mile back from the edge of the pond judging from the map in the DCP. Even the trail connecting the new development to the core use area is illustrated in the plan as being back in the forest, away from the Beaver Pond.

29b. The National Park Service agrees that the bears need access to a variety of fishing spots on the river, and that human use should recur at predictable times. The access sites for stationary intrusions are identified in the plan. After use limits are established, the scheduling of that use can be determined through the limits of acceptable change methodology. No changes in the existing sportfishing seasons are proposed in the plan. Only temporary river closures at times of heavy bear use are proposed.

## COMMENTS

## RESPONSES

2

perhaps August.

I also encourage you to take into consideration the ample successes of temporal and spatial limits set at McNiel River. Giving the bears a schedule of "safe" (human-free) times and places on the river should allow mothers with cubs who cannot or will not tolerate human presence, the opportunity to use this valuable resource. All bears will be given the choice of using the river with or without humans nearby.

Having the camp sited well away from the river would aid in enforcing temporal schedules, as visitors would be shuttled to and from the river for bear viewing periods. Spatially, different portions of the river might have different bear viewing times, so that more people could have more time to observe bears (or fish, during May and August). Of course, there should be some time periods when bears could have free reign over the river, sans people. As long as the schedule were consistent throughout the human season at Brooks, the bears could learn it as they have at McNiel. (and what an educational tool re: the complexities of bear intelligence!)

++ I find it intriguing and distressing that the document speaks to habituation of bears to people as something undesirable on the river. The more research that has been done on human-habituated bears, the more the notion that it is necessarily unacceptable has weakened: it depends on the circumstances. Food conditioning is certainly undesirable anywhere, being dangerous to both people and bears, when the latter begin aggressively seeking food from the former. Habituation to humans, on the other hand, is the mechanism by which bears in the Brooks area can have any access to the migrating salmon. We found that non-habituated bears used poorer sections of the river, and/or the lower river primarily after the lodge closed in the autumn, and were also more likely to charge people when they did use the river (see for example "Brown Bear Behavior and Human Activity at Salmon Streams in Katmai National Park, Alaska", 1990, by T.L. Olson, B.K. Gilbert and S.H. Fitkin, as well as the report I submitted with Dr. Gilbert, "Profile Analysis of Human-Bear Relationships in Katmai National Park and Preserve", 1987). Bears habituated to humans were able to go about their business with reduced stress and fewer agonistic encounters with people.

29c ++ The beaches of both Brooks Lake and Naknek Lake are travel corridors for bears. The vicinity of the Beaver Pond, however, is much more sensitive to increased human use, as noted above. Establishing the area adjacent the Pond as the primary access point would be ill-conceived. The traditional use of Naknek Lake as the access point as I understand it has been related to the location of Brooks Lodge at the mouth of the river on Naknek. Moving the camp away from Naknek Lake removes this reason: why not have the primary access point on Brooks Lake? At the least the bustle of arriving planes should be directed further toward the moraine on Naknek Lake. Preferably, Naknek would be used only when weather requires.

29d ++ Interior Secretary Babbitt has made the statement that as little new development as possible should occur in national parks. Obviously some new development is needed at Brooks! I would be interested to know why the shooting range area (historical dump) is not proposed as a camp location. It is already disturbed, and is well away from areas heavily used by wildlife.

29e ++ I am distressed to read bald eagles no longer nest on the river. They often accompanied me during my bear observations, above my observation platform on the Cutbank. Which leads to my concern about erecting a Cutbank platform: I strongly feel this should be an area left to the bears and other wildlife. As an area popular with bears, it certainly provides wonderful observation opportunities. BUT. At least one area popular with bears should be left for their exclusive use. Sportfishing should not be allowed here (unless practiced by bears, as occasionally the case), and the banks should be left clear for bears. The raised bank gives bears a good place to scope the river for

29c. See response 29a and 26b.

29d. The shooting range is not mentioned specifically in the plan as an impacted area that has potential for relocated development. The plan does, however, take into account all those areas along the Valley Road that had been cleared for gravel extraction to build the road. These areas would be looked at first in the comprehensive design phase for management support facility locations to keep impacts to natural areas at a minimum.

29e. See response 26a.

salmon, while keeping an eye on other bears.

The Cutbank area was also highly active with other wildlife during my time there. I wondered at the time if part of this stemmed from the heavy human use downstream. I observed otters, beaver, numerous water birds with young, bald eagles, and osprey frequently in this stretch of river during the spring.

You also note the presence of many pit house sites on the Cutbank. Another good reason to leave this area be.

I encourage you to have elevated viewing platforms at the river mouth and at the falls. I encourage you to leave the Cutbank to the bears and other wildlife. Perhaps bald eagles will return, should that area be less disturbed.

29f ++ I am very concerned about your proposal to enlarge the viewing platform at Brooks Falls. Limit the number of people who can go at one shot, limit the time they can spend there to a couple of hours, have a sign-up sheet to ensure everyone who wants to go, can -- and certainly, schedule visits so that non-habituated bears only have to "worry" about more dominant bears present when they attempt to fish at the falls. But please do not increase human presence at this highly important bear area. Setting these limits on human use will have the effect of improving visitors' experience at the falls much more than by simply increasing the number who can go at one time. Limits will also provide for the less human-habituated bears. It was not uncommon to observe a seldom-seen bear slipping off into the woods on the bear's side (north) of the falls when I arrived at the empty platform during off times of the day. I always hoped they would return so I could better identify their distinguishing features. Often, they did not, though I suspect they returned once I had left. Rarely, I would meet them on the trail as I left, sometimes to the dismay both of the agitated bear and, thus, of myself. Setting a schedule could also reduce these types of meetings, as these bears would know when and where to avoid people on a regular basis.

29g ++ The trail shown from the proposed Pit House exhibit in Alternative 2 travels through an area heavily used by bears moving from the Beaver Pond napping area to the river. This use was common enough knowledge when I was at Brooks that rangers would jokingly dare me to walk through there during peak bear periods. Beyond the human safety issue is the concern that the new trail would be another disturbance through an area traditionally used by bears.

++ Regarding the siting of the generator and the campground on the Iliuk: should this alternative be chosen -- perhaps? -- these ought to be separated a bit more. Having lived in a tent cabin next door to the generator, I can attest for those future campers that canvas is not much of a noise barrier.

29h ++ Finally, it was disappointing to find in the EIS document so strong an emphasis on the visitor experience. I understand the NPS mandate to provide for the enjoyment of the public, however the overall tone of the document supplants the needs of the non-human residents in favor of the anthropogenic experience. As one who dearly enjoys the wonders of Katmai, and has seen the impact experiencing Katmai can have on people who ordinarily couldn't care less about the value of Wilderness, I couldn't sincerely advocate disregarding the Visitor Experience. However, the tone of this document perpetuates the too-often held view that national parks are somewhat wilder Disneylands that exist *merely* for the enjoyment of people. And, this is all the more troubling in a document put forth by an agency mandated under ANILCA to protect sound, free-ranging populations of wildlife: people need to understand unlimited human use can be a significant detriment to this, and why.

29f. The proposal does not increase use at the falls platform beyond that which is now happening. Improvements to the platform and safe access to the platform are proposed out of concern for the bears, human safety, and enhanced bear viewing. Use limits would be applied to the platform as indicated. The method of ensuring a rotation period on the platform will be worked out with the redesign of the platform and the impacts monitoring program that would be set up as part of the limits of acceptable change methodology.

29g. The proposed trail between the visitor contact station and the lodge is portrayed as being far enough from the grassy bedding areas around the Beaver Pond as to not be a factor, however, once a trail is constructed the bears will use it. The trail to the proposed barabara replica is actually the existing road.

29h. Several letters commented on the perceived overemphasis in the plan on the visitor experience. In part one of the plan, the titles of the planning issues are all human related; this is a development concept plan that must deal with providing for human use in a predominantly natural area. However, the major decisions that are made in the plan focus on protection of the resources: (1) relocate Brooks Camp - natural and cultural resource cause, (2) river corridor management - natural resource cause, and (3) establish use limits - primarily a natural resource cause, secondary a visitor experience cause. The public use goal and objectives for the Brooks River area, listed in the plan, clearly demonstrate that public use is secondary to the preservation of the natural and cultural resources. The National Park Service does not seek to control nature on the Brooks River, it seeks to protect it. To do so, the National Park Service must control the human threats to this wild area, and that is what this plan is basically about; so it must, by necessity, include a human (visitor experience) emphasis.

4

To summarize the comments I feel are most important:

** I strongly prefer the Iliuk Moraine alternative as being the least impacting of the four, for wildlife on Brooks River and around the Beaver Pond.
*** Please consider spatial and temporal restrictions of human activity on Brooks River, and promote with the state reduced fishing seasons. This will be to the long term benefit of Brooks Bears, as well as other wildlife species in and on the river.
** Recognize the difference between habituation and food conditioning. The former is an important adaptation bears have made to allow them use of the river, given the highly significant human presence. The latter can lead to untoward consequences, and visitors (and staff) must be educated in regard to this.
** Do not increase human activity levels anywhere around the Beaver Pond. It is a sensitive area for several wildlife species, and a presently undisturbed wetland (except for the planes that sometimes use it: these should be cited heavily).
** Build a bear viewing platform or two near the river mouth, but leave the Cutbank undeveloped as a bear (and otter, beaver, etc)-only portion of the vital lower river.
** Do not enlarge the Falls platform!! Regulate visitor use to reduce crowding.
** Avoid building the trail through the woods past the Beaver Pond. It is an area traditionally used by bears, and would create a new disturbance for them.

Thank you for the opportunity to comment on this document. I hope the end result is what is best for the wildlife who depend on Brooks River, the Beaver Pond and the surrounding area for their survival, as well as the people who come to vacation (and service the vacationers) there. I also hope the funding to carry all of this out materializes in the near future!

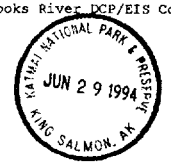
Anne Braaten

Anne Braaten

Olson, Tamara

Brooks River DCP/EIS Comments

Tamara L. Olson
[redacted]




26 June 1994

I. Overview Comments

In my opinion the draft DCP/EIS for the Brooks River Area does not present adequate data to understand or assess the environmental impacts of the proposed alternatives (see NEPA sec. 1501.2[b]); also, environmental considerations appear only minimally integrated into the development and consideration of each of the DCP/EIS alternatives. Further, there are fundamental logic problems contained in this DCP/EIS, the most notable being:

1. On p.17, par.5, it is stated that the "quality visitor experience is the resource at greatest risk in the Brooks River area." I am aware of no data that support such a conclusion. Apparently the visitor experience is of high enough quality to continue to attract increasing numbers of people, yet at the same time, research has repeatedly documented human-avoidance behavior by the majority of bears attempting to feed at Brooks River amidst the continual increase in human presence there.

30a

2. The indicators listed in Table 2 (p.29) are not adequate "measures of resource...conditions" (p.28, lines 10-12). None of the measures listed in Table 2 will give any indication of whether the DCP/EIS stated objectives to (1) "...protect and maintain critical brown bear habitat" and to (2) "make brown bear habitat accessible for bear viewing and sportfishing...to the degree that it does not significantly interfere with wildlife use and behavior" are met. **The indicators and standards listed in Table 2 are fundamental to the development of visitor use limits and to the development of each of the proposed alternatives; yet, every standard listed in Table 2 could be met even if all bears were driven completely out of the Brooks River area.**

30b

The DCP/EIS contains a lengthy list of research reports that have been written regarding bear use of Brooks River, yet the DCP/EIS presents little quantitative information regarding bear use of the river or potential impacts of each proposed alternative on this use

Brooks River provides bears their earliest access to bright calorie-rich prespawned salmon in July; it also has post-spawned salmon available to hyperphagic bears for a >1.5 month period (assuming availability is not impaired by human activities) during the fall (the closest other stream in the area with salmon available in late fall is the Savonoski River). These 2 periods of high salmon availability to bears distinguish Brooks from other salmon streams in the area (Troyer 1980) (this relates to NEPA sect 1508.27[b] regarding unique characteristics of the geographic area). Protection of this critical and unique bear habitat is a stated objective of the Katmai NPP General Management Plan and this DCP/EIS. Therefore, the Brooks River Area DCP/EIS should be rewritten with environmental impacts receiving central consideration; each section of the DCP/EIS should contain appropriate primary references (ie., **original** research reports and



30a. See response 20a.

30b. This unique characteristic of Brooks River is exactly why the proposal for river corridor management during times of heavy bear use is common to all development alternatives.

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other **original** reference materials), and provide adequate data and logical explanations to support analyses and associated conclusions presented in the DCP/EIS.

II. Comments by section.

1. Purpose and need for the plan, direction from the General Management Plan:

30c

a. P.6, par.6. If the GMP stated that "Ongoing studies documenting bear/human interactions in the Brooks Camp area will help guide future decisions" why were these studies not used to guide development of the alternatives presented in this draft EIS? The summary report written by the Bear Research Committee that purports to present a synopsis of research conducted at Brooks River since 1980 contains many statements that are contrary to quantitative results presented in those original research reports; yet this was the document that was apparently relied upon in developing this EIS. Section 1502.24 of NEPA states that "Agencies shall insure the professional integrity, including scientific integrity, of the discussion and analyses in environmental impacts statements." This cannot be said of the Brooks River Area DCP-EIS. I have many specific comments on the report written by the Bear Research Committee; these comments are applicable to both that report and the Brooks River Area DCP/EIS and are listed in Appendix I.

2. Actions common to all alternatives:

a. The assertion made on p.17, par.5, that " the quality visitor experience is the resource at greatest risk in the Brooks River area" is not supported by data presented in this EIS or in numerous research reports. Apparently the visitor experience is of high enough quality to continue to attract increasing numbers of people; at the same time, research has repeatedly documented human-avoidance behavior by the majority of bears attempting to feed at Brooks River amidst the continual increase in human presence there (Warner 1987, Braaten 1988, Olson et al. 1990, Olson and Squibb 1990, Olson and Squibb 1991, Olson and Gilbert 1992, Olson 1993, Olson et al. 1993). Other resources, including archeological remains in the Brooks Camp area, also show signs of impacts that are not apparent in the visitor use pattern.

30d

b. Pp. 17-87, Alternatives, including the proposed action--The DCP/EIS lacks an objective evaluation of the use of a boat system to reach Brooks Camp. Specifically, an evaluation should be made of the number of days that boat access to Brooks Camp might be affected by weather (based on actual weather data), the number of days that planes are unable to reach Brooks Camp due to fog (based on actual weather data and use data), the environmental trade-offs associated with the use of each form of transportation, etc. The use of boats, rather than floatplanes, should receive serious consideration, particularly given that floatplane access was a driving force behind the choice of alternative locations for Brooks Camp. Also, an objective analysis should be made of the predicted use of Brooks Lake as an alternative plane landing site. How many days in the season would it actually be necessary to land a plane on Brooks Lake? (based on actual use data); does that number of days justify maintaining human activities and

30e



30c. These studies were used to guide development of the alternatives presented in the plan, and the Bear Research Committee did carry recommendations from these studies forward in the committee recommendations to the planning team. After the 1991 Alternatives Workbook comment period, at the request of the conservation community, a Bear Research Committee was specially assembled by the National Park Service to review a decade's worth of bear studies on Brooks River and to independently review the proposed relocation sites for potential effects on prime bear habitat. The committee also served as an oversight committee to the planning team advising on the pros and cons of the proposed actions as they related to bear biology and bear use in the Brooks River area. They also summarized for the planning team all of the management recommendations by all the Brooks River bear researchers from the past decade. The planning team took the committee's recommendations into account and the development alternatives reflect this. See the "Selected References" section for a list of all the documents and studies that were consulted in the development of this plan.

In reference to the CEQ Regulations about professional and scientific integrity (sec. 1502.24), most of these "studies" were minor reports by individuals who never had them peer-reviewed for adequate methodology or scientific accuracy. As of the committee report, none had been published in a refereed scientific journal. The commente's specific comments on the "Final Report of the Bear Research Committee" are not reproduced here. The report is over four years old. This section of the DCP/EIS is for comments on the draft plan, and not for comments on past documents.

30d. Tour boats are the major mode of access to Brooks River in alternative 4. No evaluation of tour boat access versus floatplane access has been made. The data on wave conditions on the lake that would be necessary for such a comparison do not exist. People do reach Brooks Camp by both methods, and will continue to do so in the future. The overwhelming traveler preference is via floatplane.

30e. The plan proposes to reduce the amount of human intrusion on the Lake Brooks shore to the minimum of floatplane tie-downs and a contact station in the Old Log Cabin. This level of development would be sufficient to meet the need of an alternative floatplane landing site on days when winds are contrary for landing on Naknek Lake. Bears travel through this developed area now; reduction of the human presence there should be more beneficial to the bears.

development at Brooks Lake?; what are the potential natural resource benefits to eliminating human activities on Brooks Lake (reduction in human presence in the Brooks River area, eliminating most human activity in an area that has several heavily used bear travel corridors that lead from Brooks River to other salmon streams around Brooks Lake, etc.)?

c. P.18, par.1--See 5(b) for comments regarding the proposed cutbank platform.

30f

d. The cutbank area receives far more heavy regular use by bears during the fall than during July, yet a sportfishing closure (p.24, par.2) is only proposed for this area during July. During autumn most sportfishing below Brooks Falls is concentrated in the cutbank area; some fishing also occurs along the upper end of the oxbow. Many nonhabituated bears and females with young favor use of the cutbank during the fall, even though more productive fishing sites may be available downriver (Warner 1987, Olson and Gilbert 1990, Olson and Squibb 1990, Olson and Squibb 1991, Olson and Gilbert 1992, Olson 1993, Olson et al. 1993). Because avoidance of other adult bears also appears to affect the use patterns of many maternal females, these bears may continue to favor use of the cutbank area regardless of whether the lodge is moved from its present location (and/or assuming bears eventually respond to removal of the camp with increased use from the oxbow to the river mouth--an assumption that is not entirely supported by Brooks River research [see Appendix 1 to these comments]). For these bears to gain access to the cutbank area, the fall sportfishing closure should at least extend from Brooks Falls to Naknek Lake.

30g

There is a plethora of data available in research reports regarding bear use of different sections of the river below Brooks Falls (including a simplified presentation in Squibb and Olson 1993), yet none of these data are presented or referenced for the reader's information or to support the rationale behind any of the proposed closures. A presentation of these data should be made.

e. What happens if the proposed fishing closures (p.24, par.2) are not implemented? It is impossible to fully evaluate the impacts of each of the alternatives presented in this DCP/EIS without a definitive statement of how the NPS plans to manage sportfishing (management of sportfishing is related to the probability of bears obtaining fish from people at Brooks, what bear access to different portions of Brooks River will be, and whether bear access to other streams could also be affected--eg., if sportfishing limits at Brooks increase angler activities on other salmon streams in the park).

30h

f. Since NEPA (sec. 1508.8) requires an EIS address "reasonably foreseeable" direct or indirect effects, the potential effects of use limits at Brooks River on other salmon streams throughout the park (as a consequence of displacement of some human activities from Brooks to these other streams) should be discussed.

30i

g. P.28, par.4. Fall visitation has increased in recent years (concurrent with changes in NPS management of fall visitation); as July



30f. See response 26a. Sportfishing closures are not being recommended in this plan. The closures recommended in the section "River Corridor Management" section would be for all human access to the river in certain reaches at certain times.

30g. The decision to not include quantities of graphs, tables, and matrices that depict a season's distribution of brown bears on the river, or the probable age classes in the "local population" for any given year may be considered by some as a lack of information for analysis by the lay person. Because the bear population on Brooks River is dynamic and changes from year to year, the planning team decided to not produce graphs of old data sets that might not resemble the current situation, but rather to plan from those recurring, general patterns of bear use on the river that everyone familiar with the river already knows. An example of this is: bear use is generally greatest at the falls in July and greatest in the lower river in September. It is not necessary to reproduce tables from studies a half a decade old to convince the reader of this. It is an acknowledged fact. And so the team planned accordingly.

30h. The reasonably foreseeable effects on the local bear population on Brooks River would be beneficial in that some intrusion by anglers on the river would be eliminated. The potential effects of some anglers dispersing out to other salmon streams in the park (as they already do) because of temporary river closures are unknown, but, since most salmon producing streams are being fished in the park every summer now, the dispersed effects of a few more occasional anglers on transient bear use on any particular stream is surmised to have little effect.

30i. The September feeding period for bears on Brooks River has not been ignored in the plan. Separate use limits were proposed for September use on the river, and a separate riparian and river closure was proposed for the lower river with September use in mind.

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visitation reaches (and has reached) levels that result in noticeable overcrowding, interest in the fall is likely to increase. The fall feeding period is important to many bears and should not be ignored in the planning process.

h. The indicators listed in Table 2 (p.29) are not adequate "measures of resource...conditions" (p.28, lines 10-12). They also do not address several of the Katmai NPP wildlife management objectives listed on p.13 as: (1) "**protect and maintain critical brown bear habitat**" and (2) "make brown bear habitat accessible for bear viewing and sportfishing...to the degree that it **does not significantly interfere with wildlife use and behavior**" (*a significant effect is not defined; it is defined in NEPA sect. 1508.27*). **Every standard listed in Table 2 could all be met even if all bears were driven completely out of the Brooks River area.**

Records of human-bear interactions are of interest, but are of limited utility as indicators of the "condition" of the local bear population without adequate balanced sampling of individual bear use of the river. Studies to date indicate that while bear activity is seen in the lower river when visitor activity is relatively high, that bear activity is actually limited to a few human-tolerant individuals (Olson et al. 1990, Olson and Squibb 1990, Olson and Squibb 1991, Olson and Gilbert 1992, Olson 1993, Olson et al. 1993); data on bear activity recorded to the individual level would be necessary to determine minimum estimates of the number of individual bears using different zones along the river and what their activity levels are. Other limitations associated with the human-bear interaction data include: (1) the only data obtained are for bears that are involved in close-range interactions with people; most bears at Brooks avoid people, so the vast majority of this data will be for a select subset of bears that are not representative of the local Brooks River bear population, (2) if these data are collected as they have been since 1989 (see Squibb and Holmes 1992), they will also be nonrepresentative because they are not collected according to any sampling regime; the data were opportunistically collected and some were based on second-hand reports, and (3) records of the number of incidents of particular types yield no information beyond the absolute number of occurrences and the proportion of those occurrences that involved bears of a particular age-sex class (and then assuming bears have been properly identified to age-sex class); records of human-bear interactions provide virtually no information regarding the number of bears using the river or the age-sex composition of those bears.

30j

The indicators and standards should be redesigned to address stated Katmai NPP wildlife management objectives. Since the remainder of the EIS was developed using Table 2 as a guide, visitor use limits and all the alternatives should be reevaluated using the revised indicators and standards.

i. P.31, Table 3--As mentioned earlier, these numbers should be reevaluated using revised indicators and standards that give a reasonable objective measure of resource conditions. A clear logical explanation of how proposed human use limits were derived should be presented with an accompaniment of supporting data; the current presentation gives no indication that environmental impacts were

30k



30j. See response 20a.

30k. The proposed use limits (table 3) are not designed to accommodate increased visitation. Three of the four development alternatives would have use levels below current July peak days.

considered in developing human use limits--they actually appear designed to accommodate increased visitation to the area, even as data suggest that natural resources are being affected by current human use levels.

Even if overnight facilities were moved elsewhere, the proposed limits on visitation for Alternatives 1-3 seem excessively high, particularly given: (1) a high volume of air traffic that would be required to provide access to this number of visitors, (2) pedestrian traffic in the Brooks River area would be relatively high; therefore, the number of close encounters between bears and people may not be that substantially reduced, and (3) facility changes proposed to accommodate these proposed use levels lend a zoo-like atmosphere to the area (examples-visitor contact station at trail head, ramp up to falls platform, expansion of falls platform, etc. ....).

301

j. On p.33, par.1 it is stated that construction details will be determined at some later date. It is impossible to fully evaluate the impacts of each alternative presented in this draft EIS without alternative-specific quantitative information regarding anticipated requisite equipment and crews. The phasing schedules presented for each alternative also do not provide enough specific information regarding how long each construction project will take and when it would occur.

k. The capacity of the "narrows" platform is stated as 25 (example--p.39, par.5); whereas, the falls platform is said to accommodate 20 (p.35, par.2). The "narrows" platform is appreciably larger than the falls platform, and in my opinion could easily accommodate >25 people.

3. No action alternative

a. P.35, par.3, lines 12-14--Rangers do go to great lengths to try to obtain visitor cooperation with regulations; however, only rarely are the regulations enforced by issuing citations. The ratio of the number of citations issued relative to the number of human-bear interactions that involve intentional close proximity to a bear by a human, intentional displacement of a bear by a human, or in which a bear obtains fish or other food from a human is extremely low. Braaten (1988) also noted "complacency" regarding issuance of citations; she suggested that this complacency could degrade the effectiveness of NPS bear management policies at Brooks.

b. P.44, par.5--This paragraph is inaccurate and, consequently, misleading. "Some bears" should be stated as "many bears" (see Olson and Squibb 1990, Olson and Squibb 1991, Olson 1993, Olson et al. 1993). Simplistic comparisons of counts of bears by age-sex class give no indication of how much time those individuals actually used the river. Many intolerant bears were observed for only brief periods of time; a simplistic comparison of the number of individuals seen does not account for the limited amount of river use by these bears. In contrast, subadults have been over-represented in river use (ie., no. subadults/total bears vs. no. subadult min. on river / total bear min. recorded) for the past several years. This is also not reflected in comparisons using simple "head counts." This point is discussed





301. The design details on proposed structures in this plan are not necessary for an evaluation of impacts. This is a concept document that cannot include design details that do not exist at this time. The phasing schedules presented in the alternatives are specific in that most of the construction would have to be done during the summer months. There is no way around the climate and access restrictions. Information of projected manpower and equipment needs would be worked out with the contractor after comprehensive design.

further in my comments regarding the bear research committee report (see Appendix I).

30m

c. Throughout the EIS (for example, p.46, par.1) the lodge closing date is listed as Sept. 17. This closure date is a week's extension over the established lodge closing date of Sept. 10; the change in closure date was made in 1992, after the DCP alternatives workbook of alternatives had been issued. An NPS assessment of alternatives for management of human activities at Brooks River written to consider a later closing date of Brooks Lodge stated that "...keeping Brooks Lodge open would increase the intensity of human activity...setting the stage for...disruption of feeding that is critical to bears" (Jope 1985). Research conducted in 1992 (when the lodge operating period was extended) documented significant reductions in use by many bears, including females with young.

At the very least, the reader of this EIS should be made aware of this recent management change. My impression is that this recent management change in lodge closure date has biased consideration of management options presented in the EIS--no alternative operating period for the lodge is even considered. Until recently, visitor activity past the first week of September was limited by the lodge closure date (and fishing closures in some years); in this EIS the opposite appears true. The length of the visitor season is as legitimate a consideration in this draft EIS as the proposed caps on visitation and sportfishing closures.

4. Alternative 1

a. P.52, par.2--The proposed boardwalk will likely be a significant source of noise. Noise from people walking across the connecting ramp of the "narrows" platform is at times audible from >20 m; I've observed and recorded specific instances of bears changing course in apparent response to noise from people walking across the ramp. This comment applies in all cases where elevated boardwalks are proposed, including over the river mouth. Also, how tall would the proposed boardwalk be?

The combination of a boardwalk, bridge, and the "narrows" platform seems overwhelmingly intrusive in that small area of the river.

b. P.52, par.3--The proposed river mouth overlook will not solve the problem of people becoming trapped on the spit. Anyone able to reach the platform at the location presented on the map for Alternative 1 would not be "trapped" in the first place.

c. Research facilities proposed in Alternatives 1-3 do not seem in keeping with the proposed visitor use limits. Minimal housing space could be provided for researchers conducting studies within the Brooks River area; this is all that seems necessary at Brooks. More elaborate facilities/accommodations (if required) should be constructed elsewhere (King Salmon?).

d. P.54, par.5--Management of bear problems in Brooks Camp will be less effective with fewer staff around to notice problems and take appropriate actions. Also, visitors needing assistance outside normal



30m. In the plan proposal (alternative 2) no lodge would exist north of the river, no one would be in the people-free zone north of the river, the closing date on the new lodge would not affect bear use on the river, people would access the river through the trailhead contact station, and, at times of heavy bear use, a river and riparian corridor closure would be in effect.

operating hours will have to seek out the same few staff in camp every time; this seems an unreasonable burden for employees to bear on top of the potential increase in difficulties responding to bear management problems in camp.

30n

e. P.54, par.5, lines 9-10--The new deck mentioned is not illustrated on the map for Alternative 1. Where would this be (I'm assuming the overlook in front of the overlook cabins)?

f. P.55, par.1--Need more specific details on construction--equipment involved, number of crew, projected duration of projects, and timing of projects. As indicated earlier, I cannot fully evaluate impacts without this information.

5. Alternative 2

a. The prediction that Brooks River will become a "quiet place" (p.57, lines 10-11) is overly optimistic. Given the prevailing weather patterns there, overflights of the river and vicinity will still frequently occur. Also, the proposed shuttle system will add vehicle noises to the local area; currently vehicles can often be heard while standing on the cutbank. Unless special provisions are made to muffle noise from the camp generator, this too will be audible (the generator in Brooks Camp can presently frequently be heard from the overlooks on Dumpling Mountain).

30o

b. The proposed cutbank platform (p.58, par.3) does not meet all the criteria listed in Appendix C: (1) the falls platform may be visible from the proposed cutbank platform location (criterion #9)(the falls platform was not readily visible at ground-level at the cutbank tree-stand but could be easily seen when up on the platform, (2) the south bank of the river is a heavily used bear travel corridor, including at the proposed site (large salmon graveyards are located along the downriver edge of this point of land)--people will be placed in this bear travel corridor and bear travel could be disrupted (criteria #1, #2, and #3), (3) the proposed platform location may not only impede bear travel, it will also likely affect human-intolerant bears' access to the salmon graveyards along the downriver edge of this point of land (criteria #2), (4) females with young, particularly those less tolerant of people, favor use of the cutbank area (Warner 1987, Olson et al. 1990, Olson and Squibb 1990, Olson and Squibb 1991, Olson and Gilbert 1992, Olson 1993, Olson et al. 1993); higher levels of human activity in this area will likely dissuade females from using the cutbank--the cutbank may presently be favored by maternal females not only because of its distance from Brooks Camp and, at times, relatively low use by people, but also because the area receives relatively dispersed and moderate use by other bears.

c. Both the North and South beaches leading up to Brooks River serve as travel corridors for bears. Any docking of planes or boats on this stretch of beach will likely result in interactions between bears and boats/planes/passengers similar to those seen at the current camp location. This potential conflict should be recognized (but may be unavoidable for landings along the Naknek beach near Brooks).



30n. This view deck would be at ground level, on the edge of the slope between the lodge and the store that descends to the Oxbow.

30o. See response 26a. Both the Bear Research Committee and the planning team visited the area of the cutbank to see if a viewing platform there could meet the recommended criteria set forth in appendix C. The falls platform and the narrows patform are not visible from the proposed cutbank platform site. The site is back far enough from the river to allow bears to travel the shoreline. The site is well upstream of the salmon graveyard, but the comment is well taken that human-intolerant bears' access to this salmon graveyard may be affected by the presence of a platform near the cutbank. As mentioned, the concept of a cutbank bear viewing platform is controversial. In the absence of a proposed third platform at the cutbank in alternatives 2, 3, and 4, use limits for each alternative would have to be reduced accordingly.

## COMMENTS

Olson, Tamara Brooks River DCP/EIS Comments

d. It makes little sense to establish a busy visitor contact station that will be a center of human activities and impose a bear-free management zone so close to the river (p.73, par.2). It will be virtually impossible to manage for a bear-free zone at this site for several reasons, including the fact that unpredictable pedestrian traffic from several directions would make it impossible to safely use aversive conditioning in response to "bear trespassers." The proposed location of the fish cleaning station (p.58, par.1) will likely attract bears and be a similar management headache. 30p

e. P.65, par.3--Need more specific details on construction--equipment involved, number of crew, projected duration of projects, and timing of projects. As indicated earlier, I cannot fully evaluate impacts without this information. Also, I am concerned about the possibility that some development will occur at the Beaver Pond terrace without the eventual full removal of Brooks Camp from its present location (particularly if only partial funding is obtained each fiscal year).

6. Alternative 3

a. Why are the use limits so high under this alternative (p.68, par.4)? Most people will still be spending much of their time in the Brooks River area even though they will overnight elsewhere. 30q

b. Comments made for Alternative 2 regarding landings on Naknek beach, the shuttle system, the cutbank platform, and the locations of a new fish cleaning building and visitor contact station are also applicable to this alternative.

c. P.76, par.2--Same comments as 5(e) regarding phasing schedule.

7. Alternative 4

a. P.76, par.5--Same comment as for the other alternatives regarding the cutbank platform.

b. Given the use limits listed on p.77, par.4, there is likely no need for an additional platform beyond the 2 that already exist. 30r

c. P.87, Table 5--Why is a full research facility proposed for this alternative? Given the reductions in visitation under this proposal, research facilities should be kept to a minimum and basically consist of housing for researchers conducting studies in the immediate Brooks River area. 30s

8. Other suggestions regarding alternatives

a. Limits could be placed on the times of day that visitor activities are allowed on the river--for example, 0800-2000 h during July. Such limits have been implemented at other bear viewing sites; these limits would increase the predictability of human activities to the bears and would also provide less human-tolerant bears with a "people-free" time period. 30t

b. An alternative that would remove Brooks Camp facilities and replace



## RESPONSES

30p. The text has been amended. No bear-free zone would be enforced at the visitor contact station, except, of course, the building itself.

30q. Alternative 3 allows for 20 more day use visitors and 10 more staff than alternative 2 in July and for only 10 more day use visitors and 10 more staff in September. The reason for the increase in use limits has to do with the distance of the lodge from the river (more wait time and travel time on the shuttles), the addition of scenic hiking trails, and more time spent at the lodge. People would be spread out in this alternative though visitor use on the river would still be the major reason for staying at the lodge or campground.

30r. On the contrary, in alternative 4, the third platform would be needed because the people would have no other place to go but along the river.

30s. Not all of the research and monitoring would be focussed on visitor interaction with bears. The program for the proposed research facility is described in the text.

30t. This comment has immediate merit from an operational perspective. The experience oriented indicators on table 2 dealing with time on the platforms and in the core use area imply that some "time-of-day" limits would have to be implemented by management to enforce the indicators. These "time-of-day" limits would indeed provide predictability of human activities to the local bear population.

30u them with a campground set away from the river is lacking in this EIS. NEPA requires a full range of alternatives be considered; to remove all overnight facilities (alternative 4) is a radical leap from Alternatives 1, 2, and 3.

9. The affected environment

a. The numbers listed on p.94, par.3 should be noted as minimum counts; they do not include dependent young; these were simply counts of the number of individual animals actually seen by researchers (and the numbers presented should be referenced to their source).

b. As mentioned previously, changes were recently made in the length of the visitor season and should be clearly indicated (length of season cited on p.101, par.3; p.102, par.2).

10. Environmental consequences

a. P.106, par.1, lines 11-12 and par.2, line 6--Not all GMP requirements would be met under this alternative (see my alternative-specific comments and more general comments).

30v b. P.108, par.2, lines 9-10--this sentence implies that no bears would abandon use of the river in response to increased human activities; this implication is not supported by research conducted at Brooks River. That research documented a decline in the number of individual adult animals seen using the river during the fall, a decline that occurred concurrent with increased human activities (Olson et al. 1990, Olson and Squibb 1990, Olson and Squibb 1991, Olson 1993, Olson et al. 1993).

30w c. P.112, par.5, lines 9-10--For Alternative 1, why not establish a trail for anglers to use that would perhaps originate off the pithouse trail and lead anglers to the river on a route that cuts through the trees rather than through the marsh?--travel through the marsh could then be restricted. I have repeatedly travelled to the cutbank and oxbow via a route similar to the one described here; other rangers and anglers have done the same.

d. See previously listed comments for each alternative applicable to this section, including comments regarding impacts of additional platforms, expanded platforms, and boardwalks.

30x e. P.116, par.1, lines 5-7--Impacts on bear habitat are not restricted to the north side of Brooks River; this sentence should be rephrased.

30y f. P.118, par.4, p.124, par.3, and p.127, par.4--It is unknown whether nonhabituated bears would benefit under this proposed alternative; there are not enough data to definitively support the statement made here (also, see previous comments regarding this alternative and the general comments regarding the research committee report).

g. P.118, par.4, lines 5-6, and p.124, par.4, lines 5-6----See p.12, par. 3-4, of Appendix I to my comments.







30u. See responses 18a and 20c.

30v. This line does not imply that no individual bears would abandon use of the river in this alternative. The sentence does imply that the brown bear species would continue to use the river, their adaptability to changing situations making it possible.

30w. This comment has immediate merit from an operational perspective.

30x. The sentence does not imply that impacts on prime bear habitat only occur on the north side of the river.

30y. Obviously, hard data do not exist that document the results of proposed actions, but common sense would indicate, and all the biologists the planning team consulted with agreed, that removing all facilities north of the river would be a positive benefit to brown bears that use the river, and especially to nonhabituated and less people-tolerant bears.

## COMMENTS

Olson, Tamara Brooks River DCP/EIS Comments

30z

h. P.126, par.4, lines 6-8--Most of the alternative sites that anglers might use are already being used by guides and their clients; what of the impacts to bears at these streams?; see previous comments regarding this issue, as well as comments in Appendix I to my comments.

i. P.131, par.4--Under this alternative the number of planes that would be landing near Brooks would be reduced, there would be limited need for a shuttle, and the number of visitors would also be reduced; therefore, it is hard to imagine that Brooks would be less quiet than it would be under the other alternatives. To reduce noise even further, shuttles (to the valley I assume) could originate away from the river--people could walk to their planes.

III. Environmentally preferable alternative

1. An alternative that would remove Brooks Camp from critical bear habitat, limit visitation at Brooks River (and consider a boat system as the primary visitor transportation system), and provide, at most, a small campground set well away from the river corridor would clearly be the environmentally preferable. However, none of the alternatives presented in this DCP meet all these criteria. A parkwide river management plan would be needed in conjunction with the above mentioned suggestions for an alternative (or, for that matter, any alternative) to meet the standards specified by ANILCA regarding indirect effects (sec. 1508.8[b]).

30aa

-Page 10-

## RESPONSES

30z. See response 301h.

30aa. A parkwide river management plan is not needed in conjunction with every alternative in this plan. The Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, Sec. 1508.8(b), referred to incorrectly by the commenter as a section in the ANILCA, regarding indirect effects caused by proposed actions states that they must be reasonably foreseeable. Reasonably foreseeable direct and indirect effects for resources in the park have been considered in the environmental analysis.

REVIEW COMMENTS ON:
THE DRAFT DEVELOPMENT CONCEPT PLAN AND ENVIRONMENTAL IMPACT STATEMENT FOR THE BROOKS RIVER AREA, KATMAI NP/P, ALASKA.

by
Ronald C. Squibb
[redacted]

5 June 1994

I found the Draft Development Concept Plan/Environmental Impact Statement for Brooks River Area seriously lacking in its fundamental logic and in the adequacy of the data presented from which the reader is to understand the environmental impacts of the project.

31a The DCP/EIS proposes putting 260 people a day into a "critical brown bear habitat" (DCP/EIS p. 13) that measures only about one square mile, and undertaking a major construction project there during the season that bears use it. Yet the DCP/EIS states,

31b "The quality visitor experience is the resource at greatest risk ..." (p. 17). It then proposes a monitoring program that would evaluate whether the critical bear habitat was being adversely impacted by the selected alternative (Table 2, p. 29); yet, if bear use of the river were to be reduced to zero, that monitoring program would conclude that there were no adverse impacts.

The reader cannot learn from the document any quantitative estimates of what the likely impacts to bear use of the river or to the bears within the park might be. Even though nine years of research at Brooks River since 1982 have documented bear use in terms of seasonal, spatial, and diurnal use patterns, fish capture rates, and numbers of bears by age, sex, and behavioral classes, the DCP/EIS presents no quantitative data on bear use of the river. Further, the DCP/EIS does not evaluate the impacts of the proposed project at Brooks River as part of the cumulative effect of the ongoing impacts to bears by human use at sites throughout Katmai NP/P. Also, quantitative information and approximate dates of the proposed construction are absent. This lack of data seems contrary to National Environmental Policy Act (NEPA) Sec. 1501.2, "Identify environmental effects and values in adequate detail so they can be compared to economic and technical analyses".

I discuss these and other issues in more detail below.

Another aspect of the project that concerns me is the likelihood of it actually being carried out. Given an estimate of $27 million for the proposed alternative and Secretary Babbit's recent announcement of no new construction in National Parks, I think that the alternative which will eventually be selected and presented in the final EIS will probably never be implemented. I fear that this situation will then leave any hope of addressing

31a. The DCP/EIS proposes nothing of the sort. The total of 260 people per day in the core use area would be proportioned by a variety of experiences over an extended geographic area. Not all 260 people would be in prime bear habitat at one time. This proposed use limit is less than the number of visitors now occurring with no controls on current peak July days. The major construction proposed in alternative 2 would be well away from prime bear habitat.

31b. Two monitoring programs are proposed. One has the goal of refining the range of use limits by employing the limits of acceptable change methodology, and the other to monitor the adjustments bears make to the establishment of a people-free zone north of the river. The National Park Service would hope to reduce most human/bear interaction indicators to a zero sum every summer, this would benefit both bears and humans. To imply, as the commenter does, that zero use of the river by bears would be interpreted by the National Park Service as no adverse impact is incorrect reasoning.

the increasing natural resource impacts at Brooks River in limbo: the NPS will do nothing while waiting for funding that will never come.

Process of developing Alternatives

There is insufficient information available in the DCP/EIS to determine how the NPS derived the alternatives from existing information. The DCP/EIS progresses from statements of desired future conditions (p. 13), through a short discussion of actions common to all alternatives (p. 17), and then through a short discussion of the methodology of Limits of Acceptable Change (p. 26). Then, without presentation of any analysis, there is a list of 20 indicators with standards for each of 4 alternatives (Table 2, p. 29). Similarly, by the next page, visitor use limits are presented for each alternative with no quantitative documentation of their derivation. There is reference to the Limits of Acceptable Change indicators (Table 2), apparently those dealing with number of people per platform and area, as the basis for the use limits (p. 30). Yet structures were proposed. e.g. Cutbank platform and expansion of Falls platform, apparently without prior analysis of their impact on the natural resources.

Without more information on the derivation of use limits, the reader cannot reject alternative explanations of the decision process such as that the use limits proposed represent different approaches to allow a 10-30% increase over average July 1992 use. This explanation is reinforced by the tone of the last paragraph of page 31 which is apparently meant to placate anticipated criticism for proposing any limits at all.

31c

Impacts to bear use of the river do not appear to be a factor in deriving use limits; for, in this entire discussion through 18 pages, reference was made to only two documents and only one datum regarding bears. The proper process of decision should begin with LAC indicators and standards that describe the desired future condition of bear use of the river. (current indicators and standards fail to do so; see below) The DCP/EIS contains in its list of references citations of many of the studies that should be used to derive such indicators and standards, but it never does a synthesis of them to deduce any relevant conclusions. It seems that the necessary and appropriate compromises with visitor demand should be made only after such an analysis. The DCP/EIS fails to adequately address this issue.

Visitor experience vs. bear use

I found no justification for the DCP/EIS's statement, "The quality visitor experience is the resource at greatest risk in the Brooks River area." (p. 17). What data are available in the

31c. See response 21c.

DCP/EIS indicate visitor use is increasing at an increasing rate (Table 1, p. 4) and that one cohort of bears, non-habituated adults, are being progressively excluded (pp. 42-43). From this information, one can only conclude that the visitor experience is of sufficient quality to attract ever increasing numbers of new and repeat visitors while access to the river by bears is being adversely impacted.

31d

The DCP/EIS (pp. 42-43) quotes from Olson et al. (1990) that 1988-1989 levels of human use were excluding 45% of the bears, especially females with young, from areas below the falls when occupied by people. More recent research (Olson et al. 1993) found that extending the lodge closing date from the traditional 10 Sep to 18 Sep in 1992 resulted in a 68% decrease in use by non-habituated adults; non-habituated bears constitute 64% of the adult bears using Brooks in Sep-Oct. These data support a conclusion that bear access to the river is at greater risk than the visitor experience.

I suggest that the priority of the DCP/EIS should be redirected towards protecting and preserving bear access to a critical feeding area.

Impacts of construction

31e

The dates that construction will occur are not addressed in any detail beyond generalities. The DCP/EIS description of the construction schedule makes no reference to bears, but only to the visitor season and the lodge's operating season (pp. 55, 65, 76, *and 82*). *Much of the construction* will be occurring at or very near the river, "critical brown bear habitat" (p. 13). Olson et al. (1993) documented significant impacts on bear use of the river by the extension of the lodge operating season and associated operations in Sep 1992. Historically the NPS has carried out disruptive projects during important periods of bear use of the river; the construction of the viewing platform at mouth in 1992 continued into mid-September during the bear's hyperphagic feeding period. Given the short summer season, it is imperative that the DCP/EIS address periods and impacts of construction in much greater detail. (see NEPA Sec. 1501.2)

The No Action Alternative states, "The Falls Bear Viewing Platform ... is old and must be replaced for safety reasons." (p. 41) I recall the Maintenance Chief stating after an evaluation of the structural integrity of the platform in 1990 or 1991 that the platform could support a couple of trucks and that there was no need to worry about the ability of the structure to support the weight of 40 to 60 people. I doubt that the platform has deteriorated very much in a few years. Replacing the platform would be a major impact on the bears, given the limited construction season, and a major expense. I suggest that this



31d. The NPS proposal would remove the lodge from prime bear habitat making these data irrelevant after serving their purpose in assisting management in making resource based development decisions. The priority of the DCP/EIS does not need redirecting. It proposes 1) removing all facilities north of the river (prime bear habitat), 2) establishing use limits to stop the uncontrolled growth in day use visitation, 3) establishing a people-free zone north of the river in prime bear habitat, and 4) establishing a river corridor management strategy that respects the rights of bears and wildlife to undisturbed use of critical reaches of the river at certain times of year.

31e. See response 30l.

Squibb, Comments on Brooks R. DCP/EIS Page 4

decision to replace it be reevaluated and necessary repairs be substituted for replacement.

Bear-Human Interactions

The DCP/EIS states (p. 24) that the NPS will discuss with the State of Alaska changing fishing regulations to catch-and-release only. The NPS has authority to write special regulations that would accomplish that objective unilaterally, as the NPS wrote special regulations to reduce the limit to one-fish-per-day. I understand the NPS's need to involve the State of Alaska in the decision process, but the NPS should make a clear commitment to changing regulations if they are necessary to make the Alternatives work. As the DCP/EIS now reads on this issue, it is impossible to evaluate the impacts of the various alternatives (1) on bear food-conditioning, (2) on the number of anglers that would be displaced to other streams in the park, and thereby (3) on the resulting impacts to bear access to streams elsewhere. (see NEPA Sec. 1501.2 and 1508) A large number of people who come to Brooks in July keep sockeye salmon, many keeping several (ask the Brooks Lodge Manager how many salmon they freeze for visitors each year); these anglers will be displaced causing impacts elsewhere while reducing impacts at Brooks.

31f

Bear Access to Brooks River

Indicators and Standards. The indicators and standards presented in the DCP/EIS in Table 2, p. 29, would fail to evaluate whether the direction of the GMP (DCP/EIS pp. 6-7) or the DCP/EIS's own management objectives for future conditions (p. 13) were being met after implementation of the selected alternative.

Under the section Direction from the General Management Plan, the DCP/EIS states, "The DCP needs to address ... human intrusion into prime bear habitat, potentially dangerous interactions between humans and bears, and disruption of normal bear feeding and behavior patterns. (p. 6)" and "The NPS will strive to maintain the natural abundance, behavior, diversity, and ecological integrity of native animals as part of their ecosystems." (p. 7). The management objectives for future conditions of the Brooks River area include (p. 13), "Protect and maintain critical brown bear habitat." and "Make brown bear habitat along Brooks River accessible for bear viewing and sportfishing in a manner as safe as possible for visitors and to the degree that it does not significantly interfere with wildlife use and behavior." The indicators and standards (DCP Table 2) would fail to measure whether these GMP directions and DCP/EIS objectives were being met by the selected alternative.

31g

31f. See response 30h.

31g. See response 20a.

The indicators fail in two ways. First, they fail to provide any information on the most important issue regarding impacts of human use on the bears, i.e. bear access to critical feeding habitat. Second, the methods used in the study from which these indicators were derived (Holmes 1991 and 1992) will not provide repeatable estimates on the number of bear-human incidents occurring on the river.

If there were no bears using Brooks River, the standards for the indicators listed in DCP/EIS Table 2 would all be within acceptable levels, i.e. there would be no bear-human incidents. If NPS plans to monitor whether their selected alternative will indeed "not significantly interfere with wildlife use and behavior" and will "protect and maintain critical brown bear habitat" so that bears can use it, then they should choose some indicators that will evaluate the actual bear use of the river, and not rely on those in Table 2 which attempt to evaluate the occurrence of undesirable bear-human incidents. Counts of these incidents are not a sufficient measure of the integrity of bear use of the river.

Further, the indicators chosen would not even produce reliable estimates of the bear incidents occurring on the river unless methods different from those of Holmes (1991 and 1992) were proposed by the DCP. The methods used by Holmes (1991 and 1992) and Squibb and Holmes (1992) to collect reports of bear-human incidents in the Brooks River area were opportunistic; observers recorded incidents that they witnessed while they were involved in other duties and incidents that were reported to them by park staff, lodge staff, and visitors. As they were not based on a systematic sampling design, they cannot be expected to produce precise estimates of the frequency of these events. They produce minimum counts of incidents that will vary with the effort put into the program. For example, the annual variation in number of incidents reported in Squibb and Holmes (1992) reflected the annual variation in Resource Management staff dedicated to the effort and the enthusiasm of the Rangers in participating in the program. Reporting rates by visitors and lodge staff have different biases among the indicators in Table 2; people tend not to report things that they think will get them into trouble. The purpose of those methods was to provide management with a sample of what was happening on the river; they were not designed as a long term monitoring program.

31h

There exists a wealth of baseline data on bear use of Brooks River in terms of seasonal, diurnal, and spatial distributions of use and bear fishing success by age, sex, reproductive, and behavioral classes in the reports of Beattie (1983), Warner (1987), Braaten and Gilbert (1987), Olson et al. (1990), Olson and Squibb (1990 and 1991), Olson et al. (1993), and Olson (1983). A monitoring program that was based on these systematic studies would provide the NPS a reasonable evaluation of the

31h. The monitoring program for bear use on the north side of the river would borrow from this "wealth of baseline data" just as the DCP/EIS did, but it must be recognized that, with the removal of all facilities north of the river, establishment of a people-free zone north of the river, river corridor management, and daily use limits, the conditions under which those baseline data were gathered will no longer exist. See response 20a for an explanation of why no indicators measuring bear use on the river were included in the suite of indicators.

## COMMENTS

Squibb, Comments on Brooks R. DCP/EIS Page 6

stated objectives of the DCP/EIS vis-a-vis the selected alternative. The indicators and standards presented in DCP/EIS Table 2 fail to do so.

New indicators measuring bear use of Brooks River should be added to the DCP and standards appropriate to the NPS's vision for the various alternatives determined. As the LAC indicators and standards in DCP/EIS Table 2 serve as the basis for the various alternatives (DCP/EIS p. 30, ¶ 2), new analyses must be performed to determine if the current alternatives would allow bear access according to the new standards.

31i

Closures
The DCP/EIS (p. 24) proposes seasonal closures of sections of the river to people (except for those on platforms) at
1. Brooks Falls to Oxbow (Falls & Cutbank) during July, and
2. Oxbow to river mouth during mid-Sept through Oct.
The area descriptions are vague and not illustrated on any map; it is not clear whether either closure includes the Oxbow. The Oxbow is an especially important fishing area for bears during the fall; bear use and fish capture rates have been consistently high there (Olson and Squibb 1991).

31j

The rationale for times and places of closures are cursory. The DCP/EIS presents no analysis and makes no reference to the five years of research that documented the relative importance of the different sections of the river to bears in terms of hours bears spent in the areas and their fishing success in them (Olson et al. 1990, Olson and Squibb 1990 and 1991, and Olson et al. 1993, and Olson 1993). Given the wealth of information available, the public deserves some presentation of it. (see NEPA Sec. 1501.2)

31k

I understand the rationale for closing the Cutbank during July. The Cutbank is an important area to less competitive bears and to females with young during July. However, I do not agree with the DCP/EIS's choice for a closure during the fall.

The Cutbank also provides unique fishing opportunities to non-habituated bears (more than 50% of the adult cohort at Brooks (Olson 1993)) during Sep-Oct because they are largely excluded from waters closer to Brooks Lodge by the concentration of human use there (Olson et al. 1990, Olson and Squibb 1990 and 1991, Olson et al. 1993, and Olson 1993). From 1988 through 1991, the Cutbank area accounted for 41% of bear fishing hours on the lower river in Sep-Oct; the mouth accounted for only 22%, with the Oxbow accounting for the remainder (Olson and Squibb 1991). If the lodge were not moved, the Cutbank would definitely remain an important fall feeding area for non-habituated bears. If the lodge were moved or removed, it is unknown how long it would take for non-habituated adults to adjust to using the mouth. The continued airplane traffic off the mouth of the river may be

31l

## RESPONSES

31i. The text and maps have been clarified on these points.

31j. See response 30g.

31k. The cutbank would not be included in a fall river closure.

31l. If the lodge were removed, the airplane traffic at the mouth of the river would also cease. In alternative 4 tour boats and floatplanes would be pulling up to the Naknek Lake shoreline somewhat south of the river mouth, but nonetheless, in a well established bear travel corridor. Since a gravel airstrip was rejected early in the planning process, all access, at some point must cross a shoreline bear travel corridor.

sufficient to exclude many of these bears.

These details should be addressed in the DCP/EIS. It is especially important to address the Cutbank because it is an area important to bears as a feeding area with periods of low human use during some parts of the day, and an area sought after by sport anglers for the excellent rainbow trout fishing there in Sept-Oct. The DCP/EIS should provide adequate detail for the public to compare the importance of the Cutbank to the bears against its value as a sport fishing area, particularly since it is an area of contention between an influential user group and the resource.

The potential benefits to the natural resources of possible closures of other areas should also be addressed. The NPS facilities on Brooks Lake and the road to Brooks Lake impact bear access to Brooks River similarly to the present location of Brooks Camp on Naknek Lake. The east and south shores of Brooks Lake are a major travel corridor for bears moving between Brooks River and the salmon spawning streams of Up-a-tree Creek, Hidden Creek, and Headwaters Creek; this fact is evinced by the heavily travelled bear trail going south from the Superintendent's house.

31m The EIS should address whether the small percentage of days that planes cannot land on Naknek Lake is sufficient justification for maintaining this impediment to bear access to Brooks River. Removing these facilities and the road would substantially reduce the "footprint" of development in the area. Requiring visitors to take a bumpy boat ride or perhaps not travel at all on a few days seems reasonable given the objectives of the DCP, particularly for some of the Alternatives. The EIS should present an analysis of the number of days landing at Brooks Lake is actually required against other options of an earlier Lodge closing date (many of the days of strong east winds are during September), providing commercial boat access to Brooks Camp from Lake Camp, or simply inconveniencing a relatively small number of visitors.

31n Environmental Consequences
DCP/EIS Part Four: Description and Environmental Consequences of the Proposal and Alternatives (p. 105) provides no quantitative estimates of the impacts of the proposed alternatives to bear use of the Brooks River. Given the nine years of baseline data on bear use of the Brooks River, quantitative estimation of those impacts can be done. Again, there is not adequate detail for the public to compare the environmental impacts among the various alternatives. (see NEPA Sec. 1501.2)

31o Lodge Closing Date. The closing date of Brooks Lodge was extended in 1992 from its traditional date of 10 Sep to 18 Sep. Olson et al. (1993) documented a 68% reduction of use by a cohort of bears constituting 64% of the adults using the river. Anticipating these sorts of impacts, Katmai NP/P found in their

31m. See responses 30d and 30e. Not getting people in and out of Brooks "on a few days" out of a 100 day season would not be fair to the visitors or the concessioner.

31n. See response 21c. The National Park Service normally does quantitative estimates of acres of disturbance by proposed development, or acres of habitat modified by development, but quantitative estimates of impacts at the population level, or, as the writer infers, at the sub-population level are almost never done. Besides, as mentioned before, the situation under which the baseline data were gathered would have been substantially changed (for the better regarding bears) by the proposed actions removing most of the human influence from prime bear habitat.

31o. See response 30m. The lodge closing date is a moot point when regarding bear management if the lodge is not in prime bear habitat.

## COMMENTS



Environmental Assessment of 1985 (Jope 1985) that extension of the operating season of Brooks Lodge beyond 10 Sep would be an unacceptable adverse impact. I am not aware of what information the EA for the 1992 extension presented to justify reversing the 1985 decision.

How late the lodge operates into the Sep-Oct hyperphagic period of bear feeding is a major source of impacts. The availability of salmon to bears at Brooks River ends by late Oct or early Nov; the only remaining source in the Naknek drainage by that date is the Savonoski River (Troyer 1980). The period of unrestricted access for bears to this source of food should not be progressively reduced by periodic extensions of the visitor season.

As the DCP/EIS "is a comprehensive proposal for all aspects of future management and use of the area, including visitor use, management of natural and cultural resources, operations, development and interpretation programming" (DCP/EIS p. 17), operating seasons should be described in detail for each of the Alternatives. Otherwise, their environmental impacts cannot be sufficiently understood to evaluate them. (see NEPA Sec. 1501.2)

Cumulative Impacts to Bear Population

31p The DCP/EIS (p. 42) quotes from Olson et al. (1990) excerpts "particularly relevant to understanding the existing conditions of brown bear utilization of the Brooks River Area." The first excerpt states, "Planning and management for growth in visitation at Brooks River should recognize the implications of loss of [bear] access to this resource." Unfortunately, the DCP/EIS does not do so. There is no analysis of the relative importance of Brooks River to bears within the Bristol Bay drainages of Katmai NP/P or of Brooks within the whole of Katmai NP/P. Several studies contain information on the availability of salmon for bears at streams within the Bristol Bay drainages (Troyer 1980), on bear density in comparable habitat (ADF&G density estimates from Black Lake area), on bear use of other streams (Olson et al. 1990, Olson and Squibb 1990 and 1991, Smith 1993), and on the impact of human use on bear use of Brooks River (e.g. Olson et al. 1993, Olson 1993). Other resources exist.

31q A detailed analysis of the importance of Brooks River to area bears is possible. Best estimates, however crude, should be made of parameters that would describe its importance, e.g. what proportion of bears in Bristol Bay drainages and of the park as a whole use Brooks River, how many bear-caught fish the river currently generates and how many it could generate in the absence of people, the significance of that food source to the bears' annual food requirements, etc. (see NEPA Sec. 1501.2)

## RESPONSES

31p. The DCP/EIS does recognize the implications of loss of bear access to the river. See response 31d.

31q. A detailed analysis of the importance of Brooks River to the local population of bears would be possible to present, but is not necessary to the plan. The importance of the area to the local bear population has already been recognized, and is in large part, why the National Park Service is involved in this planning effort. Neither is it necessary to present estimated cumulative impacts on bears of human use on the river; management has already determined that human use, influence, and impacts cannot continue on this upward trend. The plan does consider cumulative impacts to the local bear population under each alternative, especially as they relate to the removal of all human influence north of the river. The plan does not estimate what the numbers of bears and population structure would be like under each alternative. These are unknown, but the plan does call for a monitoring program to learn how the people-free zone would be used by the bears.

More importantly, an analysis should be presented in the DCP/EIS that estimates the cumulative impact on bears of human use at Brooks River as a part of the total of all cumulative impacts to the bear sub-populations using streams within the Bristol Bay drainages of Katmai NP/P and within Katmai NP/P as a whole. Otherwise, the public cannot really understand the impacts of these alternatives on the world's largest protected bear population. (NEPA Sec. 1508 requires the EIS to address "reasonably foreseeable" direct and indirect effects, including those occurring at other places)

31r

The argument that the bears displaced from Brooks River can feed somewhere else is not valid given current levels of visitor use at other bear feeding streams in Katmai NP/P. Sportfishing, bear viewing, and lodges are impacting bears on critical feeding streams throughout Katmai NP/P. It is not simply a question of several bears being displaced from Brooks River; but one of several being displaced from Brooks River, several from Funnel and Moraine Creeks, several from Nonuktuk Creek, several from Kulik River, several from Swikshak River, several from Big River, several from Kashvik River, etc. The cumulative effect must be addressed.

Brooks River is a prime example of a pattern of adjustment that bears appear to go through as human use increases in their critical habitats. Human use of salmon spawning streams inevitably displaces some bears; these bears, in turn, displace less competitive bears from other areas. The least competitive bears in the region may then be left with no alternative but to try to fish areas where humans are. Subadults and adult females, especially with young, are the classes most likely to be forced to use habitat occupied by people (Miller and Chihuly 1987, and Mattson et al. 1987 and 1992). These bears are then more likely habituate to the presence of humans (see McArthur-Jope 1983, Nadeau 1987, Mattson 1990, Albert and Bowyer 1991, and Mattson et al. 1992), and thereby are predisposed to becoming conditioned to humans as an alternative source of food, e.g. garbage, fish and game carcasses, and poorly secured caches of meat, fish, and human food (Herrero 1985 and Mattson 1990). Herrero documented that food-conditioned bears are more likely to aggressively seek food from people, to damage property, to be involved in incidents resulting in human injury, and to be destroyed in defense of life and property. Mattson et al. (1992) concluded that this process is exacerbated by years of reduced availability of natural foods. Miller and Chihuly (1987) predicted that the proportion of non-sport kills will rise relative to the sport harvest as human use increases in remote Alaska.

In an unhunted population with protected habitat, such as Katmai NP/P, the population should be at carrying capacity. Therefore, it cannot be assumed that bears displaced by human use can go some place else to feed. By the process described above, the

31r. Bear displacements from streams in the park other than Brooks River are not a concern of this DCP. Various park resource management plans must address this issue. By creating unobstructed access to the entire north side of Brooks River, and managing the times and places anglers may fish during periods of heavy bear use on the river, and by limiting the number of visitors in prime bear habitat, the National Park Service would be providing far better conditions on the river for bear use than occurs now. It is not likely that bears would be displaced from Brooks River because access conditions improved for them.

## COMMENTS

Squibb, Comments on Brooks R. DCP/EIS Page 10

least competitive bears will be under strong pressure to feed in habitat occupied by humans. The observations of Olson et al. (1993) and Olson (1993) at Brooks River agree with this model: as the non-habituated adults have been progressively displaced from the river by increasing human use, subadults have replaced them. Some of these subadults continue to use the river after they mature into adults, and contribute to the growing cohort of habituated adults on the river.

Thus, to the naive observer there appear to be no impacts because bears (subadults mostly and a few habituated adults) and people are fishing the river together. In September 1992, a Kodiak commercial fisherman watching bears in the mouth of Brooks River commented that bears in Katmai were smaller than those on Kodiak. We explained that that was not the case and that all he was seeing were two and three year old bears. We suggested that if he were to wait long enough, the one habituated large male might come along.

The NPS's intensive management at Brooks River reduces the proportion of bears, usually subadults, that become food-conditioned. Unfortunately, this is not the case for habituated Brooks bears that wander out of the park and for Katmai bears that use other popular recreational streams where there is little NPS presence (e.g. Funnel and Moraine Creeks, Nonuktuk Creek, Kulik River, Kashvik River, Big River, Swikshak River).

31s

At Brooks River and other streams throughout Katmai this process of displacement, habituation, food-conditioning, and potentially non-sport kills is ongoing. Beyond the eventual destruction of some bears, this process is fundamentally changing the composition of the bear population from one of wilderness bears that are shy of people to one of habituated and food-conditioned bears whose interactions with people often lead to conflicts. This process is contrary to the direction from the GMP cited by the DCP/EIS (pp. 6-7). "The DCP needs to address ... human intrusion into prime bear habitat, potentially dangerous interactions between humans and bears, and disruption of normal bear feeding and behavior patterns." (p. 6) "The NPS will strive to maintain the natural abundance, behavior, diversity, and ecological integrity of native animals as part of their ecosystems." (p. 7) The DCP/EIS should address the impacts of its alternatives on this process at Brooks River as a cumulative impact on the bear population of Katmai NP/P as a whole.

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## RESPONSES

31s. NPS management does strive to maintain ecosystem integrity. The proposals in the DCP would enhance the river conditions for the bears and for park visitors. However, with a continued human presence at Brooks River, some habituation and food-conditioning by bears that frequent the area will continue. This fact is understood by NPS management and is a valid assumption common to all alternatives. With less than 100 of the estimated 2,000 bears resident in the park using the Brooks River area over the course of the year, a numerical argument that improvements to bear access along the river and better control of human use along the river will have a negative cumulative impact on the park population as a whole is just not valid.

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Superintendent
Katmai National Park
PO Box 7
King Salmon , AK 99613

April 19,1994

THOMAS COOK C & I S CONVENTION & INCENTIVE SERVICES
100 CambridgePark Drive
Cambridge, MA 02140-9104

Dear Sir :

Thank you very much for your courtesy in sending me your most recent proposal for Brroks River Area . I made my first trip to Brooks Lodge in 1958 and have been back every year since so I feel I have some input that might be of interest to you.You may also note that I am sending my copy to Congressman Peter Torkildsen and asking him to relay my comments to any of his fellow members who may sit on the committee involved with the funding of NPS projects.

With 35 plus years experience at Brooks I can certainly greatly appreciate the problems you are currently faced with.Over the years , especially the past ten or so , there has been a huge increase in bear activity and with tourist/fishermen activity. For the last few years ,my time at Brooks runs earlier and earlier into June and this year my dates are June20-24 , prior to the invasion of bears and pepple.

There truly is no solution to the problems at Brooks - unless one were to follow your suggestion in Alt. 1 to 4 which would cost taxpayers like me anywhere from $ 15,991,000 to $ 28,776,000 extra above current operational costs. It would also totally put out of

32a

business the Peterson family , pioneers in Alaska whose energy, money and foresight developed Brooks Lodge since no way can they afford the extra $ 3,000,000 plus concessioner costs shown in your charts.I would imagine that when they hire any top lawyer and sue for damages , any court in Alaska will award them huge compensatory damages.

The NPS is a government body. Like any and all government bodies , your main intent is to up your budget since that means bigger salaries for all staff. Increasing costs and staff at Brooks is NOT the right solution.

Long times like myself , Don Nuttall ( now deceased) , Bill Fredendall, Tom Hempel and others have all met and discussed our ideas with NPS staff.Starting back about four years ago , it was obvious to all of us that NPS did not care at all about our input and the decision had alreay been made to solve the problem the NPS way - throw more tax payers money around.

32b

One of our suggestions was that daily fly ins to Brooks be sharply limited and length of stay at both Brooks Lodge and the campgound be shortened to staays of just maybe 3-4 nights.This would allow more people to enjoy the area.The fly in restrictions would remove a major part of the problem.When the reds are running , as many as 22 planes can be parked on the beach.At 4 anglers per plane that adds 80 fishermen to those already in house at Brooks Lodge and that's too many people.Further , the fly-ins are all paying from $ 500 to $ 750 per day at their camps and they want to catch - and kill

Thomas Cook

32a. The plan states that "it is also anticipated that the government would be required to subsidize the concessioner's relocation in order for it to be feasible".

32b. Day use limits and limits on overnight use are proposed in the plan. The length of stay at the campground is now limited, and would remain so under the proposed action. No limit on length of stay a Brooks Lodge has been discussed with the planning team.

- some fish.They start at the area up around Brooks Lake, get into their first salmon whereupon the guide waits to collect four fish before he walks back to the fish house with them .Meanwhile ,bags of fish sit on the bank where the bears can smell them-Soon bears realize - fishermen = bags= fish dinner ! The rights on the American River are very tightly controlled to avoind over fishing and the same can and should be done at Brooks River

I fish quite often at the area we refer to as the swallow bank- an area that over the past several years has had some excavations going on by a team of archeologists.I was surprised to read your comments on this area since the actual researchesr told me they have not found any thing unusual !

I don't believe the taxpayers will go along with your request to build a new NPS kingdom at Brooks and spend millions of dollars. Enforcement of current fishing laws ( it is illegal to keep snagged fish yet almost all snagged fish are kept by anglers ) ; more ranger presence on the river ( last year you only had one pair of chest waders for the whole staff ) ;limiting number of fly ins and making all personnel and visitors to the area fully aware of the bear danger can solve the current problem at little or no added cost.

Thank you for taking the time to read my missive. I am also writing to Trout Unlimited / Fly Fisherman Magazine / Rod and Reel Magazine / The Anglers Notebook newsletter / and Leigh Perkins at Orvis.

Cordially yours ,,

Don Kimel

[redacted]

20 April 1994

THOMAS COOK
C & I S
CONVENTION & INCENTIVE SERVICES
100 CambridgePark Drive
Cambridge, MA 02140
Telephone (617) 547-1399
Fax (617) 349-1095

Congressman Peter Torkildsen
PO Box 395
Danvers , MA 01923-9989

Dear Peter :

Joan and I want to thank you for including us on all your invitation lists for your various meetings. We have been on the go a great deal with trips to London / South Africa / Hawaii and Thailand so have been unable to attend but hopefully can catch a future one.

Newt Gingrich sent out a very fine letter about you and your accomplishments and needs and I am enclosing a check from us and can assure you there will be more to follow .

I also am including a tome from the NPS on a project they are pushing that really rubs me the wrong way . They want to take anywhere from $ 15 to $ 28 million dollars of tax payers money for a foolish project in Alaska .I would very much appreciate it is you can have one of your staff look this over and send it on to one of your counter parts who may be involved either on the NPS appropriation committee or one of the conservation committees.

What especially concerns me is that NPS is making a strong move to totally put the Peterson Family (Ray Pterson ,Sr. and his son) out of business.Ray Peterson is a true pioneer in Alaska. Back in the 59's , Ray add his partner , John Walakka ( now deceased) set up lodges in several remote areas of Alaska.These were the very first Alaska fishing lodges and Brooks Lodge was built in 1950. They have poured countless hours and money to develop this area and now NPS wants to take it all away.

Can we really afford spending this type of money ? This reminds me of a quote attributed to , naturally , a past democratic legislature that goes " you drop ten million here and ten million there and eventually it adds up to some mmney ! " Let's not drop that first ten million.

Thank you for taking the time to read this over and anything you can do will be appreciated.

Best personal regards,

Don Kimel

[redacted]

Thomas Cook

KEITH W. GRESSER
[redacted]

April 19, 1994

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska 99613

*Subject: Development Concept Plan - Brooks River*

Dear Sir:

I first visited Brooks Lodge in 1973 and when I return in June of this year it will mark my 22nd visit. I have carefully read the subject plan, and I am deeply concerned over the future of the Brooks River area.

Consider that man has occupied the present lodge area for thousands of years and so have the great brown bears. Many, many generations of these bears have known that man lived there and have generally stayed away. Development has already impacted any archeological value of the site. Why move now?

The highlights of any visit to the lodge have to be the magnificent view across Naknek Lake to the rugged mountains beyond the terminal moraine, especially in the early morning and late afternoon, and also the viewing of the endless parade of wildlife, as seen in the oxbow area and along the river from the bluff in front of cabins 25 and 26. Shuttle buses simply will not get it done!

Over the years I have seen an astronomical growth in the number of visitors to Brooks. The capacities of both lodge and campground have not increased. Therefore, the growth in the number of visitors is entirely due to day use tourists and fishermen. There has been a great proliferation of fly-out fishing lodges throughout Alaska and especially in the Bristol Bay area. These lodges can deliver large numbers of anglers to the river at Brooks. The numbers vary greatly from day to day, but in June of 1984, I counted 24 aircraft on the beaches at Naknek and Brooks Lakes.



33. Comments noted.

Counting fishermen, guides and pilots, that meant about 140 people in and along the river where the bears feed. Add to this the 30 or so anglers from the lodge and campground, and the total becomes 170 people along 1.5 miles of river. Very dangerous!

If a system of daily permits can be put in place, that will limit the number of fly-in anglers to the same number as the overnight anglers, ~~and~~ the problem will be solved. Keep in mind that fly-out lodges can take their guests to many other wonderful fishing holes.

You can easily see that I strongly favor the adoption of Alternative Number 1. Please don't move the lodge, and do restrict the number of day-use anglers.

Sincerely,

Keith W. Gresser

KWG:eda/pm

## COMMENTS

20 April 1994

Team Captain
Brooks River
DCP National Park Svc.
Po Box 25287
Denver, Colorado 80225

Dear Sir,

Please add the following commemts to your consideration of any planned changes at the Brooks Range Campground.

I have been to the Brooks Camp several times. I have boon on the river, on the lakes and to the archaeological site several times.

The Brooks Camp is very well managed, always demonstrating a strong concern for the welfare of the area, including their customers and the bears. If it were not for such places as this Camp, a large number of people would never be able to visit such a place. Many are just not able physically to do the "tent" scene,but rather, depend upon places like the Brooks CAmp for our wilderness experiences. It provides a good "jumping off" place for those who wish to back-pack into the wilderness areas.

It appears to me that the Park Service admits to the increase in bear population of the area, so the conclusion can be made that the Brooks Camp location is not a hinderance to the life of the bears. The fact that the only people/bear serious incident involved a Park Ranger should not have anything to do with the Brooks Camp and it's location. I don't see the connection. My opservation has been that "some" Park Rangers I;ve met think that the bears won't bother them, because they are vegeterians. (Not very bright).

The Brooks Camp has been in operation for a lot longer than the Park Rangers out there. The camp operators have a whole lot more professional experience than the Park Service people. I'm inclined to credit theie opservations and recommendations over some Ranger that spends a couple weeks or even a couple years out there, then proclames himself an expert. The camp operators are the experts. Ask them!

Sincerely,

Owen F. Saupe

[redacted]

CC: Katmailand
Sen. Stevens
Rep. Young & Murkowski

## RESPONSES

34. Comments noted.

Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, Alaska
99613

23 Apr. 1994

Dear Superintendent:

Thank you for allowing me and other like myself to comment on your Development Concept Plan and Environment Impact Statement for the Brooks River area. It is obvious a great deal of time, effort, and expense went into this document. You have done an excellent job with this document.

If the decision was mine alone to make I would go with a somewhat revised Alternative 1.

I am firmly against any new construction and in favor of upgrading older facilities such as water, sewage, electrical and fuel oil systems.

In addition, I am for limiting visitation. If older facilities are upgraded, and visitation is limited, there should not be a need for new construction. And please, PLEASE, do not build a boardwalk from camp to the narrows. The new bear viewing platform at the pontoon bridge is bad enough. *The idea here is to maintain the natural beauty of the area and with* all this new construction planned, it can only serve to detract from it.

Another object of the exercise is not to disturb the wildlife's habitat. By building anything new you surely will disturb the habitat.

If you allow too much building and too many tourists, that will unquestioningly impact the area's wildlife. What you may end up with would be a Yellowstone Park on a smaller scale.

As a fisherman, my number one priority is fishing, with viewing the wildlife a close second. I stay at Brooks Lodge and upon arrival I receive the "Beach Speech" with the rules of the area. I endeavor adhering to them. Many fly-in fishermen do not get the "Beach Speech" and many that do disregard them as it will not affect them later. For those of us who plan on returning year after year will definitely affected. Unfortunately there are not enough park personnel to police the

35. Comments noted.

entire area all the time. I fear the fly-in fisherman give us all a bad name. I am not saying I have never broken a rule but I sure try to stick to the rules as most people who stay in Brooks Lodge do. Severely limiting fly-in fishing would go a long way towards alleviating fisherman related problems in addition to curbing visitation.

Another problem are photographers. When they see a bear many times they move closer to get a better picture instead of moving away. This poses a real problem.

Foreign visitors present a language problem and campers present their own set of problems. I do not have suggestions regarding problem solving for the photographer, foreigner, or the camper, however I have e few simple ones for the angler.

In summation, this June will be my 12TH consecutive year staying at Brooks Lodge and fishing the Brooks River. I hope to continue fishing there for at least another 12 or more years. By reducing visitation to levels averaging 1985-1990 figures there would no longer be a need for additional construction. Upgrading existing facilities would suffice. As much as I would hate to see it, I would much rather have the "Brooks River Area" closed to humans, than to see this magnificently beautiful area destroyed by over-construction and/or overcrowding.

Yours Sincerely

Tom Hempel

[redacted]

cc. Larry Norris
Planning Team Leader
N.P.S.
Denver Service Center
Denver, Co. 80225-0287

April 26, 1994

Superintendant
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Sir:

After reviewing the Draft Development Plan for the Brooks River area, I would like to offer some comments.

Having visited this area on previous occasions, I would like to see the area remain the same. However, as the plan points out, the area cannot take the increased pressure that is being placed upon it. Change seems to be inevitable. Bears, prehistoric man as well as all the subsequent Brooks River camp visitors have fished along side one another and I would like to see this continue by having catch and release fishing only but leave area open to fishing all season.

Impacting over 100 acres as in alternative 2 or alternative 3 and allowing 260-290 people per day is not acceptable. It might help commercial interests but not the environment. Excess use by day visitors from other lodges and cruise lines has increased the problems that are now occuring.

Alternative 4 impacts the least area and allows the least amount of visitors per day and I feel is the best choice for the area.

I would like to continue to be informed as to the action that you are going to take in this regard. Tough decisions, commercial interests might not be happy, but the bears might be.

Thank you for taking time to read these comments.

Sincerely,

Eugene Green

[redacted]

36. Comments noted.

April 27, 1994

Bill Pierce, Superintendent
Katmai National Park
Post Office Box 7
King Salmon, Alaska 99613

Dear Mr. Pierce:

Welcome to your new position as Katmai Superintendent. I am sure you will have an interesting and challenging job ahead of you.

I am sending you with my compliments, my book River of Bears. It may be of special interest to you because the State sanctuary is your neighbor and draws many of its bears from Katmai.

Having spent many happy summer days at Katmai in the 60's, 70's, and early 80's, I have a fondness and regard for the park and its wildlife. I have NOT been back since 1986, mainly because I think the photo tour groups and fishing guides have greatly diminished the quality of the Katmai experience.

It is my fervent hope that under the Development Concept Plan, sport fishing on the river can be totally eliminated. Anglers and bears do NOT mix. I support the total removal of all human development on the North side of the river. The people-free zone on the North side will go a long way to improving the situation for both visitors and bears. I heartily support Alternative Four which designates the area as Day Use Only.

I am quite hopeful that you will work towards improving relationships with the photographic community. In my judgement your predecessor only exacerbated a "them vs. us" attitude that seems to permeate some sections of park service. There also seems to exist a double standard in that park service employees ignore certain standards that the public is held to.

I fully support your regulation that prohibits close approach to bears but sometimes all the hollering and posturing by rangers that goes on at Brooks River whenever a bear gets closer to someone than 100 yards is absolutely unnecessary. I am hoping common sense combined with knowledgeable rangers will alleviate some of the panic attacks.

Sometimes the rangers are worse than the visitors in pushing bears. A bear named "Sister" that had to be destroyed for approaching people and stealing their fish is a classic example of food conditioning. However, one certain ranger that was employed there in the 70's was responsible, in part, for Sister's death because he made her his personal "photographic model." She behaved differently towards him, and his shotgun and camera, than she did other visitors.



37. Comments noted.

## COMMENTS

"SAVE A MOOSE, DROWN A RANGER," read the bumper sticker popular in Alaska in 1981. *In September 1980, during a* Park Superintendent's conference at Brooks Camp in Katmai National attended by most high level National Park Service administrators in Alaska, two upper level staffers - Roy Sanborn and NPS photographer Bob Belous - saw a bull moose swimming in the Lake. *Approaching* the moose in a boat to photograh it, the two men panicked the moose into deep water instead of toward shore. They continued to pursue for pictures. The moose drown.

Subsequently an effort was made to cover up the tragedy, staff eyewitnesses say, until maintenance man Jeff Moody threatened to go public with the details. The following "investigation" failed to find fault and no citations were issued because the harrassment was "unintentional".

For many years I believed that that was the low-point of the "bad old days." Early winter of 1992 brought me unsettling information. A photographer at Katmai had been warned repeatedly that he was too close to bears. He likely deserved the warning. While I believe he may have been in the wrong, what happened next was equally wrong. He soon saw the ranger that warned him, lead personal friends of the ranger right up to a bear for photographs. This incident was independently witnessed. This same ranger then was later seen photographing people and asking for model releases, the technique of a *professional* photographer.

Also in 1992, as in previous years, I heard that your predecessor was writing letters to various photographers and publications that displayed Katmai bears in full frame. He complained about the pictures and said that these pictures may have been taken in violation of Katmai regulations. Some of these pictures were taken by Michio Hoshino TEN years before publication and well before the distnace regulation at Katmai was established. (None of the pictures were mine by the way, nor did I get any letters.)

These incidents from Katmai are disturbing for several reasons. The ranger's actions again raised the issue of a double standard, and conflict of interest. If you view a listing of all the books published on Alaska's National Parks, the vast majority are written by current or former park service employees. Hirschman, McIntyre, Heacox - the *list goes on and on*. Some of these books, specifically Hirschman's Lake Clark book and McIntyre's bear book, could not have been accomplished without special access, support, and assistance provided through park service employment. In fact my book, Denali Journal, is one of the very *few* books published on an Alaskan park by an independent person unassociated with the park service. A lot of people, right or wrong, question the motivation behind some park service regulations.

## RESPONSES

An example: Recently I called Katmai and spoke with acting superintendent Rick Potts. I asked him if he knew of a book titled Brown Bears of Brooks River. He said that he did. I asked if he had any comment on it. He had none. I re-phrased the question and he responded that he had no problem with it. I told him that obviously some of the pictures in the book were taken at very close range. I wanted to know if he, or his former boss, had written a complaint letter to the authors. They had not. He also stated that "if you have any proof that the photos were taken illegally...". My next comment was that that did not previously stop the Katmai staff from writing others about their pictures. The Brown Bears of Brooks River was written and photographed by park service employees or contractors. Curious, to say the least.

Mr. Pierce, I am not accusing anyone of wrong doing or anything else. I am merely pointing out to you a few of the undercurrents one hears regularly about Katmai. The growing chasm between the public and park service in Alaska greatly troubles me. We all have the same goal in mind, protecting these wonderful treasures while at the same time allowing their use and public enjoyment.

My fervent hope is that you will be able to visit McNeil River quite soon and see how bears and people get along there. Bears passing within feet of people without any problem. Of course, fishing is tightly limited and food conditioning unknown. McNeil might serve as an example of what Brooks might become under Alternative four.

My best to you, sir, and I wish you the best at Katmai.

Sincerely,

Tom Walker

Tom Walker

CC: regional Director

*Primary Care Associates*

BRUCE J. KIESSLING, M.D.
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KATMAI NATIONAL PARK & PRESERVE
MAY 6 1994
KING SALMON, AK

May 1, 1994

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska 99613

Dear Sir,

I would like to thank you for the receipt of the very detailed draft and development concept plan and environmental impact statement revolving around the Brooks River area in the Katmai National Park and Preserve.

My family and my five associates at Primary Care Associates in Anchorage have thoroughly enjoyed the Brooks River area in the past and will wholeheartedly indorse alternative number two, the proposed Beaver Pond Terrace relocation. I think this would be in best keeping with all of the interests of those of us who had the experience of enjoying the Brooks camp in the early 1980s prior to its rapid commercial growth.

Again, I would like to thank you for allowing us to have input into this environmental impact statement.

Sincerely yours,

Stanley N. Smith, M.D.
SNS/slm



38. Comments noted.

## COMMENTS

Mike Sterbis
[redacted]

Dear Sirs:

I am writing to comment on the Brooks River Area Development Concept Plan/Environmental Impact Statement. I have read this document in its entirety and would like to voice my strong support for the proposal to remove the existing facilities from the north side of the river to an alternative site. In particular, I would strongly agree with limitations on day use of this area for the reasons stated in the document.

As a fisherman, I support changing the fishing regulations to catch and release fishing only. I also agree that closing the river during July and again in mid-September would benefit the bears and still allow sport fishing in this unique river.

I understand that Beaver Pond Terrace is the intended site for the new facilities. My only disagreement with the plan is that I think the Iliuk Morraine Terrace would be a much better site. I say this primarily because some of the most beautiful memories I have of Katmai involve looking over Naknek Lake at the mountains. These views would be much more accessible at Iliuk compared with Beaver Pond, and I really feel our grandchildren would be glad we spent an extra $1.4 million to place the facilities at a more beautiful location.

39a Lastly, I have a suggestion. How about a ban on lead fishing sinkers like the one Yellowstone National Park has. This is surely the wave of the future and would be consistent with the other changes proposed to benefit wildlife in the vicinity of Brooks River.

Sincerely,

Mike Sterbis

## RESPONSES

39a. This suggestion has been referred to park management for consideration.

David L. Willard
[redacted]

9 May 94

Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

This letter is in response to the brooks River Area Draft Development Concept Plan Environmental Impact Statement, dated April 1994. First and foremost I wish to applaud the proposed actions to be taken at Katmai National Park. During the past several years I have spent at least a week at Katmai during different parts of the season and noticed several things which, I believe, needed to be addressed. First, the limited number of park ranger were unable to monitor the actions of humans. Often times this resulted in avoidable encounters between humans and bears. People were given access to areas which were not monitored due to the limited Park Service Rangers available. Second, the campground (which is where I stay) is too often used by the bears as they made their way to and from the river. Third, people tended to stray from designated trails, being insensitive to the environment around them. This again, often times resulted in avoidable human/bear encounters.

Katmai is a unique wilderness area, matched only by a few other areas on earth, that is why I am opposed to Alternative 4. By making the Brooks River/Katmai Area a "day-use only" I believe the commercialization would destroy this unique area. Another aspect of Alternative 4 I am opposed to is the idea of allowing only primitive camping.

Alternative 2 or 3, I believe are suitable options. I am strongly in favor of removing all facilities from north of the river and establishing a "people-free zone." This would allow the NPS to better control people, while saving fragile bear habitat and archeological sites which now are inhabited by Brooks Lodge and other facilities north of the river.

Alternative 2 at Beaver Pond Terrace is the best of the four proposals. This is mainly because it allows access to the river without the use of the shuttle service. I am an avid fly fisherman and appreciate the accessibility to the river Alternative 2 affords me. I also agree with your statement concerning anglers being the most intrusive human activity while bears are in the area. For the safety of both angler and bear, I am in favor of closing the lower river to anglers during peak bear periods. If this does not help the situation, eliminating angling on the entire river during peak bear periods may have to be considered.

## COMMENTS

40a

Another option not discussed in your draft proposal is the establishment of a larger campground without the presence of a lodge and related facilities on the south side of the river. This stand alone campground would only need shower facilities and a small management/support staff. However, I am a realist and know the lodge is a money maker; people really do not want to experience nature without all the comforts of home.

These are just a few of my views on the proposed Katmai Development Plan. Continuing the current situation at Katmai is unacceptable because it is damaging fragile bear habitat and archeological sites north of the river. Please keep me informed concerning your future plans for Katmai. I enjoy my yearly vacations to the Katmai area and look forward to continued enjoyment in the future.

## RESPONSES

40a. See response 20c.

JAMES H. STREET, ESQ.
[redacted]

May 9, 1994

Superintendent
Katmai National Park and Preserve
PO Box 7
King Salmon AK 99613

Re: File No. 20321

TO WHOM IT MAY CONCERN:

This summer, my wife and I had the opportunity to visit the Brooks River Area in Katmai National Park for three days during which time we both photographed the bears and other wild life as well as fished for salmon. During our tenure at Katmai National Park, my wife and I has occasion to speak with some of the rangers there regarding the problems they perceive the Brooks River Area is experiencing as well as the solutions proposed by the National Park Service. Accordingly, I then requested the ranger to provide me with a copy of what was styled "Brooks River Area Development Concept Plan" and she promptly did.

After my return to Virginia, my wife and I had the occasion to review that document in detail and, after a complete and thorough review made known our opinions regarding the same in a letter dated December 23, 1993. I am enclosing a copy of that letter for your review.

As of last week, I am also in receipt of a document which is entitled "Development Concept Plat Environmental Impact Statement" and which concerns Katmai National Park. First and foremost, I would like to again note that I am aware of the fact that Katmai National Park is a approximately 50% larger in size than Yellowstone National Park and its brown bear population is approximately ten times the size of that in Yellowstone or somewhere in the vicinity of 2,000 bears. With the exception of the graveled road from the Brooks River Area to Katmai Volcano, there are no roads in the park and all travel must be either by air or by boat. Additionally, it is also my understanding that with the exception of four or five fishing lodges in the Park, there is absolutely no construction in the Park to hinder or disturb wildlife. Furthermore, only one other area at the Park has more than two or three cabins. Therefore, common sense dictates that





41. Comments noted.

the activities of man pose little overall disturbance to the wildlife in the Park. With this in mind, I have again reviewed the Development Concept Plan of April, 1994, as to Alternatives 1, 2, 3 and 4.

In reviewing these plans, I again note that all four of the plans directly or indirectly limit visitor access to the Brooks River Area either by directly limiting the number of Park visitors or, alternatively, by moving the facilities now present at the mouth of Brooks River to an outlying area. Since this outlying area is several miles distant from the river and the only vehicular traffic in the Park is that which is owned by the Park Services, alternatives 2 and 3 will also have the effect of limiting visitor access to the Brooks River Area. Therefore, I am opposed to all of these alternatives since their sole purpose is to limit visitor access to the Park.

It is my feeling that Katmai National Park is sufficiently large to as to allow substantial increased visitor access to the Brooks River Area. I would also support increased visitor access to other areas in the Park which are similarly noteworthy for their scenic and/or wildlife viewing. Such a policy would have the effect of diverting a substantial portion if not in fact much of the visitor flow from the Brooks River area.

I also note that in reviewing these amended proposals, the proposal to increase the size of the viewing stands in the vicinity of the falls and to construct walkways above the falls and down the course of the river to the area of the float bridge have been deleted. Having stood, or shall I say, been crowded onto the visitor's stand for the better part of two days, I must say that the size of this stand in comparison to the visitor use is ridiculous. It is obviously a compromise between the ecoliberal's attempt to completely eliminate all human visitation and the normal visitor's desire for such experience. While I certainly recognize the need to preserve both the Park and its wildlife, I fail to understand how the construction of additional facilities can, in any meaningful way, have any significant or measurable detrimental effect upon the bears of Brooks River area or the Katmai National Park as a whole. At most, such additional human visitation could have at worst a negligible detrimental effect upon a few of the

bears in that specific area and I seriously doubt even that. In point of fact, I note that in reviewing the development concept plan of April, 1994, as well as the original development concept plan, it appears to me that the Park Service is stretching their evidence to be able to document that any of the bears at Brooks River are environmentally stressed in any way over and above similar bears at other sites throughout the Park which are not presently occasioned by human visitors. There was, in fact, no such evidence documented, merely assetions without corroboration.

I do support increased construction of visitor facilities in the Brooks River Area for the purpose of opening the area up to the general public. I also support the construction of additional facilities throughout the remainder of the Park for both visitors and fishermen. Such facilities will not only have the effect of opening up much of the Park which is presently effectively closed, but will also divert a substantial percentage of visitors from the Brooks River Area. It is my belief that both humans and wildlife can live in relatively close proximity to each other as long as certain precautions are maintained and care is utilized to insure that all disruptions to the environment are minimized. Both Yellowstone and Glacier National Parks are good examples of this balance and neither of the Parks have limited visitor access to date. Certainly the Park service cannot claim for Katmai National Park that such levels of visitation even minimally and certainly not significantly impact brown bears present in the park when, based upon its own statistics, the Park saw only a total of 13,000 day visits by visitors in 1993 or a total of about 130 visitors a day for the months of June, July and August.

For the foregoing reasons, I am again opposed to every single concept contained within the draft development plan of April, 1994, inasmuch as each and every one of them are for the purpose of curtailing visitor access to the Park in general and Brooks River in particular.

For purposes of showing my wife's concurrence, I am also having her sign this letter.

A0018310.DOC

**Superintendent**
**Page No. 4**
**May 9, 1994**

Thank you for your review of this letter, I am

Very truly yours,

Judy C. Street

**Judy C. Street**

James H. Street

**James H. Street**

JHS/cjs

cc: Larry Norris, Planning Team Leader
National Park Service
Denver Service Station/TWE
PO Box 25287
Denver CO 80225-0287

A00E510.DOC

June 02, 1994

Bill Pierce
Superintendent Katmai National Park
P.O. Box 7
King Salmon, Ak 99613

Re: comments on Brooks River development plans.

Dear Sir,

42a

You and your staff are doing a great job at Brooks Camp but I do have some reservations about the huge expenses involved in all but Plan I. The access to Brooks River is definitely clouded by the exsistent Angasan land claims which are in litigation. The environmental Impact statement does not address this road block and the planners do have a fiduciary responsibility to those who will pay the bill. The BLM has already given the Angasans the land as you know.

The second plan, which seems to be an expensive favorite of some planners, would increase commercial and park personal use at a huge cost to the taxpayers and Alaskan residents who basically would have their daily allotment reduced by 33⅓ percent while park personal and lodge clients are increased. The road maintenance and building costs here would be significantly higher and the plan would only benefit the lodge concessionairs until the "no trespassing" land claim signs go up.

This plan II would also adversly effect sport fishermen by not allowing use of the best and safest fishing side of the river. By destroying the existing camp it would also tend to show the court that the government has decided to forfeit on the native claims. We really need to get a "clear title" before tremendous expenses are committed on relocation.

42a. See response 5c and 13k.

I've been sport fishing this area for over 30 years and hope my suggestions may be of some use. Thank you for considering these and the needs of the Alaskan residents. Too often we see the desires of commercial operators limit access by local residents to our National Parks.

Best regards,

Ken Mears

Ken Mears

**Bechtel**
Fifty Beale Street
San Francisco, CA 94105-1895

S. D. Bechtel, Jr.
Chairman Emeritus
Bechtel Group, Inc.

June 3, 1994

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Sir:

Development Concept Plan
Brooks River Area

As a regular visitor to Western Alaska over the past thirty years, I am pleased to comment on the April 1994 "Development Concept Plan", as follows:

Alternative #1 appears to be the best answer in that it:

- Retains the Brooks Camp facilities and existing structures north of the river.

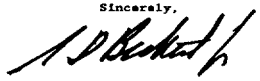
  (Moving the Park Services and Brooks Lodge would be an unnecessary waste of money, especially in view of our great federal-government budget deficit.)

- Establishes day-use limits at levels slightly below July 1992 levels.

- Provides for the building of an elevated bridge and boardwalk.

Generally, I am against any reduction of fly-fishing on the Brooks River. If better managed, the Brooks River Area should be able to continue to provide a very special experience for bear watchers and photographers, sports-fishermen and sightseers, alike.

Sincerely,





43. Comments noted.

Superintendent
Katmai National Park & Preserve
Post Office Box 7
King Salmon, AK 99613

13 June 1994

Dear Planning Team:

Thank you for sending me the Brooks River Area Draft Development Concept Plan Environmental Impact Statement. I would like to take the time to comment on the EIS as a part of public record.

In 1988 my wife and I visited Katmai National Park and it was then that got me interested in the problems of Katmai and the planning process. My wife and I attended a speech by Barry Gilbert in which he stated the present facilities should be moved to the other side of the river. At that time I was a little taken aback by his comments. The present lodge was such a nice place to have a beer and get a good meal. The building itself was quite beautiful and I thought worthy of saving. But soon I realized what he was trying to say, that this is prime bear habitat and there couldn't have been a worse place to build a lodge right where it stands now. Since that time I have graduated in my thinking and will go one step further than Mr. Gilbert. I now believe we should eliminate the present lodge and do not build a new one anywhere. This I'm sure is not the popular position or the political or economic decision, but it is the right decision. We must not trash this area with more development, more conflict with the bears, more roads, or bring in shuttle buses and make the place a mini Yosemite. There's already too many people visiting the area, an area that should be largely for the bears. Services in the area should be minimal for people visiting the area and restrictions on day use should be implemented.

It is totally anathema in this day that we are planning for more development in our National Parks when our values are changing concerning them. We increasingly are viewing parks not as playgrounds for people with large lodges and hotels but as harbingers of ecosystem Biodiversity. We are slowly graduating from consumptive uses of our parks to nonconsumptive uses.

There are three big problems in Brooks Camp today. The number one problem is the inability to limit day use. It must be limited. The second problem is the floating footbridge. It must be dismantelled. The third problem is the fishermen. There presence must be severely reduced and total catch-and-release be implemented.

Limiting the area to day use which itself would be limited offers the best opportunity to solve these three main problems. This would also limit fishing since most fishermen want to be pampered at the lodge after a thrilling close encounter with a bear. The

footbridge would no longer be needed. Alternate 4 is closest to my vision of a new Brooks River Area. Eliminate the shuttle buses and it sounds even better. I question the need, however for four bear viewing platforms in this scenario. We must question why we need so many areas to view bears. I say that we must give the bears some privacy and not go overboard too much. We already have two platforms thanks to Senator Stevens who railroaded through the most recent one. We must ask ourselves; how much development is enough? Where will the line be drawn? With day use only, do we need to build more bear viewing platforms?

44a

We should give back the Brooks River to the bears and stop the competition from fishermen and close-encounters which is having a deleterious effect on the bears. Some bears right now do not use the area because of people pressure. I would like to see the Brooks River Area turned into a day use only area with opportunities for primitive camping well away from the immediate area. This to me is minimum impact. Time limits would be set for those day users to leave if they are not camping. Let's not make everything convenient for Aunt Martha.

Development begets more development. Slowly we encroach further not knowing what we are doing. More and more people want to see the bears. How can they all be accommodated? Where will it all stop? Put this area back into the wild state that it was before the lodge was built. It is the right thing to do.

Please keep me informed of any future developments in this planning process.

Sincerely,

Marc Olson

[redacted]

44a. Alternative 4 only proposes three bear viewing platforms. The small platform at the river mouth would not be designed as a viewing platform, its function would be to provide a safe haven for anglers and sightseers when bears are seen coming down river or up the Naknek Lake shoreline. Although people may use it from time to time as a place to lookout over the river mouth, the platform's location would not be the best for viewing. The addition of the third viewing platform in Alternative 4 would be needed under the proposed use limits because, in this alternative, visitors would be only along the river and on the valley tour. There would be no lodge at which to spend time and no long trails through the spruce forest for hikers that go to scenic views. Ninety people per day divided between two platforms would make for crowded conditions, especially if bears were only being seen at the falls on a particular day. The number of people permitted on a platform at one time and the amount of time they are allowed to remain on the platform will be central to instituting an equitable use scenario for alternative 4.

## COMMENTS

ROBERT G HADFIELD
[redacted]

SUPERVISOR BILL PIERCE
KATMAI NATIONAL PARK & PRESERVE
BOX 7
KING SALMON, ALASKA
99613

DEAR SUPERVISOR PIERCE;

I AM WRITING TO VOICE MY OPINION ABOUT THE PARK SERVICE ACTIVITIES AT BROOKS CAMP. I BELIEVE THE AREA NORTH OF BROOKS SHOULD BE RETURNED TO A NATURAL STATE AND THAT THE PARK SERVICE SHOULD NOT REPLACE THE FACILITIES TO ANY OTHER AREA OF THE PARK.

I BELIEVE THAT DEVELOPMENT OF THE PARK BY THE PARK SERVICE IS THE GREATEST DANGER THE PARK FACES.

I HAVE LIVED IN THIS AREA ALL MY LIFE AND REMEMBER WHEN IT WAS STANDARD OPERATION PROCEDURE FOR THE PARK SERVICE TO PUMP ITS SEPTIC TANKS INTO THE LAKE EVERY FALL. I BELIEVE IT WAS ONLY THE FACT THAT THE PUBLIC WAS BECOMING AWARE OF THIS FACT THAT PROMPTED THE PARK SERVICE TO START HAULING ITS SEWAGE OUT BY BARGE. I DO NOT TRUST THE PARK SERVICE TO PRESERVE AND PROTECT AND WELCOME ANY REDUCTION OF ITS PRESENCE AS BENEFICIAL TO THE PARK.

THANK YOU FOR ANY CONSIDERATION YOU GIVE TO MY COMMENTS

ROBERT G HADFIELD

Robert G Hadfield

6/16/94

## RESPONSES

45. Comments noted.

June 20, 1994

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Superintendent:

This letter contains my comments and recommendations on the Draft Development Concept Plan Environmental Impact Statement for the Brooks River Area within the Katmai National Park and Preserve. Please consider my input, and include this letter in the appropriate administrative record.

I generally support the proposed alternative 2. I believe that this alternative would best balance the need to protect the Alaskan brown bears, while providing for limited and compatible public uses. I know that balancing these interests is difficult. If there is any question or doubt, I believe that protecting the bears should come first.

In terms of specifics, I support and applaud the proposed removal of facilities away from the river and the establishment of day-use limits. I also appreciate the recommendation for temporary closures on portions of the Brooks River during times of intense bear use.

My only concern with the proposed alternative is the development disturbance on about 105 acres of presently undisturbed habitat. I hope that every effort will be made to avoid, reduce or mitigate adverse impacts on habitats.

As you know, the Brooks River Area is crucial habitat for the globally-significant Alaskan brown bear. As such, this area should receive the strongest possible environmental protection, including strict limits on public uses.

Thank you very much for your consideration.

Sincerely,

Donna Spotts

Donna Spotts

[redacted]

46. Comments noted.

[redacted]

JUN 2 7 1994

Bill Pierce
Superintendent
Katmai National Park and Preserve
P.O.Box 7
King Salmon, Alaska

Dear Mr. Pierce:

This is concerning how the areas of Katmai National Park would be used according to which parts would be set aside for the brown bears and other wildlife and to which areas would be used for visitors for observing the bears and for sport fishing.

The proposed "Development Concept Plan" of the National Park Service would have the north side of the Brooks River would be reserved for bears and other wildlife, while the south side of the river would be used for people at facilities surrounded by "bear free" zones, and both bears and anglers would share the river. Floatplanes would continue to be used, and visitors would be given short briefings about bears and then would be turned loose on the river to observe and fish wherever they pleased.

There are flaws in such a plan. By dividing the Brooks River bear habitat between bears and people and allowing visitors to wander freely in in an area used by bears, the plan would continue to disturb bears during the most critical time of their life cycles. It would put visitors at risk of increased conflict or confrontation between them and the bears, and human activity on the river would deprive young bears of the fish in the river that they need for food. Their survival would be put at risk.

There is an alternative:

Visitors would be brought in on specially designed tour boats. They would no longer be turned loose in bear habitat.

Overnight lodging and most National Park Service facilities would be moved to the west end of Naknek Lake or the gateway community of King Salmon, where local business and Alaska Native corporations would be eager to provide services for park visitors.

A new campground would be located away from key bear travel and use areas. This would accomodate those wishing to remain more than a day at the Brooks River and facilitate back-country use by boaters and other wilderness travelers.

I urge you to give serious consideration to this new alternative. It would be much better for both visitors and bears.

47a

Yours truly,

Daniel A. Lindstrom

47a. See response 18a.

June 21, 1994

Mr. Bill Pierce, Superintendent
Katmai National Park and Preserve
PO Box 7
King Salmon, AK 99613

Dear Superintendent Pierce:

This letter is in support of an additional alternative to the Brooks River Development Concept Plan.

48a

Please include a bear priority alternative with these principal elements:

- Specially designed tour boats to bring in all visitors. Ranger-interpreters would be on board and accompany visitors to bear viewing areas and other facilities. Float planes should be reserved for administrative and emergency use.

- Overnight lodging and most NPS facilities moved to the west end of Naknek Lake or the gateway community of King Salmon, where an Air Force base is closing and the Bristol Bay fishery is entering lean economic times. Local businesses and Alaska Native corporations are eager to provide services for park visitors.

- A new campground located away from key bear travel and use corridors. This would accommodate those wishing to remain more than one day at Brooks River and facilitate back-country use by boaters and other wilderness travelers.

We urge you to include a fifth alternative that gives priority consideration to the bears and also provides park visitors with a safe and enjoyable appreciation of these magnificent creatures.

Sincerely,

Jordon Bluestein  C Bluestein

Jordon and Cheryl Bluestein
[redacted]

48a. See response 18a.

Walter P. Schmitz
1700 Hollyhock Lane
Elm Grove, Wisconsin 53122

June 21, 1994

RECEIVED
JUN 27 1994
KATMAI NATIONAL PARK AND PRESERVE
KING SALMON, AK

Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

Re: Brooks River Area
Development Concept Plan

Dear Sir:

I am a resident of the State of Wisconsin and have enjoyed visiting Alaska frequently. Three of the last four years have included visits to the Brooks River Area. I have a Master of Science Degree from the University of Wisconsin and am a Registered Professional Engineer. Over my lifetime, I have been able to enjoy many hours of both fresh and saltwater fishing in Wisconsin, Canada, Alaska and the Florida Keys.

After carefully studying the Development Concept Alternative Plans for the Brooks River Area, I would like to relay my strong feelings to you. I will not burden you with the pros and cons of the four alternatives as I see them, but would like to express the following:

1. The impact to the bears use of this area by visitors should be the primary concern of all.
2. The visitor experience should be focused on high quality even though it means fewer numbers and difficulting in scheduling access to the area.
3. Fishing should be limited to periods when few bears are present and all fishing should be catch and release.
4. The proposal of a fleet of six 11-passenger vans in two of the alternatives is a horror story. Please do not make this another Denali.
5. Enlarged relocated Visitor Centers with new accomodations with more shuttle buses to service them again spoils the remote and wild atmosphere of this unique area. Please do not destroy it.

The last few years have brought such a change in the Brooks River area. Please back it up and severely limit the day use of the area. The cabin and campground use do not appear to cause the impact that the new heavy day use has caused.

Because of the reasons above the best choice in my judgement would be Alternate 1 with a second choice of Alternate 4. If you should select Alternate 2 or 3, you will be destroying a unique spot in the world which offers a wildlife experience second to none including the fascinating Serengeti National Park in Africa. Please do not let that happen.

Respectfuly yours,

Walter P. Schmitz

49. Comments noted.

June 23, 1994

Gregory C. Speer
[redacted]

Mr. Bill Pierce, Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

*Dear Mr. Pierce*

*I am writing in support of two things.* First and foremost is a strong vote of support for the brown bears of Katmai. Second, I support a quality park experience for visitors but one that will not be at odds with the intended sanctuary (for the bears and other wildlife) function of the park.

In light of the above, the proposed development plan for the Brooks River area is, I feel, flawed in that it fails to satisfy the above mentioned priorities, especially the first. I would like to request that the Park Service adopt an alternative plan that gives priority consideration to the bears yet also provides park visitors with a safe and enjoyable way to appreciate the bears. *It is my* understanding that the Sierra Club has proposed such an alternative which would minimize disturbance to bears, accomodate visitors and cost less *than the currently proposed plan.* Sounds like a "win - win" idea to me and I strongly urge its implementation.

50a

I write in the spirit of the staunch belief that these great bears are the last vestige of that which is truly wild *in North* America and should be protected at virtually any cost. Thank you.

Sincerely,

Gregory C. Speer

50a. *See comment letter 22.*

[redacted]

June 24, 1994

Mr. Bill Pierce, Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Mr. Pierce:

Subject: Draft Development Concept Plan

This letter expresses my support for the Sierra Club's "bear friendly" alternative to be included in your forthcoming draft Development Concept Plan for Katmai National Park.

As a fishery biologist in Katmai National Monument (now Park) from 1959 through 1961, I had intimate contact with coastal grizzly bears on spawning streams, while recreational fishing, walking the trail between Brooks Lake and Naknek Lake and at the National Marine Fisheries Service (then Bureau of Commercial Fisheries) field station at the outlet to Brooks Lake.

I can readily understand and appreciate the dilemma confronting the Park Service in its effort to accommodate both Park residents (bears) and Park visitors (humans). Even as far back as 1960 (or 1961) the Park Service was forced to kill two young bears who had become so habituated to humans that they posed a threat to visitors and Park Service personnel. Unfortunately, the two bears in question suffered from human errors (unburned garbage in pits, open fish cleaning station, open food storage shed, etc.) that were always rectified (burning, electric fences, locked sheds, etc.) AFTER the bears had been attracted and caused damage.

51a You now have a unique opportunity to at least partially rectify years of inept management by selecting a management alternative that favors the bears. I urge you to adopt the Sierra Club's bear priority alternative or a comparable one for inclusion and consideration in your Draft Development Concept Plan.

Please send me a copy of the draft plan for my comment when it is released for review. Thank you for your favorable consideration of my request.

Very truly yours,

David T. Hoopes, Ph.D.

51a. See response 18a and comment letter 22.

June 25, 1994

Bill Pierce, Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Superintendent Pierce,

A few years ago my wife and I spent a delightful week at Brooks Lodge in the beginning of July, including a ride to the Valley of 10000 Smokes and a walk up Dumpling Mountain. Your park is truly one of the gems of wild Alaska. (I might add that we are not fishermen, though we thoroughly enjoyed the fruits of those who were.)

We came away with one worrisome concern--the relationship between people and bears. That impressed us as an unnatural set-up, not respecting the bears' relation to the habitat, developed over many centuries. Their having to continually be aware of people's presence and activities could not help changing their natural behavior and psyche. In other words, the bear--human interface creates a bad scene.

Ever since our visit I have felt that a change in the situation on that region ought to be effected by moving the human concentration away from the vicinity of the inlet of Brooks River into Naknek Lake. I am pleased to learn that a serious discussion about plans for that location is underway Without supporting any particular plan, I cast my vote for drastically decreasing the bear-human interaction there.

Sincerely yours,

Daniel M. Popper

[redacted]

52. Comments noted.

[redacted]

Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, Ak 99613

Dear Sir:

I am writing concerning the Brooks River Area Environmental Impact Statement (EIS). I had the marvelous opportunity to visit the Brooks River area in summer of 1991 and again in 1992. I witnessed first hand many of the problems you have highlighted in the EIS. I have the following specific comments:

1. I fully support the removal of all facilities north of the Brooks River. The number of bear-human encounters is too high. I believe that the only viable method of reducing this number is to make the north side of the river people-free. During my two visits I witnessed several bear-human encounters that were caused by man's callous disregard of the parks's rules and the bear's comfort zone. After witnessing these encounters I believe that fences or additional rules will not solve this problem. Sooner or later a visitor's macho attitude or the desire for that one last picture will lead to a deathly encounter.

2. I believe that the beaver pond terrace to be an ideal location for the new visitor facilities. It is removed from the concentrated bear use area yet close enough to the south river trail complex to permit foot travel for the majority of visitors.

3. I recommend that the Iliuk moraine trail discussed in alternative 3 be added to the preferred alternative.

4. I do not agree that the cabin at three forks overlook should be improved and I do not support half day trips to the overlook. The Valley of Ten Thousand Smokes is unique and should be treasured for its raw nature. My experience is that a half day trip is not necessary. It was raining the day of my trip and the group was given three hours to eat lunch and hike to the river. This permitted those that wanted time to hike to the river, while those that elected not to hike read books or played cards. No one who did not hike complained about excessive time at the overlook.

5. The support the reduction in the number of day use visitors. The increase in day use visitors, **SEVENTY** per cent (3,915 to 6612) between 1991 and 1992, can not continue without significantly impacting the environment. I personally found this increase to change the very nature of the Katmai experience. In July of 1991 it was possible to spend extended periods of time watching the undisturbed interaction of the bears, both at the platform and along the river. This was possible because of the limited number of visitors using the trails and the platform.

I am sad to say that in 1992 this experience changed significantly. During the day the falls platform was always crowded and viewing time was limited. It was not until after the day use

53. Comments noted.

visitors departed that quality viewing could be experienced. It should also be noted that in 1991 a ranger was usually stationed at the beginning of the falls platform trail and one on the platform. They would control access to the platform at the trail head to ensure that the overcrowding did not occur. This control was not present in 1992 and overcrowding often resulted.

In addition, during the day the bridge area was always crowded with groups of people on both sides of the bridge and fishing in the river. Whenever a bear would traverse the area it would often have to alter its movement because of the people. Several times people would be caught between a bear fishing near the bridge and one coming down the beach from the lodge area. This situation stressed both the bears and the people involved.

I agree that the noise generated by the numerous float planes does detract from the solitude.

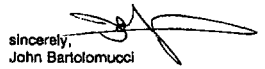
Finally, the overall quality of the visitor experience can not be over emphasized. It was my impression that most of the day use visitors were only there to add a "check mark" to their Alaska vacation. They were not there long enough to gain an appreciation of unique nature of what they were witnessing.

6. While I generally agree with the use limits suggested for the preferred alternative, I do not agree with starting in the middle of the (+) or (-) 15% range. I believe that a conservative approach should be used. Therefore, I would suggest that use limits be initially implemented at 15% below the suggested value and raised, if appropriate.

7. I support use limits and seasonal closures for reaches of the Brooks River. I also recommend that a catch and release only policy be established as this would eliminate the need for a new fish cleaning station.

8. I strongly support government subsidizing the concessioner's relocation expenses. I believe this will ease potential conflicts and promote a sense of cooperation between the park service and the concessioner.

In closing, I would like to say that I was impressed with the quality of the draft EIS. I support the implementation of the preferred alternative with the comments noted above. This plan will correct developing environmental problems and ensure that the unique nature of the Brooks River area remains forever undamaged.



sincerely,
John Bartolomucci

June 28, 1994

Superintendent
Katmai National Park and Preserve
P. O. Box 7
King Salmon, AK 99613

I have read the Draft Developmental Concept Plan/Environmental Impact Statement prepared for the Brooks River Area. Having visited the Brooks River in 1993, I agree that there is a real need to change the current conditions. I support the proposed Alternative 2, with the relocation of facilities to the Beaver Pond Terrace.

I also strongly support the establishment of day use limits. My visitor experience would have greatly been improved if fewer people had been allowed to visit the area on a day trip basis. We were fortunate enough to be spending a week camping in the area and basically avoided the bear viewing areas during the prime day hours due to all the people at the platforms.

I would also encourage continued talks between the National Park Service and the State of Alaska to promote a change in the fishing regulations to catch-and-release-only for all of the Brooks River. Catch-and-release fishing would prevent the recurrence of incidents similar to the one that occurred during our visit which resulted in the closure of the Oxbow area. It would also allow the funds set aside for the fish cleaning station to be better utilized for other essential services.

My visit to Brooks River to view the bears and to fish such a beautiful river was a wonderful experience. If the proposed alternative is implemented, I believe future visits will continue to offer such an experience, while ensuring minimal impact to the brown bear population.

Teresa Meachum
Teresa Meachum
[redacted]

54. Comments noted.

Douglas G. Sobey
[redacted]
June 28, 1994

Superintendant
Katmai National Park and Preserve
Post Office Box 7
King Salmon, Alaska 99613

Re: Brooks River Area
Development Concept Plan
Environment Impact Statement

Dear Sir/Madam:

I have visited the Brooks River Area several times in the last ten years and I have the following comments to make on the draft Development Concept Plan.

I wholeheartedly support the development of Alternative 2 in the proposal i.e., the relocation of the existing facilities to the Beaver Pond Terrace location. I believe this is the best alternative for several reasons all of which are detailed in the Plan.

This alternative is the best because it clearly is the superior alternative in meeting the objectives of the management plan(s). In particular the objectives that concern minimizing impact on the bears. (See Page 5 references). Minimizing impact on the bears is best achieved by relocation of the existing facilities and limiting day use. Alternative 2 achieves both of these objectives.

I am particularly gratified that day use is being limited as I have personally witnessed the degradation of the Brooks River experience by increased day use over the past ten years. I do recommend that the day use limits are closely monitored. I also believe that the areas that the anglers can go in peak periods is clearly defined so as to avoid human/bear conflicts. How will the day use limits be allocated between anglers, photographers, etc.? On a first come first serve basis? Reservations? These questions need to be detailed in the final plan. I believe that anglers should be restricted from certain sections of the river during peak periods as they have the most impact on bears.

55a





55a. A permit system would be put in place that would address the various visitor activities that occur on the river. Because such a permit system is strictly an operational issue and would have to be tested and modified over the course of a few seasons to make it equitable for all visitors and activities, no permit system is presented in the final plan. The plan proposes to establish use limits for July and September in each alternative. The decision to establish use limits or not is within the scope of this plan, the decision on what permit program to use to institute visitation limits is an operational choice. This comment has been referred to park management for consideration.

Katmai National Park and Preserve
June 28, 1994
Page Two

I support Alternative 2 as it allows people to hike along the proposed trails as well as take the shuttles. I personally object to using shuttles in a wilderness setting however I do understand that some people would prefer to take them. Alternative 3 almost forces people to use shuttles due to the distance from Brooks River.

This is a wilderness and the ability to hike in peace without the intrusion of shuttles and airplanes is a major factor in enjoying the wilderness experience. Alternative 2 best meets this objective.

I am also pleased to see that the boardwalks and viewing platforms have been significally reduced from earlier proposals. The number and size of platforms that are currently proposed seem to have the right balance between accommodating the number of visitors and also limiting the impact on the wilderness experience.

In closing I strongly support adoption of alternative 2 for the future development of Brooks River. This is a unique place and should be preserved for future generations. Alternative 2 has the best balance between allowing humans to experience this wonderful place but at the same time minimizing the impact on the bears.

I thank you for the opportunity to comment on this proposal and I look forward to enjoying Brooks River for many years to come. It truly is a National Treasure.

Sincerely,

Douglas G. Sobey

Douglas G. Sobey

KATMAI NATIONAL PARK & PRESERVE
JUL 5 1994
KING SALMON, AK

Henry Wilson
[redacted]

June 30, 1994

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska 99613

Re: Brooks River draft EIS

The following are comments on the Draft Development Concept Plan/Environmental Impact Statement dated April 1994 for the Brooks River Area.

My wife Karin and I have been going to the Brooks River area as overnight guests at Brooks Lodge once or twice a summer for about the last 5 years. We hope to be able to continue to enjoy the area in the future with our children, without seeing some of the radical changes proposed as alternatives in the draft plan.

We oppose the proposal identified as Alternative 2, which would involve removal of the existing Brooks Lodge and the creation of a "people-free zone" north of the river. We would favor either no action, or minor changes similar to those described in Alternative 1.

As the narrative at p. 3-4 of the draft plan and table 1 illustrate, the dramatic increases in use of the Brooks River area that have resulted in crowding are attributable to day use, not the lodge or campground facilities. It makes no sense to move the lodge to address problems that are not being caused by the lodge.

To the extent that use limits are imposed, the focus should be on the commercial use licenses issued to the airlines, air taxis and other commercial operators who bring visitors to Brooks Camp for the day. We oppose limits on day use by private individuals using their own aircraft.

To the extent any facilities are moved, it should be the National Park Service (NPS) facilities, not the lodge. We understand that it is the NPS, not the lodge, that is responsible for the fuel oil leaks discussed in the draft plan.

We would support the presentation of a proposal to the Alaska Board of Fisheries to modify existing regulations to provide for catch-and-release fishing only in the Brooks River. As noted in the draft plan, eliminating the one-fish-per-day limit (which in practice means one sockeye) would reduce the potential for food conditioning of bears, and eliminate the need for a fish cleaning



56. Comments noted.

building with the associated waste disposal concerns. There are better places to catch salmon for consumption. However, we strongly oppose time and area closures that would interfere with trout fishing. The Brooks River supports a unique rainbow trout fishery. Catch-and-release trout fishing has minimal impact in terms of bear/human encounters, particularly in June and August when there are few bears in the area. Catch-and-release trout fishing has no impact in terms of food conditioning or waste disposal.

In general, the draft plan overstates the impact of the existing lodge on bears. Also, significant portions of the draft plan seem to be based on the assumption that bears suffer some kind of psychological harm as a result of merely associating with people, which is absurd. As the archaeologic sites north of the river demonstrate, people and bears have both used that area for centuries. There is no reason to establish a "people-free zone" there or anywhere else in Katmai.

Thank you for consideration of these comments. Please keep us on the mailing list for further planning documents.

Yours truly,

Henry Wilson

April 14, 1994

Dear Sir,

57a

Your handsome Draft Plan for the Brooks River Area is worthy of praise. But is it printed on recycled paper? The tome doesn't say.

Well, your four (4) Alternatives appear to be similar; though I choose Alt-4 as being the least destructive. But the accommodation of ever more of the human element will not ensure the salvation of the Area; for here in the Lower-48 it is this element and its pressures that threaten the Parks, and the Park Service seems helpless to stop it. Yosemite is an example. With Katmai and the Preserve there is evidently no limit as to how many subsistance seekers may enter in and take what they "need", alas.

All good wishes. Concerned citizen,

Norman Johnson

June 23, 1994

Dear Mr. Bill,

I see your Prefered Alternative as but a variation on the status quo, which is dreadful for the Bears and threatening to visitors; while the primary purpose of the Park remains protection of the Bears and their habitats.

57b

Surely a new campground away from the Bears is called for; visitor lodgings need to be moved to the West end of Lake Naknek; and visitors to viewing areas should always be accompanied by a Park Ranger or a docent. These I appeal for.

Please consider my appeal. And I take this opportunity to wish you and your staff every succes with your re-design of the Park -- and I'm sure the Bears join me in this.

Concerned citizen,

Norman Johnson

57a. Yes the draft DCP/EIS was printed on recycled paper. See the inside front cover for notification of same.

57b. See responses 13d and 18a.

## COMMENTS

[redacted]

Dear Mr. Pierce, June 21, 1999

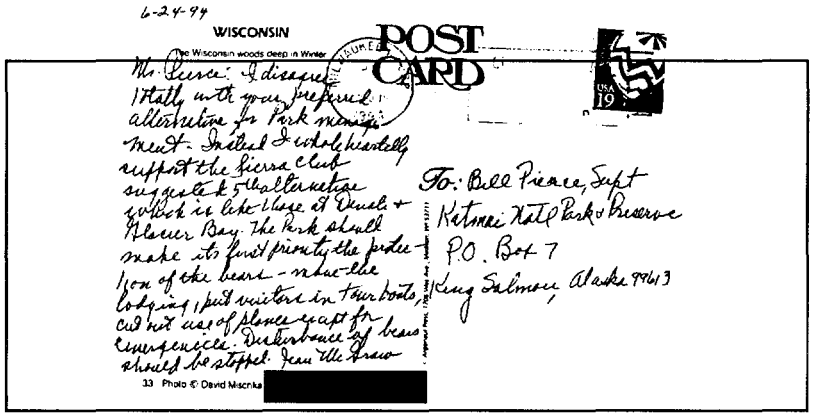
We feel there should be a 5th alternative that would adopt basic procedures similar to ones that protect wildlife at Glacier Bay and Denali National Parks, Alaska's two other "crown jewel" sanctuaries. We strongly request that a "least priority" alternative be included in the Draft Development Concept Plan. Respectfully yours,

Ruth W. Zeller, Robert O. Zeller

## RESPONSES

58. Comments noted.

59a


6-24-94

WISCONSIN

The Wisconsin woods deep in Winter

POST CARD

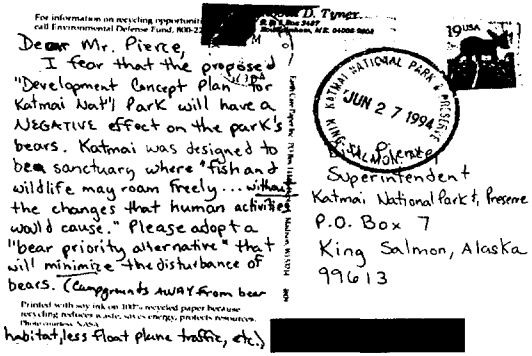
Mr. Pierce: I disagree
I totally with your preferred
alternative for Park manage-
ment. Instead I would heartily
support the Sierra Club
suggested 5th alternative
for both the Lake Clark &
Aleneer Bay. The Park should
make its first priority the protec-
tion of the bears - whose life
lodging & just visitors in tour boats,
will not use of planes except for
emergencies. Disturbance of bears
should be stopped. Jean Ulle Braun

To: Bill Pierce, Supt
Katmai Natl Park & Preserve
P.O. Box 7
King Salmon, Alaska 99613

33 Photo © David Mschka [redacted]

59a. See response 2f and comment letter 22.

## COMMENTS



For information on recycling opportunities call Environmental Defense Fund, 800-2[illegible]

[redacted] D. Tymes
[illegible]

19 USA

KATMAI NATIONAL PARK & PRESERVE
JUN 27 1994
KING SALMON, ALASKA

Dear Mr. Pierce,

I fear that the proposed "Development Concept Plan for Katmai Nat'l Park will have a NEGATIVE effect on the park's bears. Katmai was designed to be a sanctuary where "fish and wildlife may roam freely... without the changes that human activities would cause." Please adopt a "bear priority alternative" that will minimize the disturbance of bears. (Campgrounds away from bear habitat, less float plane traffic, etc.)

Superintendent
Katmai National Park & Preserve
P.O. Box 7
King Salmon, Alaska
99613

Printed with soy ink on 100% recycled paper because recycling reduces waste, saves energy, protects resources. Photo courtesy NPS

[redacted]

## RESPONSES

60. Comments noted.

[redacted]

June 7, 1994

Superintendent
Katmai N.P.
King Salmon

Dear Sir:

I prefer Alternative #2 for the Draft Development Concept Plan for the Brooks River Area. Also, please include a preference for campground users & day users for locals (Naknek, King Salmon, South Naknek residents). Perhaps 10-15% of these visitors could be reserved for Bristol Bay Borough residents.

Additionally, how would the visitor numbers be allocated?.. to what air taxi, personal boats/planes, etc.

Thank You for the opportunity to comment.

Jeff Adams

61a

61a. See response 55a.

[redacted]

18 June 94

Bill Pierce, Superintendent
Katmai National Park and Pre
P.O. Box 7
King Salmon, Alaska 99613

Dear Mr. Pierce:

Many years ago I had the great good fortune of spending several days at Katmai and the Valley of Ten Thousand Smokes. The facilities were rustic and small - as they should be in a wildlife preserve. It was a truely memorable experience.

I have recently been reading of the human population explosion in the area and it is quite disturbing, as the primary purpose of the area is the protection of the bears and their habitat. That is the meaning of the word sanctuary is it not?

I understand that a "bear priority" alternative plan has been suggested, but was not included in the Draft Development Concept Plan.

62. Comments noted.

-2-

This bear alternative plan should be the only plan, it is time for us to move away from the dark ages of the Regan - Bush years and realize that we are not the only beings on this planet we call home.

We need a Development Plan that will minimize disturbance to bears, give them a lower level of human activity and a measure of predictability with regard to humans. We must remember we are the guests in the bears home and should act accordingly

Sincerely yours
Patricia N. Barbuck

## COMMENTS

[redacted]

Superintendent Bill Pierce
P.O. Box 7
King Salmon, Alaska 99613

Dear Superintendent Pierce:

This is a comment on the management plan for Katmai National Park + Preserve. There should be an alternative adopted that would protect wildlife as a priority.

63a

Common sense would be to move overnight lodging and most park facilities to the community of King Salmon because this would help the local people economically and also cost us taxpayers less.

The new campground should be located away from bear travel and use areas.

Instead of float planes, tour boats should bring in visitors, who should be well instructed and accompanied to view areas by ranger-interpreters.

The most important consideration should be the well-being of the bears.

Sincerely,
Walter + Dorothy Pelech

## RESPONSES

63a. See responses 13d and 18a.

[redacted]

Bill Pierce, Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska

6/21/94

KATMAI NATIONAL PARK & PRESERVE
JUL 5 1994
KING SALMON, AK

Dear Mr Pierce

The proposed "Development Concept Plan" is inconsistant with the best interests of Katmai's bear population. I urge you to adopt a "Bear priority" plan, that would benefits the park's bears and offer a quality park experience for visitors.

Specially designed tour boats with Rangers on board should bring in all park visitors. Visitors should not be "turned loose"

64a N.P.S. facilities and visitor lodging should be relocated out of the park to the gateway community of King Salmon

The new campground should be located away from bear travel and use corridors.

Again I strongly urge you to reject the "Development Concept Plan" and adopt a "Bear Priority Plan". Bears, Visitors and Tax payers would benefit.

Sincerely Yours
Peter Z. Zachs

64a. See responses 13d and 18a.

## COMMENTS

6-23-94

NATIONAL PARK & PRESERVE
JUN 28 1994
KING SALMON, AK

Dear Mr. Pierce;

I am writing to you in regards to the "Brooks River Developement Plan".

I would like to ask the Park Service to adopt an alternative that gives priority consideration to the bears, and that also provides park visitors with a safe and enjoyable experience with part of our wild kingdom that would adopt basic procedures similar to the ones that protect wildlife at Glacier Bay and Denali Natl., Park.

I would like to remind the Park Service that the preferred alternative reflects 12 yrs of obsolete Reagan Bush policies and that new thinking is in order.

Your serious consideration to this matter would be greatly appreciated, Thank You.

Sincerely

Mr. A. R. LaPalme

## RESPONSES

65. Comments noted.

June 23, 1994

Bill Pierce, Superintendent
Katmai National Park + Preserve
P.O. Box 7
King Salmon, Alaska 99613
Dear Mr. Pierce:

In regard to The Brooks R, area, the National Park Service is on the verge of making a very important decision. I hope the National Park Service will not go for its preferred alternative, which merely utilizes the status quo thinking of the Reagan-Bush administrations.

A better alternative is the

Bear Priority Alternative [2.
a proposal similar to the ones protecting wildlife at Glacier Bay and Denali National Parks. I would like to have you use the "bear priority" alternative or a similar plan and to have them included in the Draft Development Concept Plan.

This "bear priority" alternative would minimize disturbance to the bears. The taxpayers would also benefit if the lodge & NPS facilities

3.) were relocated to King Salmon.

66a

The bear priority alternative would have 3 benefits:
1.) Special tour boats to bring in all visitors.
2.) Overnight lodging is to be moved to Naknek Lake where local businesses are eager to provide services.
3.) A new campground to be established away from bears' travel routes.

Sincerely
Ms. Ruth Alexander
[redacted]

66a. See response 18a.

[redacted]

JUNE 24, 1994

MR. BILL PIERCE
SUPERINTENDENT, KATMAI NPP
P.O. BOX 7
KING SALMON, AK 99613

DEAR SIR,

I'VE LOOKED OVER THE BROOKS RIVER AREA EIS AND DCP. SINCE THE NPS HAS REJECTED SUGGESTIONS BY THE SIERRA CLUB I URGE YOU TO IMPLEMENT ALTERNATIVE 4: BROOKS RIVER AREA DAY-USE-AREA ONLY. ALTERNATIVE 4 IS THE LEAST EXPENSIVE PLAN THAT REMOVES FACILITIES NORTH OF THE RIVER. IT IS ALSO THE MOST CONSERVATIVE ACTION THAT WILL EFFECTIVELY ADDRESS THE PROBLEM AND ALLOW FOR RE-ASSESSMENT IN A MORE STEP-WISE APPROACH. MOST IMPORTANTLY, THIS ALTERNATIVE WOULD SEEM TO BENEFIT THE BEARS THE MOST.

67a

SINCERELY,

MATTHEW DiSABATINO

67a. See response 18a.

June 25, 1994

Mr. Bill Pierce, Supt.
Katmai Nat'l. Park & Preserve
P.O. Box 7
King Salmon, Alaska 99613

Dear Mr. Pierce,

This letter is to let you know I support the brown bears of Katmai & hope the Park Service takes a different approach to the problem of bears.

I'm asking the Park Service to consider an alternative, using these points:

- Specially designed tour boats to bring in all visitors.
- Overnight lodging and most Nat'l. Park Service facilities moved to the west end of Naknek Lake on the gateway community of King Salmon.
- A new campground located away from key bear travel and use corridors.

68a

This alternative minimizes disturbance to bears, who would have a lower level of human activity to face. This alternative would also provide savings to the taxpayers. This new thinking is in order.

Sincerely,
Olga Roesche

68a. See response 18a.

## COMMENTS

Supt. Bill Pierce,

I strongly support
an alternative that
gives greater priority
consideration to
the bears of
Katmai National
Park and Preserve.
The Brooks
River bear habitat
should be protected
from development,
and ~~the~~ excessive
human activity
so that the beautiful
bears can have
the freedom to
engage in their
activities...

Sincerely,
Carl Rouch
[redacted]

## RESPONSES

69. Comments noted.

June 30

To whom it may concern

I feel Alternative 4 would be the best plan to preserve the uniqueness of the Brooks River Area. Further, I believe some of the day use permits should be reserved for locals and Alaskans if possible. I would like to be included on your mailing list for the results of this statement.

Mary C. Burtness

70. Comments noted.

## COMMENTS

June 30, 1994
(written at
Brooks Camp, Alaska)

Bill Pierce
Superintendent
Katmai Nat. Park & Preserve
P.O. Box 7
King Salmon, AK 99613

Re: Comment on 1994 DCP for Brooks River Area,
Katmai National Park & Preserve

Dear Sir,

First let me give you some background about where I'm approaching this comment. I've been coming to Brooks Camp Campground for the last 13 years. My trips in the area have been from 7 to 21 days long. My wife (who comes with me) feels that Command will be given me. I'm 48 years old and I've lived in Alaska for the last 28 years.

I have read all of the DCP's over the years but I've always, probably, been too lazy to write a comment. Maybe not lazy, but just too confused by thoughts + emotions to put them into writing.

I'd like to write on one of the alternatives presented in the DCP. I vote for Alternative #1. However:

A) I believe the addition of cooking shelters at the campground is unwarranted. From a user's perspective, I think it would detract from the wonderful campground you have, is not needed and is something thought up by someone who doesn't "live" in the campground. Look at the new (June 94) food shelter to experience "distract." As you need this is a magnificent place to train people to coexist with bears. To my knowledge very little (if any) food at the campground becomes bear food. Ever would be better, but I think education is needed there, not more facilities. Bears must be interacted to coexist

## RESPONSES

71. Comments noted.

(2)

food not only in the campground but every where in bear country. How do they never learning first unattended and by forever backing off of that food. That's always worked for me so far. Let Smoke and is backcountry Alaska. Once too late all bear is on the food.

B) The elevated boardwalk from camp to an elevated bridge is an interesting idea and I know all of the reasons, but just one more intrusion (or building) on the environment! I'm not against boardwalks to protect ~~from erosion~~, but the only one I could see there is a small maple, 4" wide one on the ground. That's not practical however for anyone. And a raised bridge would be an eyesore not at all in keeping with the unique flavor of Smoke Camp.

The ~~number~~ number of people using Smoke Creek area is the key question. Does a day use only would be used for the "critical instant" figure. Camp more urged & advocated by those who make ~~no~~ profit or by those who have an interest in that profit. 150 - 200 TOTAL PEOPLE AT 3 ROCKS Overnight Do I last with me. I say that because I've seen Alaskans suck with fish and bears and I've seen many humans on them. Visitation numbers were great pre-1995 National Geographic Special. Then human bear conflict occurred in 1984, and the Brooks Camp Experience started to deteriorate. Intentionally speaking we can either increase, decrease, stability or leave. I believe every increase diminishes that which we enjoy so much. A increase would just lead possibly to bear, human. Day use only, weekend day many and camping would restore Brooks Camp to their natural life style, as was the case on quite a few occasions in Katmai/Alaska, but then as humans remain like a great treasure.

Well I seem able to do on this subject is

(3)

people. I love living here. I love visiting with the bears as can do on no other park in the world. My soul is re-energized and yet re-tranquilized every time I come here. Bambi campground and Bambi lodge is a treasure and cannot be "improved" or "upgraded". If you mess with it, you'll lose what this is forever. Sure you can build another camp or complex but you can't build another treasure like this.

Thank you for listening to me Sandy. If there's ever anything I can do to help, please feel free to call or write me and/or my wife, Kaden. I love to talk about Katmai but first the talk and especially writing is very emotional and confused. In normal life I call myself an environmentalist but my thoughts are very confused about this issue.

Thanks Sincerely,

[redacted]

I concur -
Karen L. Avery

P.S. Please read this letter more than once - there are true feelings here.

Dear Superintendent,
I think that your p[illegible] is generally very good.
I would however make the following changes. I would keep the Brooks falls viewing platform at its current size and limit the numbers on the platform and also the time allowed if there are people waiting. I would delete the cutbank viewing platform to give the bears a section of the river they would be free to use, I would stop the fishing above the cutbank.
All the rest of the proposal on the river seems ok. Keeping the road single lane to three forks overlook is good. Day use people seem to cause much of the ~~dest~~ disruption so these numbers should be kept to 40 maximum. The lodge & campground people should be kept to the 60 apeice like it is now. I agree that too many people a overstressing the bears & the visitors.
Good Plan!

Steve Irving
[redacted]

72. Comments noted.

## SUMMARY OF COMMENTS ON SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Approximately 1,000 copies of the *Supplement to the Draft Development Concept Plan / Environmental Impact Statement* were distributed to government agencies, public interest groups, and individuals. Written comments were accepted from June 16 to August 15, 1995, a period of 60 days. In addition two public meetings were held, one on July 18, 1995, in Anchorage and one on July 19, 1995, in King Salmon.

A total of 55 comment letters were received from government agencies, public interest groups, and individuals during the comment period. All letters with substantive comments are reprinted in this section. NPS responses to all substantive comments are also included in this section. Some comments called for clarification of information in the supplemental DCP/EIS; others required text modifications. No responses are provided to comments that only expressed opinions and did not identify a needed text clarification, correction, or modification.

For informational purposes a list of the agencies, organizations, and individuals of the comment letters reproduced in this document is provided. The page number where each letter can be found follows the commentor's name.


**Federal Agency**
U.S. Environmental Protection Agency 403

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## COMMENTS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

REPLY TO ATTN OF: WD-126

AUG 15 1995

Bill Pierce, Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, Alaska 99613

Re: **Supplement to the Draft Development Concept Plan/Environmental Impact Statement (EIS), Brooks River Area, Katmai Naitonal Park and Perserve, Alaska**

Dear Mr. Pierce:

The Environmental Protection Agency (EPA) has reviewed the Supplement to the draft Development Concept Plan/EIS for the Brooks River Area, Katmai National Park and Preserve. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42.U.S.C. 7609 12[a] 84 Stat. 1709), and the National Environmental Policy Act.

1a

The supplement to the draft EIS does not discuss nor address any of our concerns previously raised on the draft EIS. Therefore, in accordance with EPA policy, we have rated the supplemental draft EIS EC-2 (Environmental Concerns, Insufficient Information). Please refer to our previous comment letter dated June 27, 1994 (see enclosure) for more details on our continuing concerns.

An explanation of the EPA rating system for draft EISs is enclosed for your reference. These ratings and a summary of these comments will be published in the Federal Register.

We appreciate the opportunity to review and provide comments on this draft EIS. If you have any questions about our comments you may contact Larry Brockman of my staff at (206) 553-1750.

Sincerely,

David Stalsh, Jr.

Joan Cabreza, Acting Chief
Environmental Review Section

Enclosures (2)

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## RESPONSES

1a. See responses 1a–1e to comments on draft DCP/EIS for the Brooks River area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

JUN 27 1994

REPLY TO
ATTN OF: WD-126

Bill Pierce, Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, Alaska 99613

Dear Mr. Pierce:

The Environmental Protection Agency (EPA) has reviewed the draft environmental impact statement (EIS) for the Concept Plan proposed for the Brooks River Area, Katmai National Park, Alaska. This review was conducted in accordance with Section 309 of the Clean Air Act, and the National Environmental Policy Act (NEPA).

The purpose of the proposed project is to plan for the management, use, and development of the Brooks River Area, Katmai National Park. The preferred alternative includes: removal of all National Park Service (NPS) and concessions facilities north of Brooks River; designation of the north side of the river as a people-free zone, construction of new visitor facilities on the Beaver Pond Terrace south of the river; establishment of day use limits for the Brooks River Area; recommendation of temporary closures on reaches of Brooks River during times of intense bear use; and, improvement of the area's interpretation program. Based on our review we offer the following comments.

Other than a brief description, and the large scale, somewhat ambiguous maps that have been provided, the draft EIS does not attempt to identify and delineate wetlands in the project area. Given that the preferred alternative will, to some degree, impact approximately 105 areas of undisturbed habitat, the potential for direct wetlands impacts should not be overlooked. In particular, it appears there is a potential for wetlands impacts in the vicinity of the proposed float plane access, boat tie-downs and docking, barge wharf and contact station on Naknek Lake. Construction of the facility access road, and widening of the existing Valley Road may also result in direct wetlands impacts.

Wetlands areas should be formally delineated using the Army Corps of Engineers (ACE) 1987 Wetlands Delineation Manual; the applicant's jurisdictional determinations should be verified by the ACE. Further, the EIS should be revised to document efforts to avoid wetlands losses and minimize impacts. Compensatory mitigation should be outlined in the revised EIS for all unavoidable wetlands losses. Finally, a discussion of all potential permits (e.g. Section 404 permit from the ACE) that may be required for this project, should also be included in the final EIS.

In a related matter, as part of the preferred alternative, the gravel road which currently restricts the natural hydrologic connection between the Oxbow marsh south of the Brooks River and the River itself, will be converted to trail use. The final EIS should

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investigate the possibility of reestablishing this natural hydrologic connection, conceivably through constructing culverts under the trail.

Furthermore, the EIS should evaluate potential measures for mitigating construction related impacts on the water quality of Naknek Lake, Lake Brooks and adjoining waterways. Specifically, the section on surface water quality should fully consider both temporary (i.e., construction-related) and permanent impacts of the construction of the barge facilities, floatplane access and other related features. Additionally, a contingency plan for fuel spills resulting from potential barge accidents or vehicle refueling activities should be evaluated in the final EIS.

Finally, given the very substantial increase in tourism in the Brooks River Area (900% increase over the past ten summers), it is foreseeable that Park facilities will eventually be expanded beyond what is planned for in the draft EIS. Therefore, the final EIS should include a commitment to prepare supplemental NEPA documentation if future expansion warrants it.

In conclusion, based on our review and in accordance with EPA policy, we have rated this draft EIS as EC-2, indicating that we have environmental concerns (EC) about the proposed project. In particular, the draft EIS does not adequately assess the proposed project's potential wetlands impacts. Additionally, the document does not adequately evaluate the potential for impacts to surface water quality, or present contingency measures to ensure that surface water quality is not impacted by accidental fuel spills. Accordingly, additional information (2) is required in the final EIS to address these issues.

Should you have any questions concerning our comments, please contact Wayne Elson of my staff at (206) 553-1463.

Sincerely,

Joan Cabreza, Acting Chief
Environmental Review Section

cc: Larry Norris, NPS Denver Service Center
U.S. Army Corps of Engineers, Anchorage District

SUMMARY OF THE EPA RATING SYSTEM
FOR DRAFT ENVIRONMENTAL IMPACT STATEMENTS:
DEFINITIONS AND FOLLOW-UP ACTION *

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA intends to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

February, 1987

TONY KNOWLES, GOVERNOR

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

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RECEIVED
Division of Environmental Quality
AUG 1 1995

August 14, 1995

Mr. Robert Barbee
Field Director
National Park Service
2525 Gambell Street, Room 104
Anchorage, Alaska 99503

Dear Mr. Barbee:

The State of Alaska has reviewed the supplemental draft Development Concept Plan for the Brooks River area within the Katmai National Park and Preserve. This letter represents the consolidated comments of the State's resource agencies. In preparing these comments, state agencies also consulted with the Bristol Bay Native Corporation (BBNC), which has been instrumental in facilitating valuable dialogue on Brooks River management issues.

The State commends the National Park Service, particularly Superintendent Bill Pierce, for the time and effort expended in working with the spectrum of interested parties. As a result, the new alternative 5 is a great improvement over previous alternatives. Our comments are limited to facility development plans in the preferred alternative. State resource agencies have not identified significant concerns with these facilities. Given the new direction in the preferred alternative, we offer the following comments.

First, the State is interested in working cooperatively with the NPS on the specific operational aspects of bear viewing at Brooks River. The Governor is generally supportive of enhancing the potential for bear viewing in Alaska as a component of his Trails and Recreational Access for Alaska (TRAAK) initiative. Given the growing popularity of bear viewing at Katmai, the State's longstanding role at McNeil River, and interest in fostering bear viewing opportunities in other areas of the state under various jurisdictions, it would be valuable to share insights and explore common principles.

## COMMENTS

2a By the same token, the State's management authorities concerning fisheries must be acknowledged in the plan, including the role of the Board of Fisheries in setting season and bag limits and establishing closures. These are not discretionary actions of the National Park Service, and the NPS must work with the Alaska Department of Fish and Game (DFG) and the Board of Fisheries on any desired modifications to fishing rules. Historically, there have been relatively few conflicts between fishing and bears, although as public visitation increases DFG stands ready to jointly evaluate the plan's proposed modifications.

2b In light of the DCP's Beaver Pond Terrace proposals, we agree with the views of participating local interests that other parts of Naknek Lake and the gateway communities of King Salmon and Naknek have not received the attention they deserve. New Brooks Camp facilities and an increased partnership with the gateway communities need not be mutually exclusive. If limited funding is the key constraint, then perhaps the Brooks Camp facilities could be streamlined or scaled back somewhat to help fund other facilities which serve the park.

2c The State concurs with BBNC that it may be possible to slightly increase day use with more structured management. The popularity of this area necessitates that the NPS look for ways to maximize day use without jeopardizing the bears. On the other hand, the plan should insure that visitors to other areas of the park, such as the Valley of 10,000 Smokes, are not unnecessarily constrained by bear viewing restrictions.

The State also supports BBNC's interests concerning cultural resources. The outstanding opportunities for cultural interpretation are not sufficiently recognized. An increased emphasis on cultural resources provides the NPS with unique opportunities to enter into mutually beneficial partnerships with local organizations.

Thank you for your consideration of these comments. If you have questions, please call me at 269-7477.

Sincerely,

Sally Gibert
State CSU Coordinator

cc: Joan Darnell, Division of Environmental Quality, NPS
John Katz, Governor's Office, Washington, D.C.
Marilyn Heiman, Governor's Office, Juneau
Diane Mayer, Director, Division of Governmental Coordination
John Shively, Commissioner, Department of Natural Resources
Frank Rue, Commissioner, Department of Fish and Game
Joseph Perkins, Commissioner, Department of Transportation and Public Facilities
Gene Burden, Commissioner, Department of Environmental Conservation
William Hensley, Commissioner, Dept of Commerce and Economic Development



## RESPONSES

2a. The proposed action calls for working with the Alaska Department of Fish and Game. See "Part Two: Alternatives, Including the Proposed Action" — "Alternative 5: Proposed Action – Beaver Pond Terrace, Visitor Experience and Use Limits" section.

2b. Gateway communities are included in the proposed action in "Part Two: Alternatives, Including the Proposed Action" — "Alternative 5: Proposed Action – Beaver Pond Terrace, Proposed Regional Context Concept, Gateway Community Cooperation" section).

2c. The National Park Service is confident that the elements outlined in the DCP/EIS, presented under the proposed action, represent the best possible, and most economically feasible, ways available for both protecting Brooks River area resources and providing for visitor enjoyment of those resources in a way that does not have a significant negative impact on the resources.

## COMMENTS

## RESPONSES


***Lake and Peninsula Borough***
*P.O. Box 495*
*King Salmon, Alaska 99613*

*Telephone: (907) 246-3421*
*Fax: (907) 246-6602*

August 11, 1995

Mr. Bill Pierce
Superintendent
Katmai National Park
and Preserve
P.O. Box 7
King Salmon, A.K. 99613

RE: Alternative 5
Supplement to the Draft Brooks River DCP

Dear Superintendent Pierce:

We are writing in response to the Park Service's recent call for public comments regarding Alternative 5 which is contained in the Supplement to the Draft Brooks River Development Concept Plan and Environmental Impact Statement. This correspondence contains the Lake and Peninsula Borough's comments on Alternative 5.

We would like to begin by expressing our appreciation to the Park Service, and to you in particular, for your willingness to listen to and work with the local residents, business owners, and other concerned parties who have a direct interest in the lands encompassed by Katmai National Park. We believe that the Park Service made an effort to compromise and incorporate local comments when it drafted Alternative 5. Although not everyone is happy with Alternative 5, we believe that the Park Service took a very positive step in that it established a precedent for public involvement that other national parks in Alaska can follow.

As you know, the Park Service does not have the best reputation in some parts of Alaska. Involving the public in the land use decision making process will go a long way toward increasing public confidence in and support for the Park Service. The Borough would strongly suggest that the next time you amend a land use plan in the park, it would be prudent and good public policy to begin the process of public consultation before the Denver Service Center announces that it already has settled upon a preferred alternative. That would greatly increase public confidence in the process.

3a

The Lake and Peninsula Borough generally supports Alternative 5 however, we believe this alternative could be improved with several modifications. Following are the Borough's



3a. Substantial public involvement was done on the Brooks River area DCP/EIS project before a preferred alternative or proposed action was decided on or presented to the public.

comments about four broad themes contained in Alternative 5 that are of particular interest to the residents of the Borough.

Cultural Resources:

As you know, many residents of the Lake and Peninsula Borough have direct cultural and historic ties to the lands encompassed by Katmai National Park. Some had ancestors who lived and worked in the Brooks River area. Others are decendents of Katmai Village and the other villages that once existed along Katmai's Shelikof coast. Protecting the rich cultural resources that exist in the park is a very high priority for our residents.

Therefore, we are pleased to see that one of the most prominent objectives in Alternative 5 is to protect the cultural resources in the Brooks River Area from additional damage. Designating the north side of the Brooks River as a "people free" zone and removing all buildings and facilities is one way to accomplish that objective. In the event that the relocation of Park Service and concessionaire facilities does not occur in the near future, we would recommend that the Park Service develop a strategic plan for protecting these resources. This plan should be drafted in cooperation with the public and groups which have a direct interest in the protection of these sites such as the Decendents of Katmai. We would also urge the Park Service to remove and/or remediate the contaminated soils in the area in the most expeditious and sensitive manner possible.

3b

Borough residents also believe that the rich cultural history of the Brooks River area is one of the most important and interesting resources the region has to offer. We believe that learning about the cultural history of Katmai is as interesting and rewarding to visitors as learning about bears and volcanoes. Therefore, we are pleased to see that one of the stated objectives in Alternative 5 is to increase the scope and number of Park Service interpretative programs targeted toward the cultural history of the area. We would like to see Alternative 5 contain more detail and specificity about how the Park Service will accomplish that and how it will involve local Native organizations in the process.

3c

Recent surveys of tourists visiting Alaska have shown that learning about the culture of an area is very important and desirable to many visitors. New and expanded cultural interpretative programs could become one of Katmai's greatest assets and another of its many attractions. Expanding the park's cultural programs would be a good way to involve local Native people in telling the story of Katmai to the world. It could also provide them with meaningful and rewarding employment opportunities.

Title 13 of ANILCA:

The Bristol Bay Native Corporation has reminded the Park Service in several of its correspondences that it had an obligation to comply with Title 13 of ANILCA. Title 13 essentially says that commercial activities within National Parks shall benefit local people as much as possible because they lost economic opportunities that could have been



3b. In the unlikely event that relocation of NPS and concessioner facilities does not occur in the near future, the National Park Service would develop additional strategies for protecting the cultural resources of the Brooks River area. Strategies would be developed in consultation with appropriate Native Alaskan groups, such as the Council of Katmai Descendants, as well as with the State Historic Preservation Office and the Advisory Council on Historic Preservation. If any action is found to be required, but was not anticipated in this EIS, additional compliance would be done.

Text has been included in the new proposed action (alternative 5) noting that current remediation efforts involving the contaminated soil at Brooks Camp would continue, with resource staff monitoring the remediation crew's actions and impacts to ensure a minimum of human influence and interference occurs north of the river.

3c. A more detailed description of how cultural history will be addressed will be presented in an updated interpretive prospectus.

## COMMENTS

3d

available to them when the area becoming a park. The Lake and Peninsula Borough agrees wholeheartedly with BBNC on that point and would urge the Park Service to take all necessary and appropriate steps to insure that it is in compliance with Title 13.

Although it may not be necessary to mention Title 13 specifically in the Brooks River DCP, the plan itself has important implications for whether or not the Park Service is doing all it can to carry out the spirit and intent of the law. For example, encouraging the development of gateway and recreational facilities at Lake Camp would further the goals of Title 13 because most of the land in the area is owned by local Native people and the local Native Corporation. Encouraging appropriate development there would give them the chance to capitalize on economic opportunities that might become available as the visitor industry grows at Katmai.

3e

The Park Service could take other steps to insure compliance including establishing and adhering to a Native or local preference when awarding contracts for concessionaire operated services or other commercial operations in the park, requiring that concessionaires employ a certain number of local residents, and requiring that the new cultural interpretative programs be directed and staffed by local Native people.

The Gateway Community Concept:

The Lake and Peninsula Borough believes generally that the gateway community concept is a good idea. It promotes park related economic development in adjacent communities and encourages local private enterprise. It also serves to protect park resources and the wilderness values that makes the park so popular. We believe that King Salmon is the logical gateway community for Katmai and we support your intent to establish a larger visitor and orientation center here. We would also support the Park Service in any efforts it may undertake to work with the community to make it more physically attractive and to develop additional activities and destinations for visitors. We would ask that the Park Service keep an open mind about working with the Lake and Peninsula Borough Communities of Kokhanok, Igiugig, and Levelock to estsblish them as gateway communities also if and when they decide that they wish to be established as such.

Although we support the gateway concept in general, we believe that there are still valid reasons for maintaining the presence of some type of lodge or overnight facility in the vicinity of Brooks River. We believe this for a number of reasons which include:

1. Visitor demand for the Brooks River is at an all-time high. The Brooks Camp experience is unique and it is very hard to get a "feel" for the place or experience its many moods and personalities unless one spends more than a couple of hours there. There is value in spending at least one night there and immersing yourself in all of the wonders the area has to offer. In addition, not everyone is physically or mentally prepared to camp. We believe all people should have an equal opportunity to experience the wonders of the Brooks River area and to have the opportunity do so for more than a brief day trip if they so choose.



## RESPONSES

3d. The National Park Service will fully comply with Title 13 of ANILCA.

3e. See response 3d above.

## COMMENTS

2. There is value in having a centralized "base camp" for hikers, climbers, kayakers, and others who are out experiencing the backcountry and wilderness areas of Katmai. Brooks Camp is presently the only place in the park where people can come in and make a radio call, buy some fuel, restock food supplies, and get a shower. It would be tough indeed if backcountry travelers had to make their way all the way back to King Salmon to do these things. Eliminating lodge and service facilities completely from Brooks Camp would serve to make the park more inaccessible than it already is. Only the most hardy and self reliant of visitors would be able to experience the Katmai backcountry.

3. The Lake and Peninsula Borough has the ability to tax commercial operators in the Park. It currently levies a flat permit fee for lodges and guiding activites. The Borough Assembly is actively considering levying a modest "bed" or lodging tax in the future. We use the revenues raised from the permit fee to fund services and infrastructure improvements that directly benefit the people who reside in the Borough. The most important service the Borough provides is an excellent public school system. We also use this money to promote tourism by supporting the King Salmon Visitor Center and other activities. While the ability to levy local taxes may not technically fall under the purview or intent of Title 13 of ANILCA, it does serve to direct revenues derived from commercial activities in the park toward services and local improvements that benefit local residents.

3f

Although we support the presence of some type of lodge in the Brooks River vicinity, we agree with BBNC that this facility should be scaled back even more than what is proposed in Alternative 5. We believe this is necessary to reduce this facility's "footprint" and its impact upon the land. We also believe that the estimated pricetag for the proposed facility is far too expensive; especially if the Park Service anticipates that most of the cost of building these faciities will be borne by the concessionaire who is awarded the contract to operate there. We believe that a serious look at amortization tables for this project would be enough to give pause to all but the most well endowed of business organizations. In other words, although the Brooks River may seem like an attractive business opportunity on the surface, we can imagine that the Park Service may not get too many bidders at the estimated price contained in Alternative 5. We believe that the facility complex can be scaled back by doing things like combining functions and activities under one roof and by using existing buildings to the extent possible.

Limiting Day Use:

The Park Service has been criticised by some for its proposals to limit the number of day users who visit the Brooks River. Alternative 5 contains some changes in how the Park Service would manage the Brooks River area in response to that criticism. The Borough agrees that more intensive management is necessary in order to protect the bears from unneccesary harassment and to preserve the quality of the visitor experience. The Borough believes further that the Park Service should continue to work with commercial operators and the general public to explore other alternative methods for managing the area that would meet the stated management objectives contained Alternative 5.



## RESPONSES

3f. The lodge facility called for in the proposed action will efficiently accommodate several functions, minimizing the total footprint for these functions. The functions accommodated by the lodge facility are part of the spectrum of functions needed to provide for the widest cross section of the public as is feasible (NPS *Management Policies* 1988, chap. 8:5). The cost is a reflection of complying with various regulations that apply to facilities that fall within government jurisdiction, providing sustainable design requirements, and providing the required functions. The mechanism for funding development is somewhat flexible.

Having said that, we would also like to state that we support the Park Service's Limits to Acceptable Change (LAC) approach to managing the Brooks River area. We believe that there are indeed limits to growth if preserving the quality of the visitor experience is important. There is a point of diminishing returns and when this point is reached, the visitor experience will deteriorate and the uniqueness of the Brooks River area will cease to exist. The Borough believes that the daily visitation target limits contained in Alternative 5 are very close to point at which change in the visitor experience becomes undesirable.

The Borough understands that some have advocated for a more creative and intensive management scheme and for the construction of facilties that would serve to maximize the number of people that could visit Brooks River during the course of a day or at any given time. We believe that these ideas should be given serious consideration and review. We also understand that some of these ideas have worked elsewhere.

However, we have reservations about these ideas and would recommend caution in proceeding with them. Brooks River is unique precisely because visitors can view bears and fish in a relatively uncrowded, unstructured, and natural setting. We question whether the visitor experience or the well-being of Katmai's bears is well served by packing as many people as possible into the area. The constant arrival and departure of boats and aircraft in tightly scheduled intervals may not be realistic or desirable. In short, we are concerned that these types of proposals have the potential to destroy what is unique and valuable about Katmai. Katmai is not a zoo and its value may be greatly diminished by establishing a Disney Land or Sea World type of atmosphere where people are constantly present along most stretches of the river and are shuffled in and out of the area as quickly as possible.

This does not mean that business opportunities should be curtailed or that the total number of visitors to the park should be limited at this time. We believe the Park Service can implement Title 13 of ANILCA, encourage tourism, promote the Park, and limit day use at Brooks River all at the same time. These goals are not mutually exclusive. This can be done by promoting dispersed use within the park. Locations like the Bay of Islands, Research Bay, Lake Grosvenor, and Lake Camp itself are relatively easy to access for the public. They all have plenty of good fishing, plenty of bears to view, and a multitude of other activities that visitors can enjoy. None of these areas are even close to approaching carrying capacity in terms of visitor impacts. With careful management, it is possible to encourage dispersed use in selected areas of the park without adversely impacting the wilderness resources and values which make Katmai National Park special.

The Lake and Peninsula Borough appreciates the opportunity to comment on Alternative 5. Please do not hesitate to contact us if you have any questions or need any additional information.

Sincerely,

Walt Wrede

Walt Wrede
Borough Manager

c.

Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young
Governor Tony Knowles

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SOUTHWEST ALASKA MUNICIPAL CONFERENCE

3300 Arctic Boulevard, Suite 203
Anchorage, Alaska 99503
Phone (907) 562-7380
Fax (907) 562-0438

August 14, 1995

Robert Barbee, Regional Director
National Park Service, Alaska Region
2525 Gambell Street
Anchorage, Alaska 99503

Dear Mr. Barbee,

We appreciate the Park Service's efforts to work with local residents and business interests to develop Alternative Five for the Draft Brooks River DCP. Brooks Camp is one of the most popular attractions in southwest Alaska, but as with many of the national parks in the U.S., it is in danger of being "loved to death." On behalf of the Southwest Alaska Municipal Conference (SWAMC) I wish to offer the following brief comments:

4a Gateway Communities — The gateway community concept has great potential for relieving the need for extensive visitor and interpretive facilities in the park, however it is not very well developed in Alternative Five. We are very supportive of developing facilities in King Salmon to educate and inform visitors about Katmai National Park and the unique opportunities to view bears and recreate at Brooks Camp. Since the primary access point by boat is at Lake Camp, we also encourage the Park Service to look into providing interpretive kiosks or other informational facilities near the boat launch area. Since Lake Camp is a former military site, there may be funds available through the Department of Defense's Legacy Program for developing appropriate visitor facilities.

4b Title 13 ANILCA — The Park Service should make special efforts to encourage local participation in Park projects and facilities development in accordance with Title 13 of ANILCA. NPS might consider such measures as allowing additional points for park concession applications submitted by local residents or a local-hire preference for concession employees and staff interpreters.

4c Cultural Resources — The Park Service currently uses the bears at Brooks River and the Mount Katmai eruption as the two primary interpretive themes for Brooks Camp. The indigenous people of the Katmai region have a long and unique cultural heritage that should be prominently incorporated into the park's interpretive program.

Thank you for your consideration. We look forward to working with you and other Park Service staff as you continue to develop and implement the Brooks River development concept plan.

Sincerely,

Mary S. Stockum,
Executive Director

Kodiak Island ♦ Alaska Peninsula ♦ Bristol Bay ♦ Aleutian Chain ♦ Pribilof Islands

4a. The National Park Service will work cooperatively with various groups to develop programs and facilities to accomplish the purposes and goals of Katmai National Park and Preserve that apply to the Brooks River area, including those that assist in providing public information about park visitor opportunities, interpretation, resource protection, access, and movement of materials needed to support the area.

4b. See response 3d to comment on supplement to draft DCP/EIS.

4c. As stated in the section on cultural resource interpretation, the 1993 *Interpretive Prospectus* for Katmai National Park and Preserve would be updated to better reflect the richness of the cultural resources, and the National Park Service would seek out local people knowledgeable in Native culture and history to develop and conduct interpretive programs. The section on interpretive facilities notes that cultural interpretive facilities would include reconstruction of a model barabara, archeological excavation sites, ethnographic displays, and work areas. Demonstrations of traditional practices and explanations of the culture and lifestyle could also be developed. These activities would be tied in with other activities and exhibits, including those at Lake Camp and King Salmon, to provide a full array of programs telling the story of the environment and cultures of the region.

## COMMENTS

ALASKA PENINSULA CORPORATION
800 Cordova St., Suite 103
P.O. Box 104360
Anchorage, Alaska 99510
Telephone (907) 274-2433
Telecopier/Facsimile (907) 274-8694

August 11, 1995

Bill Pierce, Superintendent
Katmai National Park
P.O. Box 7
King Salmon, AK 99613

Dear Mr. Pierce,

The Alaska Peninsula Corporation (APC) is the village corporation for five villages in the Bristol Bay Region. The five villages are South Naknek, Kokhanok, Ugashik, Port Heiden, and Newhalen. The villages are adjacent to the Katmai National Park, the Aniakchak National Monument and Preserve, Becharof Refuge, Alagnak Wild River, and the Lake Clark National Park.

APC would like to comment on Alternative 5 of the Brooks River Area Development Plan.

5a During the initial phase of the Denver Work Group's recommendations on the Brooks River alternatives, APC objected to the alternatives because they lacked a meaningful focus on the culture of the area. The alternatives were a desecration to the ancestral homeland of the descendants of the Katmai. The Decendants of the Katmai expressed grave concern about the archaeologically sensitive sites that were being proposed.

We were encouraged when the Park Service heard the concerns expressed by the organizations interested in the Brooks River and began to build a consensus for a supplement to the Draft Brooks River DCP. We had hoped that the plan would address the concerns that the Katmai Working Group had about the development of the Brooks River.

5b We would like to take this opportunity to voice our objection to the new plan. We believe that the plan is not economically feasible. We feel that the relocation of the concession to the Beaver Pond would be cost prohibitive and would in effect eliminate small businesses from participating in any future business opportunities.

5c We also feel that there is not enough cultural interpretation of the Native People who inhabited the area five thousand years ago. There are no plans in the alternative to highlight the cultural significance of the site.

We feel that the day use is one of the best ways to develop Katmai. This in turn would promote gateway development of the Park.

## RESPONSES

5a. See response 5b to comment on draft DCP/EIS.

5b. The National Park Service is confident that the elements outlined in the DCP/EIS, presented under the proposed action, represent the best possible, and most economically feasible, ways available for both protecting Brooks River area resources and providing for visitor enjoyment of those resources in a way that does not have a significant negative impact on the resources. All appropriate efforts will be undertaken to enable small businesses to participate in providing facilities and services for the Brooks River area.

5c. See response 4c to comment on draft DCP/EIS.

Of course, with day use, a dock facility at the Lake Camp along with some dredging of the boulders and shallow water would be necessary.

5d

Finally, we believe that nothing in the plan addresses the other potential gateway developments such as a staging area at the Kokhanok Village for entry into the Katmai National Park.

5e

Additionally, we believe that the plan does not give any special consideration to Native Organizations such as APC to participate in any business development at the park as promised by Congress when ANILCA was passed.

We urge that these issues be addressed so that we can look forward to a long and meaningful relationship with the National Park Service.

Sincerely,

Ralph Angasan

Ralph Angasan, Sr., President
ALASKA PENINSULA CORPORATION

5d. It is beyond the scope of this DCP/EIS to address broader Katmai National Park and Preserve access issues.

5e. See response 3d to comment on supplement to draft DCP/EIS.

BRISTOL BAY
NATIVE CORPORATION
800 CORDOVA / P.O. BOX 100220 / ANCHORAGE, ALASKA 99510 / (907) 278-3602
TELECOPY (907) 276-3924

10 July 1995

To: Katmai Working Group
Fm: Tom Hawkins
Re: Alternative 5 Brooks River DCP

We read the new effort by the folks from Denver. There were some reasons to feel that our efforts were not wasted. However, it seemed to us that they had taken most of our suggested improvements and merged them with the flawed vision that NPS preferred, alternative 2. Now NPS has 2 alternatives in the derby that they can live with but many of us are still looking for one to endorse. We have taken a preliminary cut at our comments and are furnishing them to you in hope that you will mark them up and tell us what you think. Working together, I thought we were on the brink of a vision for the DCP that made sense for a broad range of us. I know that I learned a lot from hearing the views that you shared over the past months.

Perhaps my initial views on this matter are too pessimistic. Your comments may help me recognize the silver lining in what looks like a large gray cloud. I think the extent of the development that NPS projects for the Brooks River area is unrealistic and unnecessary. I would like to see more attention given to Lake Camp and the other gateway locations. We made some progress on the day use issue but I think NPS doesn't give enough credit to the willingness of the guiding and concession community to structure this experience. The upcoming workshops will likely teach us why our thinking about these matters is so far off the mark. See you there. If you have comments on our preliminary views of this matter it would be good to hear from you by the end of July. Thank you.

## COMMENTS

July 4, 1995

Robert Barbee, Regional Director
National Park Service - Alaska Region
2525 Gambell Street
Anchorage, AK 99503

**Subject: Katmai National Park/Brooks River DCP**

Dear Director Barbee,

This letter responds to the May 95 supplement to the Draft Brooks River DCP. We can not support Alternative 5. While some incremental progress has been made, this "new" alternative largely has the same approach and same failings as the old preferred plan (Alt 2). Alternative 5 continues to push for too much development at Brooks (over $21 million worth). The alternative proposes very little in Katmai gateway communities, where impacts and costs are much lower and more benefits go to local residents and businesses. The plan continues to short change day use, to miss opportunities to celebrate the area's remarkable cultural resources, and to neglect the goals of Title 13 of ANILCA. As Table 5 of this supplement EIS repeats again and again, the impacts of this alternative are "Same as Alternative 2".

We have worked hard over the last year to develop a better plan. We helped bring together knowledgeable, diverse voices, including the Native community, environmental organizations, the concessioner, local landowners and businesses and the Park Service. While there was not total consensus, the framework of a much improved plan - the plan we had hoped to see as Alternative 5 - emerged through this process. The elements of this framework include the following:

6a **Reduced Facilities at Brooks** - Alternative 5 appears to have been prepared by making a few minor chips off the block of development proposed in Alt 2. The planning process should have been reversed: starting at a zero base, facilities should only be proposed at Brooks if they are vital to the Brooks experience, can not be located elsewhere, and can be built and operated with minimal impact. For example, impacts could be reduced and money saved by not building separate structures for a contact station ($184,000), ranger station ($121,000), orientation center ($126,000) and a lodge dining facility ($1,650,000), as called for in Alternative 5.

6b **Expanded Day Use/Improved Visitor Management** - Brooks Camp is too important and too popular a destination for the simplistic day use limits imposed by Alternative 5. With

## RESPONSES

6a. The process used to arrive with the facilities called for in the proposed action examined the need for each facility and opportunities for clustering and combining facilities that were determined to be necessary.

6b. Under the proposed action, monitoring visitor experience, using limits of acceptable change (LAC) procedures may indicate that 15% more or fewer people would be allowed in the Brooks River area, on a per day basis, and still meet the standards called for under the proposed action. The National Park Service is confident that the standards called for by the proposed action provide the best possible visitor experience and resource protection that adhere to applicable policies and legal mandates.

## COMMENTS



more sophisticated, structured visitor management, at least 100 day use visitors "at-one-time" can have a high quality experience while resources are well protected.

6c

**Improvements in Gateways/Naknek Lake Area** - Alternative 5 makes references to gateway improvements and dispersed visitor use, but lacks detail. A stronger Park Service role will be needed in public-private partnerships on at least four projects: 1) a new or much improved visitor interpretive center within walking distance of the King Salmon airport, 2) improved boat launch facilities at Lake Camp, and 3) cooperative planning to make King Salmon/Naknek/Lake Camp area a better gateway community, 4) visitor improvements around Naknek Lake within the Park to support expanded day and overnight use.

6d

**Increased Focus on Cultural Resources** - For over a year we've dutifully noted that the re-created structure at Brooks should be a *barabara*, not a "pit house". While Alternative 5 starts to define a cultural resource strategy, it's still a pit house in this alternative (and now bumped off the NPS funding list), and the proposals for cultural interpretation are still weak. NPS needs to make much stronger commitment to specific facilities, interpretive programs (including limited traditional fish harvesting practices), trail routings, staffing and other actions to bring out the ancient and ongoing Native life at Brooks Camp and throughout the Park.

6e

That we are once again listing these issues illustrates the fundamental problem underlying this alternative. The process to prepare this plan is as important as its contents. This is because of local knowledge, and because the plan relies so heavily on local political support, local "partnerships" and the concessioner for implementation funding. The current planning process separates those who must support/implement the plan (largely people and organizations in Alaska) from those control key plan policies (largely people outside Alaska) and is destined to fail.

The Park Service should apply the oft-mentioned "partnership" concept, not just when listing those who were contacted, or who will help pay for the plan, but when preparing the plan. Attached are specific comments on particular sections of Alternative 5, developed over the last year with the participation of the parties mentioned above. Alaska needs a primary voice in either remaking Alternative 5 or developing new alternative to address these issues. We believe that with such changes, NPS would have a plan that would meet the Park Service's mandate for Katmai, satisfy visitors, be supported by a diverse range of local and statewide interests, and because of this broad support, have an excellent chance of successful implementation.

Thank you for this opportunity to comment on policies for the Katmai area.

Sincerely,

Tom Hawkins
Chief Operating Officer

## RESPONSES

6c. More detail is beyond the scope of this DCP/EIS. However, the National Park Service is supportive of working with the local community to address the four areas listed.

6d. The term "pit house" has been replaced by *barabara* in the text throughout the DCP/EIS. The barabara was not eliminated from the funding list; please refer to appendix F, table F-5, under "Partnerships/NGO Costs" in this DCP/EIS.

The NPS commitment to providing staffing and developing facilities and interpretive programs for interpreting cultural resources in the Brooks River area is clear (see response 4c). The detailed contents of interpretive exhibits and programs are more properly addressed in the 1993 *Interpretive Prospectus* for the park, not in this plan (see response 13j to comment on draft DCP/EIS).

6e. Preparation of the Brooks River area DCP/EIS has involved substantial public involvement conducted by NPS staff both from Katmai National Park and Preserve and from the regional office in Anchorage, with people and organizations in Alaska. NPS staff in Alaska participated in, reviewed, and oversaw the entire process, and make all final decisions regarding the process and the content of the plan.

CC:Secretary Bruce Babbitt, Under Secretary George Frampton
Senators Frank Murkowski and Ted Stevens
Representative Don Young
Superintendent Bill Pierce

## COMMENTS

**CHANGES TO ALTERNATIVE 5**
**BROOKS RIVER DEVELOPMENT CONCEPT PLAN**

6f

pages i, iii (Summary) - Insert prior to sentence re King Salmon Visitor Center

The size and infrastructure requirements of new facilities would be limited, and the intensity of day and overnight visitor use along Brooks River carefully managed to minimize impacts on natural and cultural resources. (if necessary to save space, sentence re Brooks River orientation could be dropped)

page 2 (Guiding Principles and Concept Statement) - Substantially revise this section to clarify guiding principles - replace the first three paragraphs with the following material.

The management actions and development proposed in Alternative 5 are based on a recognition that the Brooks River area offers a unique concurrence of wildlife and cultural resources in a spectacular setting, offering visitors an experience rarely found in North America or the world.

The principles that guide Alternative 5 begin with the goal of **preserving the particular experiences which today make Brooks River such a unique destination.** Key elements of the Brooks River experience today include the natural setting, the chance to observe brown bears at close range and world-class rainbow trout fishing. Also key is the opportunity for people to enjoy this remote natural setting and at the same time be comfortable and socialize, to talk around the fire. To protect these experiences this alternative will provide rustic but comfortable overnight accommodations and an improved approach to managing day use. Special efforts will be made to make the entire Brooks River area handicapped accessible. Elements which intrude on natural processes (e.g., uses affecting bear movement), that are readily available elsewhere (e.g., salmon fishing), or that diminish the visitor's sense of closeness to the natural world (e.g., unnecessary luxury) would be carefully controlled or eliminated.

**Providing a better opportunity to understand the area's ancient history of human habitation** and its connections to the vital contemporary Native culture of the region is another guiding principle. This will be achieved with interpretive facilities and programs at Brooks River, at other Park locations, and in "gateway" communities.

6g

Another guiding principle is **managing Brooks River as one part of a larger regional system of visitor activities and facilities.** The goal of this effort is to provide a high quality visitor experience and protect resources, and also to broaden the economic benefits of Park use to people of the Katmai region. This latter goal reflects the objectives of Title 13 of ANILCA. These goals will be accomplished by reducing the intensity of development at Brooks, while promoting expanded visitor facilities at the Park's periphery in the King Salmon/Naknek/Lake Camp gateway area and dispersing visitor use over a broader area of the park. A related goal is **relying more on partnerships with other public and private parties in the region to construct and manage visitor programs and**



## RESPONSES

6f. The National Park Service believes the description of the proposed action adequately addresses concerns about size and infrastructure of new facilities; therefore, there is no need to insert this statement into the text (see "Part Two: Alternatives, Including the Proposed Action" — "Alternative 5: Proposed Action – Beaver Pond Terrace, Proposed Development" section). The description of the proposed action also notes that management of day and overnight use of visitors along the Brooks River would be more structured than under current conditions (see "Part Two: Alternatives, Including the Proposed Action" — "Alternative 5: Proposed Action – Beaver Pond Terrace, Visitor Experience and Use Limits" section).

6g. The suggested changes are essentially included in "Part One: Purpose of and Need for the Plan" — "Brooks River Area Significant Resource Statements" section; "Part Two: Alternatives, Including the Proposed Action" — "Actions Common to All Development Alternatives" and "Alternative 5: Proposed Action, Visitor Experience and Use Limits" sections. The National Park Service will fully comply with Title 13 of ANILCA.

## COMMENTS

**facilities**. Programs and facilities historically provided by NPS are likely to be provided by other parties, under NPS guidance.

Lastly, Alternative 5 **requires a more carefully structured visitor experience, for both day and overnight visitors.** These management practices have proved effective in other places where demand is intense for a limited, vulnerable resource, including areas where bears and people are consistently side by side in the wild. To both protect Brooks River's unique resources, and provide opportunities for the greatest number and diversity of visitors to experience the area, both the physical developments and the management actions recommended in Alternative 5 are required. To achieve desired results, development and management cannot be separated.

6h

page 3 (Visitor Experience and Use Limits) - first full paragraph, add sentence after 1st sentence, and revise beginning of following sentence.

To accomplish this goal, the NPS will work cooperatively to expand or establish a new visitor center, to be located within walking distance of the airport. This and other improvements would be undertaken cooperatively with the citizens....

6i

page 3 - second full paragraph, modify last sentence, follow with new material

There are a number of challenges to the use of boat access to Brooks River, including occasional poor weather and shallow waters at the outlet of Naknek Lake. Recent experience has demonstrated, however, that watercraft can provide a viable supplement or alternative to air service. Recognizing the value of boat access, the NPS will place priority on cooperative work with land owners in the Lake Camp area, the Brooks Camp concessioner and other affected parties to improve boat and barge launching facilities.

6j

page 3 - last paragraph, modify first sentence

Visitor use limits at the Brooks River area would be established to protect and improve the visitor opportunities of this unique natural area as well as provide for visitor safety and resource protection. (It's misleading to characterize Brooks River as an "uncrowded wilderness-like" area. It's more like a uniquely valuable, naturally occurring class room or art gallery)

6k

page 4 - first paragraph, add sentence following second to the last sentence

These figures reflect the intent to manage all visitors more intensively in the Brooks River area, which allows the number of day users to be increased from the 1994 LAC projections. New management practices will include limiting time on the platforms, improving orientation and pre-trip briefings, and requiring all visitors to make reservations and be in specific parties accompanied by a guide.

6l

page 4 - second paragraph, revise existing fifth sentence, add additional material





## RESPONSES

6h. The National Park Service will continue to work cooperatively with citizens of King Salmon, the Native organizations, Bristol Bay and Lake and Peninsula Boroughs, U.S. Fish and Wildlife Service, and others to broaden the scope of information available at the King Salmon Visitor Center. However, it is beyond the scope of this DCP/EIS to address the need, specific location, and construction of a new visitor center outside the Brooks River area. The Brooks River orientation center and the Brooks River lodge will complement and complete building-based facilities, located at Brooks River and at other locations, directed at providing information and interpretation emphasizing the Brooks River area. See also response 4a to comment on supplement to draft DCP/EIS.

6i. The National Park Service will, as appropriate, work cooperatively with landowners and others regarding issues of access to the Brooks River area, including the use of boats. The text, as modified, is adequate.

6j. The statement has been revised in this DCP/EIS to better reflect the desired futures for the Brooks River area, which include maintaining low-to-moderate interaction levels between visitors and ensuring that visits to the area feature small groups, an unhurried atmosphere, and occasional opportunities for solitude.

6k. The statements provided have been added to the text of the proposed action (alternative 5); however, the word "could" has been substituted for the word "will," as a decision to implement all of the listed management practices has not been made.

6l. The National Park Service believes visitor numbers should be defined as the maximum number of people in the Brooks River area per day, rather than at one time. If visitation were limited on the basis of the people at one time, the impacts on the environment could potentially be much greater than if use limits were set on a per day basis. To illustrate this concern, imagine setting a use limit of 10 people at one time for an area. This means there could be 10 people in the area at one particular point in time, 10 different people in the area at a different point in time, 10 other people in the area at yet another time, etc. The total number of people in the area at the end of a day could be some multiple of 10; therefore, the impacts on this number of people would be higher than if the use limit had been set at a maximum of 10 people per day.

Please note that the supplement to the draft DCP/EIS (p. 4) mistakenly stated that alternative 5 is based on a defined number of visitors permitted within various locations along the Brooks River corridor at one time. This statement has been corrected in this final DCP/EIS to state that use limits would be defined as the maximum number of people that can be in the Brooks River area over the course of a day without creating unacceptable impacts defined by the standards.

6m. The National Park Service remains convinced that seasonal closures of certain reaches of the Brooks River must be established to reduce the number of human/bear encounters along the river and decrease food conditioning and

## COMMENTS

Rather than a system based on the total numbers of visitors who may be randomly present over the entire Brooks River Area in one day, this alternative is based on a defined number of visitors permitted within various locations along the Brooks River corridor at one time. This corridor is defined as the area between the river and the east west road on the river's south side. Visitors who only pass through Brooks Camp facilities en route to the Valley of 10,000 Smokes, for example, are not considered in these day use limits.

6m

page 4 - third paragraph, modify sentence re fishing restrictions

... Brooks Falls downstream to the river mouth would be zoned as a people free area in July when there are large numbers of bears present. In mid-September through October, when bears congregate to feed on late spawning salmon and salmon carcasses, access in this area would be allowed but be limited. (This is the compromise worked out between to allow exceptional late season angling and protect bears.)

6n

page 4 - add at end of this page

Much of the daily responsibility to implement this more intensive visitor management system will fall on commercial operators. Their initial and ongoing right to operate will be based on compliance with these limits and practices. Commercial operators will be responsible to establish the capabilities to work within these restrictions, including necessary communications, visitor orientation and guide services, and the ability to respond to changing weather. Ongoing NPS monitoring will ensure that this visitor management system is not creating unacceptable impacts on wildlife, the natural environment or cultural resources.

6o

page 7 - modify Table 1 and add footnote

Day Users
(at one time)*

* = Day use limits are set for visitors "at one time". At Brooks day use visits would be allowed and reserved in half day increments, thus allowing up to 95 day users in the morning and 95 in the afternoon if commercial trips were so scheduled (numbers drop to 85 in September). Maximum total day use would therefore would be as high as 190 visitors (170 in September). Day use would be by reservation only and would be managed through the concession permit requirements for all operators bringing people to Brooks. This reservation system will allow these visitors to be spread out over the long Alaskan day, so that overcrowding can be avoided.

6p

page 8 (Cultural Resource Interpretation) modify first sentence

An expanded, integrated set of programs and facilities...

6q

page 8 (Cultural Resource Interpretation) replace second paragraph with expanded version below



## RESPONSES

habituation of the local bear population. However, the proposed closure in mid-September to October when bears congregate to feed on late-spawning salmon and salmon carcasses has been changed to apply only to that portion of the Brooks River from the Oxbow closure line (not Brooks Falls closure line as was described in alternative 5) downstream to the river mouth, excluding the narrows platform. If the actual number of bears present and other attributes of the bears, indicated that the risk of a human/bear encounter was low, then the closed sections could be reopened.

Evidence suggests that, even without seasonal closures in place, these areas of the river would be closed most of the time during July and from mid-September through October due to the number of bears and other bear-related conditions. The National Park Service believes implementing seasonal closures would let the public know to expect. This would be better than having people expect the areas to be open when in reality they would be closed most of the time.

6n. The more detailed language suggested is appropriate for contracts with respective service providers rather than this document.

6o. Implementation of "per day" rather than "at one time" use limits for the Brooks River Area is more logistically feasible. It would also result in lower resource impacts, given the same use limit numbers under the two different approaches.

6p. The National Park Service believes the sentence as written is adequate.

6q. The paragraph has been modified.

## COMMENTS

At Brooks River, interpretive activities and facilities would be located considering the need to minimize conflicts with bears while taking best advantage of the area's cultural resources. Interpretive programs for archeological sites immediately adjacent to the river would be improved. Developed interpretive facilities, such as a rebuilt barabara or living history exhibit, would be located outside the river corridor. In general, Brooks River interpretive efforts would focus on programs such as interpretive walks, story telling, observation of crafts and similar activities not requiring facilities dedicated exclusively to interpretive use. Brooks River interpretive activities requiring built facilities, such as displays, resource materials, and enclosed gathering areas, should be incorporated into facilities such as the lodge or visitor pavilion. Additionally, Brooks River interpretive programs should be planned as part of the broader interpretive program available in King Salmon, Lake Camp and throughout the park.

6r

page 8 add new paragraph

The Park Service will comply with the specific mitigation requirements of NEPA, the Native American Graves Repatriation Act and other applicable laws protecting the cultural/archeological resources.

6s

page 8 (visitor orientation) - modify section title, associated text

**Construct Multi-Purpose Visitor Orientation & Interpretation Pavilion**

A multi-purpose "pavilion" area will be developed, either independently or as part of the program of the lodge or other buildings. This pavilion will be designed to be comfortable and give shelter from the elements, but will not necessarily be fully enclosed or heated. The space will provide an area for interpretive activities requiring indoor space and for day users to eat their meals. (Orientation re behavior in bear country will be provided en route to Brooks.)

Visitor orientation and interpretation activities would actively use of the area's natural and cultural resources - real bears, archeological sites, swimming salmon, growing plants - and de-emphasize the use of displays, exhibits and structures. This approach will rely on capable interpreters to tell the stories of the area's natural and cultural history, and programs that give visitors a direct experience of these stories, such as demonstrations of Native crafts or food preparation, interpreted hikes, and supervised participation in archeological research. The limited interpretive activities requiring displays, exhibits or indoor presentations would occur in the pavilion area described above, or be incorporated into the program for other buildings, such as the primary lodge facility or the campfire/cooking area associated with the campground. Using these means, indoor space will be provided for evening programs for up to 40 visitors.

6t

page 15 (trail to Brooks Falls) modify existing sentence

.... including removal to eliminate blind corners, and rerouting of trail sections and to better protect and interpret archeological resources, and to take advantage of slope conditions.





## RESPONSES

6r. The National Park Service will comply with numerous laws, regulations, and policies, including the National Environmental Policy Act in the management of the Brooks River area. See "Part Two: Alternatives, Including the Proposed Action" — "Actions Common to all Development Alternatives, Cultural Resources" section for a listing of specific laws that will be adhered to regarding cultural resources.

6s. The National Park Service believes that the proposed visitor orientation and ranger station building, as well as the proposed use of the lodge as a gathering area for visitors during inclement weather and for evening programs, would serve the same purposes as the "pavilion."

The suggestions on visitor orientation and interpretation activities are covered in the 1993 *Interpretive Prospectus*.

6t. The text has been changed.

## COMMENTS

6u

page 15 (bear viewing platforms) modify second paragraph of this section

The falls platform would be expanded to two platforms, separated by 50 feet or more, with one way visitor traffic....

6v

page 16 (Beaver Pond Terrace) substitute material below for third paragraph

Criteria that will be used to guide and evaluate development proposals include: the guiding principles (presented earlier), a quality visitor experience, energy conserving designs requiring minimal or no use of off-site energy sources such as diesel fuel, and artful reuse of materials and structures from the existing Brooks Camp facilities. Other building criteria would include minimizing the overall footprint, scale and areal extent of development; minimizing the number of buildings/plans for multiple use of buildings; use of materials that complement the natural setting; and minimizing environmental impacts such as those associated with wastewater discharge, water use, heating and noise. To fulfill visitor needs and reduce impacts, the building program should include a spectrum of lodging types, from camping, to bunkhouse/hostel, to more traditional "private" cabin/tents.

Site selection criteria would include protection of archeology, protection of bear movements and activity areas, requirements for vegetation removal, and the physical characteristics of the site for sewer, water, etc. Site planning evaluations would also consider the response to views, light, and wind, and the selection of specific sites to create the best relationships between different activities. Finally, criteria for a successful design extend to demonstration that the project can be financially viable, and to operational details such as maintenance requirements, generation of garbage, etc.

6w

The entire development package will be evaluated on the premise that the NPS is desiring as small a footprint and impact on the land as possible while still providing visitors for a comfortable stay, a chance to meet other visitors and above all a change to experience the unique resources of the area. Likewise staff facilities should be sufficiently comfortable to maintain morale and retain good workers.

page 16 (lodge and related facilities) revise paragraph as shown below

Lodge and Related Facilities - The central lodge would provide a simple dining facility and gathering area for overnight guests and day users, and overnight accommodations for up to 60 guests. The specific facilities developed would be those that best meet the criteria outlined above. One possibility is to offer a combination of multi-bed bunkhouse and tent/cabins similar to the High Sierra Camps in Yosemite National Park. Lodge food service would provide basic food service for overnight and day users in the most effective manner possible. Only limited sales of books, interpretive materials and essential items would be authorized at the lodge. Interpretive displays and exhibits and gathering places for interpretive presentations would be incorporated into the program for the lodge building. Low impact toilet/shower facilities would be provided for all lodge guests and campers.



## RESPONSES

6u. The separation of these two platforms will be minimized to reduce the area of bear habitat disturbed by human presence at the falls.

6v. The text at this place in the document or elsewhere addresses and covers many of the points will be addressed in the design phase following the "Record of Decision."

6w. The text has been changed to provide more details and to call for elements the National Park Service believes are more appropriate.

## COMMENTS

6x

page 17 (interpretive facilities) revise term in first sentence, add new sentence as shown below

Cultural and natural interpretive facilities and exhibits, such as a reconstruction of a model barabara, ... ... Demonstrations of traditional practices and explanations of the culture and lifestyle could be included. The late season, cultural use of "redfish" is an example of this type of demonstration and could be incorporated into the interpretive program as well as provide a true activity in existence to this day.

6y

page 17 (resource management) last paragraph

....selected with the assistance of the Council of Katmai Descendants.... (correct name)

6z

page 18 (phasing schedule and costs), second paragraph

Most project funding for concession facilities....

Add note re map improvements

6aa

page 23 (gateway communities cooperation) add the material below

The primary cooperative project would be to expand or relocate the Borough/Park/Refuge cultural and natural history interpretive center. This facility will be located within walking distance of the airport at King Salmon. NPS headquarters will be maintained in King Salmon, either in the visitor center or in a separate structure. NPS would work with the community to examine opportunities for reuse of existing structures in the area, including facilities on the King Salmon Air Force Base for the visitor center, NPS headquarters, or other uses.

Other joint planning and cooperative projects include work to restore the natural environment in the gateway area, for example, through revegetation, erosion control, and other actions to mitigate impacts on the area; cooperation with the community on their planning for improvements to the community's visual quality; and encouragement of planning for expansion of visitor activities in the King Salmon/Naknek/Lake Camp area, e.g., fishing, hiking, birding, boating, bike riding, cultural activities.

NPS will also work to support needed improvements at Lake Camp. This includes improved boat launching facilities, facilities for day use, and may include other visitor facilities on private land such as lodging.

If and when other communities, such as Igiugig and Levelock, wish to expand their gateway role, work with these villages to plan to achieve this end. The NPS could cooperate with all the partners to develop an overall *Gateway Community Plan* to explore and coordinate these options.

As part of the Brooks River DCP implementation process, NPS will make renewed efforts to implement the provisions of Title 13 of ANILCA. This includes giving priority to use of Native land for needed new facilities, and encouraging local hire.



## RESPONSES

6x. See response 13j to comment on draft DCP/EIS and response 4c to comment on supplement to draft DCP/EIS.

6y. The text has been changed.

6z. The National Park Service does not believe the suggested change is correct.

6aa. The National Park Service believes the existing text is adequate. The suggested additional text is beyond the scope of this DCP/EIS. See response 3d to comment on supplement to draft DCP/EIS.

BRISTOL BAY NATIVE CORPORATION
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TELECOPY (907) 278-3824

Alaska Region Office
AUG 14 '95

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August 14, 1995

Robert Barbee, Regional Director
National Park Service - Alaska Region
2525 Gambell Street
Anchorage, AK 99503

**Subject: Katmai National Park/Brooks River DCP**

Dear Director Barbee,

This letter responds to the May 95 supplement to the Draft Brooks River DCP. We can not support Alternative 5. Although it makes some steps forward, this "new" alternative still has too many of the failings of the old preferred plan (Alt 2). Alternative 5 continues to push for a style and quantity of development at Brooks beyond what is needed or realistically can be paid for (over $21 million worth). The alternative proposes too little in Katmai gateway communities, where impacts and costs are much lower and more benefits go to local residents and businesses. The plan continues to short-change day use, to miss opportunities to celebrate the area's remarkable cultural resources, and to neglect the goals of Title 13 of ANILCA. As Table 5 of this supplemental EIS repeats again and again, the impacts of this alternative are the "Same as Alternative 2".

We have worked hard over the last year to develop a better plan. We helped bring together knowledgeable, diverse voices, including the Native community, environmental organizations, the concessioner, local landowners and businesses and the Park Service. While there was not total consensus, the framework of a much improved plan - the plan we had hoped to see as Alternative 5 - emerged through this process. The elements of this framework include the following:

**Reduced Facilities at Brooks** - Alternative 5 appears to have been prepared by making a few minor chips off the block of development proposed in Alt 2. The planning process should have been reversed: starting at a zero base, facilities should only be proposed at Brooks if they are vital to the Brooks experience, can not be located elsewhere, and can be built and operated with minimal impact. For example, impacts could be reduced and money saved by not building separate structures for a contact station ($184,000), ranger station ($121,000), orientation center ($126,000) and a lodge dining facility ($1,650,000), as called for in Alternative 5.

**Expanded Day Use/Improved Visitor Management** - Brooks Camp is too valuable a destination for the simplistic day use limits imposed by Alternative 5. With more structured, sophisticated visitor management, at least 100 day use visitors "at-one-time" can have a high quality experience while resources are well protected. Key to this effort will be development of several well-placed, elevated walkway/platforms that expand capacity for bear viewing, ensure bears and visitors are separated, and improve the quality of the visitor experience.

7. The contents of the preceding letter dated July 4, 1995, is identical to one not reproduced here dated August 14, 1995.

**Improvements in Gateways/Naknek Lake Area** - Alternative 5 makes references to gateway improvements and dispersed visitor use, but lacks detail. A stronger Park Service role will be needed in public-private partnerships on at least four projects: 1) a new or much improved visitor interpretive center within walking distance of the King Salmon airport, 2) improved boat launch facilities at Lake Camp, and 3) cooperative planning to make King Salmon/Naknek/Lake Camp area a better gateway community, 4) visitor improvements around Naknek Lake within the Park to support expanded day and overnight use.

**Increased Focus on Cultural Resources** - For over a year we've dutifully noted that the re-created structure at Brooks should be a *barabara*, not a "pit house". While Alternative 5 starts to define a cultural resource strategy, it's still a pit house in this alternative (and now bumped off the NPS funding list), and the proposals for cultural interpretation are still weak. NPS needs to make much stronger commitment to specific facilities, interpretive programs (including limited traditional fish harvesting practices), trail routings, staffing and other actions to bring out the ancient and ongoing Native life at Brooks Camp and throughout the Park.

That we are once again listing these issues illustrates the fundamental problem underlying this alternative. The process to prepare this plan is as important as its contents. This is because of local knowledge, and because the plan relies so heavily on local political support, local "partnerships" and the concessioner for implementation funding. The current planning process separates those who must support/implement the plan (largely people and organizations in Alaska) from those control key plan policies (largely people outside Alaska) and is destined to fail.

The Park Service should apply the oft-mentioned "partnership" concept, not just when listing those who were contacted, or who will help pay for the plan, but when preparing the plan. Attached are specific comments on particular sections of Alternative 5, developed over the last year with the participation of the parties mentioned above. Alaska needs a primary voice in either remaking Alternative 5 or developing new alternative to address these issues. We believe that with such changes, NPS would have a plan that would meet the Park Service's mandate for Katmai, satisfy visitors, be supported by a diverse range of local and statewide interests, and because of this broad support, have an excellent chance of successful implementation.

Thank you for this opportunity to comment on policies for the Katmai area.

Sincerely,

Tom Hawkins

Tom Hawkins
Chief Operating Officer

CC: Secretary Bruce Babbitt, Under Secretary George Frampton
Senators Frank Murkowski and Ted Stevens
Representative Don Young
Superintendent Bill Pierce

AUG 14 '95 17:03 BRNC P.1

COUNCIL OF KATMAI DESCENDANTS
800 CORDOVA STREET, STE. 100
ANCORAGE, AK 99501
907-265-7832

Alaska Region Office
AUG 11 '95

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August 14, 1995

Robert Barbee, Regional Director
National Park Service, Alaska Region
2525 Gambell Street
Anchorage, AK 99503

Dear Mr. Barbee:

On behalf of the Council of Katmai Descendants, I submit our comments regarding the supplemental development concept plan for the Katmai National Park, Brooks River Area.

As Native descendants of Katmai our interest in Katmai is not one of a monetary gain, but rather of a cultural and spiritual significance to our people, our children, and their children. As descendants of Katmai, we maintain a strong spiritual connection to our ancestral lands that has been under the National Park Service's stewardship for more than eighty years.

While under the care and management of the National Park Service, the Brooks Camp area has been contaminated by diesel fuel. Park Service has been aware of the various fuel leaks since 1982 and no action has taken place to correct the problem. Monitoring wells will be in place within the month. Nonetheless, this is 1995 and the Park Service has been aware of the fuel contamination problems since 1982, thirteen years ago.

Park Service and concessionaire facilities are located on top of our ancestors' resting place. Scientific analysis of human occupation of the Brooks River area dates back to approximately 6,000 years ago. Ancestral human remains have been removed from their original resting place and have yet to be returned and respectfully reinterred in uncontaminated soil in the Brooks River area. Thousands of visitors each year visit Brooks Camp and are unaware that they are walking on our ancestors' graves.

AUG 14 '95 17:04 BBNC P.2

These are just a few examples of the wrongs that our Native descendants have witnessed and, until recently, remained silent. This disrespectful treatment of our ancestral lands cannot continue.

The Council of Katmai Descendants have been participating in the supplemental development concept plan process with the Katmai Working Group and the National Park Service. The slight change in the DCP process has been noted and is encouraging to all parties involved.

Although Park Service has patiently listened to the many voices during the DCP process, it is apparent that Park Service did not hear our collective concerns about the various alternatives. Alternative 5 in the supplemental DCP does not reflect our messages that have been relayed to Park Service.

8a The Council of Katmai Descendants does not support of the size of the footprint currently occupying Brooks Camp and, therefore, cannot support Alternative 5 as the size of the footprint is the same. Instead of lighter on the land, Alternative 5 appears to be Brooks Camp relocated to another location. This is unacceptable to the Council. Our vision is a Park with a campground and minimal infrastructure in the Park itself. The number and the size of the facilities that are proposed for the Brooks River area is unessential and completely goes against the Council's vision of minimal impact on the cultural, environmental, natural, and spiritual resources of the Park. The surrounding communities can and should be given the opportunity to provide the unessential luxuries that some visitors require. Kindly reevaluate the size of your footprint.
Wear a moccasin and leave no footprint is our message.

8b The cultural and natural resources of the Park are significant and should be properly interpreted for the visitors. Bears has been the emphasis and major concern of the Park Service. Bears are magnificent animals, however, there is so much more to the Park that is not revealed to the visitors. Such as the cultural and traditional practices of the Native people is practically nonexistent at the Park.

8c Native people can and should be employed to relay their rich cultural history to the visitors, as well as identifying the natural plants that have been utilized for medicinal purposes or to supplement the diet. A visitor's center in King Salmon could serve functionally as an orientation center as well as a gathering place to hear Native stories, see Native dancers, view Native artists at work and be used as an educational center in the off-season.

8a. Alternative 4 (day use area only) is "light-on-the-land," has a very small footprint and has been evaluated by the National Park Service. The National Park Service believes that alternative 5 (proposed action) is the best reasonable alternative providing the most appropriate balance of resource protection and visitor enjoyment, that meets policy requirements to provide for the widest cross section of the public as is feasible (NPS *Management Policies* 1988, chap. 8:5), and will incorporate the principles of sustainable development (see "Part Two: Alternatives, Including the Proposed Action" — "Actions Common to All Development Alternatives, Sustainable Development" section).

8b. See response 13j to comment on draft DCP/EIS and response 4c to comment on supplement to the draft DCP/EIS.

8c. The National Park Service would work with Native corporations pursuant to ANILCA sections 1306, 1307, and 1308 to encourage development and services provided by Native corporations and local residents.

AUG 14 '95 17:04 EBNC P.3

Native students can be brought into the Park to assist the Park personnel with archeological, anthropological, or ethnographic work while learning and growing. There are many worthwhile projects that are exciting to the Council to just think contemplate.

While the Council of Katmai Descendants does not support Alternative 5 or any of the other alternatives identified in the previous DCP, we are willing to continue to work with Park Service to better develop a vision we can all live with.

Thank you for the opportunity to comment.

Respectfully yours,

Margie Macauly
Secretary

cc: Secretary Bruce Babbitt
Under Secretary George Frampton
Senator Ted Stevens
Senator Frank Murkowski
Representative Don Young
Superintendent Bill Pierce
Katmai Working Group

MAY 30 '95 09:54 MIKE ONEILL 907 276 4827 TO: 9072572533 P01

Alaska Region Office
MAY 31 '95

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Gateway Family Heritage Group
Anchorage, Alaska
May 30, 1995

George Frampton
Assistant Secretary
U.S. Dept. of Interior
1849 C Street NW
Washington, DC 20240

cc:

Re: Katmai National Park and the Brooks River DCP

Dear Mr. Frampton:

Thank you for your sincere involvement in and concern for the protection and visitor opportunities at the Brooks River and the rest of Katmai National Park. In the letter you wrote me on January 27, 1995 you stated the National Park Service "must balance visitor access and enjoyment with the sensitive wildlife habitat, cultural sites, and other resources."

9a In order for that statement to be true, I believe a smaller foot print must be made at Brooks River while the larger foot print should be made at Lake Camp on the edge of the park. Lake Camp offers a wonderful alternative to the now significant development planned at Brooks River. At a minimum Lake Camp should be targeted for a first class boat launch facility and satellite visitor center.

The mission of the Katmai Partners working group is to reach consensus among local natives, the borough, state, and federal agencies, and among conservation groups to contribute to the cultural, natural, recreational, and economic values of the area. In other words, the gateway principle referred to by Secretary Bruce Babbitt in his May 23, 1994 speech discourages in-park development and supports gateway communities to serve as staging areas where visitors can learn about the park and plan their excursions -- all without adding to congestion inside.

Please reflect on back on Mr. Babbitt's meaningful speech of May 23, 1994 and the public law of ANILCA 96-487 Section 1306, 1307, & 1308 as we mold Alternative 5.

Sincerely,

mike O'Neill

Mike O'Neill
Spokesman, GFHG

KATM

9a. See response 8a to comment on supplement to draft DCP/EIS. An alternative that considered primary facilities located in the Lake Camp area has been considered but was rejected for several reasons that are described in "Part Two: Alternatives, Including the Proposed Action" — "Alternative Considered But Rejected" section.

## COMMENTS

907-895-4627 TO: P01

106104

Gateway Family Heritage Group
Anchorage, Alaska

June 19, 1995

Secretary Bruce Babbitt
Department of the Interior
1849 "C" Street NW
Washington DC 20240

Re: Comment to Alternative 5 dtd May 1995

Dear Mr. Babbitt:

I am writing this letter in response to the Alternative 5 supplement for the Brooks River DCP released by the National Park Service. I have read Alternative 5 and I totally disagree with it's content and it's purpose. After a whole year of discussing gateway development with the NPS, the plan blatantly leaves out the Lake Camp-gateway concept by not specifying in the guiding principle statement anything about ANILCA 1306/1307/1308 as a reference point for development of the park or describing the need for a quality boat launch and satellite visitor center at Lake Camp. All major development is planned for Brooks River at the advantage of the going concern and this in turn, puts local native concerns at a disadvantage.

10a

The development planned for Beaver Pond Terrace is enormous. The grand total cost is $21,175,000. Employee housing and facilities alone come to $1,360,000 or put another way...about $30,000 per employee. My biggest objection to this plan is that it gives a "lion's share" of business to a single concessionaire by allowing the concessionaire to provide services to 260 people per day during peak season. Overnight lodging is way up at Brooks while gateway development and day use is way down. The existing concessionaire is probably in the best position with the NPS and Alaska delegation to secure the up-coming concession award even though they have a poor environmental and social responsibility record. If they or another outside entity win the award, native communities can forget about any significant lasting local economic impacts. My other major concern is that development of this size will have a negative effect on the bears and heavy fly-out traffic will proceed as usual, by-passing local communities. The logistics of building and maintaining a development project of this size will be costly and ecologically dangerous. The greatest thing we can do with Katmai is protect the resource by allowing only minimal development at Brooks. Further, it is imperative that boat access replace plane access to break the cycle of "elite visitors" dominating the Brooks River experience. Lake Camp, on the edge of the park, is the most sensible, logical, equitable, and safe place for major development.

Sincerely,

mike O'Neill

Mike O'Neill
Spokesman, GFHG

cc: Interested parties

## RESPONSES

10a. A Lake Camp alternative was considered (see the "Alternative Considered But Rejected" section in "Part Two: Alternatives, Including the Proposed Action." The National Park Service will fully comply with Title 13 of ANILCA.

JUL 03 '95 09:37 MIKE ONEILL 907 276 4827 TO: P01

Gateway Family Heritage Group
Anchorage, Alaska

July 3, 1995

Honorable Ted Stevens
United States Senate
Washington, DC 20510

Subject: Reply to your letter dated June 27, 1995 re Brooks River

Dear Senator Stevens:

Thank you for your personal inquiry into the Brooks River DCP and your personally signed letters to me. I have read Alternative 5 released May 1995 and I totally disagree with it's content and it's purpose. After a whole year of discussing gateway development with the NPS, the plan blatantly leaves out the Lake Camp-gateway concept by not specifying in the guiding principle statement anything about ANILCA 1306/1307/1308 as a reference point for development of the park or describing the need for a quality boat launch and satellite visitor center at Lake Camp. All major development is planned for Brooks River at the advantage of the going concern and this in turn, puts local native concerns at a disadvantage. Maybe what is needed is more media coverage to expose the injustice of Alternative 5. The development planned for Beaver Pond Terrace is enormous. The grand total cost is $21,175,000. Employee housing and facilities alone come to $1,360,000 or put another way...about $30,000 per employee. My biggest objection to this plan is that it gives a "lion's share" of business to a single concessionaire by allowing the concessionaire to provide services to 260 people per day during peak season. Overnight lodging is way up at Brooks while gateway development and day use is way down. This will inhibit development by local native land owners. The existing concessionaire is probably in the best position to secure the up-coming concession award even though they have a poor environmental and social responsibility record. If they or another outside entity win the award, native communities can forget about any significant lasting local economic impacts from the Brooks Rivers development project. My other major concern is that development of this size will have a negative effect on the bears and heavy fly-out traffic will proceed as usual, by-passing local communities. The logistics of building and maintaining a development project at Brooks River of this size will be costly and ecologically dangerous. The greatest thing we can do with Katmai is protect the resource by allowing only minimal development at Brooks. Further, it is imperative that boat access replace plane access to break the cycle of "elite visitors" dominating the Brooks River experience. Lake Camp, on the edge of the park, is the most sensible, logical, equitable, and safe place for major development.

11a

Sincerely,

Mike O'Neill

Mike O'Neill
Spokesman, GFHG

cc: Interested parties

11a. See response 9a to comment on supplement to draft DCP/EIS.

PAUG-VIK INC. LTD.
P.O. BOX 61
NAKNEK, ALASKA 99633

TELEPHONE
MANAGER: (907) 246-4277
ACCOUNTING: (907) 246-4278
FAX (907) 246-4419

August 9, 1995

Mr. Bill Pierce, Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, Alaska 99633

Subject: Alternative 5, Brooks River DCP

Dear Mr. Pierce:

We appreciate the given opportunity to comment on the supplemental draft of May 1995 and thank you for the National Park Service's effort in putting forward a new and improved Alternative 5.

From the beginning, we have endorsed Alternative 4: Day-Use-Area-Only. We believe this option is not only realistic in terms of protecting the natural and cultural resources, but also a plan economically feasible for the Park Service to undertake in times of shrinking budget dollars.

Under this option, we see less damage to the land as some 63 acres of white spruce forested land can be saved as natural habitat. While under Alternative 5, there would be a loss of 105 acres of wildlife habitat to the Beaver Pond Terrace development project.

We reasoned, as there will be less development within the park system, funding for the project would require less from congressional appropriations.

We do applaud the National Park Service in taking the effort of incorporating the Gateway Community Concept under its DCP/EIS. In this venture, the National Park Service in concert with its partners should take the leading role in

## COMMENTS

creating an atmosphere conducive to the economic development of its neighboring communities.

12a

We propose for the Park Service to build a regional cultural center. Part of which, may include a museum, art performing center where native dances can be held and native crafts displayed for the viewing public. The center could also serve as the primary visitor orientation site. The center itself would be an added attraction for the visiting tourists. Perhaps, a decommissioned Air Force building can be obtained to house a regional cultural center.

12b

Over-night facilities and campgrounds should be considered in the Lake Camp area. National Park Service facilities could also be located at Lake Camp.

Primary access site and facilities. Under this heading, we propose for the Park Service to improve or construct a new barge and boat dock & tie down in the Lake Camp area for use by the Park Service and others in ferrying supplies or visitors into the park system. A similar facility on the Naknek Lake landing site should also be provided.

12c

Dispersed Use/Diversified Access. Opening the entire park under a managed time schedule is also suggested. Boat sight-seeing tours to other scenic areas of the park, i.e Bay of Isles, should be permitted in addition to bear viewing activities at the park. Whether by boat, bus or plane, emphasis must be placed on providing the visitors with a high quality, safe experience.

12d

Bear Viewing Platforms/boardwalks. Visitor expects a memorable personal experience worthy of their investment when coming into our area. Therefore, improved viewing platform, boardwalks, and supporting roads and trails for access to quality wildlife viewing, photography and fishing should be provided. These facilities should be handicapped accessible.

As we are mindful of the environment of Katmai National Park and the role of the Park Service, we ask for a cohesive development concept plan that can utilize the resources of both the Park Service and communities of the region.

## RESPONSES

12a. Construction of a regional cultural center is outside the scope of this DCP/EIS. However, as noted in the section on gateway communities, the National Park Service would participate in any cooperative planning or other projects that promoted King Salmon as a gateway community to the park, adjacent refuges, Aniakchak National Monument, and other recreational opportunities in the Naknek drainage and broader region.

12b. See responses 5d, 6i, and 11a to comments on supplement to draft DCP/EIS, and "Part Two: Alternatives, Including the Proposed Action" — "Alternative 5: Proposed Action, Proposed Development, Construct Primary Access Site and Facilities" section.

12c. Currently, a managed time schedule is not necessary for any areas of the park other than Brooks River. As noted in the section on dispersed use/diversified access, greater use of waterborne access into central areas of the park could be anticipated.

12d. Under the proposed action, improved viewing platforms, short boardwalk sections along the falls trail, and supporting roads and trails would provide a memorable personal visitor experience worthy of the visitor's investment. The National Park Service would ensure all facilities are appropriately accessible to disabled persons as required by law.

On behalf of the board members, I thank you again for listening to our comments.

Cordially,,

Cecil DePedro, Jr.
General Manager

cc: Secretary Bruce Babbitt
Asst. Sec. George T. Frampton
Senator Ted Stevens
Senator Frank Murkowski
Representative Don Young
Governor Tony Knowles
Regional Director, Bob Barbee
Board Members
Katmai Working Group
File

08-14-1995 17:13 9075615727 ALASKA VISITORS ASSN. P.02


# ALASKA VISITORS ASSOCIATION

3201 C Street, Suite 403 • Anchorage, Alaska 99503
Tel: (907) 561-5733 • Fax: (907) 561-5727



1994-95
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Brad Walker
Alaska Airlines


*Transmission via Fax*

August 14, 1995

Bill Pierce, Superintendent
Katmai National Park & Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Mr. Pierce:

On behalf of the members of the Alaska Visitors Association, we offer the following comments regarding the Draft Development Concept Plan and the Supplement to the Draft Development Plan/Environmental Impact Statement for Brooks River Area, Katmai National Park & Preserve.

AVA is a statewide, non-profit trade association representing the tourism industry in Alaska. For 45 years, our mission remains to promote travel to, and within, the state of Alaska. Our nearly 700 member businesses employ more than 20,000 Alaskans, and encompass the full spectrum of the tourism trade.

The tourism industry in Alaska represents a strong and significant annual contribution to the state's economy. Tourism is the fastest-growing industry in Alaska. With over 27,000 tourism jobs held by Alaskans, tourism is Alaska's second-largest employer. This $1.6 billion industry also ranks third in terms of economic impact.

We have reviewed the plan and EIS, and have discussed them with AVA members associated with the park. We agree with our members in opposing limits on day use at Brooks River. Scientific evidence in support of day use limits is insufficient, and history offers no support for adverse bear-human interaction brought about by visiting bear viewers. In addition, the Supplement is unclear in its proposed day use maximums -- i.e. "per day" or "at one time." 13a

We are also inclined to oppose any relocation of the current facilities which are located north of the river; however, we do not feel sufficiently knowledgeable to render a final judgment at this time. We would like more time for further study and subsequent response. Please advise if this is possible.

Thank you for the opportunity to provide our comments and recommendations.

Sincerely,

Tina Lindgren
Executive Director

13a. A combination of study results and best professional judgment were used to arrive at the day use limits in the different alternatives, including the proposed action. The National Park Service believes these are adequate bases for the day use limits numbers called for in these alternatives. The text has been clarified to indicate that day use limits are on a "per day" basis, not on a "at one time" basis.

The Alaska Wildlife Alliance

August 3, 1995

Bill Pierce, Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

**RE: Brooks River Area Draft Development Concept Plan and EIS**

Dear Mr. Pierce,

Thank you for this opportunity to participate in deciding the future of the Brooks River area in Katmai National Park and Preserve (KNPP). We have followed the history and development of the DCP with great interest, as we believe that Brooks River is truly a unique asset of the National Park System. We hope it will remain so.

The Alaska Wildlife Alliance is a nonprofit group which promotes protection of wildlife, most notably wild predators, on all public lands in Alaska. Our 3,000 members and supporters work for equitable representation of nonconsumptive uses of wildlife, and for improvement of the wildlife policy public process. Many of our members have visited KNPP and Brooks Camp.

***COMMENTS ON THE NEW PROPOSED ACTION***

We were pleased to see the NPS react to the public comments on the original DCP/EIS and develop a new alternative. *Unfortunately, the differences* between the new Alternative #5 and the former proposed action are cosmetic. Instead of acting responsibly to protect the resources at Brooks Camp, the NPS seems determined to develop.

One of our original problems with the DCP was that the proposed action was propped up by the park service and the public process seemed like a formality. Our concerns were validated when Alternative #5 was released. The chart comparing Alternative #5 with Alternative #2 clearly demonstrates that the new plan is essentially a cosmetic alteration of the original.

We commend the NPS for putting forward the idea of removing all facilities north of the river, to protect both cultural resources, brown bears and people. We also compliment the concept of the "people-free" zone, including the zone's rehabilitation, the detailed maps within the DCP, and the easy-to-read format of the document. While we fundamentally disagree with the NPS agenda for Brooks Camp, the new proposed action is an improvement over the former.

14a

If the NPS is determined to replace the existing Brooks Camp facilities with a new visitor center and lodge at the Beaver Pond Terrace, the facility should be as unintrusive as possible. In this regard, the new proposal is better than the former. It is encouraging to see the park service look at ways to have less impact on this important area. For example, reducing the access road from two lanes to one lane is the type of thinking that should inspire all park planning. As far as wildlife and habitat are concerned, smaller and cheaper park development is almost always better.

14b

We would like to see the park service encourage boat service as the primary visitor transport into Brooks Camp. *It was encouraging to see* boat service addressed in the new proposal, although the proposal does not go far enough in reducing float plane use. Increased reliance on boat service would reduce noise and wildlife harassment, and would provide visitors with a quality interpretive wilderness experience.

14a. See responses 3c and 5b to comments on supplement to draft DCP/EIS.

14b. See response 22e to comment on draft DCP/EIS, which addresses noise and wildlife harassment from aircraft.

14c In our view, the goal of KNPP management should be protection of wildlife, ensuring the long-term health of the park ecosystem, preservation of the park's wilderness character, and equal attention to all KNPP resources, not just Brooks Camp. While it may be a mandate of the NPS to provide tourist and sport opportunities, these goals are of secondary concern, and should be provided only after these initial priorities are met and guaranteed. Of least concern is private concessionaire profits derived from public park resources, though we recognize that this will be a component of any overall park plan.

14d We would like to see the NPS address Secretary Babbitt's "gateway community" concept in its planning effort. Developing King Salmon as a gateway community would be good for the local economy and the wildlife habitat in the park. While the introduction to the Supplement pays lip service to the gateway community concept, the proposed action contradicts the entire notion.

14e A major concern is that the proposed action will cost over $20 million. In this age of budget cuts and shrinking government it is naive to think that funding will be available for such a large scale proposal. The NPS should consider a less expensive alternative that would allow for the removal of facilities from the north side and the construction of a dramatically scaled down visitor facility on the south side.

A major theme in the DCP is accommodating the 900% visitation increase to Brooks Camp in recent years. A number of people at the public meeting in Anchorage accurately described how the pleasant and relaxed experience at Brooks has changed dramatically for the worse. In 1991, 494 undesirable bear-human incidents were recorded.

14f Rather than try to indulge such detrimental visitation levels, the NPS should cap visitation to 1985 levels (approximately 700 visitors over the course of the season). Keeping visitors at a manageable level will protect the bears and other wildlife, protect visitors and the visitor experience, lessen stress levels of park personnel and facilities, and keep human impact on the area to a minimum.

14g Instead, the proposed action is focused on "lowest common denominator" development. The NPS has proposed a plan that would give as many people as possible a chance to visit Brooks Camp and not have a "bad" experience. The NPS should focus on how to preserve the wildlife habitat and wilderness experience that draw people to Brooks Camp in the first place. Many of our members would rather see limits put on visitation at Brooks Camp instead of seeing the area become more crowded and developed.

Degradation of wilderness charm and quality in many National Parks is a well-known reality. Brooks Camp offers an opportunity for the NPS to make proactive choices, and avoid sealing such a fate for KNPP. Visitor demand can be reasonably accommodated while at the same time protecting the integrity of the park.

Thank you again for this opportunity to present our views. We trust that these comments, along with our comments on the original DCP, will not only be added to the public records, but will be meaningfully incorporated as well.

Sincerely,

Matt Singer
Associate Director

cc: Alaska conservation organizations

14c. See response 21b to comment on draft DCP/EIS. Also, see "Part One: Purpose and Need for the Plan" — "Brooks River Area Purpose Statements" and "Desired Futures for the Brooks River Area" sections.

14d. See "Part Two: Alternatives, Including the Proposed Action" — "Alternative 4: Day Use Area Only." This alternative is essentially a "gateway community" concept alternative. Also, see response 5b to comment on supplement to draft DCP/EIS.

14e. See "Part Two: Alternatives, Including the Proposed Action" — "Alternative 4: Day Use Area Only" section. This is a much less expensive alternative.

14f. See response 13a to comment on supplement to draft DCP/EIS.

14g. The National Park Service is confident that the elements outlined in the DCP/EIS, presented under the proposed action, represent the best sustainable, and most economically feasible, ways available for both protecting Brooks River area resources and for providing visitor enjoyment of those resources in a way that does not have a significant negative impact on the resources.

JIM JANSEN DBA/ BRANCH RIVER FISH CAMP
15149 LAKE RIDGE DRIVE
EAGLE RIVER, ALASKA 99577

SUPERINTENDENT
KATMAI NATIONAL PARK AND RESERVE
PO BOX 7
KING SALMON, ALASKA 99613

RE:DRAFT DEVELOPMENT PLAN-BROOKS CAMP

GENTLEMEN:

MY FAMILY AND I HAVE OPERATED A PRIVATE CAMP ON THE ALAGNAK RIVER SINCE 1979. WE HAVE FLOWN OUR GUESTS TO BROOKS CAMP TO FISH AND VIEW BEARS FOR OVER 15 YEARS. WE CURRENTLY HOLD A COMMERCIAL PERMIT, EVEN THOUGH OUR CAMP IS NOT FOR HIRE AND IS SPECIFICALLY FOR OUR GUESTS AND FRIENDS. WE TAKE APPROXIMATELY 60 GUESTS ANNUALLY TO BROOKS CAMP MOSTLY TO VIEW BEARS FOR USUALLY LESS THAN 1 HOUR.

OUR FAMILY AND OUR GUESTS GREATLY ENJOY VIEWING BEARS AND FISHING THE BROOKS RIVER, AND PREFER TO HAVE NO FURTHER RESTRICTIONS ON OUR ACTIVITY.

I HAVE READ THE SUPPLEMENT TO THE DRAFT CONCEPT PLAN EIS. I OPPOSE THE PLAN AND OFFER THE FOLLOWING COMMENTS.

1. THE PLAN FURTHER RESTRICTS USE OF THE BROOKS CAMP AREA.
2. THE PLAN CALLS FOR MORE CONSTRUCTION AND AN INCREASE IN THE FACILITIES, STAFF AND IMPACT ON THE AREA.
3. THE INCREASE STAFFING AND FACILITIES WILL CAUSE MORE IMPACT THAN THE CURRENT SITUATION.
4. THE COST OF THE IMPROVEMENTS IS EXCESSIVE, AT A TIME WHEN WE MUST REDUCE, NOT, INCREASE COSTS IN THIS COUNTRY.
5. WE SHOULD REDUCE OVERNIGHT FACILITIES, NOT INCREASE THE LIVING ACCOMMODATIONS. SEVERAL HOURS IS ENOUGH TIME TO VIEW THE BEARS. GUESTS SHOULD EAT AND LODGE IN KING SALMON OR AT ANY OF THE MANY LODGES IN THE REGION. ( NOT IN THE CONGESTED AREA OF BROOKS CAMP.)
6. PRIVATE GUIDES SHOULD BE REGISTERED TO GUIDE THEIR OWN GUESTS, AND NOT BE REQUIRED TO HAVE A PARK SERVICE GUIDE. THE EXPERIENCE IS CHEAPENED WITH SMOKY THE BEAR

TYPES LEADING OUR GUESTS. GUESTS WITH APPROVED PRIVATE GUIDES SHOULD NOT BE REQUIRED TO GO TO BEAR SCHOOL.

7.WE SHOULD BE REMOVING OVERNIGHT FACILITIES, NOT BUILDING NEW ONES.

8.WE SHOULD ELIMINATE THE OVERNIGHT CAMPGROUNDS, NOT BUILD NEW ONES.

9.VEHICLES, SHUTTLE SERVICES ETC. SHOULD BE ELIMINATED FROM THE SITE. NO NEW ROADS SHOULD BE BUILT.

10. NEW STAFF FACILITIES SHOULD NOT BE BUILT. THIS ONLY INCREASES THE HUMAN IMPACT ON THE AREA. WITH NO OVERNIGHT ACCOMMODATIONS, A VERY SMALL PARK SERVICE STAFF IS ADAQUATE.

11.THE IDEA OF BUILDING A BREAKWATER IS FOOLISH. THE PROBLEM IS NOT PARKING BOATS AND AIRCRAFT, ITS THE ROUGH WATER FOR TAKE OFF AND LANDING.

12.WHY ELIMINATE PEOPLE FROM THE NORTH SIDE ? THIS SHOULD REMAIN AS IT IS, AND NO FURTHER FACILITIES SHOULD BE BUILT.

15a

13.REMOVAL OF THE OIL CONTAMINATED SOIL SHOULD BE DONE BY PRIVATE CONTRACTORS, BETWEEN NOV. 1 AND MAY 15. THIS IS ENTIRELY WORKABLE, AND ELIMINATES THE EXCUSE TO RELOCATE FACILITIES.

14.I AGREE WITH THE CATCH AND RELEASE PROGRAM. THERE ARE PLENTY OF LOCATIONS TO CATCH FISH TO KEEP WITHOUT DOING SO AT BROOKS CAMP.

15.I TOTALLY DISAGREE WITH THE NO FISHING IN JULY, SEPT. AND OCT. THE BROOKS RIVER IS A VERY SPECIAL FLY FISHING RIVER THAT SHOULD BE AVAILABLE TO FISHERMEN. YOU MIGHT CONSIDER MAKING IT FLY FISHING ONLY, AND WITH A REGISTERED AND APPROVED GUIDE.

I EXPERIENCED THE GRAND CANYON PARK LAST WINTER. ALTHOUGH A BREATH TAKING OPPORTUNITY, I AM FEARFUL THAT THAT TYPE OF OVERMANAGEMENT WILL KILL THE BROOKS CAMP ALASKA EXPERIENCE.

IN CONCLUSION, DO NOT BUILD MORE FACILITIES, DO NOT ADD MORE STAFF TO BROOKS CAMP, DO NOT SPEND MORE MONEY, AND DO NOT RUIN THE BROOKS CAMP EXPERIENCE BY OVERMANAGING IT.

SINCERELY YOURS,

JIM JANSEN

15a. A remediation plan has been prepared by the National Park Service, Alaska System Support Office, and is being implemented. This remediation planning process and the implementation of that plan is completely separate from the DCP/EIS process for the Brooks River area except that systems for fuel called for in the alternatives will avoid the problem that caused the fuel leak that occurred in the spring of 1991. See "Part Three: Affected Environment" — "Remediation Efforts" section.

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*August 5, 1995*

*Robert Barbee, Regional Director*
*National Park Service*
*Alaska Regional Office, Room 107*
*2525 Gambell Street*
*Anchorage, AK 99503-2892*

*Re: Katmai National Park and the Brooks River D.C.P.*

*Dear Director Barbee:*

*Thank you for your response to my letter regarding the possible restriction of commercial use licenses. Much progress has been made concerning Katmai National Park since I last wrote to you in February. However, again as a local native and King Salmon area small business owner, I cannot agree with the National Park Service's latest alternative for limiting visitation in Katmai National Park. Through my involvement with the "Katmai Working Group", it seems that the focus of the National Park Service has been turned specifically on the number of people that can fit on one small viewing platform at Brooks Falls. I ask that more consideration be placed on the entire Brooks River "core area" and the rest of the vast acreage of the Park. Most importantly, before making any specific decisions on limiting the number of people that the "core area" can reasonably accommodate; a true and scientific survey and study should be performed. A non-scientific study from three to five years ago should not be relied upon for such major decisions as limiting the number of visitors to one specific area in the Park.*

16a

*I think we all agree that the popularity and demand for use at Brooks and in the rest of Katmai National Park will only increase in the years to come; and although we all would like to keep the "rustic wilderness feel" intact, it is inevitable that this atmosphere will change. I do not agree with the plan to spend enormous amounts of money to build separate buildings for a contact station, ranger station, orientation center, and a lodge/dining facility. I cannot see where these basically "luxury" accommodations can be light on the land and provide a rustic feel. A more rustic wilderness feeling would come about with one main structure built to house the lodge/dining facilities and ranger station. The "contact station and orientation center" could be combined as one station and located in King Salmon, the gateway community, for all visitors to "check in" at before traveling into the Park. I feel this would be most economical and logical because the visitors would be educated before even entering the Park, and Brooks Park Officials would be informed of the number of visitors expected to arrive. Also, the "contact and orientation center" could be funded jointly by local, private entities and the National Park Service, reducing more expenditures. The educating process*

16b

16c



16a. See response 13a to comment on supplement to draft DCP/EIS.

16b. No, it is not inevitable if use limits are put in place.

16c. The text has been revised specifying more combining of functions in single buildings and using duplexes, triplexes, and quadriplexes for staff and visitor housing. More detail on procedures for providing information and managing people is beyond the scope of this DCP/EIS.

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*should begin with the commercial operators when a potential visitor calls for information. All commercial operators could be required to have all their passengers "checked in" at the King Salmon Gateway Center before traveling into the Park. Also, Park officials could ask commercial operators to report regularly to Brooks officials as to the number of people who have made reservations to travel into the Park and what the visitors main interests are. Once commercial operators bring visitors into the Park, I feel they should be required to remain with the day users through out the day; ensuring that they follow the basic "rules" once at the core area. Currently, many visitors are dropped off at the core area and left in the Park Staff's hands to educate and manage the entire day. The savings in building less expensive structures, could be used for more staff to help manage the increased number of visitors to the Park. Finally, I have had the majority of my guests ask why there isn't a Park visiting fee such as there is at most other national parks around the nation. A minimal fee of even $5.00 per person could help fund an annual flier that Katmai National Park officials could print to help educate park visitors before they arrive.*

16d

*Also, the rich cultural history in the "core area" of the Brooks River is not currently even mentioned when visitors check into the visitor's center. Visitors walk right by historical barabaras when they walk to the Brooks Falls viewing platform, and they do not even know what they are looking at! Almost all of the cultural and natural history in the Park revolves around the millions of salmon that make their way up the streams to spawn; and people are not even informed of this wonderful phenomenon. I feel a National Park should be a place of learning and not a place where one natural subject, such as the Brown Bear is singled out. I understand that the Bears are the "main attraction", but people are not learning anything more about the Park during their stay and therefore, the message they bring home to future visitors is only of Bears! And so, the continuing cycle of singling out on park resource remains.*

*After working with the Katmai Working Group I feel that the majority of commercial operators doing business inside Katmai National Park boundaries are willing to work with the National Park Service to help preserve this wonderful natural and cultural resource. We have been trying to send a message to the National Park Service but I feel that only bits of information are being used in the planning process and our main points are not being addressed in the latest alternative for the Development Concept Plan. Katmai National Park and the surrounding area is a spectacular, vast and unique region that deserves more research and ideas to help manage the growing visitor population and I hope that we, (local natives, and business owners) will have the opportunity to aid the National Park Service in it's future expansion and management efforts in the area. I truly appreciate the opportunity to be involved in this process and hope that the Park Service continues to listen to the local commercial operators and residents of the Gateway community.*





16d. See "Part Two: Alternatives, Including the Proposed Action" — "Actions Common to All Development Alternatives, Primary Interpretive Themes" section, which calls for all of the topics mentioned. More detail on procedures for providing interpretation is beyond the scope of this DCP/EIS.

See response 13j to comment on draft DCP/EIS and response 4c to comment on supplement to draft DCP/EIS.

## COMMENTS

## RESPONSES



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*Sincerely,*

*Diedre O'Neill*
*Owner, Bristol Bay Charter Adventures*

*cc: Senator Frank Murkowski*
*Senator Ted Stevens*
*Representative Don Young*
*Superintendent Bill Pierce*
*Tom Hawkins, C.O.O., B.B.N.C.*

August 14, 1995

Bill Pierce
Superintendent
Katmai National Park
King Salmon AK 99613

Dear Bill,

I think you know by now my feelings on the DCP for Brooks Camp. I have attached more comment anyway, most of which I've put in writing to you before.

At the DCP workshop held at the Anchorage regional office I had the occasion to see and talk with Ray Bane. He told me that when he was superintendent of Katmai, he figured this whole DCP thing would be done in a year or less. The DCP as called for in the parks general management plan called for a new visitor center at Brooks Camp and some trail and viewing area improvements. How did this thing get to the point it is today. It's almost unbelievable.

If you go to Brooks Camp today, August 14, 1995, you will see a very mellow place. The lodge is full and there are a few campers and day visitors. The place is really only busy for about 3 or 4 weeks a year.

This July there seemed to be more bears than ever. There were plenty of visitors too, most of whom enjoyed their experience at Brooks. I for the life of me cannot understand why the NPS keeps convincing themselves that there is such a huge problem.

Doesn't the fact that there are lots of bears and satisfied visitors mean something besides a crisis. The visitor safety record at Brooks Camp has been outstanding. All indications are that things seem to be working pretty good. Now granted, it does get pretty busy for those 3 or 4 weeks, and sure, the place does have a carrying capacity. But the sky is not falling here. Every year we go out and operate the lodge without any serious problems.

My recommendations are to make the improvements to the existing facilities as outlined in my attached comments. However, if you are locked in on the move, then I still maintain that you need at least the level of visitor service that now exists. A lot of time and effort has been put in to this deal by the NPS. It is entirely understandable that trashing all that effort and simply making what we have work better would be a bitter pill to swallow. My critique of Alternative 5 is also attached.

Finally, is this thing ever really going to happen? Your talking about a lot of money here and a major project in the middle of the

*Located in Katmai National Park*

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wilderness. The climate back in D.C. doesn't seem to be conducive to spending a lot of money. Somehow it doesn't seem to me that this thing is going to be a budget priority. You may have to make the improvements at the present location regardless.

Some time in the near future I would like to sit down with you and discuss the future of Katmailand in what ever decision is made. It is my feeling that we have done a pretty darn good job for the NPS and for park visitors. Also, while we have had our occasional differences of opinion, I think our relationship with the NPS has been open and good. We do our best to comply with your policies even when we don't necessarily agree with them. We definitely want to continue our involvement in the park. Hopefully you feel the same way. I look forward to the opportunity to discuss this with you.

Sincerely;

Raymond F. Petersen
president

cc: Robert Barbee, ARO Anchorage
Secretary Bruce Babbitt, Under Secretary George Frampton
Senators Frank Murkowski and Ted Stevens
Representative Don Young

KATMAILAND INC
RECOMMENDATIONS FOR
BROOKS CAMP DCP
August 14, 1995

17a

RECOMMENDATION /INTERPRETIVE GUIDED WALKS
Quit policing people and start guiding them. This is the single most important thing that can be done to allow the most possible people to see the bears. Most of the inquiries we get from bear watchers ask when the guided trips go to the falls. They are usually surprised and many times intimidated when they discover they must go it alone.

We have to provide more interpretive walks with naturalist guides. Lots of them. This is the perfect way to make sure people do not have problem encounters with bears. The walks should coincide with the times that visitors usually walk up the river for the purpose of bear viewing. They may leave every hour in the morning when day trippers arrive and after lunch when newly arrived lodge guests are apt to be ready to go.

Most visitors would prefer to go up river with a ranger or guide, especially for their first time. The fact that most people would be in the larger groups would be an additional safety bonus. Along the way they would learn about the bears from a naturalist rather than by trial and error. The current practice of the guided walks not going to the falls is not logical, people are going to go anyway so why not with a guide to keep them out of trouble.

Twenty years ago NPS naturalists guided daily nature walks to the falls. Most visitors took the walks back then. As time went on, and as more visitors began to visit Brooks, NPS gradually changed from a guiding role toward one of policing people as they now do almost exclusively. Consequently NPS has to constantly reprimand people for mistakes they wouldn't have made had they been guided.

The most common complaints I hear from people at Brooks are about rangers who were rude to them. Just think how much more positive the image of the Katmai ranger would be if he or she were a friendly guide instead of being seen as an enforcer cop barking orders. What a better use of park personnel and a way more effective method of controlling people movements this approach would be.

BEAR VIEWING AND BEAR SAFETY

RECOMMENDATION /ELEVATED BOARDWALK AND BRIDGE
Build the elevated board walk and bridge as described in alternative 1 of the draft plan. This would provide additional bear viewing and interpretive opportunities while removing the barrier to migrating salmon that attracts both people and bears to congregate together. The elevated bridge in particular would allow people to cross the river without being confronted by bears. Bears would pass underneath the bridge more freely and would be unlikely to use the bridge as

17a. See response 13d to comment on draft DCP/EIS.

## COMMENTS

they occasionally do now. The boardwalk should emerge from the woods and cross the river directly without paralleling the river. That would reduce traffic along the river bank by people who just want to cross to the other side

17b

RECOMMENDATION /VIEWING PLATFORMS AND TRAILS
The existing bear viewing platform at the falls should be enlarged as described in alternative 2. Harden the surface of the existing trail and implement vegetation management. A board walk along the river should not be constructed as it would only encourage traffic along the river by people whose objective is to go to the falls, however a spur trail should be built from the existing trail that emerges from the woods somewhere between the two existing platforms such as is described in alternative 2. This would provide an additional viewing option on the guided walks, thereby reducing the demand for time on the falls platform.

RECOMMENDATION /BEAR POLICY
The statements in the draft DCP warning of potential impact on the bear population ignore the fact that a very small percentage of the park's bears use Brooks River. Katmai National Park and Preserve covers 4.2 million acres. Other parks and refuges near and adjacent to Katmai encompass much of the Alaska Peninsula and not too far away to the North is Lake Clark National park. The continued existence and maintenance of a vast undeveloped area that is necessary for a strong free roaming population of bears is virtually assured.

At a DCP hearing held in King Salmon state wildlife biologist Dick Sellers estimated the parks bear population at 2500 animals. How can anything that happens at Brooks river with its 20 or at most 30 bears (approximately 1% of the total) be potential for "irreparable impact on the bear population".

17c

The park's bear studies conclude that human use of Brooks River after September 10 is particularly detrimental to bears and is population threatening. Bears, (particularly non-habituated bears) we are told, are being displaced during this "critical feeding period". Once again all relevant facts are not being considered. There are only three rivers in Katmai west of the Aleution Range that have late season salmon spawning, they are Brooks, Kulik and Grosvenor Rivers. These rivers may have 60 or 70 bears combined. Are we to assume then that the rest of the bears are starving. This of course, is not at all the case.

The parks policy should be to manage for area population protection and not be overly concerned with the few non-habituated bears who don't use Brooks river.

A policy statement on the probability of a bear attack incident should be made and included in NPS publications on Katmai. Bear attacks occur occasionally in Alaska, it is one of the inherent risks associated with the wilderness here. The statement should

17d

## RESPONSES

17b. This option was analyzed in alternative 1. The National Park Service continues to prefer the proposed action, which would remove all facilities north of the river and designate the area as a people-free zone. As noted in response 13c to comment on draft DCP/EIS, NPS management goals seek to reduce the potential for human injury by bears at Brooks River. By reducing the amount of development in prime bear habitat (i.e., north of the river), and limiting the amount of daily use along the river, the potential for human/bear interaction would be less than what now occurs.

17c. The quote regarding a potential "irreparable impact on the bear population" is from the 1986 *General Management Plan* for the park as was clearly stated in the draft DCP/EIS (see "Part One: Purpose of and Need for the Plan" — "Relationship of this Planning Effort to Other Approved Plans, Direction from the General Management Plan" section. The quote was also taken out of context; the population referred to was the local population of bears using the Brooks River in the early 1980s, not the park or regional population. The same is true with regard to the population referenced in the bear studies.

17d. This suggestion has been referred to the Alaska System Support Office for consideration.

point out that no bear policy can totally ensure the safety of visitors and that the possibility of a bear attack can not be ruled out. It should further state that therefor, if and when a bear incident occurs, no departure from present policy will therefor be implemented.

VISITOR FACILITIES

RECOMMENDATION /THE LODGE
Retain the lodge as it currently exists. Under current conditions the allowed 60 pillows is never attained. With only 16 guest units and demand for double occupancy we are usually full with 45 guests.

RECOMMENDATION /VISITOR CENTER
A new visitor center should be built as described in alternative 1. The lodge facilities are paid for by those who patronize it. Use of lodge facilities by non patrons is a bit of a problem. A visitor center to accommodate day visitors would help this problem.

RECOMMENDATION /CAMPGROUND
Like the lodge the current limit is sixty campers but that number is never reached because there are only 18 camp sites. The campground should maintain it's current size but be relocated nearer the rest of the visitor facilities. It should be further from the beach to avoid bears, perhaps just north of the employee housing. This would reduce the overall size of the camp's footprint. Shower facilities should be built at the campground so that campers could have a shower near their camping area.

17e

The campground should be operated by the concessionaire. The concessionaire should absorb all costs of operating and maintaining the campground and charge a minimal fee for its use. I understand that in many parks this is now being done. The current system charges no non-refundable deposit, consequently many campers no-show. This is not fair to others who wish to visit the area. A non-refundable pay in advance policy should be implemented to help eliminate the no-show problem.

RECOMMENDATION /EMPLOYEE HOUSING
I recommend no change to the existing employee housing at this time. The current location should be retained. This is consistent with consolidating the camp and reducing its overall foot print.

OTHER VISITOR ACTIVITIES

RECOMMENDATION /SPORTFISHING
There is a perception by sportfishermen and guides that the NPS is going to restrict fishing at Brooks and that it will not stop there. The NPS is viewed as an enemy of sportfishing. The "bear thing" is the vehicle they see being used to exclude them from using the park. This is really unfortunate because these people are some of the parks greatest friends. They are for the most part conservationists who know how to visit the wilderness with minimal impact. Many of them, myself included, resent the fact that they are forced to

17e. A few of these recommendations have been incorporated into the proposed action but relocated to the Beaver Pond terrace.

## COMMENTS

appear as anti-conservation in their effort to obtain a reasonable approach to access issues.

Sportfishing is the one activity that is most similar to the activities of the areas prehistoric inhabitants, yet the bear study states that "angling is the most intrusive human activity in this prime habitat...Resolution of this conflict through bear management is difficult without a policy determination about the relative priority of bears versus fishing." Sportfishermen don't buy it. It is considered an insult to both their integrity and intelligence.

17f Catch and release fishing should be implemented over the entire river effective immediately. One advantage is that people would no longer be walking around with dead fish. The other is that people whose sole purpose for coming to Brooks is to fill their freezer would probably not come at all. I would not anticipate opposition to catch and release from area guides or sportfishermen.

No other action is really necessary. It's really quite natural for people to be fishing with the bears. If an individual bear begins to display aggressive behavior or other situations arise that require further action, then limited closures of small sections of the river can be enacted on a case by case basis. This has been done in the past and the NPS has always seen fit to reopen the river within a few days.

17g RECOMMENDATION /VALLEY OF 10,000 SMOKES
The valley road definitely needs improvements in its design and maintenance. The road doesn't need to be two lane over its entire length but it should be widened to provide the driver better visibility and dangerous soft shoulders should be repaired. Short, two lane areas or turnouts to allow passing should be built. Proper scheduling and radio communications can ensure that vehicles meet at appropriate passing areas.

17h An interpretive visitor center and camp ground should be built at the three forks overlook. Upgrade of this facility has been needed for some time to accommodate the needs of campers and to see that their activities do not interfere with day visitors and vice versa.

17i The NPS should brief campers on the dangers of hiking in the valley. It's ironic that the NPS finds it necessary to brief visitors on bears and not the valley. The valley, not bears, has been the cause of accidental deaths in the park. This can best be accomplished by maintaining a naturalist/guide on the valley tour. Most hikers ride the tour bus to the valley.

17j The concessionaire can not assume the liability of advising hikers. Concession valley guides are currently instructed not to advise campers in any way about hiking in the valley. During peak times the concessionaire may run special vans for one way passengers. When this is the case, hikers should be briefed by the NPS prior to departure much like what is currently done with bear briefings.

## RESPONSES

17f. See responses 2h and 13c to comments on draft DCP/EIS and response 6l to comment on supplement to draft DCP/EIS.

17g. The Valley Road would be upgraded to a single-lane road with pullouts.

17h. The respondent should refer to the "Actions Common to All Development Alternatives" section, which was incorporated into the supplemental draft DCP/EIS by reference. In this section the National Park Service proposes that the Three Forks overlook cabin be upgraded to provide better interpretive opportunities and a primitive campground be constructed out-of-view of the cabin.

17i. This comment has been referred to park management for consideration.

17j. The National Park Service agrees. It would not be the responsibility of the concessioner to provide advice on backcountry dangers to hikers.

RECOMMENDATIONS /NEW ATTRACTIONS
We had a hard time filling the cabins at Brooks Lodge before we had all these bears. The Valley Tour bus was rarely sold out. Now we get thousands of calls for people who want to go to Brooks. The vast majority want to see the bears. Brooks is experiencing close to 100 percent occupancy. Consequently, the valley tour bus goes out full and has a wait list almost every day. The point is that the bears draw the people, then they also go to other attractions.

People really enjoy seeing the bears and that's what they want to do. Since that is what is drawing visitors to the entire area, I don't recommend attracting visitors with other interests in mind. However, I think it's important for visitors to realize that bears have always confronted people in the area. The pit house exhibit and the visitor center should have depictions of the areas early inhabitants fishing, interacting with bears, and living in the area.

The NPS should encourage other cultural attractions, such as a functioning native fish camp, to be privately developed on the Naknek River near King Salmon. This will encourage visitors to spend more time visiting the local community there. It would very likely be counterproductive to have such a facility at Brooks Camp. We don't want to return to killing bears to defend our fish.

LIMITS TO VISITATION

With the changes I have recommended the camp can easily accommodate visitation at the current levels. The added people control achieved by providing lots of guided bear viewing walks may allow visitation at much higher levels, perhaps up to 200 visitors at any one time. With the lodge and campground having a real capacity of 90, that would allow 110 day users at any one time. No day use limits should be implemented at all until the effects of the added people control and improved trail system is evaluated. 17k

If day use limits do become necessary, they should be set for a visitors at one time limit. This will allow the most possible people to visit. For example, many of the lodge guests and day visitors depart on the valley tour at 9:00 A.M. each day. Since they are no longer there, that many more can go to watch the bears. Likewise for day visitors who stop by for only a few hours. Visitors can be asked to make prior arrangements to be on one of the guided walks. In this way we can effect how many people are there at any one time. 17l

ARCHEOLOGICAL RESOURCES

There is concern for the archeological resources at Brooks Lodge. This is a valid concern, however, the damage has already been done. We cannot undue that now. The NPS sewer, water and fuel system project back in the early 1970's did most of the damage. Ditch witches and other machines were used without any surveys for what was in the ground. More recently in the 1980's, NPS mandated concession improvements were accomplished without penetrating the

17k. Day use limits under the proposed action were developed with full consideration of both the effects of more structured visitor management and improved platforms, trails, and other visitor facilities. New visitor management practices could include limiting time on the platforms, improving orientation and pre-trip briefings, or requiring all visitors to make reservations and be in specific parties accompanied by a guide. Given all of these factors, as well as the level of staffing that would be required to support the proposed actions, the National Park Service believes the proposed use limits are the best possible for achieving the desired futures set out for the Brooks River area (see "Part One: Purpose of and Need for the Plan" — "Desired Futures for the Brooks River Area" section).

17l. See response 6l to comment on supplement to draft DCP/EIS.

## COMMENTS

one foot thick ash layer from the 1912 eruption.

The corridors through which utilities pass are reopened from time to time for maintenance purposes. These proceedings are monitored by archeologists. Any damage, however, was already done by previous projects. With care, new projects can avoid the resources entirely.

17m

I have been told that the NPS Plans no further excavations in the area. Archeologists have told me that "they pretty much know what's there." The concern is that there be no further degradation. Well, it seems to me that going in there and ripping everything out will risk further damage. Now everything is safely buried underneath Novarupta's ash. It doesn't make sense to take the chance of making a similar mistake across the river. Leaving everything where it is is the best thing that can be done in regards to archeology.

ACCESS TO BROOKS CAMP

Brooks camp is currently accessed from King Salmon by float equipped aircraft and by boat. Frequent high winds, poor visibility and shallow water at the outlet of Naknek Lake effect transportation. For the past two years a hotel in King Salmon has offered a Naknek Lake tour that stops at Brooks Camp. During high winds the boat spends most of the day at Brooks.

17n

Economics, demand and nature will determine the best way to access the area. The NPS should allow private enterprise to compete quite freely to provide transportation to Brooks. In this way market and natural forces will decide the most practical and popular system. I predict that both air and boat service, as well as lake tours, will be successful. There are advantages and disadvantages to them all.

PLANNING FOR THE FUTURE

These recommendations are not just a band aid, they are exactly what is called for given the present and anticipated demand. They deal with the problems at minimal cost and could be accomplished in a relatively short period of time. I would submit that these changes could be implemented for less than it would cost just to remove the existing facilities at Brooks Camp. The demolition would also risk archeological and environmental damage. Then you would have the cost and disruption of new construction. We're talking millions of dollars here and a big project in the middle of the wilderness.

The NPS could save even more money if the new concession contract required that the concessionaire provide the guided walks. The NPS could pay the concessionaire or compensate through a reduction of concession fee, or both. The other option, of course, is for the concessionaire to charge an appropriate rate directly to the public. Either way, with less policing necessary, some of the current NPS housing would be available for either NPS or concessionaire guides.

17o

These changes can be made with the idea that they don't prevent further measures if conditions require. For instance, if after ten

## RESPONSES

17m. Regarding archeological resources, aboveground facility removal would occur under the proposed action, but existing underground facilities (e.g., utility lines) would be left in-place. There would, therefore, be little potential for buried archeological sites to be disturbed under the proposed action. However, if development were to remain (as under the no-action and minimum requirements alternatives), additional maintenance requirements would further disturb buried sites. Additionally, the cost of mitigating the potential adverse effects of necessary ground-disturbing operation and maintenance activities if the development remains would amount to a substantial, long-term cost. Also see response 5b.

17n. The text has been revised.

17o. See response 14g to comment on supplement to draft DCP/EIS. Also, a phasing schedule for each element has been included in the estimated construction costs (appendix A, table A-6).

years it is determined that a smaller foot print may be necessary on the north side of the river, employee housing could be moved to the other side of the river. A wait and see attitude should be adopted. There is no reason to take the plunge to radical and costly change at this time or all at once. These recommendations do not preclude a move in the direction now being considered at some later time.

17p

If these recommendations have the desired result as I believe they will, we should add a separate lounge room to the existing lodge building. This would add the room needed to accommodate current and expected use levels. It would also separate those who wish to drink alcoholic beverages from families with children and others who don't wish to be in the bar. The lounge could be added to the South West side of the lodge parallel to the kitchen and would provide a view of the river.

The concessionaire should construct a small building to house a coin operated laundry for use by both lodge guests and campers. Laundry service is often requested.

An additional 10 units should be added as a second level on the current Skytel building while retaining the current limit of 60 pillows. This would allow more double occupancy as is often requested without increasing the physical area of the camp.

When making the determination of if and when additional changes are necessary, don't rely on the perceptions of those who feel that any use of Katmai by people is an intrusion. Brooks should not be a laboratory to observe bears in an unnatural human free environment. It is really an opportunity to live with them and for people to see them in their natural environs, and that has always included people.

17p. These details would be addressed at the comprehensive design stage of alternative 1 rather in the DCP/EIS.

CRITIQUE OF ALTERNATIVE 5
BROOKS RIVER DCP

HISTORY

It is important, I think, to realize how the current Brooks Lodge and other visitor facilities evolved into what they are today. The needs of the increased lodge capacity in the 60's and later the day use visitation dictated what services were provided. These needs will not go away.

Originally Brooks Camp was a concession operated tent camp not to different than what is described in alternative 5, but the capacity was much lower, perhaps 15 to 20 guests. There was no permanent Park Service presence and no day visitation. If you have ever watched an episode of MASH, you'll have a basic idea what the facilities were like.

In the early 1960's the concessionaire, Northern Consolidated Airlines Inc. of which my father was president, pushed for the road to the Valley of 10,000 Smokes. The idea was to attract non-fishing visitors to the area. There were very few bears at Brooks in those days. The current guest cabins, office and lodge were constructed in 1961 and the NPS constructed the road the next year. The 9 unit "skytel" building was built in 1964. The lodge guest facilities have remained unchanged since then and are still classified as "rustic housing" by the NPS.

Cabins were built because the tent cabins were drafty and expensive to heat. The 9 unit building was even less expensive due to the shared wall and roof, and was cheaper yet to heat. The entire concession facility was powered by a 15 kilowatt generator. We were allowed 60 "pillows" but due to the fact that most people want double occupancy we were full with 30-40 guests. The approximately 14 employees lived in the tent cabins which were framed completely with wood and the canvas covered with green tar paper. This allowed them to be heated more efficiently. The large 16X32 kitchen tent was framed in also and became maintenance laundry storage and trading post.

By then the Park Service had a permanent presence in the park at Brooks. Increased need for interpretive services was the reason for more and more NPS personnel over those years. The NPS facility had separate utilities than the concession, and a much larger generator, maybe 30-50 Kilowatts. The bear population began to increase over the years and eventually, about the time Katmailand got the concession in 1982-83, bear watching had become the major attraction. In 1974 the NPS installed a camp wide utility system including the notorious underground tanks and fuel lines. A 100 KW generator was used.

When Katmailand got the concession contract in 1982-83, we were mandated by the NPS to replace the tent cabins. We were also required to increase the size of the dining room because of increased

outside demand for food service from other visitors, campers and day visitors. All of the construction by Katmailand was accomplished without penetrating the ash layer left by the 1912 eruption.

With further increase in day visitation we were given permission to add a walk in cooler to the kitchen. Our staff has been level at 22 since 1985. Buffet dining was introduced in 1987 because it became impractical to feed everyone at once. With a buffet you can feed more people over a 2-3 hour period in a smaller area. It requires fewer plates, utensils and employees, less infrastructure.

I would like to point out that, with the exception of the walk in cooler and buffet tables, the electrical needs of our facility has not increased since the 15 KW days. The current employee cabins and maintenance/laundry facility are, if anything, more efficient than the tent cabins. The guest facilities have not changed at all.

CRITIQUE OF ALTERNATIVE 5

The facilities and particularly the proposed services described in alternative 5 are very similar to those that existed in the late 1950's. The current facility and services evolved into what exists today for practical, logistic and business reasons. The current lodge, with it's 16 guest units is ordinarily full with around 45 guests. The campground, with it's 18 camps sites, seldom has more than 50 total campers. These figures are lower than the proposed numbers. Day use also has not reached the proposed numbers and has not increased significantly during peak season (July) since 1988. That is because the lodging available near the park has not increased significantly since the Quinnat Hotel went into operation that year. The point being that we're talking higher than the current visitation. Which is good, let's promote tourism.

LODGE FACILITIES

17q

Alternative 5 calls for guests quarters to be tent/cabins. Tent/cabins are difficult and expensive to heat. Not only are they cold, but they also "sweat" moisture on damp days, flap around in the wind and generally have little capacity for windows. Even "technologically advanced" ones like the WeatherPort brand buildings have these problems.

We proved during our replacement of employee cabins, maintenance facilities and lodge expansion that construction of "kit cabins" can be accomplished without penetrating the 1912 ash layer. Why not build something that looks nice and keeps people warm, dry and comfortable. The facilities will have to conform with the NPS 48 concession manual standards, including handicap access. Our current facilities are considered "rustic accommodations" by those standards. In fact, a multi unit building would be even less expensive to build and heat. Tent/cabins are really impractical.

While you could probably fill anything during peak bear watching season, the lodging needs to be attractive and comfortable enough to

17q. The text has been revised to call for hard-sided, hard-roofed visitor and staff cabins with toilets, wash basins, and showers in each unit. Staff units would have cooking facilities. Details of utilities design will be done at the comprehensive design stage rather in the DCP/EIS.

## COMMENTS

attract visitors during shoulder periods. That will be difficult enough with the proposed new location let alone tent/cabins. The costs of staying in any facility will be high if you can only fill it for part of the time. I'll say it again, tent/cabins are a really bad idea. One of the reasons the current cedar log buildings were built was to attract the average tourist. The tent/cabins didn't do that.

I would recommend some accommodations similar to what exists now. A bunk house type accommodation could also be built with some sort of partitions, housing both singles and couples. This would provide a lower cost alternative.

SEWER AND WATER

The water/sewer system needs to handle 60 lodge guest, 60 campers, 40 staff and 100 day users. One of the first thing people do after arriving by airplane and especially by boat is to hit the rest room.

The best way to deal with sewage is to leach it into the ground. It is biodegradable and it actually feeds the vegetation. While holding tanks and a leach field do need to be fairly deep, our experience building a new DEC approved system at our Kulik Lodge has demonstrated that, given closely consolidated structures, the sewer and water lines can be just under the surface. They would not need to penetrate the 1912 ash layer.

Given that, why not have not have private bath/toilet in the rooms or cabins. With 60 guests you are talking about the same number of showers and flushes on any given day regardless of whether they are in the rooms or in a central facility. This facility needs to attract the average tourist all season long.

FOOD SERVICE

Family style food service isn't going to make it with 60 guests. At least not without a larger facility and more staff than you need with either portion control or buffet. You need to seat a few people at a time over a longer period of time in order to get practical use of your square footage and your staff.

17r

The unit cost of food service is less when you serve more people. Why not make the food service available to campers and day users as well? Do you want food being brought in by campers and day users in larger amounts than it is today? Where are day visitors going to eat? The weather is almost always lousy. A separate facility requires more square footage. Who is going to pay for up keep on a separate "public" shelter and eating facility.

CONCLUSION

Like I said, you need at least the services that are now provided. Why do you want to reinvent the wheel? We know what works because the demands and logistics of basic human needs has determined what facilities and services are required. The current facilities evolved

## RESPONSES

17r. The text has been revised, removing language referring to how people will be served food. This will be addressed at the comprehensive design stage and in the concession contract. In the proposed action, the dining facility would serve both overnight lodge guests and day users.

into what is there based on these needs. You are not going to change that.

Essentially, infrastructure will not be minimized, as the plan states, by centralizing a wash house. It won't change the demand for water or the amount of sewage produced. Family style meals require a larger facility not a smaller one, and more staff. Not providing meals to campers and day users requires an additional facility. You guys have got it all wrong here. Your plan limit the use of lodge dining to those staying at Brooks will require more infrastructure, not less than currently exists. Tent/cabins will not attract season long visitation by the average non bear watching tourist. This increases the cost for those who do come.

FUNDING

17s

Your plan envisions funding for concession buildings from some sort of capital improvement fund based on gross receipts to be determined during future contracting processes. The bottom line thoug is that the concessionaire will need to borrow and/or invest to build it in the first place if the funding doesn't come from congress. This will necessitate that the facility provide a return on investment. There is no way around that. Demolition of current facilities and building the NPS facility will require funding by congress. It's anyone's guess how that will be received given the current cost cutting climate there. Currently the cost of staying at Brooks Lodge is comparable to staying in King Salmon. The cost of accomodations will have to go up substantially to cover the cost of a new facility.

TRANSPORTATION ACCESS

17t

The area proposed for floatplane, boat docking is in an area that can get wave action during winds from a northerly or northwest direction. Winds from any westerly direction preclude landing at Brooks Lake. Potentially, you could get a situation where aircraft could not come ashore either on Naknek or Brooks Lake. To avoid this situation, wharfage needs to be south of the Beaver Pond, nearer the Brooks River mouth.

The plan calls for "encouraging" water born access. It is true that, as the plan states, boat service can become attraction unto itself. However, the plan also points out the shortcomings of relying on boat access, low water and the "notorious" rough water. These problems may not though, be "likely over come by the right type of boats and back up air charter support."

Firstly, last year was the first year that the Quinnat Hotel's boat was able to navigate the low early season water at the lake outlet. We can not count on an early rise of the water each year. Furthermore, the physics of displacement cannot be altered. A larger boat than their's would need even deeper water. The Quinnat boat had a limit of approximately 35 knots of wind, which is not uncommon. Riders say the ride is uncomfortable at 15-20 knots, which is common.

Back up air support isn't going to be there. Air planes are

17s. See response 3f to comment on supplement to draft DCP/EIS.

17t. The exact location for the floatplane and boat docking area will be based on minimizing impacts on bears and optimizing safe land of aircraft.

expensive. The fixed costs such as insurance and interest on money are high. Pilot and mechanic pay must be guaranteed whether you are flying or not. You either keep your airplane busy all season long or you sell it. How does this job offer sound: (Pilot wanted. Wait around on nice days. When the wind is blowing over 35 knots you get paid to fly. The pay is low because we don't fly much and must cover insurance costs etc.) Get the picture?

17u

The NPS needs to butt out of the transportation issue. Economics, demand and nature will determine the best way to access the area. The NPS should allow private enterprise to compete freely to provide transportation, not promoting any particular method. In this way, market and natural forces will decide the most popular and practical system. I predict that both air and boat service, as well as lake tours, will be successful. There are advantages and disadvantages to them all.

FINALLY

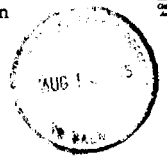
I really think you need to go back to the drawing board. This plan demonstrates a general lack of knowledge of the area. It is obvious to me that the planners have no experience in operating, maintaining or marketing a visitor facility in Katmai National Park. We talk to the visitors, past, present and future every day.

Actually, it's time to seriously consider whether we gain anything by moving or removing the camp. Maybe we can come closest to accomplishing all of our goals by leaving it where it is, especially saving money. The problems at Brooks are exaggerated and can be remedied by how we operate, not where we operate. It would be an expensive mistake, and a disservice to the public, to remove the lodge and replace it with a facility that doesn't provide the same level of service.

17u. The text has been revised.

National Parks
and Conservation Association

ALASKA REGIONAL OFFICE



August 14, 1995

Bill Pierce, Superintendent
Katmai National Park and Preserve
P. O. Box 7
King Salmon, Alaska 99613

**Re: Comments on the Supplement to the Draft Development Concept Plan and Environmental Impact Statement (DCP/EIS) for the Brooks River Area, Katmai National Park and Preserve (Katmai)**

Dear Superintendent Pierce:

**Introduction**
This letter represents the views of the National Parks and Conservation Association (NPCA) regarding the Supplement to the Draft DCP/EIS for the Brooks River Area, Katmai, which presents a new proposal (Alternative 5) for public review. As you know, NPCA was involved in the effort to have the National Park Service (NPS) develop a revised alternative, and was an active participant in discussions and consultations among NPS, state agencies, Native interests, commercial operators, environmental organizations and others which led to the development of Alternative 5 for consideration through the EIS process. In addition, NPCA recently had the opportunity to observe first hand the current situation at Brooks River during the height of the July bear viewing period and compare the experience with previous visits during July dating back over a decade. The following comments reflect these discussions and observations.

**Overview**
NPCA supports the basic approach embodied in Alternative 5. As mentioned in our earlier comments on the original draft DCP/EIS, removal of all facilities north of Brooks River and the establishment of a "people free" zone is a vitally important step which should be taken as soon as possible to both protect bears and sustain the unique opportunity for people to view brown bears in their natural environment over the long term. NPCA also supports the establishment of day use limits, a more structured visitor experience, redesign of the viewing platforms at Brooks Falls and the river mouth, elimination of the cutbank platform, catch and release fishing and seasonal closure of the lower river, enhanced visitor interpretation, increased recognition of cultural resources, dispersed opportunities in the Naknek Lake area, and cooperative planning and expanded visitor opportunities associated with King Salmon as a gateway community. Lastly, NPCA supports the opportunity for continued overnight/multi-day park experiences in the Brooks River area through the construction of a developed campground and rustic

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cabin/lodge facility in the Beaver Pond terrace location. However, a number of the specific elements of Alternative 5 demand further consideration, refinement and/or definition if the final DCP/EIS is to accurately reflect current management challenges, and propose realistic and achievable solutions which can adequately protect resources and serve visitors. Some of the issues which NPCA believes deserve additional attention are discussed below.

18a

**Day Use Limits**

There has been a good deal of discussion about applying the concept of "visitors at one time" as opposed to "visitors per day" to the numbers of day use visitors at Brooks River. The notion was that such an approach could provide for substantial additional day use opportunity (i.e. increased numbers) without any additional impact. Along with others, NPCA suggested that day use visitors might arrive in two shifts - morning and afternoon - for visits to the bear platforms. While the idea sounds appealing, NPCA is convinced that this approach is wholly unworkable. Weather conditions frequently dictate arrival times at Brooks River. During my recent visit, alone, there were two days when a "morning group" would have been unable to access the area until nearly noon. On one day, almost twenty five flights landed after 11am during a space of about twenty minutes. Under a "visitors at one time" system, these people would have had only a brief time to rush through their viewing experience or (more likely) would have jammed up with the "afternoon group", doubling the numbers of day users clamoring to get to the bear platforms. In theory "at one time" sounds great. In practice it would be chaos.

Moreover, the bears themselves often dictate the pace and schedule of visits to the platforms. Several times during my visit, I was with groups of people who were held up at the viewing platforms, or delayed in getting to the platforms because of the movement of bears. NPCA acknowledges that some of the physical construction proposed (i.e. elevated boardwalk approaches to the falls platform) together with more structured and consistent visitor management (i.e. leading visitors to the platforms) will partially address this situation. However, if the goal is to keep Brooks River a natural system, and one in which people yield to bears, then visits to the platforms will never be a perfectly timed exercise. Brooks River may be a major visitor destination, but it is still part of the northern wilderness. It is subject to Alaska's patterns of weather and wildlife, and our visitor management must both recognize and respect these natural elements.

18b

**Dispersed Use**

Several additional issues need to be considered when encouraging dispersed use in the Naknek Lake area. First, there needs to be a good way to inform dispersed users in advance that they can not avoid use limits at Brooks by camping beyond the Brooks River area and then coming to Brooks River during the day. This situation occurred several times during my recent visit when dispersed use boaters visited Brooks to view bears.

18c

Second, dispersed use may have significant management implications for NPS in resource protection and public safety. Two small craft sank at Brooks during my visit. One visitor had rented a small skiff from the gateway community of King Salmon, but had insufficient knowledge of conditions on Naknek Lake. Third, while encouraging dispersed use may



18a. See response 6l to comment on supplement to draft DCP/EIS.

18b. True, these visitors, like all others, would need a day permit.

18c. True. Dispersed use in Katmai National Park and Preserve other than the Brooks River Area is not addressed in the draft DCP/EIS. It is appropriately addressed in the *Backountry Management Plan* and the *General Management Plan*. If people plan to visit the Brooks River area and have a permit, dispersion is not a problem.

provide the ability to limit use at Brooks and lessen impacts on bears at this location, dispersed use may also create significant impacts on bears in the broader Naknek Lake area. Last year, several bears were killed by floaters on the Alagnak. Earlier this year, five bears were killed on the Iliamna. Human safety is also a major concern. As part of any plan to encourage expanded and dispersed use, and particularly alternative fishing and bear view opportunities, NPS should develop a much stronger bear/visitor information and management program for Katmai, including requirements regarding such things as requirements for use of bear proof food storage containers.

18d

**Cultural Resources Interpretation**

Alternative 5 places expanded emphasis on cultural resources at Brooks. This is appropriate, but needs further refinement. The notion that visitors arriving at Brooks would be given a "brief orientation" on bear safety and then introduced to a much more detailed program on cultural and human history is unwise and unrealistic, especially during certain times of the year. No matter what the interpretative program is, the contemporary phenomenon of Brooks River is bears, and bears are what people will continue to come to Brooks to observe. This is certainly true during peak viewing periods. NPS needs to place more - not less - emphasis on educating visitors about bears and bear safety. On the other hand, Alternative 5 misses certain opportunities to address cultural resources.

There are outstanding and appropriate opportunities to interpret the significant cultural resources at Brooks. In addition to providing a meaningful additional dimension of the Brooks River experience to visitors who come during peak bear viewing times, the opportunity to learn about cultural resources can offer a major experience to visitors who come to Brooks during the early season, or in August. This should be mentioned in the DCP/EIS. Moreover, some of the facilities which are needed to improve bear/visitor management can also serve to protect and interpret cultural resources. For example, an elevated boardwalk along the last hundred yards of the trail leading the Falls platform would greatly improve visitor safety and management, especially during July. That same boardwalk would provide protection for the house pits and other cultural features on the grassy knoll overlooking the falls, and interpretative panels could be included in the boardwalk design. People might very well walk to the Falls when bears were not present to view the house pits and the setting, and to read information panels or hear an on-site interpretive program. More specific attention should be paid to cultural resources.

**Gateway Community**

This area still seems to get short shrift. Alternative 5 mentions cooperative planning, but does not provide any detail. NPS supply and management at Brooks is still largely dependent on a barge which is rather tenuously anchored along the river bank. The park patrol boat is still moored in a marshy slough on the far side of the river. This is an aspect of operations at Brooks which seems to be a particularly weak link in the chain. It should certainly be addressed as part of any long range plan for management at Brooks River. Perhaps cooperative gateway planning would be the appropriate vehicle. In addition, if the King Salmon area is to become a staging or "jump-off" area for a variety of opportunities in the park, NPS might consider some sort of limited campground facilities,

18e







18d. The National Park Service would continue to place a strong emphasis on educating visitors about bears and bear safety. Although under the proposed action the National Park Service would do much more to interpret the cultural and human history of the area, it has no intention of making this its only, or primary, interpretive focus. See response 24a to comment on draft DCP/EIS.

18e. See response 6aa to comment on supplement to draft DCP/EIS.

## COMMENTS



especially in light of the constraints of weather in the region which can delay travelers. Morino campground in Denali provides a simple walk-in camping opportunity for visitors who arrive by train and who plan to hike into the park. Campers arriving in King Salmon by air might find a similar facility useful. Lastly, gateway planning may also be an appropriate forum for NPS to participate in additional cooperative efforts regarding cultural resources. It would be far easier for Native elders, students and other local residents to participate in programs which were based in King Salmon as opposed to Brooks River, and many more "hands on" activities, such as those involving the use of salmon, would be more appropriately (and safely) conducted at a gateway location.

**Removal of Brooks Lodge**

18f NPCA still has major concerns with the schedule and approach to removing Brooks Lodge. The current approach of constructing all utility and transportation infrastructure at the Beaver Pond terrace site prior to any removal/relocation of existing Brooks Lodge facilities leaves open the chance that two lodges will be built at Brooks River. Strong and specific steps must be taken to avoid this possibility. Moreover, given the projected costs, NPS should give further careful consideration to the financial plan which can most realistically accomplish the goal of removing facilities north of the river. One option which NPCA believes deserves additional detailed analysis is the use of the upcoming concession contract as a tool to implement the DCP/EIS. In any case, in the long term, it would be far better to lose a season or two of overnight visitor lodge use at Brooks River, than to stumble into a situation in which developments were in place on both sides of the river. Even if this situation could be guarded against, in the absence of a firm financial plan, the most likely situation is that the existing Brooks Lodge facilities would not be removed. This would be a tragic result.

**Bear Country**

18g While the focus of the DCP/EIS is to improve management in the primary wildlife corridor along Brooks River, it is important to recognize that all of the Brooks River area is bear country. This fact should be incorporated into all aspects of visitor management and facilities design. During my recent visit, I witnessed a group of visitors gathered at the junction of the road and the beginning of the trail leading to the falls viewing platform. The general attitude of the crowd seemed to be one of waiting to get into a stadium or theater. As the crowd waited for their chance to go into bear country, a bear emerged from the woods along the road, almost stepping on two visitors who were sitting on the ground against a tree. If a more structured management system is to be adopted at Brooks, particularly one in which groups of people are escorted to the platforms, then care must be taken not to create new management problems in the process of solving others. The creation of a focal/gathering point at the falls trail head should be reviewed, and it may be necessary to provide some sort of more controlled waiting facility at this location. Bears are also encountered along other portions of main the road system.

**Level of Services at Brooks River**

18h One goal of NPS management at Brooks should be to provide a diverse group of visitors with the chance to experience the natural setting and living systems of Brooks River as



## RESPONSES

18f. Cost estimates have been substantially reduced such that the entire development could be done as a single continuous process, and that minimizes the time that there would be facilities on the north side of the river. The mechanism for funding development is somewhat flexible.

18g. The National Park Service agrees. Planning and design of the proposed facilities and visitor management system does and would continue to recognize and respond to the presence of bears throughout the Brooks River area. The suggestion for a focal/gathering point at the falls trailhead and consideration of a more controlled waiting facility at this location have been presented in alternatives 2, 3, and 4 of the draft DCP/EIS.

18h. The National Park Service has no desire or intention of allowing the Brooks River area to become an "outdoor zoo"; proposed developments and services would be kept to the minimum necessary to protect the natural and cultural resources and provide for quality visitor experiences and safety appropriate to the Brooks River area. A shuttle system would be provided only when necessary to transport visitors from Naknek Lake to the Brooks River orientation center and to transport visitors who need assistance to get around the area.

more than a "commuter wildlife show". NPCA supports the continued opportunity for both camping and rustic cabin/lodge accommodations at Brooks River. However, the level of services associated with operations at Brooks River should be kept to an absolute minimum. It is important to 1) keep the Brooks River area focused on its major purposes, 2) avoid activities which may create additional bear management problems and 3) maintain, as closely as possible, a direct/non-insulated connection between the (day use and overnight) visitor and the natural world. Putting aside for a moment the major problems regarding the location of the current lodge, one of the wonderful aspects of the current operation at Brooks is that once the visitor steps onto the beach, the remainder of the visitor's experience at Brooks is on foot. Extreme care should be taken not to turn Brooks River into a motorized shuttle park and/or a place where the visitor goes from plane/boat to briefing building to shuttle bus to bus stop to boardwalk to platform and back without every touching the ground. This may be an exaggeration, but it would be very easy to fundamentally alter the natural and personal character of the Brooks River experience. Brooks River should not become simply a tour through an outdoor zoo. In this same regard, while offering interpretation of cultural resources and providing access to the Valley of Ten Thousand Smokes is appropriate, the Brooks River area is not the place from which to stage recreational activities such as boat rentals. As management at Brooks River is refined, such activities should be based from the King Salmon gateway.

18i

**Campground Reservations**

Virtually all parties agree on the desirability of continued overnight camping in the Brooks River area. However, there is currently a significant problem managing/scheduling visitor use of the existing campground which should be specifically addressed in the DCP/EIS, and which needs immediate attention by NPS. Given use demands, a reservation system is essential. The attempt at establishing an early, open reservations system proved subject to widespread abuse. The lottery system used this season seems most fair, but in the absence of any required fee, people apparently feel no sense of commitment. Thus, everyone applies, but only half of those who win show up. NPCA commends the park staff for trying various means of managing the campground to provide maximum opportunity while avoiding the chaos and problems of unscheduled use. The department needs to provide some additional assistance in successfully addressing this problem.

18j

**Technical and Resource Information**

Adequate landing and docking facilities on the south side of the Brooks River are critical to the successful operation of facilities proposed in Alternative 5. NPCA believes several technical and resource questions remain regarding the siting, potential resource impacts, design, and serviceability of such landing facilities. These questions should be addressed as soon as possible. Additional assessment of seasonal bear movements in the Beaver Pond terrace area also needs to be undertaken.

**In Closing**

NPCA would be pleased to consult with NPS and other interested parties in addressing the issues raised above and improving Alternative 5 toward a final decision to guide future



18i. All options will be explored in developing the best campground reservation system.

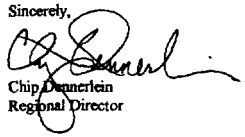
18j. Additional detail regarding new floatplane and boat tie-downs and docking and a barge wharf will be addressed at the comprehensive design stage. The National Park Service believes that the evaluation of bear habitat and movements on and around the Beaver Pond terrace area by professional bear biologists is adequate.

management of the Brooks River area. Moreover, while the DCP/EIS lays out the major steps which would be taken to improve management at Brooks, NPCA feels strongly that a number of steps can and must be taken immediately to address the current situation.

Resources, visitor interests and the visitors themselves have dramatically changed at Brooks River over the past decade. There are increased numbers of bears, there is much more interest in bear viewing than fishing, and there are many more children and "package" tour visitors who are unfamiliar with wilderness and wildlife. On one evening during my recent trip to Brooks River, I stood at the falls platform and counted twenty one bears in view. At several sections of the lower river where I had fished in years past without incident, I could not have fished this year without actively and constantly pushing bears out of the river. I watched several day use visitors fume because they were on a tight schedule and were delayed - by bear activity - in getting to the platform. I saw (and caught) a two year old child who ran unattended through the campground and into the woods, after we had just moved a bear out of camp. I saw bears fishing, fighting and even exhibiting mating behavior.

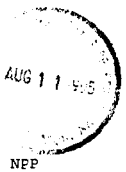
On a good salmon year, Brooks River now approaches the experiences available at McNeil River. However, current management is very unlike the situation at McNeil. Where McNeil has strict day use limits, Brooks has none. Where McNeil is managed by state biologists with long term on site experience, with the exception of one employee, NPS personnel at Brooks River are all seasonals with limited or no prior experience at Katmai. Where visitors to McNeil are required to pay substantial fees to apply for lottery permits and additional fees to confirm reservations if chosen, visitors to Brooks pay no day use, or campground reservation fees. NPCA does not suggest that McNeil provides a template for management at Brooks River. The two areas have certain different objectives. But the goal of establishing a safe, quality, sustainable experience for people to view bears in a manner which protects the natural patterns and lives of the bears, should be a primary objective of NPS at Brooks River. NPS recognizes this challenge and NPCA commends the trial efforts made this summer to bring more structure to visitor use during the peak period of bear activity. Thus, in addition to moving forward to refine and finalize the Brooks River DCP/EIS, NPCA urges NPS to review the current situation, consult with the state and other wildlife professionals as appropriate and take immediate steps to improve on site management at Brooks River prior to next season.

Sincerely,



Chip Dennerlein
Regional Director

August 8, 1995

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2525 Gambell St.
Anchorage, Ak 99503

Re: Brooks River Area Development Concept Plan, Katmai NPP

Dear Mr. ~~Barbee~~ Bob:

Ed and Peggy Wayburn and I greatly enjoyed discussing national park issues with you yesterday, and getting your perspective on Alaska after your first year as Field Director.

One of the issues we discussed was the Brooks River DCP, and the NPS's new preferred Alternative 5. Ed and Peggy visited Brooks Camp as part of their trip, and were especially interested in how the Service planned to cope with the unique situation there.

I observed that the new preferred alternative includes the fundamental feature of the previous preferred alternative, the retention of major overnight accommodations and related NPS facilities at Brooks River. I also noted that despite three previous requests that a realistic gateway community alternative be included in the draft DCP/EIS, and, subsequently, in the current Supplemental to the Draft, I had not even received the courtesy of a reply explaining why my suggested alternative was so summarily rejected.

You said that you would follow up on my request. Thank you.

I am enclosing a copy of my statement on the Draft DCP/EIS, which I submitted prior to your assignment to Alaska. I would value your thoughts on the Sierra Club's proposed 6th alternative, which I believe fully complies with existing law (ANILCA, NPS Organic Act), official NPS policy (Management Policies, NPS, 1988), Secretary Babbitt's "Gateway Community" policy, and the Administration's policy on Native Americans. The new preferred Alternative 5 fails on all four counts.

Sincerely,

Jack Hession

Jack Hession

Alaska Representative

Enc.
cc: Ed and Peggy Wayburn
Deborah Williams, Melanie Beller, and Brooks Yeager
Bill Pierce

## COMMENTS

Statement of the Sierra Club
on
Draft Development Concept Plan/Environmental Impact Statement
Brooks River Area, Katmai National Park and Preserve
Anchorage, Alaska
May 18, 1994

Good evening. I am Jack Hession, Alaska Representative of the Sierra Club. The Sierra Club is a national environmental organization of more than 500,000 members with chapters and groups in nearly every state, including Alaska.

I appreciate this opportunity to comment on the proposed plan. The selection of a management and development plan for the Brooks River area is the most important administrative decision in the nearly 70-year history of the park, one that will determine the management direction of the entire park for many years to come.

19a

The Sierra Club recommends adoption of an alternative not included in the draft plan. This alternative would (1) relocate the existing Brooks Camp overnight lodging and most of the NPS facilities complex to the King Salmon area, (2) replace float planes with tour boats as the primary means of access to Brooks River, and (3) provide for modern camping facilities south of Brooks River.

This fifth alternative is not entirely different from the four considered in the draft. Although it does not call for day use only, it shares with the Day Use Only alternative the relocation of most existing facilities to the King Salmon area. In common with the Beaver Pond and Iliuk Moraine alternatives, it includes a new campground south of Brooks River, which is why it is not a day-use plan.

Use of specially designed passenger vessels in lieu of float planes is the primary difference between this fifth alternative and the draft plan's four alternatives, all four of which assume the continued use of float planes as the primary means of getting visitors to and from Brooks River. According to the Park Service, 88 percent of 1992 visitors to Brooks River arrived by float plane. Under the suggested fifth alternative, float planes would continue to be used by park staff, for medical evacuations or other emergencies, and if Naknek Lake weather and water conditions temporarily ruled out access by water. In the latter case, flights would originate in King Salmon and be under permit from the Park Service.

Without explanation, park planners chose not to include a passenger vessel alternative that, after all, is obvious--Brooks River empties into Naknek Lake at Brooks Camp, and boats have been delivering visitors to the river for many years. Tour boats are used in Glacier Bay National Park, and at Denali National

## RESPONSES

19a. To the extent NPS policy allows, alternative 4 (day use area only) does consider the suggestions. Providing only a campground for overnight stays does not meet the NPS practice of providing for the widest cross section of the public as is feasible. With regard the use of boats and floatplanes for access to the Brooks River area, the National Park Service believes that the current language is adequate.

Park visitors ride tour buses, which are the land equivalent of tour boats.

Park planners did not simply overlook this obvious alternative. Last summer, I submitted a detailed description of a proposed alternative 5 to park planners of the Alaska Regional Office of the National Park Service and the NPS Denver Service Center, with the request that it or a comparable alternative be included in the Draft DCP. A copy of my letter is attached to this statement.

Now, because the Draft DCCP lacks this fifth alternative or a comparable one, the public is being denied the opportunity in this version of the draft to evaluate a logical, traditional, and practical transportation system alternative. This omission also means that the Park Service has not fully complied with the National Environmental Policy Act, which requires that a full range of alternatives be considered. Accordingly, I recommend that the Park Service publish a supplemental environmental impact statement for public review and comment prior to making a final decision on the development plan.

Citizens should have the opportunity to consider this fifth alternative, as it offers advantages that make it more consistent with the purposes of the park than the four alternatives of the draft plan. It is based on Congress's directive that Katmai be managed as a park where "...fish and wildlife may roam freely, developing their social structures and evolving over time as nearly as possible without the changes that human activities would cause." (Senate Report 96-413, p. 137).

In summary, the advantages of this fifth alternative include:

■ A much lower level of disturbance to bears. Replacing float planes with passenger vessels would substantially reduce the disturbance caused by overflights and aircraft noise. The overall level of human activity and hence the potential for disturbance would be diminished if overnight lodging and most NPS facilities are located in the King Salmon area.

■ Substantially decreased overall environmental impacts. This includes less modification of the Brooks River area for lodging, new roads, shuttle bus service, and related facilities; less fuel transportation and storage and hence a decreased risk of spills; and less disturbance to wildlife and archeological resources.

■ Better, more enjoyable bear viewing and interpretive services. A King Salmon visitor/interpretative center combined with park ranger-interpreters aboard tour boats would allow the Park Service to better inform visitors about bears and other park resources in advance of arrival at Brooks River.

■ A higher quality park experience. Vessels would displace the constant arrival and departure of float planes at Brooks Camp,

which is now a busy float plane base during the visitor season. Peace and quiet, which are fundamental national park values, would be enhanced for park visitors. Vessels would also gradually introduce visitors to the park, as opposed to the current method of depositing visitors abruptly on the beach at Brooks Camp.

- A greater degree of visitor safety. Well-designed and constructed passenger vessels are safer than float planes, and can operate when low ceilings rule out air travel.

- Improved Brooks River visitor management. Groups arriving on a scheduled basis could be more readily and safely escorted to and from the viewing platforms and other facilities.

- Improved park management. Some NPS staff now needed at Brooks River could be reassigned to other park tasks and needs. Currently, the NPS's Brooks River operation consumes about 90 percent of the park's entire budget, which means that other vital park management needs are not being adequately covered.

- Affirmation of National Park Service policy on visitor services and concessions. Building expensive new and unnecessary facilities inside the park under the preferred alternative or alternative 3 is incompatible with NPS policy that calls for major visitor facilities to be located in a gateway community or elsewhere outside the park.

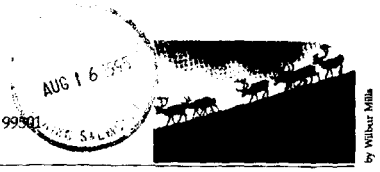
- Less cost to taxpayers. If businesses in King Salmon provide overnight lodging and other visitor services, the Park Service would be spared the expense of subsidizing the same services, and have lower operating and personnel costs at Brocks River. Increased competition in King Salmon could result in lower prices to visitors. Alternative 4, which would also relocate overnight lodging and most NPS facilities to King Salmon, has estimated construction costs of $13 million, versus $27.3 million plus additional compensation and subsidy costs to the concessioner under the preferred alternative.

- Benefits to the local economy. As the Bristol Bay fishery encounters troubled times, and the King Salmon Air Force base is mothballed, the local economy would benefit from the location of major visitor facilities and services in King Salmon.

- Potential economic benefits to local Native corporations and individuals. If new concession facilities are built in the King Salmon area, and a tour boat concession put in place, Native corporations and individuals could benefit under the preference right provision (Sec. 1307 (b)) of the Alaska Lands Act.

In conclusion, I look forward to your supplemental environmental impact statement. Thank you for the opportunity to submit these views.

**Sierra Club**
Alaska Field Office
241 E. Fifth Avenue, Suite 205, Anchorage, Alaska 99501
(907) 276-4048 • FAX (907) 258-6807




Via Facsimile

August 14, 1995

Mr. Bill Pierce
Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Re: Supplement to the Draft Development Concept Plan/EIS, Brooks River Area

Dear Mr. Pierce:

On behalf of the Sierra Club, I offer the following comments on your Supplement.

General comments

20a

Alternative 5, the preferred alternative, is described as a "new" proposal on each of the first four pages of the Supplement. But Alternative 5 is not "new." As Table 4 clearly indicates, Alternative 5 is a scaled-down, less costly version of preferred Alternative 2 of the draft DCP/EIS. Almost all of the essential features of Alternative 2 are retained; most are unchanged, and some are modified to reduce the cost.

Thus it is misleading to state that the Supplement presents a "new" proposal. It is a Revised Alternative 2, and should be designated as such in the final plan.

Alternative 2, as revised and renamed, now has a $21 million dollar price tag, and is based on the following assumptions: (a) that a concessioner would be willing to spend $2.9 million for the proposed Beaver Pond lodge/restaurant/campground/bus shuttle, plus an unspecified share of $14.9 million in "shared NPS and concessioner costs;" (b) that Congress will appropriate the necessary federal funds for the project; and (c) that the Federal Highway Administration will contribute another $1.3 million for a new road connecting the docking facilities with the new complex on Beaver Pond Terrace.[1]

20b

[1] There is, of course, considerable additional expense involved in operating and maintaining the new facilities, as well, but the Supplement is silent on these costs. In the final

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20a. Whether the alternative 5 presented in the supplement to the draft DCP/EIS is called a "revised alternative" or a "new alternative" is only semantic.

20b. The DCP/EIS does not contain the level of detail required to calculate operation and maintenance costs of the alternatives.

## COMMENTS

These are questionable assumptions, particularly the idea that federal funds will flow in the amounts envisioned. Congress, which is engaged in severely cutting the federal budget as a whole, including funds for the National Park System, is likely to question the need to construct a new resort and related facilities at Brooks River at considerable taxpayer expense given the availability of overnight lodging and other commercial visitor services in nearby King Salmon.

A more realistic assumption is that some federal funds may be available in future years for improving the visitor management program, e.g. money for improving existing trails, but that the amounts called for under Alternative 5 are unlikely to be appropriated.

20c

Under Alternative 5, it is also assumed that the entire new complex on the south side of the river "would have to be built first, before the removal of facilities north of the river and at Lake Brooks" (p.18).

However, if federal and private funds for Alternative 5 are not assured, and may not be forthcoming at all, then the agency should adopt a different "phasing schedule" for the alternative if it is serious about removing the existing facilities north of the river. For example, the campground and NPS facilities needed for visitor management could be moved to an appropriate place on the south side of the river, and the private concession and remaining NPS facilities on the north side phased entirely out of the Brooks River area.

Under this phasing schedule, hotels and other commercial visitor services in King Salmon would provide overnight accommodations, transportation, and other visitor services while the NPS sought new federal and private funding for its Beaver Pond Terrace resort proposal. This kind of phasing schedule--one that avoids the indefinite postponement of a move out of the north side of the river--would demonstrate the sincerity of the NPS in its avowed intent to reform the visitor management program at Brooks River.

20d

Given the NPS's plan to retain the present facilities north of the river pending the construction of the new community south of the river, what does the agency plan to do when the existing Brooks Lodge concession contract comes up for renewal in 1996? The final plan should relate the new concession contract to the various alternatives.

20b (cont.)

DCP/EIS, please include estimated operation and maintenance costs for each alternative.



## RESPONSES

20c. See response 18f to comment on supplement to draft DCP/EIS.

20d. A new contract will be negotiated after the "Record of Decision."

Specific comments

Page

3. NPS guided trips to the bear-viewing platforms. This is a good feature of Alternative 5 and should be part of whatever visitor use limits and alternative is finally adopted. It is a long-overdue reform that will benefit both bears and visitors.

20e

3-5. Visitor use limits. Under Alternative 5, a maximum of 260 people per day is allowed, subject to a 15% up or down modification based on monitoring of the impact. "This is more people than now visit Brooks Camp" (p.30). But Table 1 does not give the current visitor use as a basis for comparison. According to information presented at the work sessions of Katmai "shareholders" earlier this year, in July lodge guests currently average 50 per day, campers 50, day users 75, and staff 35, for a total of 210. In September the corresponding figures are 50, 40, 50, and 35, for a total of 175. Thus Alternative 5 does indeed involve more people--24 and 37 percent, respectively.

20f

Most importantly, the Supplement, like the Draft DCP/EIS, fails to relate the proposed visitor use limits to the results of the extensive scientific research funded over the years by the NPS on bear-human interactions at Brooks River. One of the principal findings of this research is that the increasing level of human activity in the Brooks River area has resulted in the displacement of some sows and cubs and other non-habituated animals from the river corridor during the critically important feeding times of July and September. This in turn could be adversely affecting the bear population.

According to Dr. B. K. Gilbert, principal investigator in these studies, in his comments on the Draft DCP/EIS,

> The [Draft] is deficient in presenting quantitative predictions of the impact of the estimated numbers of people on bear use of the prime Brooks River habitat, particularly during the fall period of hyperphasia so important to overwinter survival. The planning team has at its disposal detailed results of a series of formal scientific investigations aimed specifically at these questions. Without this information the public can not compare the effect of various options on bear foraging ecology.

In the absence of this information and analysis, the NPS's choice of 260 people per day in July, and 240 per day in September, is arbitrary. It reflects the agency's decision to subordinate the habitat requirements of the bears to the desires of visitors.



20e. 1992 use data are included for comparative purposes in table 3 of the final DCP/EIS.

20f. See responses 13a, 21c, and 29a to comments on draft DCP/EIS.

## COMMENTS

This is contrary to the purposes of the park as set forth in ANILCA.

20g

8. Visitor orientation and interpretation building at Beaver Pond Terrace. This $126,000 building or lodge annex is obviously a visitor center. Why not call it that?

20h

15. New bear-viewing platforms. The existing Falls Platform would be expanded by the addition of another platform of unknown capacity, while a new river overlook platform would be linked by a raised handicap-accessible boardwalk to the existing Narrows Platform.

Before planning for these two new platforms proceeds any further, the findings and opinions of the bear researchers should be sought on the advisability of the new structures, and on the location chosen for the Narrows Platform.

Of special biological concern is the plan to link the Narrows and river overlook structures, and to leave the current dike in place with the exception of new culverts. Again, the opinion of bear scientists should be sought on the wisdom of erecting this boardwalk/overlook in a prime bear use area and maintaining the existing dike. For example, the structure could serve as a barrier to bears attempting to reach that stretch of the river from the south.

20i

15. Primary access site and facilities. This would include float plane and boat tie-downs, a dock, barge wharf, and possibly even a breakwater or pier system. This proposed new port should be described in further detail and the environmental impacts be given serious analysis, particularly the effect of all these new structures and associated human activity on bear movements to and from Brooks River. The beach is a bear travel corridor and the forest behind the beach is used by bears for day beds.

If, as recommended in a proposed alternative 6 (discussed below), a modern ferry system replaced the current and proposed reliance on float planes, visitors to Brooks River could walk off specially designed vessels directly onto to the beach, thus eliminating the need for the conventional and costly structures of Alternative 5.

20j

16-17. Beaver Pond Terrace Development. The description of the proposed developments is in outline form. A far more detailed description is required. For example, how large (square feet) would the lodge/restaurant be? How many cabins are planned, and of what type?

20k

"Rustic" is used several times to describe the proposed new lodge/restaurant/"orientation" center/campground/NPS facilities. Also, the new complex will be "comfortable, but rustic," "light



## RESPONSES

20g. The facilities called for have been reduced in the proposed action to be consistent with an orientation center, which is now combined in the same building with the ranger station.

20h. The raised handicap-accessible boardwalk to the existing narrows platform that was described in alternative 5 has been eliminated from the proposed action as it did not meet all of the recommended criteria for boardwalks and platforms in the Brooks River area (see appendix C). Instead the road would be converted to a trail and culverts would be placed in the trail to allow the marsh to reconnect with the river, or gaps created in the old roadbed would be bridged by the trail.

Throughout the development of the proposed action and other alternatives, the opinions and findings of bear scientists have consistently been sought and used (see responses 13a, 21c, 29a, 29d, and 31c to comments on draft DCP/EIS). Leaving the existing dike in place as a trail and allowing the river to reconnect with the marsh via culverts would not significantly impact bear travel and use of the area. Further, existing regulations guiding visitor behavior around bears would remain in-place, reducing the potential for negative bear/human encounters.

20i. Additional design detail for the proposed access facilities would be developed during subsequent environmental planning and analysis; such a level of detail is neither necessary nor appropriate for a development concept plan (also see response 31l to comment on draft DCP/EIS).

Regarding the comment on bear travel corridors and day beds, see responses 22f and 30a to comments on draft DCP/EIS.

20j. This level of detail would be presented at the comprehensive design stage rather in a development concept plan.

20k. The National Park Service believes the terms used to specify characteristics of the development are appropriate. Most of the terms specify qualities that would minimize visual and natural resource impacts and are not used to clarify levels of cost.

on the land," "natural/rustic," and in a "wilderness-like setting" (ii, iii, 2, 16, Beaver Pond Terrace map).

Given an estimated construction cost of $19.1 million (including the new dock and road to the complex) for the Beaver Pond Terrace/NPS management support facility, it requires a willing suspension of disbelief to think of these costly new installations as "rustic" and "light on the land," especially in the absence of detailed descriptions of what the planners intend. Accordingly, these warm and fuzzy adjectives and phrases should be replaced with objective terms and descriptions in the final plan.

19. Estimated cost of Alternative 5. See Footnote 1.

20l

28. Impact on fish and wildlife. The discussion notes the important bear use areas on the north side of the river and along Brooks River. It ignores the area south of the river, including the areas proposed for the new complex, as a bear use area, especially for bears traveling back and forth from Brooks River to other favored habitats to the south, e.g., Margot Creek and the Research Bay area, and across Iliuk Moraine to the north side of Naknek Lake.

20m

In lieu of a discussion, the assertion is made that "This [Beaver Terrace] development and the proposed management support facility along the Valley Road would have very little impact on important bear habitat or the population of bears in the Brooks River Area." No evidence whatsoever is given to support this statement. Hence the final plan should address the full spectrum of bear use in the entire Brooks River area, including the areas proposed for the new port, lodge, campground, road, shuttle system, trails, and NPS facilities, and analyze the impact on bear use of these proposed developments and the associated level of human activity involved.

32. Cumulative impacts. "The cumulative impact on brown bears that use the Brooks River area and prime bear habitat would be beneficial," claims the Supplement. Bear-human encounters would be reduced, and the bears would enjoy a people-free north side of the river.

To be persuasive, the assertion quoted above needs to be supported by more reasons than those given. Offsetting the advantages of less encounters and the absence of people on the north side of the river would be a substantially increased human presence on the south side of the river, focused around a new summer resort/NPS facility complex involving extensive development. Until the NPS relates its proposed plan to the scientific findings on bear-human interaction, conclusions such as the one quoted above should be held in abeyance, or frankly acknowledged as unsubstantiated assertions.

5

20l. See response 22 to comment on draft DCP/EIS.

20m. For a response to the comment on cumulative impacts refer to response 32q to comment on draft DCP/EIS. The National Park Service does not propose a "substantially increased human presence on the south side of the river." New development would be centered around the Beaver Pond terrace, approximately 1 mile from the Brooks River, and all alternatives, except alternative 3, have use levels that are below current common peak days in July (see table 3). See also response 21e to comment on draft DCP/EIS.

## COMMENTS

20n

32. Unavoidable adverse impacts. One of the primary adverse impacts not acknowledged is the effect on overall park management. Currently, the lion's share of the total park budget goes to the Brooks Camp visitor management program, which means that other vital park functions are receiving less management than they require. If the Park Service digs back in on the south side of Brooks River with a costly visitor center and NPS installation, this management imbalance will continue indefinitely to the detriment of other park resources and values.

Because the sixth alternative described below relies on private enterprise to provide overnight lodging and other commercial visitor services in the gateway community of King Salmon/Lake Camp, at least a portion of the millions of dollars that would otherwise be sunk in building and operating the new Brooks River complex could be re-deployed for other park management purposes such as increased poacher control, management of Alagnak Wild River, controlling illegal ORV use, and management of the east coast of the park, to mention just a few tasks that need more attention.

20o

In FY 95, what is the total budget for the park, and what percentage of it is being used to operate and maintain Brooks Camp? What is the estimated annual operating and maintenance costs of Alternative 5? of the other alternatives?

Summary and conclusions

20p

Overall, Alternative 5 reflects the Park Service's determination to maintain overnight lodging and associated NPS facilities at Brooks River, regardless of the plan's inconsistency with the findings of NPS-sponsored bear research; with the purposes of ANILCA and the NPS Organic Act of 1916; with official NPS policy on the location of concession facilities; with Secretary Bruce Babbitt's "gateway community" policy; with the Administration's and Congress's intent to reduce unnecessary government spending; and with the need to use available funds to provide adequate management of the park as a whole while providing a bear-viewing program at Brooks River that is consistent with park purposes.

20q

The Supplement itself is deficient in one very fundamental respect. It ignores a sixth alternative first suggested during the scoping period for the draft DCP/EIS, and then again during the public comment period on the draft.

This sixth alternative combines Secretary Babbitt's "Gateway Community" policy and a ferry system. It would (1) shift overnight lodging and most of the NPS support facilities at Brooks Camp to the King Salmon/Lake Camp area; and (2) replace the existing King Salmon-Brooks Camp float plane shuttle, and the private and commercial float plane traffic to Brooks Camp, with a modern ferry system designed for the Lake Camp-Brooks Camp run



## RESPONSES

20n. It is beyond the scope of this DCP/EIS to develop management alternatives for Katmai National Park and Preserve as a whole. And, it is not possible to effectively discuss impacts of Brooks River area alternatives on parkwide management without the context of parkwide management alternatives.

20o. See response 20b to comment on supplement to draft DCP/EIS.

20p. See responses 8a and 14g to comments on supplement to draft DCP/EIS.

20q. The alternative suggested is a combination of alternatives that have been considered except for an alternative that provides only camping at Brooks River area for overnight stays. If the National Park Service provides camping facilities it must provide other overnight facilities to comply with the requirement to provide for the widest cross section of the public as is feasible (NPS *Management Policies* 1988, chap. 8:5). Other alternatives that deal with the suggestion are alternative 4 (day use area only), and the Naknek West alternative which was considered but rejected (see "Part Two: Alternatives, Including the Proposed Action" — "Alternative Considered But Rejected" section). The National Park Service believes that the text, as modified, regarding modes of access is appropriate.

and for reaching other destinations around Naknek Lake. This sixth alternative would also include a relocated and modern campground in the Brooks River area, provided the campground could be located so as not to interfere with bears moving in and out of the Brooks River area.[2]

20r In overlooking this gateway community/ferry system alternative, the NPS has produced a plan that is not consistent with the the National Environmental Policy Act, which requires that all reasonable alternatives be considered.

Thank you for this opportunity to offer our views.

Sincerely,

Jack Hession

Jack Hession
Alaska Representative

cc: George Frampton
Bob Barbee

20s [2] This alternative was fully described in a September 3, 1993 letter from the Sierra Club to former Regional Director John Morehead that requested consideration of the alternative in the then-forthcoming Draft DCP/EIS.



20r. See response 20p to comment on supplement to draft DCP/EIS. The National Park Service believes that the DCP/EIS fully complies with NEPA requirements and that all reasonable alternatives have been considered as required.

20s. See comment letter 22 and attachments in the comments on draft DCP/EIS.

## COMMENTS

# THE WILDERNESS SOCIETY

DCP/SEIS COMMENTS SUBMITTED VIA FAX

Mr. Bill Pierce, Superintendent
Katmai National Park & Preserve
P.O. Box 7
King Salmon, AK 99613

August 14, 1995

REF: COMMENTS ON SUPPLEMENTAL TO THE DRAFT DEVELOPMENT CONCEPT PLAN & ENVIRONMENTAL IMPACT STATEMENT, BROOKS RIVER AREA KATMAI NATIONAL PARK & PRESERVE

Dear Mr. Pierce:

The Wilderness Society (TWS) appreciates the opportunity to comment on the above referenced Supplemental to the Draft Development Concept Plan & Environmental Impact Statement (DCP/SEIS) for the Brooks River Area of Katmai National Park & Preserve. The Wilderness Society, founded in 1935, is a non-profit membership organization devoted to preserving wilderness and wildlife, protecting America's prime forests, parks, rivers, deserts, and shorelands, and fostering an American land ethic. With over 275,000 members nationwide, 1,200 of whom live in Alaska, TWS's members have had a long standing interest in the management of Katmai, its wilderness and wildlife.

SUMMARY STATEMENT:

21a

There has been a tremendous amount of planning energy expended over the last six years on addressing the future of the Brooks River Area and the clearly articulated need to move Brooks Camp. At the same time, we do not believe that the National Park Service (NPS) has made sufficient progress to be responsive to the criticisms of the earlier drafts of this planning effort in the crafting of the Alternative #5 presented in the DCP/SEIS. We are still faced with a plan that has failed to address and evaluate all of the reasonable alternatives, has failed to address the protection of brown bears adequately, and very likely can not be adequately funded to be achieved because of its enormous cost. It continues to be our belief that this plan has not yet responded to major earlier criticisms of impact evaluation and, as a result, has not yet complied with the National Environmental Policy Act (NEPA). TWS does not support Alternative #5.

ALASKA REGION
430 WEST 7TH AVENUE, ANCHORAGE, AK 99501
TEL. (907) 272-9453 FAX (907) 272-1670

## RESPONSES

21a. See responses 21a–21f to comments on draft DCP/EIS and response 14g to comment on supplement to draft DCP/EIS. The National Park Service believes that the final DCP/EIS fully complies with NEPA requirements and that all reasonable alternatives have been considered as required.

TWS COMMENTS ON NPS BROOKS RIVER AREA DCP/SEIS, 8/14/95, Page 2.

TWS EVALUATION OF THE DCP/SEIS:

I. ALTERNATIVE #5 - SPECIFIC COMMENTS:

We are disappointed in Alternative #5. After a whole year of further planning, it appears to be only a slight modification of the Alternative #2 in the original draft DCP/EIS and has many failings.

21b First, Alternative #5 is not responsive to the Draft DCP/EIS criticisms of biologists, Native organizations, and the public at large. All of these interest groups called for a lower intensity facility and footprint, and therefore impacts, than is represented here.

21c Second, Alternative #5 fails to adequately address a full range of impact issues on grizzly bears and the use of the Beaver Pond site as a resting area for bears, and instead trades off the removal of the existing Brooks Camp site as the mitigation for displacing bears in the area of the Beaver Pond.

21d Third, Alternative #5 is still a very high cost alternative ($21 million, if you add up all the parts, which the DCP/SEIS chart fails to do) that may fail from a lack of funding in this Congressional Appropriation and general business climates, and by default leave Brooks Camp right where it is and therefore completely miss the mark of meeting its purpose and need.

21e Fourth, Alternative #5 does not phase the Brooks Camp move to another site in stages to allow for the start of the process of cleaning up Brooks Camp until the other new site is completely built, thus guaranteeing that no progress is made on the current problems in the interim.

21f Fifth, Alternative #5 represents a significant increase in allowable visitor use levels at Brooks River over the current levels of use, and tries to justify that increase as allowable because NPS will have mitigated the current use level impacts on bears by moving everything to the South side of Brooks River, but offers no substantiation of that assumption. Numbers are still a significant problem with this plan. Actual current usage at the Brooks River Area is substantially less than NPS proposes for Alternative #5, which reflects an increase in use levels by comparison. The proposed daily use level of 260 for July and August is a 24 % increase over current actual use and the proposed daily use level of 240 for September is a 37 % increase over current actual levels. The proposed use numbers should be reduced to what is now actually happening while the biologists have an opportunity to evaluate the new situation for bear impacts. Current use levels are as follows:

| JULY/AUGUST | SEPTEMBER |
|---|---|
| 50 "Camp " guests | 50 "Camp" guests |
| 50 Campers | 40 Campers |
| 75 Day Users (at one time) | 50 Day Users (at one time) |
| 35 Staff | 35 Staff |
| Total of 210 People | Total of 175 People |

21b. See response 21a above.

21c. The National Park Service believes the analysis of bear habitat, use, and human/bear conflicts in the Brooks River area represents a full range of impact issues. Regarding the use of the Beaver Pond site as a resting area for bears, the National Park Service would locate new developments well away from these areas (see response 30a to comment on draft DCP/EIS).

21d. The cost of alternative 5, the proposed action, has been substantially reduced. The total cost for this alternative is now approximately $9.5 million.

21e. Since the cost has been substantially reduced, the goal will be to develop the new facilities and remove existing facilities from the north side of the river and restore these sites, all as a single, coordinated, continuous process.

21f. The total use levels proposed under the proposed action would allow for slightly more visitors than now use the area on an average July day, but would allow for fewer visitors than on current common peak July days. The National Park Service does not consider these to be significant increases or decreases in use. It is unclear on what basis or how the respondent derived his use numbers; the Park Service stands by the current use numbers presented in table 3 of the final DCP/EIS.

## COMMENTS

TWS COMMENTS ON NPS BROOKS RIVER AREA DCP/SEIS, 8/14/95, Page 3.

21g Sixth, Alternative #5 does not respond to the issues raised by the public and biologists that, even if Brooks Camp is moved, the use levels at Brooks River may already be too high for the bear use in the Brooks River Area.

21h Seventh, Alternative #5 proposes to open up a whole new previously undisturbed site with its own site disturbance impacts, and fails to fully evaluate those new area impacts or attempt to relocate facilities in a way to reuse and recycle existing disturbed sites to minimize impacts from the project.

21i Eighth, Alternative #5 changes the funding framework to a mix of concession investment and Congressionally appropriated funds, but does not fully address the implications for NPS management control of the design, operation, and maintenance of facilities under the concession investment approach and does not fully address the implications of the resulting possessory interest for this financial structure for the public to have a chance to comment on it.

21j Ninth, Alternative #5 does not adequately address aircraft overflight and use limits at Brooks River. This is an important factor to improving the visitor experience.

II. PLAN OMITS ALTERNATIVE #6, CAMPGROUND & DAY USE ONLY:

21k The DCP/SEIS failed to identify and present for public evaluation an Alternative #6, Campground and Day Use Only. The original DCP/EIS had a day-use-only alternative (Alt #4) in it that many people believed was not representative of all realistic low impact alternatives because it did not provide for any camping at Brooks. The DCP/SEIS also failed to address this as a valid alternative and was not responsive to that prior public criticism, and the plan continues this "all or nothing" fiction on the alternatives with no middle ground. This does not meet NEPA tests.

III. PLAN DOES NOT PROTECT GRIZZLY BEARS AT BROOKS RIVER:

One of the most critical reasons NPS is doing this planning and relocation exercise for the Brooks River Area is that there is a clear recognition of the evidence that we are crowding the bears and could be jeopardizing the resource and the visitor experience. TWS does not believe that we should be promoting tourism by raising the numbers. In fact, the actual visitor numbers could be a problem, which leads to two key points on grizzly bears and their protection at Brooks River.

21l First, extending the open season at Brooks Camp by one week in September from the traditional September 10 camp closing to a September 18 closing is a problem that NPS has yet to address in any of the alternatives. 1992 research by Tamara L. Olson et al found that this one week extension of the open season at camp resulted in a 68% decrease in use of the camp area by non-habituated adult brown bears. Non-habituated brown bears constitute 64% of the adult bears using Brooks in September - October. These are significant findings that the DCP/SEIS failed to consider for any alternative, even after public criticism pointed to this need in the plan. We continue to believe that the September 10 closing should be used, not a later date.

## RESPONSES

21g. The Park Service disagrees; see responses 17j, 18a, and 21c to comments on draft DCP/EIS.

21h. The Park Service believes the impact analysis completed for alternative 5 (the proposed action) is consistent with the level of detail required for a development concept plan. Additional, more detailed, evaluations of impacts would be done in subsequent, site-specific, environmental analyses. A primary objective of alternative 5 was to remove existing developments from the north side of the river, converting this area into a "people-free" zone. Reusing or recycling existing disturbed sites north of the river would conflict with this objective. Wherever possible, other sites that are already disturbed would be used to locate new developments.

21i. The National Park Service would always retain control of design, operation, and maintenance of all facilities on NPS land. And all facilities would be on NPS land. The possessory interest for facilities financed by parties other than the federal government would be negotiated and cannot be determined within this DCP/EIS.

21j. See response 22e to comments on draft DCP/EIS. The National Park Service believes that aircraft overflight and use limits at the Brooks River area have been adequately addressed.

21k. Providing only a campground for overnight stays does not meet the NPS practice of providing for the widest cross section of the public as is feasible.

21l. See response 30m to comment on draft DCP/EIS.

TWS COMMENTS ON NPS BROOKS RIVER AREA DCP/SEIS, 8/14/95, Page 4.

Second, TWS does not yet see the science based monitoring program incorporated into the DCP that is needed to evaluate what is happening on the ground with bears and people, and other resource values as well for that matter, and can provide a basis for the limits to use of the Brooks area that will protect the resources there. We have repeated below our comments to the Draft DCP/EIS from our June 30, 1994 letter to the record to underscore this point which NPS continues to fail to address:

"(B) BROWN BEAR PROTECTION - IMPACTS OF ALTERNATIVES:

While the Draft General Management Plan/Environmental Assessment proposed a phased relocation of all Brooks Camp facilities to reduce the number and frequency of bear/human encounters, the General Management Plan/ Final EIS deferred making any decision on relocation of Brooks Camp "until the results of current studies on bear/human interactions in the Brooks Camp area have been completed." (Pg 32, par 3). Those studies were completed and published for NPS by Olson, Gilbert, and Fitkin on June 1, 1990, and have been released to the public. Subsequent studies by Olson, et al have added to the body of evidence that brown bears are displaced by increasing use of the Brooks River Area and increasing the length of the season of use.

21m

However, the information developed in those bear/human interaction studies, which clearly shows the impact of increasing numbers of humans displacing bears, does not appear to be prominently incorporated into the design of the alternatives displayed in the Brooks River Area DCP/DEIS. Instead, NPS states that: "A critical resource management issue in the Brooks River Area is how to accommodate the growing numbers of anglers, photographers, and bear viewers without impacting the natural dynamics of the local brown bear population, or severely degrading the visitor experience" (page 3), ignores the issue of human use limits to protect the bears throughout the DCP/DEIS, and constructs a set of Human/Bear Interaction Indicators in Table 2 on page 29 that place no values on protecting the bears or their behavior and habitat. Conceivably, success could be defined as eliminating any bears on the Brooks River as the way of meeting the standards portrayed in Table 2. In short, the emphasis is on accommodating more people rather than protecting bears, and the DCP/DEIS fails to really address and meet the NPS stated objectives to protect bears.

The DCP/DEIS fails to map or otherwise detail any identified brown bear habitat and use patterns as key information required to design and evaluate the impacts of legitimate alternatives, nor is that information sufficiently summarized and displayed in a manner that helps to answer the fundamental question of where any facilities can be placed in the Brooks River Area without impacting the bears. A matrix of that research needs to be explicitly mapped as a basis of planning and all alternatives should be structured in the DCP/DEIS to allow the reader the ability to see how the conclusions of that research shaped each alternative. Failure to show how each alternative relates to the bear research casts doubt on the integrity of the alternatives and the sufficiency of the DCP/DEIS."

21m. The details of the monitoring program would be outlined in a subsequent monitoring plan; such detail is neither necessary nor appropriate for a development *concept* plan. See response 21c to comment on draft DCP/EIS.

TWS COMMENTS ON NPS BROOKS RIVER AREA DCP/SEIS. 8/14/95. Page 5.

These long standing criticisms of the Brooks River Area Plan have not yet been addressed by NPS and still stand today.

CONCLUSION AND RECOMMENDATIONS:

21n

Much of the public comment on the Draft DCP/EIS focussed on the size, location, and extent of the footprint of any proposed relocation of Brooks Camp. The Draft Alternative #5 is still too vague in that sense and does not provide specific enough information to the public for meaningful comment. The public still does not have a definite sense of the size and extent of the footprint and that is essential to achieving both a public understanding and consensus. There is still the appearance that NPS has not really scaled back, as most of the public comments suggested NPS needed to do at Brooks, but that NPS is just building another Brooks Camp of similar scale in another location at the Beaver Pond site. This still troubles many people, many of whom believe that NPS needs to come to grips with overall visitor use levels that may well be too high at Brooks River by developing a plan in the form of a much smaller footprint to protect the park resources, grizzly bears in particular, and the visitor experience.

TWS does not believe that the NPS has yet achieved a meaningful alternative or plan and does not support Alternative #5. Neither do we support the Beaver Pond site. We believe that NPS has not yet complied with NEPA on this plan and recommend that NPS complete the task.

Sincerely yours,

Allen E. Smith
Alaska Regional Director

CC: George T. Frampton, Jr., Assistant Secretary, USDI
Bob Barbee, Alaska Regional Director, National Park Service
Alaska Conservation Groups

21n. The National Park Service disagrees that the descriptions of the alternatives are too vague to enable meaningful public comment appropriate to this DCP/EIS. See response 21d above.

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August 10, 1995

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Sir:

The Alaska Professional Sportfish Coalition registers its strong opposition to the proposed closure of the lower Brooks River to sport fishing as outlined in Alternative 5 of the Supplemental Environmental Impact Statement (SEIS) to the Development Concept Plan for the Brooks River Area of Katmai. The Coalition is a group of sportfishing operators located in Southwest Alaska and committed to maintaining access to fishery resources on federal lands.

22a

There is no evidence that the presence of sport anglers along the lower river are the source of any tangible resource management problems at Brooks. Anglers have used this area continuously since in the early 1950's. During that period, bear use of the river has increased substantially and the fishery resource remains outstanding because of protective regulations strongly endorsed by the sport fishing community. In its efforts to restrict burgeoning numbers of day users at Brooks, the National Park Service must refrain from imposing unwarranted limitations on sport anglers.

Please be aware that most angling use of the area is by guided anglers or experienced anglers who have fished Brooks for many years. These individuals are generally experienced in the out of doors and do not pose the same management challenges presented by causal day users who generally are visiting the area for the first and only times in their lives. Management restrictions aimed at the latter should not adversely impact the interests of the former.

22b

Any sportfishing related problems that might arise in the future should be addressed by specific regulations tailored to the specific problem. For example, the matter of lower



22a. See response 2h to comment on draft DCP/EIS. The respondent should also note that the restrictions on use during the seasonal closures would apply to all visitors, not just anglers.

22b. See response 6m to comment on supplement to draft DCP/EIS.

BIRCH, HORTON, BITTNER AND CHEROT
A PROFESSIONAL CORPORATION

Superintendent
August 10, 1995



river management was addressed seven years ago. NPS was concerned that the five salmon bag limit was encouraging "meat fishing" and creating situations where many anglers with dead fish were attracting unwanted attention from the brown bears. Although there was talk then of closing the lower river to fishing, the appropriate response was to reduce the daily bag limit to one salmon. That resolved the problem without resort to an unnecessary closure. Similar specific action should always be pursued before closures are even contemplated.

Thank you for this opportunity to comment and we urge NPS to reject proposals to close the lower reaches of the Brooks River to sport fishing.

Sincerely,

BIRCH, HORTON, BITTNER
and CHEROT

William P. Horn

WPH:jpp
F:\USERS\DOL\WPH0049

cc: Bob Barbee

Samuel J. Fortier,
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2550 Denali St. Suite 1500
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Attorneys for The Heirs of Palakia Melgenak

**COMMENTS of the HEIRS OF PALAKIA MELGENAK REGARDING THE SUPPLEMENT TO THE DRAFT DEVELOPMENT CONCEPT PLAN ENVIRONMENTAL IMPACT STATEMENT**

**I. Introduction**

The Heirs of Palakia Melgenak are the descendants of an allottee applicant to 160 acres of land in the Katmai National Park. Pursuant to a decision rendered by the Interior Board of Land Appeals ( IBLA) in case # IBLA 86-32, a decision favorable to the Heirs was reversed under a "cessation of use" theory. The Heirs will file a lawsuit with in the next month with regard to the IBLA decision.

Palakia Melgenak filed for an allotment, pursuant to application AA-7604, in accordance with the Native Allotment Act of 1906, as amended, claiming 120 acres of land on the north and south sides of the Brooks River. This selection includes lands which are the subject of the NPS EIS. Pursuant to findings of IBLA;

- The testimony of witnesses established that Palakia continued to use or occupy her lands in a substantially continuous manner after the death of her first husband in 1953, visiting her cabin, marking trees to protect against the likelihood that "'white men would come and take the land" 127 IBLA 233.
- NPS had actual knowledge of Native seasonal fishing activities at the mouth of Brooks River ("the exhibits presented by the NPS contain color photographs depicting hundreds of fish on racks, Natives splitting fish, and other activities...."). 127 IBLA 234.

- No case "has ever held that use by heirs of an applicant may support a claim of abandonment or non-use." ID.
- Due to advancing age (Palakia was in her 80's in the 1960's), she was unable to continue to visit her lands, but she sent the Heirs' father and the Heirs to gather fish for her, and to bring her soil , water and ashes to prolong her life. "Clearly, the land continued to be used by [Palakia] through her heir, on her behalf, and for her livelihood and well-being." Id.
- Structures on the site, before the construction of Katmailand, included Palakia's cabin, fishracks, and tent frames. Id. In addition, and not addressed in the decision, the structures included a cabin belonging to the Heirs' father, Trefon.
- "The entire record supports the conclusion that [Palakia] made extensive use of the land at Brooks Camp...." 127 IBLA 240.

Portions of the Heirs' allotment were wrongfully taken by the National Park Service decades ago, and Brooks Camp constructed on the portions taken. No compensation has ever been rendered to the Heirs or their predecessors in interest. Artifacts and cultural items within the meaning of the Archaeological Resources Protection Act, 16 USC 470(a)(a), et seq. ("ARPA") and the Native American Graves Protection and Repatriation Act, 25 USC 3001, et seq. ("NAGPRA") were disturbed or destroyed without proper permits. According to the Draft Environmental Impact Statement ("EIS"), much of the allotment has been polluted, due to leaking underground fuel systems. Further, the degradation due to the leaking system has resulted in degradation to artifacts and graves still buried. The National Park Service ("NPS") activities have also resulted in the ruination of many of the cultural features within the boundaries of the allotment and adjacent lands.

Palakia and The Heirs were prohibited from the use and enjoyment of the allotment for decades, as well. The transcripts of the hearings in the case reflect a general pattern of indifference to the property rights of this Native family to the same extent as the destructive indifference of the NPS towards the Heirs' cultural rights. Indeed, the NPS allowed the homes to be destroyed and prohibited traditional use and occupancy of the claimed lands. The white man came, as Palakia had prophesied, and took her life source.

The Heirs now comment on the Brooks River Area Katmai National Park and Preserve, Supplement to the Draft Development Concept Plan Environmental Impact Statement.

**II. Failure to Resolve Adverse Claim**

23a

The EIS is silent on the question of adverse claims, and this silence is misleading. The NPS is well aware of the fact that the application of Melganak exists, that it is still active, that the statute of limitations on the trespass is still running and that no prudent investor would expend the level of funds for which commitment is here sought without assurance that title is unchallenged. The NPS is not able to warrant title. Thus, the EIS is incomplete.

The EIS is defective because it does not consider the effects to the property interests of the Heirs, although the NPS was a party to the administrative contest and therefore has a complete record of its past shameful history. Courts have read the term "effects" broadly in other EIS litigation. See Colorado River Indian Tribes v. Marsh, 605 F. Supp. 1425, 1435 (C.D. Col. 1985):





23a. See response 5c to comment on draft DCP/EIS. The National Park Service has consulted extensively with Native Alaskans, in accordance with provisions of the National Historic Preservation Act, regarding the planning process, as indicated in the "Part Five: Consultation and Coordination." The Park Service will continue to work with all parties expressing an interest in the area, especially Native Alaskan, through implementation of the plan.

## COMMENTS



> Whenever any condition of the undertaking causes or may cause any change, beneficial or adverse, in the quality of the historical, archaeological or cultural characteristics ... or when an undertaking changes the character of location, design, setting, material, workmanship, **feeling**, or association of the property which contributes to its historic significance. (emphasis added).

See also 36 CFR sec. 800.3(a) and (b). Consultation is required; there has been insignificant consultation. There has been no consideration of the rights of the Heirs at all.[1]

**III. Failure to Consider Impact to Cultural Resources**

The EIS pays lip service to the protection of cultural resources, but there is no plan for the remediation of such resources, much less the protection of resources. See, for instance, p. 17, EIS:

> Cultural sites would be surveyed and monitored to ensure their protection and to select the best site for the limited development at the Beaver Pond Terrace. All cultural sites would be selected with the assistance of the Descendants of Katmai and would be sensitive to the archaeological and ethnographic importance of the area. Activities and facilities would be located considering the need to minimize conflicts with bears while taking best advantage of the area's superb resources for educating visitors.

23b The EIS, however, does not address the present day harm existing, nor what effect mitigation efforts, will have on the existing environmental problems due to the leaking underground fuel facilities. It is believed that the existing facilities have been placed over, upon, and through ancient graves, ancient buried villages and other archaeological

[1] Indeed, as demonstrated, infra, Counsel for the heirs did not even receive a copy of the EIS until August 10, and then, only after repeated phone calls. Counsel had appeared at other public discussions, was on the mailing lists, and even made suggestions, previously, that the DCP failed in that there was no mention of the disputed allotment and inadequate consideration of the impact to the cultural features that were clearly occasioned by any alternative. Park Service personnel promised to address the issues with the Solicitors office; it is doubtful, however, that the Solicitor's office was briefed on the points raised at those meetings.

## RESPONSES

23b. As noted in "Part Three: The Affected Environment" — "Remediation Efforts" section, remediation efforts associated with the leaking underground fuel facilities do "not preempt the current planning process, nor do they preclude the full consideration of all DCP alternatives." Though remediation is an existing and ongoing effort, it is considered a separate issue from the DCP; therefore, associated impacts and costs were not considered in this document. The DCP/EIS does, however, recognize the presence of significant archeological resources and considers the effect of current developments and conditions on these resources, as well as the effects of the proposed action and other action alternatives. See response 17m to comment on supplement to draft DCP/EIS regarding the effect of proposed mitigation efforts.

23c

features. *Incredibly, the EIS budgets a reduction in archaeological oversight, from $1,* 024,000 to $210,000, with no explanation. The quoted paragraph obviously refers to mitigation efforts with respect to the planned development; there is no estimate of cultural *resources mitigation efforts with respect to the contaminated site.*

The failure to address the issue of cost and effort to mitigate with respect to the present site is clearly a major failure of the EIS.[2] For, the EIS discusses the planned mitigation of other harm to the site, and the removal of existing improvements on site. The Heirs submit it is impossible to remove the existing improvements, much less mitigate the existing contamination without significant disturbance of the cultural resources.

23d

Alternatively, the EIS should disclose the estimated costs, and discuss the necessity of planning, which it does not. Indeed, the estimated budget identifies only the costs of removal of the facilities. It appears that the NPS has not even considered the possibility of harm to archaeological and cultural features which will be occasioned by the proposed removal of facilities.

23e

The EIS is also deficient in failing to consider all the costs of mitigating impacts to the rich archaeological features likely to result from the proposed development. There is an inadequate analysis of the cost of mitigation; the budget appears to provide only for the

23f

[2] The EIS does not consider the religious and spiritual context of the property or the proposed action's effect. Indeed, the promise of consultation is belied by the budget and the thrust of the EIS, which is to permit involvement by indigenous people in explaining to tourists the culture. But contrast the importance the law places on sacred sites. The federal government is required to be sensitive to the special concerns of the Heirs, not only on their lands, but also with respect to issues which "often extend s beyond Indian lands to other historic properties.: *36 CFR sec* 800.1(d)(2)(iii)(91).

23c. See response 23b above. As stated in "Part Four: Environmental Consequences" — "Impacts of No-Action Alternative" section, "the continued presence of intensive development on nationally significant archeological resources constitutes an adverse effect." As such, an archeologist may be needed on staff to approve and monitor all ground-disturbing activities, amounting to a substantial long-term cost. Under the proposed action, facilities would be relocated to the Beaver Pond terrace where no significant archeological resources are thought to exist (see also response 5b to comment on draft DCP/EIS); therefore, the need for and cost of oversight, monitoring, and mitigation would be substantially lower than under the no-action alternative ($210,000 as compared to $1,024,000).

23d. The cost of planning has been calculated and shown for each group of items. No removal of facilities below ground level is proposed, hence, minimal impacts on archeological resources is anticipated.

23e. The National Park Service believes that the cost displayed is fully adequate to cover the cost of oversight, monitoring, and mitigation.

23f. The National Park Service has and will continue to work with Native Alaskans interested in the spiritual and religious contexts of proposed development sites in national parks. The Park Service would also continue to comply with all laws and regulations pertaining to this subject.

cost of an archaeological survey. As was graphically demonstrated with respect to the EXXON VALDEZ oil spill response, survey work is an inadequate basis for mitigation and remediation of cultural resources. In this instance, the proposed development consists of buildings, support facilities and trails. The single budget category of $210,000 for "archaeological oversight" is inadequate.[3]

23g

There is, in fact, no definition for the term "oversight" within ARPA, and this project clearly falls within the requirements of ARPA. Under ARPA, mitigation requires a phased approach. See 43 CFR 7.1, et seq. The EIS implies that there will be no mitigation effort, and that no mitigation efforts were considered. Indeed, the EIS admits that the purpose is to take the "best advantage of the areas superb [archaeological] resources ...." Clearly, the thrust of the alternative is directly at odds with ARPA protection afforded by the Department of the Interior through its own regulations. The purpose of the regulations is:

> [to] enable Federal land managers to protect archaeological resources, taking into consideration provisions of the American Indian Religious Freedom Act (92 Stat. 469; 42 USC 1996), ....

[3] There should not be any doubt that the project here anticipated will result in additional harm to the religious and spiritual values the Heirs place on the lands. As demonstrated, supra, the lands are believed to be so important and fundamental as to rejuvenate and prolong existence--through the soil, the water and the ashes. See also 43 CFR 7.32(a) (defining a site of religious or cultural importance to include locations which are important because " of a religious event which happened there; because it contains specific natural products which are of religious or cultural importance; because it is believed to be dwelling place of, the embodiment of, or a place conducive to the communication with spiritual beings, because it contains elements of life-cycle rituals, **such as burials and associated materials**; or because it has other specific and continuing significance in Indian religion or culture."(emphasis supplied). See also 43 CFR 7.32(b) (defining allottee).

23g. Mitigation, including specifically mitigation of impacts on cultural resources, which covers impacts on archeological resources, is called for in alternative 5 (see the discussion on resource management in Part Two: Alternatives, Including the Proposed Action" — "Alternative 5: Proposed Action" section).

43 CFR 7.1. The resources are to be protected on public lands and on Indian lands, including lands held in trust by the Government. Id.

**IV. Conclusion**

The EIS fails to take into account the impact on the cultural, economic and social well-being of the Heirs. The EIS simply ignores the property interests of the Heirs. The EIS fails to take into account existing laws which protect the cultural resources on lands already contaminated, during what appears to be a phased clean-up, and inadequately addresses the requirements imposed by law and regulation with respect to mitigation and remediation of cultural and archaeological features.

Finally, the NPS failed to supply a copy of the EIS to the undersigned timely, although the undersigned had been on an information sheet for a number of months as the legal representative for the Heirs.

Fortier & Mikko, P.C.
Attorneys for the Heirs of
Palakia Melgenak

By _____
Samuel J. Fortier
8/14/95

## COMMENTS

To Whom It May Concern.

Regarding the supplement to the draft DCP for Brooks Camp:

1) Alternative 5 is the best choice;

2) Residents of Bristol Bay Borough must be given a preference for day use and campground use. I suggest 10/day for campground and 25/day for day use. Openings not used could be provided to commercial operators.

24a

3) Elevate the last 200 yards of the Falls trail to prevent blockage of people when bears are nearby.

24b

4) Limit photographers' tripods at the platforms ... tripods, in effect, use up space that should be available for another person.

24c

5) The plan must include funds for study of visitors' "quality of experience" so that these changes in Brooks management can be evaluated. long term monitoring of visitors' experiences as well as monitoring of fish & wildlife populations should be prerequisite to implementing this plan.

24d

6) NPS should not be subsidizing concessionaires.

Thank you for the opportunity to comment.

Sincerely,

Jeff Adams

## RESPONSES

24a. The Brooks River area of Katmai National Park and Preserve is part of a national park and therefore preference can not be given to people from any specific geographic area for use of the Brooks River area.

24b. The National Park Service intends to elevate the last few yards of the falls trail as suggested; however, the precise distance to be covered by the boardwalk would be determined during the later design stages of planning.

24c. The issue of whether limits on the number of photographers with tripods should be established for use of the platforms is beyond the level of detail appropriate for this DCP/EIS and is an operational detail that would be addressed by the park staff.

24d. The details of additional studies and long-term monitoring plans are beyond the scope of a development concept plan. Such details, as well as the level of funding necessary to carry out the work, would be determined during subsequent planning.

Superintendent
Katmai National Park
PO Box 7, King Salmon AK 99613

Aug 14, 1995

Dear Sirs:

I have been impressed with the Development Plan and Environmental Impact Statement regarding the Brooks River Area in the Katmai National Park.

My first visit to that area was some seven years ago. Since then I have revisited Brooks Lodge, perhaps three or four times, accopanied by one or more of my daughters and usually one or more close friend.

25a

It seems to me, the redevelopment effort should emphasize this kind of priority:

1. Those willing to invest overnight (preferably several nights) stays in the area with the highest priority being give n to those wishing to do tent camping or staying at the lodge;

2. Very limited or restricted access to those whose interest is limited to getting in and out of the area within one day's flying time. Katmai should not become a ZOO.

Providing for the handicapped is a dilemna. I am 75 years old and am fortunate to be able to still get around, having had the wonderful opportunity to participate in the Iditarod start for the past two years as well as some of your winter activities such as Nordic skiing and dog sledding. I realize someday, perhaps too soon, I may not be able to do the same things, but am very thankful you have been able to preserve the "nature" in Katmai and that I have had the opportunity to share it with my daughters and their friends.

I am fully supportive of the mission of the Department of the Interior in carrying out their responsibility for conserving our nationally owned public lands and natural resources. Please let me know if their is more I can do to preserve the truly natural experience of a visit to KATMAI.

Your very truly,

Arthur W. Barron

[redacted]

AUG 16 1995

25a. See response 14g to comment on draft DCP/EIS.

## COMMENTS

Comments from: A. Braaten, [redacted]

Comments for Alternative Five:

26a I was dismayed to see that your goal is strictly preserving "the quality of and opportunity for visitor experiences ..." I try to assume you are not really discarding the mandates to preserve and protect sound, naturally-regulating, healthy wildlife populations as well (to jointly paraphrase some of the mandates under which Katmai falls). Visitor use levels need to be viewed with a much broader scope than merely "contributing to the quality of experience". It's disturbing to see it is only an "underlying concept" to protect habitat, etc.

26b Why was the research facility deleted from the plan? Katmai is a fantastic natural laboratory for a whole realm of research opportunities. More to the point, on-going management can only benefit from some level of research, especially as regards bears. As these many changes are undertaken at Brooks, a long-term look at bears' (and other wildlifes') responses could guide and enhance management – as well as add to the general knowledge of bears. I hope that by not constructing facilities you are not precluding such work from taking place.

26c I was curious and a bit disturbed to find "Beach Speeches" have been replaced by a video. The video *is* well done – but does not have the lively immediacy of a beach speech. Nor does it give rangers an idea of who has or hasn't heard the proper behavior. Staff told me this was in response to lower staffing levels than in the past. Really? It seems to me the present staff is about the same size as was on hand in the mid-1980's. Visitor use then was pretty heavy, too – *not* the idyll present staff seems to think it was. Back then, a plane coming in after everyone was off-duty was often still met by an off-duty ranger and given the speech. If the orientation center proposed would increase the amount of interactive information the visitors receive, it would definitely be to the better.

26d Dispersing visitor activities throughout the park brings up another issue that concerned me during my recent visit to Brooks. It was deeply disturbing to hear there are *no* patrols undertaken anywhere in the park but Brooks. The Alagnak, Nonvianuk, Kulik, American Creek/Grosvenor, Big River and Amalik come to mind as places needing at least periodic attention. The park should NOW have patrols throughout these popular areas – if *more* use is encouraged there, some provisions need be made for increased staff. The park should carefully monitor also the effects of any increased use of the Savonoski Loop. This could be quite impacting indeed to wildlife along its length.

## RESPONSES

26a. See "Part One: Purpose of and Need for the Plan" — "Introduction, Legislation Affecting the Brooks River Area" and "Relationship of this Planning Effort to Other Approved Plans" sections regarding recognition of mandates. See response 30h to comment on the draft DCP/EIS.

26b. The NPS believes that most research unique to the Brooks River area can be done with fairly modest facilities. This research will be supported with equipment storage areas, work areas, and lodging that is not specifically dedicated to research alone but to various itinerant activities.

26c. Decisions regarding the use of video or park rangers to give "beach speeches" are not made in this development concept plan; rather, such decisions would be made as part of the updated *Interpretive Prospectus* for the park.

26d. The National Park Service agrees; however, with limited resources and funding, the primary focus of NPS efforts must be on areas where there are the greatest number of visitors and potential resource impacts.

Comments from: A. Braaten, [redacted] 4

26e I have had several conniption fits about all the traffic proposed so near to the Beaver Pond's heavy bear day-bed area. On further thought, I wonder if part of the reason that area is so heavily pocked with day beds is it is a comfortable remove from the bustle around the river mouth. If this is so it seems likely the new development will displace the bedding area elsewhere, say on the north side of the river. The base of Dumpling is already another area full to bursting with day beds. Should use there increase due to any displacement, the park should be mindful when sending folks up the Dumpling trail. Just an observation.

26f I was deeply, deeply troubled to see a Cutbank platform still on one of the maps. I trust this was an error. Mere words cannot emphasize strongly enough how *bad* an idea a Cutbank platform would be. To try to keep this short I'll leave it at that.

26g Please *don't* expand the Falls Platform – if a new one needs building, make it big enough for maybe 30 – but *please* do not build a second. The falls area is very constricted by its landscape. Adding that many more people and another structure to the equation could really throw some things off balance. The second structure as mapped covers an area used heavily by less dominant bears for consuming fish, nursing, or viewing on-going ursine politics in the water in preparation for joining the fray. I haven't yet seen a bear willing to stand under a platform, so this would most likely reduce even more the open space available to the many bears using that cramped place in July. Bears also do notice the people on the platform; adding more people yet would probably add to the already high stress levels. Please take the bears into consideration more in your planning. They need the river to survive. We're only recreating.

26h I have mixed feelings about the proposed platform at the river mouth, and its walkway to the Narrows platform. I don't think the numbers of people that could be accommodated in this area would be as hard for bears to take as at the falls: the lower river is much more open. On the other hand it contradicts your own criteria for boardwalks and platforms as stated on p. 149 of last year's DCP. Specifically, #3: The path from the river mouth to the bridge area is a veritable bear highway. The first month or two of my study in 1985, I used a platform in the clump of trees adjacent the proposed platform. I was always antsy going down there because of the volume of ursine traffic. On my visit last month I saw nothing has changed in this respect. It is also clear the Brooks bears have not yet adjusted to the Narrows Platform. I observed last month a lot of interesting bear behavior as regards the "new" platform. One of the incidents included the obvious displacement of a bear by a person's *laugh*. The person (incidently, a park employee) was laughing in a manner that sounded a lot like a bear's huff. The bear immediately turned on heel and all but ran from the scene. All this to say, the platforms are not necessarily benign in bears' eyes. At least at this point. It's entirely possible that ten or more years from now the platform(s) will be something essentially ignored. Another useful behavioral trait worth monitoring.

26i On the topic of behavior monitoring: my advice would be to do everything you can to get the same person doing this over several seasons, if possible. It takes a while to learn bear-ese. Much bear behavior is incredibly subtle, and almost always misinterpreted by the casual watcher.

26j Of course, if all human activity is removed from the north side of the river the effects of the platforms will be at least partly mitigated. *Except* that bear's access from the south side may be severely limited due to the sheer length and location of the proposed platform and walkway. Is there a possibility of shortening things a bit to give bears a little leeway on the south Naknek beach side?

26k I very much like the concept of guided tours. What kind of training will the guides get? A June seminar on the subtleties of bear behavior would be great. I find that first season staff in particular tend to be really squirrely around bears, often feeling on pins and needles that "something" is going to happen at any

26e. Proposed developments would be located well away from Beaver Pond and, hence, away from daybeds used by the bears (see response 20a to comment on draft DCP/EIS).

26f. The proposed action in the FEIS states: "A mid-river platform could be built if absolutely necessary, based on LAC monitoring called for in the `Limits of Acceptable Change' section. Necessary compliance would be completed at the time this platform was determined to be required."

26g. The map drawing of the falls platform is conceptual only; the actual platform could be designed a number of ways. The National Park Service would ensure that no matter what the final design, the structure would meet all of the criteria listed for platforms in appendix C of the DCP/EIS, including those specific to bears.

26h. The river mouth platform would serve primarily as a safe haven and would be small and tucked behind trees to minimize the degree that it would violate criteria 9 for bear viewing platforms (see appendix C). It would not be in established wildlife use patterns and thus would not violate criteria 3.

26i. This comment has been referred to park management for consideration.

26j. The new proposed action does not call for the boardwalk. The river mouth platform will be accessed by a trail instead. See response 20h to comment on the supplement to the draft DCP/EIS.

26k. A discussion of training for guides is beyond the scope of this DCP/EIS, but this comment has been referred to park management for consideration.

Comments from: A. Braaten, [redacted] 5

moment. Given careful park management that "something" need never happen – it's just the park's responsibility to help the staff understand that and convey it to the visitors. An open seminar between returning and new staff (and if budget permitted, someone brought in, say, from McNiel) could be a good season-starter.

261 Re: the tours: may I suggest these be put on as rigid a schedule as possible. The bears will pick up on this after a time, maybe helping to reduce the wild traffic jams that ensued this past July on the Falls trail. Or not. But it's worth a try.

YES! *Definitely* go with a catch-and-release policy only, with seasonal closures of fishing *altogether!* Not to be overly dramatic, but I would kiss the feet of whomever instituted this rule, and buy them their favorite beer/wine for a year. Well, for a month. I'm not that wealthy.

I was heartily disappointed to see the phrasing "decrease... habituation" and "excessive habituation" of bears. Human habituation by bears merely means bears recognize people as a benign entity on the river. It is how they are able to use the river with so many people around, and it's what reduces the intensity of bear-human interactions. My least benign experience with a bear was a *non-habituated* individual. Food-conditioning is what you, I and anyone else working around bears should be concerned about. Just a pet-peeve of mine. Habituation tends to be viewed too rigidly by the NPS. Its worthiness or cause for worry is site-specific, not something that can be viewed statically.

It is great to see the concept of cooking shelters at the campground. Yes! Good! I trust these will have a lot of storage space too?

I assume rangers would do any enforcement at the campground despite its being run by the concessioner??

A suggestion: meetings between bears and people are consistently referred to as "encounters". This is the language of conflict – or is by popular use. Especially in educating the public, using "bear-human interactions" where appropriate can help convey something else: the dynamism of so many of the interactions around Brooks. It's subtle and maybe a little nit-picky, but psychologically it does remove a little of people's monster perception from bears, making bears not something to be encountered, but someone with whom to interact – something with behavior as varied and plastic as ours.

Oops. This wasn't very short. My apologies.

One last concern would be to repeat the nightmare I wrote about in my cover letter: That the new camp gets built and the old doesn't get torn down. Please, please don't let this happen....

Thanks for the opportunity to comment. Good luck on getting the Good Work accomplished.

Anne Braaten

261. The time schedule for guided trips to bear platforms is an operational issue and as such is not presented in this DCP/EIS.

August 10, 1995

William Pierce
Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska 99613

Subject: Comments regarding the Supplement to the Draft DCP/EIS Brooks River Area, Katmai and New Lodge Site Proposal - Research Bay (Alt. #6)

Dear Mr. Pierce:

It is a pleasure to comment on the Supplement to the DCP/EIS of the Brooks River, Katmai area. I find many of the changes regarding the Brooks River Bear Viewing Management Plan important when compared to the original DCP. Additionally, this DCP/EIS now looks at an area much larger than the local Brooks River area. This is important as the visitor activity rightly begins in the town of King Salmon (major airport), spreading to the general Katmai Park area and finally to Brooks River itself. Each of these sectors will impact the one next to it.

As you know, I have attended all the public hearings and have been a member of the *Katmai Partners, a group of diverse individuals interested in the future of this park and preserve.* From this involvement has come an understanding of the physical environment as well as those factors which impact the visitor experience.

I recognize the considerable commitment of time and planning contributed by many individuals, particularly the NPS. However, I feel that a new look must be taken to the site selection of the future lodge/operations and employee housing.

Alternative #5 site still provides an environment for negative impact relating to Brooks River bear population. The noise of aircraft still exists. I have heard the aircraft problem described as a bunch of bees around a nest. Visitor numbers have steadily increased. There is

a need for a modified full service lodge centrally located. I suggest constructing this lodge today and use Brooks River as one of many Naknek Lake attractions. I have provided further discussion on the merits of an expanded lodge 6 to 9 miles from Brooks River in a wind protected cove.

I feel the immediate area surrounding Research Bay is a site which answers those remaining issues negatively affecting Alternative #5.

The following Alternative will be designated Alternative #6. - Research Bay.

Sincerely,

William P. Bredesen

WPB/mlc
Attachment

**ALTERNATIVE #6 - RESEARCH BAY**

**TRANSPORTATION SYSTEMS**

**Air Travel from King Salmon (Float Plane)**

Under Alternative #5, air transportation from King Salmon to Brooks River still requires the use of noisy aircraft which affects the feeding or roaming bear population below its wings and motors. Additionally, it is difficult, impossible or just plain unsafe to land at Brooks Lake and/or Naknek Lake in the immediate area around Brooks River when the wind is strong creating large waves. Waterborne travel by boat is time consuming and very rough during high winds and rain.

Research Bay, in the Iliuk Arm, which lies just around the corner from Brooks River is the site of a wind protected cove. Visitors can safely fly to Research Bay from King Salmon and then travel by tour boat or by ground shuttle to the beginning of the infrastructure described in Alternative #5 (both docking facilities or road transportation). See attached maps for locations.

From its new lodge site, road access is easily used for trips to the Valley of 10,000 Smokes or to view the bears/cultural resources.

A very important element of Research Bay as a new lodge/employee housing site is the fact that the primary tour boat facility would be located here. These tour boats could easily provide access to additional Naknek Lake visitor interest areas and thereby reduce the visitor pressure on Brooks River. Also, the establishment of a central lodging and boat area would prevent the sprawling of other lodges around the east end of Naknek Lake.

27a

**RESEARCH BAY**

**New Lodge/Employee Housing**

This protected bay is far enough away from the bear viewing activity (6 to 9 miles) to relieve pressure on the bears at Brooks River. This will reduce the stress level of the feeding or roaming bears.

This bay is easy to fly to and could be a central tour boat base. It is located on the road to the Valley of 10,000 Smokes.

This lodge site would allow the concessionaire a lengthened operating season. With the dependence on Brooks River area gone as the primary activity center, other Naknek Lake

- 3 -

27a. A Research Bay site would have many major environmental and engineering problems. Research Bay proper is too shallow for floatplane landings and takeoffs and boat navigation. An access road from Research Bay to the road to the Valley of Ten Thousand Smokes would have to cross wetlands and excessively steep terrain. Facilities developed in the vicinity of Research Bay would be in wetlands and on very unstable substrate. These problems make an alternative calling for facilities and access routes in the Research Bay area infeasible. Other lodges cannot be developed in areas around the east end of Naknek Lake because it is all designated wilderness where development is not allowed. The National Park Service believes that visitor use limits are the most appropriate way to control visitor pressure at the Brooks River area.

interest areas could be expanded. Additionally, the concessionaire financial risk would be lessened because of the longer operating season using the same operating assets.

This lodge site would promote day use visitors. It could be part of a bear management plan to restrict late evening bear watching, thus giving the bears a rest from the pressure of 24-hour availability.

**Cultural Heritage/Resources**

Brooks River is the site of a long history of past use which must cataloged and preserved. It has already been discussed in Alternative #5 that local people would be the best individuals to interact with the visitors in describing the local history. The area of cultural resources should be part of a greater local employee training program. Bear viewing is very important at Brooks River today. However, the time will be soon when cultural resources will be equally important.

**Other Naknek Lake and Park Visitor Interest Area**

To relieve the pressure on Brooks River it will be necessary to identify and promote other bear viewing, fishing and general visitor interest areas in the Naknek Lake area.

A central lodge site at Research Bay will facilitate this goal by its ability to encompass wider visitor interest area without impacting the bears at Brooks River.

**Lodge Visitor Profile**

Alternative #5 provides for a maximum of 60 lodge visitors bathing in a central bath house. While this type of lodging is functional it is very limiting to a greater visitor base.

As I walked the visitor-filled downtown streets of Anchorage this summer and looked at the booking records of Alaska visitors, it became obvious that the broader visitor profile is an aging visitor population who may or may not be able to be athletic or spartan in its desire or requirements as they visit Alaska. Alternative #5 provides a lodging environment aimed at a relatively small visitor base.

Research Bay (Alternative #6) would appeal to a much wider visitor base because more comfort and need levels would be provided.

As has been stated before, Research Bay would allow a broader visitor experience and because of this, a much longer visitor season. This longer season would be beneficial to the employed local population as well as making the concessionaire's operations more cost effective. This would mean more visitor related dollars to pay for the lodge debt. We must remember that

the concessionaire will provide most of the money to make the financial formula work. The NPS will assume a role of an overseer rather than the provider of total funding. The site at Research Bay, because of its location in a protected cove, will add certainty to visitor ability to arrive safety and thus begin his stay at the concessionaire's lodge. He will not have to cancel because of rough water.

Senator Frank Murkowski introduced the National Park Service Enhancement Act on August 8, 1995 which is aimed at encouraging the private sector to make long term financial investments in our parks and to also promote concessionaire-provided services. It is clear the future spells a much greater role from the private sector to provide funding and to do so it must make economic and market sense.

This much broader visitor base is necessary to attract private funding. Our aging population is best able to help the concessionaire's risk formula because they have the time and financial resources to pay for the increased park (Brooks River) visitor costs.

Alternative #5 provides by its location and lodging environment, a much riskier financial formula for the concessionaire to look into the future. Also, it provides a shorter operating season which negatively impacts the lodge employees as well as the concessionaire.

***Campground***

The campground and its related facilities could remain at Brooks River.

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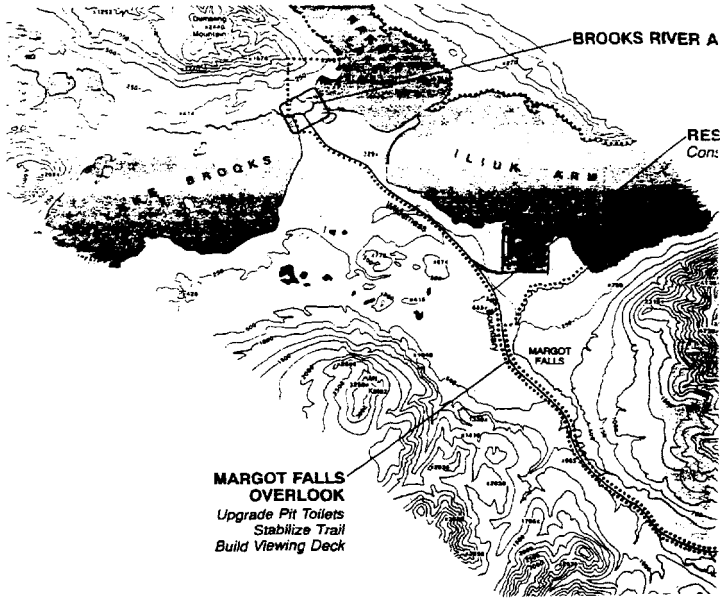
## COMMENTS

## RESPONSES





Peter M. Brown
[redacted]

June 30, 1995

Superintendent
Katmai National Park and Preserve
P. O. Box 7
King Salmon, Alaska 99613

Re: May 1995 Supplement to the Draft DCP/EIS

Gentlemen:

I have reviewed with great interest and concern the document dated May 1995 which you so graciously mailed to me. I would like to provide you with my wife's and my views, for your consideration.

My wife and I have visited Katmai for the past five years, beginning in 1990. Our primary reasons for visiting Katmai are:

1. The opportunity to photograph many types of wildlife.
2. The primitive "bush" environment.

While we have always greatly enjoyed our visits and the facilities and services provided by Katmailand, Inc. we have been alarmed by the increasing numbers of visitors. We've seen people who appear to have no business being there; we've even seen small airline luggage carts on the Falls trail! We concur wholeheartedly with management of visitation, both for the benefit of the wildlife and environment and for the better enjoyment of visitors. Clearly uncontrolled visitation is adversely affecting Katmai.

We believe that the PRIMARY DIRECTIVE of the National Park System is to protect and preserve our parks for the continued education and enjoyment of future generations of visitors. I realize that it is no small task to satisfy "the public"; someone will object to whatever you do or don't do. So you must attempt to strike a delicate balance between protection, preservation, and enjoyment of visitors.

Several specific aspects of the Supplement concern us greatly:

1. Demolition of existing facilities north of the Brooks River.

28a While one could wish some features of the current facilities were a little different, the facilities do function well and it is totally impossible to demolish them without adversely affecting both the wildlife and the environment.

2. Any major construction project would have a major impact on both wildlife and visitors.

28b You cannot help but destroy some of the same features which your mission mandates that you protect. Once a wilderness environment has been altered or partially destroyed by man's "improvements", it can never be as it once was; the damage is permanent.

28c 3. A central shower and washroom facility is absolutely unacceptable to us as overnight visitors. Cabins MUST provide facilities.





28a. The National Park Service believes that the proposed action provides a major net gain in the protection of park resources while providing for visitor enjoyment of those resources. Restoration of the area north of the river to as nearly natural conditions as reasonable will facilitate the return of natural conditions and processes. Also, see response 14g to comment on supplement to draft DCP/EIS.

28b. See response 28a above.

28c. Each overnight guest would have a toilet, a wash basin, and a shower under the new proposed action.

4. Scheduling specific times for use of bear platforms would have a major adverse impact on our use and enjoyment of the facilities.

   This concept brings to mind the "run 'em in, run 'em out" philosophy which is found in urban entertainment facilities such as Knott's Berry Farm and Disneyland in Los Angeles. If we want that type of regimen, we certainly won't go to the time and expense of traveling to Katmai!

   If you limit visitation then this approach is unnecessary, and it would create an unwelcome administrative burden for park personnel.

5. Removal of the floating bridge would be a loss for both people AND the bears who seem to enjoy using it. I sincerely doubt that the bridge is an impediment to spawning fish.

28d

6. Loss of ANY wildlife due to man's "improvement" projects is counter strategic to your primary directive to protect and preserve the park.

   The Supplement admits to loss of wildlife. This is neither necessary nor acceptable.

Therefore we most STRONGLY recommend the following course of action:

28e

1. Limit visitation, possibly with an advance daily reservation system.

   But please do NOT make the same mistake which was made in Denali in which you must be present days in advance to get your reservation. Reservations should be for full (24 hour) day intervals, with possibly a limit to the number of consecutive days (I recommend four days), and obtainable via mail or telephone in advance of the visit. We would have no objections to a fee system to cover the expense of managing a reservation system.

2. Make whatever minor improvements which are necessary in the PRESENT facilities.

3. Please do not use the limited National Park budget and tax revenue for a development project which far exceeds reasonable and necessary measures.

My wife and I would like to thank you for the opportunity to present these views, and for your consideration.

Sincerely,

Peter M. Brown

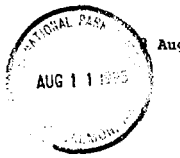
PMB :pb



28d. Neither the laws nor policies governing management of our national parks require that *no* wildlife or wildlife habitat be harmed or lost as a result of management actions (also see responses 2i, 13c, and 29a to comments on draft DCP/EIS). None of the alternatives proposes actions that would have deliberate, significant impacts on wildlife, although some actions would have to be mitigated to ensure this. All of the alternatives, however, would result in some loss of wildlife habitat; however, the National Park Service believes the proposed action — even when compared to the no-action alternative — provides the greatest overall benefits to wildlife, particularly brown bears.

28e. The design of a reservation/permit system is an operational issue and as such is not detailed in this plan. This comment has been referred to park management for consideration.

August 1995




Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

Dear Superintendent,

I have reviewed the Supplement to the Draft Development Concept Plan Environmental Impact Statement for the Brooks River Area, Katmai National Park and Preserve. I note the preferred alternative still relies almost exclusively on planes to transport visitors to the Park. Almost no mention is made of using boats to transport visitors from King Salmon to the Park. I believe the alternative form of boat transport should be given greater consideration as it is a benefit both to the wildlife and the local native community.

With regards to wildlife, it is apparent that airplanes cause more disturbance than boats. Simply put, planes are louder than boats. Further, even though boats themselves can be loud, it is often possible to cut the engine on a boat to prevent noise disruption when wildlife are present. Obviously, a plane's engine cannot be cut until it is safely on the ground.

29a

The second consideration which supports the use of boats over planes for transportation to the Park from King Salmon is the local native community. The majority of pilots flying into the Park for visitor drop-off and pick-up are white. Most of the native Americans in the area do not know how to fly. However, most of the native Americans do know how to operate a boat. Requiring visitors to arrive by boat would be a great help to the local native community.

I urge you to consider adding boat access to your preferred alternative. It is good for the wildlife and the local community.

Sincerely,

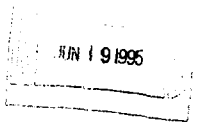
Beth S. Carlson
[redacted]

29a. See response 6i to comment on supplement to draft DCP/EIS.

## COMMENTS

[redacted]

June 19, 1995




Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska 99613

Dear Sir:

I have received the Supplement to the Draft Development Concept Plan/Environmental Impact Statement regarding the Brooks River area and dated May 1995. After reading the statement, I do wish to comment at this time in writing about specific provisions of it and make specific recommendations.

Alternative 5 is a major step in the right direction regarding management of this area. Many of the provisions of this plan I feel are well thought out and I am in agreement with these ideas. Listed below are specific exceptions to this which I feel require further changes.

1] The Brooks Falls Trail should not be paved or "improved". This is a wilderness area and in some of the most remote country in North America. This is not Washington, D.C. and it is ridiculous to try to make the Alaskan wilderness wheelchair accessible.

30a

2] Do not put an elevated boardwalk to the mouth of Naknek Lake nor place a river mouth platform. The problem here is excessive use and not the terrain itself. Again, there is absolutely no reason to make the Alaskan Wilderness wheelchair accessible. There are ample wheelchair accessible sites along the road system and making another one is a waste of resources and taxpayer dollars.

3] The road between the Proposed Contact Point trailhead and the Narrows Bear Viewing Platform should be converted to a trail, but this should not be paved nor made wheelchair accessible.

4] No shuttle bus should be allowed to run between the lodge/camping facilities and the various trailheads in the immediate Brooks River area. This is a wilderness experience. People should be expected to walk. A shuttle bus increases the risk of pollution and destroys the wilderness experience for others. Furthermore, no specific handicap facilities should be put in place because of the facilities remote location.

5] Unless an original pit house is available at the site of the proposed Beaver Pond Terrace Development, no

## RESPONSES

30a. Access for disabled persons is provided wherever feasible.

## COMMENTS

exhibit should be made at that site. If a demonstration site is desired which is not an original archaeological site, it should be in King Salmon where more people will benefit from it. Furthermore, since the local Native Association will be appropriately involved with such a site, I believe that if such a demonstration is part of any plan, the cost should be borne by the Native Corporation and not by the National Park Service as Native history in this area is not particularly unique in Alaska and was not the reason the park was established.

30b

6] Day use and overnight use still need to be further limited. I would recommend usage numbers approaching McNeil River Sanctuary numbers. At the very least, the numbers proposed by alternative 5 need to be halved again. If necessary, visitors should only be allowed into the Brooks River every 4th year like at McNeil in order to allow other people the opportunity to visit.

30c

7] The proposal states that access to Brooks Camp will be "managed through the concession permit requirements for all operators bringing visitors to Brooks Camp". This proposal does not allow for access via private aircraft nor boat. Access to this portion of the park should be by NPS permit only and not by permit of any concessioner. Certainly, a management fee for the permit system should be collected by the NPS.

30d

8] Despite the fact that I am an avid fisherman, I agree completely with the fishing restrictions. There are ample opportunities elsewhere in Alaska to catch sockeye salmon.

9] No boat or aircraft docking facilities should be allowed. This would deteriorate the wilderness experience of the visit and is an unnecessary cost to taxpayers.

30e

10] Do not expand the bear view areas/platforms. They already are too large. Limiting visitation should be the key to crowd control at Brooks Camp.

30f

11] Day usage limits should not be higher in peak tourist months. This is strictly a concession to the tourism business and is not in either the wildlife's nor the park's best interest.

30g

12] The campground should not be managed by the concessioner. There will not be adequate enforcement of bear precautions by the concessioner [i.e. campers keep food in their tents, brushing their teeth and spitting next to where they sleep, etc.]. This will put campers at risk of a bear confrontation. Instead, the size of the campground should be limited if this is what is necessary to facilitate a safe campground.

30h

## RESPONSES

30b. The National Park Service believes that a barabara replica located near barabara remains on a typical site in the Brooks River area is appropriate. The Park Service is open to working with citizens of King Salmon, the Native organizations, Bristol Bay and Lake and Peninsula Boroughs, U.S. Fish and Wildlife Service, and others in installing and interpreting a barabara replica in King Salmon. The Park Service agrees that the cost of a barabara replica exhibit should not be borne by the federal government. See estimated construction costs in appendix A, table A-6.

30c. The National Park Service disagrees; see responses 13a and 21c to comments on draft DCP/EIS.

30d. Access via private aircraft and boats by permit would be allowed. The text has been changed.

30e. Since access is only by either boats or floatplanes, some means of securing them while they are in the area is necessary.

30f. The new proposed action would achieve crowd control and enhance visitor experience at the falls platform by a combination of enlarging the platform and limiting visitation.

30g. Day use limits would not be higher in peak tourist months as a concession to the tourism business. As noted in table 3 of the DCP/EIS, day use limits during the peak tourist month of July are higher than those in the fall, because in September, the concentration of bears near the river mouth and the lack of bear viewing opportunities at the Falls constrains the ability of the core use area to accommodate visitors more so than in July.

30h. The text of the proposal has been changed to note that management of the campground *could* (not necessarily would) be done by the concessioner. While the concessioner would own and operate the campground under the proposed action, delegation of responsibilities for different management aspects would be determined when negotiating the actual concessions contract.

## COMMENTS

30i

13) Fishing equipment/boat rentals and guide services should be arranged in King Salmon. I find the thought of a kiosk selling such items on taxpayer property to be an affront to my rights. People coming to Katmai who want a remote wilderness experience should have planned this further in advance and should have made arrangements in King Salmon for these services. People who do not have such foresight also will not have the sense to take care of themselves in the wilderness and are the ones most likely to have to be rescued at taxpayer expense. As a taxpayer, I do not want to see my money spent needlessly.

As stated previously, there are many good ideas in the present alternative 5. However, there are also several serious flaws which should be corrected while still in the planning stage. Please consider the suggestions I have made above. Also, please keep me on the mailing list for further proposals regarding Brooks River as they come forth. Thank you.

Sincerely,

Craig M. Doser

CD/cd

## RESPONSES

30i. The National Park Service believes that limited sale or rental of fishing equipment, boats and various guide services by a concessioner would be appropriate at the lodge in the Brooks River area.

[redacted]

16 August 1995

Mr. George Frampton
Asst. Secretary for Fish, Wildlife and Parks
U.S. Department of the Interior
1849 C Street. N.W.
Washington, D.C. 20240

Re: **Supplement to Brooks River Area Development Plan / Katmai NP&P**

Dear Mr. Frampton:

I recently visited Brooks Camp for 4 days after an interval of some years since completing scientific research on the interaction of bears and people from 1984 to 1991. I understand that you visited Brooks Camp in 1994 and have first-hand knowledge of the close interaction between brown bears and people there.

31a

With your impending consideration of the newest proposal (alternative 5), may I summarize the reasons for moving the camp complex to the western end of the park or King Salmon area. I will restrict my comments to the resource based issues as others have made the case regarding ANILCA requirements, the Administration's priorities and policies on gateway communities and federal budgetary constraints on costs.

Transfer to the King Salmon area is consistent with:

* Protection of the wildlife and archaeological resources as set forth in ANILCA but which would *not be met with the proposed level of facility development and visitor projections in the current alternatives;*

* *Visitor and bear protection in an area congested with 50-70 wilderness brown/grizzly bears aggressively defending cubs, females and food in the face of mass tourism propelled by the exploding corporate cruise and hotel industry. The injection of large numbers of minimally prepared tourists onto traditional bear trails under these conditions risks displacement of bears, degrading the quality of visitor experience and tort actions if injury results;*

* *The General Management Plans for Katmai National Park and Brooks Camp which emphasize removal of visitor use and staging activities away from the archaeological and biological resources at Brooks Camp and the surrounding land because of the density of the wildlife use there including brown bears;*

COLLEGE OF NATURAL RESOURCES

31a. This suggestion is essentially the same as presented and analyzed in alternative 4, which would make the Brooks River area available on a day use only basis with much reduced visitation. Also see responses 13a, 21c, 29a, and 29d to comments on draft DCP/EIS regarding the use of scientific information in developing the alternatives and establishing use limits.

* The findings of the biological research sponsored by the NPS showed that the Brooks River area is an ecosystem of high utilization by wildlife, extending a considerable distance into the surrounding forest and lakeshore north and south of the River. Conflicts between bear and human use were clearly demonstrated by that research but given only superficial consideration in the Draft DCP. The implications of this detailed, systematic research were not specified or utilized in the alternatives provided to the public in the environmental impact analysis;

* A water-based transportation system that encourages a variety of back-country activities in dispersed, low-density sites. Modern, fast boats are safer than aircraft in congested traffic and able to keep schedules under the frequent ground fog conditions experienced in Katmai. Boats can disembark passengers without specialized shore facilities and can moor offshore in heavy weather overnight, if required.

Finally I encourage you to review the results of our research thoroughly. The foresight of NPS scientists in sponsoring this research has provided a wealth of information that have yet to be adequately utilized. If I can provide a briefing for you either in Katmai or another location of your choice, please do not hesitate to contact me. I would be happy to oblige.

Sincerely yours,

Barrie K. Gilbert
Senior Scientist

cc: Roger Kennedy
Robert Barbee
William Pierce

Group Travel Management Services

American Express
Travel Related Services Company, Inc.
100 CambridgePark Drive
Cambridge, MA 02140

June 15 ,1995

Mr. Bill Pierce ,Superintendent
Katmai National Park
PO Box 7
King Salmon , AK 99613

Dear Mr. Pierce :

Thank you for sending me the latest info re the future plans for my beloved Brooks River area in Katmai . I first made a trip there in 1959 and have been back every since then and , if all goes as planned , I will be at Brooks Lodge from June 19-22 this year prior to going over to Grosvenor Lodge.

Those of us who have been going to Brooks for many years have finally come to admit that the situation there has certainly taken away the feeling of the unspoiled beauty of the area.When there are over 20 planes lined up on the beach ; five or six boats zooming across the lake enroute from King Salmon and the river is crowded with fishermen who seem it is their due to compete with the bears for ther salmon; it is time to take some action .

32a I do question , however , your plan 2 and 5 for your new housing tract to be known as BEAVER POND/TERRACE.It sounds like tract homes in many of our expanding states.I have never seen a beaver in your so called beaver pond but I certainly have seen a lot of bugs and mosquitoes over there.I think this would be a horrible location.

May I take a while to go over some of your statemnts and , as I see it, some of your contradictions.

You seem to want to develop King Salmon into a tourist area. Hotels there are 100% full from mid June to late August.The town itself can be called " The 55 gallon drum capitol of the world " and it certainly is lacking

32b in any charm.What makes you think that people will want to spend any time at all there ?

32c Page 3-you state that boat travel can be safe and economical and so on. I guess you have never tried to cross Naknek Lake in one of the many storms that hit the area.In low water , the trip by anything otherthan a small, low draft boat would be very dangerous.The insurance that the boat operator would need to carry would certainly make this form of transport very expensive.

32d You have indicated a " guided" program to bear watch that sounds as tho' what you should do is place the viewers in a cage and drive the bears past them. There is about 18-20,hours of daylihgt in Brooks in June and July and how do you plan to keep people from going to the viewing platforms whenever they feel like it ?

Page 4 - I agree with the need to limit access.Also , for those of us who are fly fishermen, catch and release anyway , your" new" catch and release program is no problem.Clsing the river to fishing in July is probably a very good idea since most of the salmon caught are illegally snagged .





32a. These are not "tract homes" and they are up on the terrace, not by the park.

32b. Alternative 5 was developed based on public input on the draft DCP/EIS; many reviewers wanted to see the gateway community concept of alternative 4 expanded. This suggestion was carried out and presented in alternative 5.

32c. The National Park Service believes that with appropriate watercraft and prudent decisions concerning whether and when to travel, safe crossing of Naknek Lake is possible. Aircraft access to Brooks in all alternatives, is still proposed.

32d. Except during peak visitation times, people may be allowed to visit the platforms at anytime, and for as long as they wish. Also see response 56a to comment on draft DCP/EIS.

## COMMENTS

Page 8 - It is certainly strange that you now advocate the elimination of the floating bridge and a return to the natural river flow since it was NPS that CHANGED the course of the river bu bulldozer and did it just a year after NPS had spent $ 60,000 of taxpayers money to build a bridge over thr eiver outlet. This nice bridge is now a sunning platform for staff since the river no longer runs under it !

32e

Page 7 - you project ZERO human- bear interactuons under plan 2 or 5 yet on page 30 you contradict yourselves by stating : Some human/ bear conflicts would continue to occasionally occur in the river corridor " !

I could go on and on but it has been apparent from the original info that NPS put out that your only goal is to operate Katmai as tho it were a baby yellowstone with many new jobs for NPS personnel and and upgrading in salary for thge superintendent. This brings me to the most upsetting item of all - COSTS.

32f

I am sure you will agree that the Peterson family who have pioneered the delopment at Brooks into a world class lodge deserve to be protected as concessionaires yet your plan would cause them to spend almost $ 3 million dollars to meet your demands plus another 2.3 million costs to the governement - people like me.Current rates at Brooks run about $ 109 per person per day ( plus meals).You indicate a new plan for 60 people per day. This would mean a daily gross , based on 100% occupancy, of $ 6500 and with basically a 90 day season , a yearly gross of $ 585,000 for lodging.Let's say they NET 15% ( abox this would be above industry average) or $ 87,500 net per year.This would mean that it would require over 30 years before they would get their investment back. That is a very poor business operation. Of course , you could lift your currenty ceiling on rates but then the visitors would have to pay very high rates.

32g

I have long suggested some simple changes; Limit access to the area to fly ins from the other lodges / limit commercial boat traffic /close the river to fishing in July when there are so many bears around /limit the stay of guests at Brooks Lodge to 3 nights /enforce current fishing regulations in the river ( fly fishing only ,snagged fish must be released , one salmon per day limit or catch and release only ) /prevent fly in lodges from having river bank luncheons on the Brooks River /enforce camp ground rules re no food left in the tent area.

32h

Do you really think we need to spend $ 1.7 million for a road system ?

I know you realize there is a problem but you have not reached a solution.

Cordially yours,

Don Kimel, [redacted]

CC : Rep. Peter Torkildsen
NE Chapter Trout Unlimited
Sen. Ted Stevens

## RESPONSES

32e. The statements do not contradict each other. The respondent has misunderstood the purpose and definition of the standards (see the discussion on implementing visitor impact management in the Brooks River area in "Part Two: Alternatives, Including the Proposed Action" — "Actions Common to All Development Alternatives, Area Management, Limits of Acceptable Change" section and table 2). As noted, standards are not projections, but instead are *targets*. "Human/bear Interactions" is the title of a category under which there are eight indicators and associated standards. Standards for five of these indicators would be zero; standards for the remaining three indicators would be above zero. The National Park Service recognizes that, in reality, some human/bear interactions would continue to occur under all of the alternatives (as is reflected by standards that target levels of interaction above zero), even though this is certainly not a desired condition.

32f. The mechanism for funding is somewhat flexible.

32g. Some of these suggestions would be implemented such as closing sections of the river to people during July and mid-September through October when many bears are present, catch and release fishing only, no food except in the cooking areas and food caches. Other suggestions would be considered as appropriate by park management.

32h. The cost for roads has been reduced. This expenditure would provide relatively safe passage on the roads and would provide access to areas appropriate for visitation.

DAVID A. McGUIRE, M.D.
[redacted]

August 11, 1995

National Park Service
P.O. Box 7
King Salmon, Alaska 99613

Dear Sirs:

Please accept this letter as a comment during the open period of comments relative to Alternative #5 of the Supplemental Environmental Impact Statement, for the Brooks River, Katmai Park area.

Once again I commend you on your willingness to seek input from the Public at large, relative to this important recreational area. I assume that when all parties concerned say "our parks" that what is meant by the "our" is the people of Alaska and the rest of the United States.

In discussions regarding Katmai and Brooks River in particular, we frequently hear the expression "a true wilderness experience". Such a statement in regard to Brooks River is now, and has for a long time been inaccurate. There is no stretch of the imagination that says the Brooks River can be a "true wilderness experience". Rather, it is one of the unique areas in the world where people can view bears in their natural habitat without the requirement of obtaining a permit in advance. Most people, I think, are aware that MacNeil River allows a very limited number of visitors to observe bears in their natural habitat. Unfortunately that also means that many people try for years on end to get a permit to view the bears at MacNeil, and are unsuccessful. If given a choice, most people would choose to be able to see a bear in their natural habitat in the company of other human beings, as opposed to never seeing a bear at all.

It is this mis-perception of what Brooks really is that may lead to some of the proposals which are both expensive and probably not functional in the long run. Proposal #5 allegedly results from amalgamating public comment with proposals 1 through 4. However, in our view, Proposal #5 still contains some objectionable features, and does not contain other desirable features. Specifically, Proposal #5 is a very expensive proposal. Other solutions are available which would probably cost less money in both the near and the long term, and would more effectively accommodate the needs of the people of Alaska and the Lower 48.

## COMMENTS

Page 2 - Park Service

If we define the Brooks River as one of the world's unique opportunities to view bears, but not necessarily a "true wilderness experience", new horizons and possibilities are opened. Rather than limiting the numbers of visitors who will ever have a chance in their lifetime to see this phenomenon, we should be considering how to maximize the number of people that can see this without harming the environment or the bears.

33a

NPS needs to be precise in what it is attempting to achieve with its Brooks River management plan. It is clear that the existing facilities and patterns of use are NOT creating tangible resource problems. There has been no diminuition in the number of bears that use the area, the behavior of those bears is not appreciably different from thousands of other bears in southwestern Alaska, and the fishery resources of the River remain in outstanding condition.

33b

Your own "bear group" study showed that the bears are more numerous and healthier than they have ever been. By your own numbers, these bears at Brooks constitute only 100 bears out of an estimated total population of 1,500. Furthermore, the only concrete evidence of any disruption of bear activities is that some bears may have to detour from their intended path by buildings at the current location. Or that some bears "fish at night due to human pressure". I would suggest that these are certainly a minimal impact to the bears, and the fact that they are as healthy as they are, and as numerous as they are, certainly suggests that these impacts have very minimal adversity, if any adversity at all. Therefore, the argument that present human activity at Brooks River has impacted bears is not credible.

Change is not necessary to protect the health of the physical resources of the area. Instead it seems that NPS is seeking to establish a new mangement regime in pursuit of certain subjective amenity values (i.e., how a visitor enjoys the area). It seems that NPS has decided that present patterns of use create conditions that detract from the "right" way to visit and experience Brooks and Katmai, and that strict use limits will create the preferred way to enjoy Brooks River.

It is not appropriate for NPS to dictate the appropriate form of visitor experience. Many people are willing to forgo solitude and the subjective "wilderness experience" in order to enjoy and interact with the resources and values present in many of our parks. One need only look at the more popular locations in parks

## RESPONSES

33a. The National Park Service is clear about what is to be achieved at the Brooks River area (see the entire "Part One: Purpose of and Need for the Plan").

33b. The National Park Service is required to protect not only individual species, but also "to maintain all the components and processes of naturally evolving park ecosystems. . . . (NPS *Management Policies* 4:1). The Brooks Camp facilities on the north side of the river substantially interfere with natural bear movement and bedding down patterns. Also, repair and maintenance of the facilities substantially threatens the rich and extensive archeological resources that lie under the area. Both of these conditions significantly compromise the National Park Service's ability to comply with its legal resource protection mandates.

Page 3 - Park Service

such as Yellowstone, Yosemite, Grand Canyon and the Everglades to see this demonstrated. yet in each of those units, elements of the public seeking solitude and wilderness can elect to travel into the backcountry to escape their fellow citizens.

The same pattern is being repeated in Katmai. The great majority of our citizens are willing to share the experience of seeing the bears at Brooks. Those citizens, far fewer in number, who do not want to "share" the experience and are put off by the presence of lodging facilities, viewing platforms, boardwalks, etc., choose not to visit Brooks in favor of a multitude of alternative sites in southwestern Alaska.

33c

It is important for NPS to establish a management regine that retains this vital element of choice. Since the wildlife resources of the Brooks area are not suffering any tangible harm from existing levels and patternso use, NPS should be taking action to accommodate the visitor demands on the area. It should be managing Brooks in a manner (i.e. boardwalks, viewing platforms, dispersal plans, etc.) acceptable to the overwhelming number of citizens as a small price to pay for an opportunity to visit a truly unique spot in the National Park system.

I am well aware of the survey that was taken at Brooks in the 1993 season. I happened to be in the Park during this on-going survey. I was asked by a rather young ranger if I wanted to participate in the survey. I was extremely pressed for time and said "No". The point I'm making is that I'm sure that there were many other people who did not participate in the survey, and therefore the fundamental underpinnings of the survey are suspect. I do not recall seeing a question in the survey that said, "Would you rather share the bear-viewing experience with other humans, or not having the bear-viewing experience at all?" I suspect that the results of that question would indicate that people are willing to put up with some compromises if they have the opportunity to see these bears at Brooks.

33d

Limitations on Day Users: It is strongly advised that NPS not set a fixed ceiling on the number of day users in the Brooks River area. First, as discussed above, the apparent motivation for the visitor limitation is to serve subjective amenity objectives (i.e., provide the "right" kind of visitor experience) rather than to conserve the physical resource values of Brooks River.

33c. See response 14g to comment on supplement to the draft DCP/EIS.

33d. The purpose of day use limits are to both protect the resources and provide the desired visitor experience. Visitor use limits are based on visitor experience and resource protection indicators and standards (see table 2, FEIS). The desired visitor experience standards are based on results of the limits of acceptable change methodology and the resource protection standards are based on resource research and the input of resource professionals.

The procedure to achieve use limits is a park operational issue and is not addressed in this DCP/EIS. However, the park will not allocate numbers of visitors to each commercial transportation, or other provider.

As indicated above, the use limits are not arbitrarily determined; they are based on the limits of acceptable change methodology. Also, it is not possible to compare the Brooks River area with roaded parks such as Yellowstone, Grand Canyon, or Yosemite for use limits or methodologies for dealing with larger visitor use.

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Second, once a fixed ceiling is set it creates the need for a complex allocation system to divide the number among qualified visitor service providers. Presently, there are many entities bringing day users to Brooks including fishing lodges, theQuinnat Landing Hotel in King Salmon, and day tour package operators from Anchorage. If NPS fixes a maximum number, each of these entities will have to compete for and be allocated some fraction of the permissible use. NPS will be buying a major administrative headache by seleting a fixed cap on day use.

Third, this misplaced emphasis on limited use focuses energies on arbitrary caps rather than the means of properly managing visitor use. At Brooks, the maximum day use is approximately 120 visitors (a number reached on only a few days each season) coupled with another 100 lodge guists and campers. Although this is substantial growth from visitation a decade ago, it is extremely modest in relative terms. Most Park Managers in locales like Yellowstone, Grand Canyon, and Yosemite have found *myriad ways to manage orders of magnitude* more than 220 daily visitors in settings far more finite and constrained than Brooks. Setting an arbitrary ceiling on visitor use is, in effect, an admission of management failure that NPS in Alaska cannot find reasonable ways to accommodate the modest demands of our citizenry. We believe that NPS has a lot more ingenuity and can find ways to accommodate its Brooks River visitors without resorting to unnecessary arbitrary limitations.

Lower River Closure: The lower River provides some outstanding angling. An arbitrary closure of the entire lower River would penalize the area's original recreational user grouop--and a number of sport fishing operators--for no good reason.

Alternative 5's proposal to close the entire lower Broks River to angling is also completely unwarranted. Recreational anglers have been fishing the Brooks River continuously since the early 1950's. These users have been a driving force behind conservation of the River's outstanding fishery resources and regulations to limit the river to fly fishing, limit the take of rainbow trout, and reduce the bag limit on sockeye salmon to one. During this long period of angling use, there have been extremely few serious incidents with bears. Indeed bear use of the River has climbed steadily over the years parallel with the grouwth of the river's popularity among anglers. There are absolutely no indications that the presence of anglers on the River, lower or upper, is having any adverse impact on the bears.

33e

33e. See responses 13c, 6l, and 41b to comments on draft DCP/EIS.

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NPS should be aware too that anglers plying the Brooks above the mouth generally fall into two categories: those guided by an area lodge or outfitter or highly experienced anglers who have fished the Brooks on many occasions. These users are under the tutelage of a guide who is experienced in bear interaction or our knowliedgeable outdoors types in their own right. They are unlike many of the casusl, unskilled unsupervised day users. The limited daily number of anglers fishing above the mouth are not the source of any significant problems.

In addition, NPS has previously taken specific action to correct angling-related problems when it reduced the daily bag limit on salmon from 5 to 1. This was designed to eliminate serious "meat fishing" that was the source of incipient problems caused by fishermen carrying numbers of dead salmon. The adoption of that regulation seven years ago resolved this problem. It also had the effect ofreducing angler numbers on the lower river and at the mouth during the early July peak of the salmon run. Any other specific problems should be addressed by similar specific regulations. Wholesale clousre of entire lower river is an arbitrary action totally unwarranted by the facts.

Lodge Relocation and Expenditures: Alternative 5 also calls for the complete elimination of the existing lodge and construction of new facilities at the Beaver Pond. This action is probably unwarranted and extremely costly. Rather, it would be more beneficial to leave the existing lodge facilities and redirect limited financial resources to improvements (i.e., boardwalks, viewing platforms, day facilities) designed to accommodate growing numbers of day users.

33f

It goes without saying that the location of the existing lodge facilities may not be optimal by 1995 standards. Yet leaving those facilities in operation has little, if any, impat on Park resources. Bears have largely habituated to the presence of the cabins and whatever archeological damage may have occurred happened years ago during construction.

33g

Instead of tearing the lodge down and engaging in costly reconstruction at a new site, limited financial resources should be committed to developing day use facilities on the south side of the river. Concentrating day users on the south side, while leaving the lodge (and camp) on the north side, provides a measure of dispersal that causes less concentrated impact and less crowding. The notion of dispersal can be taken a step

33f. Ongoing failure of old systems and the repair and maintenance of the facilities substantially threatens the rich and extensive archeological resources that lie underlie the area. These problems at the Brooks Camp development north of the river are expected to continue into the foreseeable future. Thus, the National Park Service's ability to comply with its legal resource protection mandates is significantly compromised, prompting the proposed action to remove facilities from north of the river and develop facilities on the Beaver Pond terrace.

33g. The two primary objectives in removing facilities from the north side of the river are to nearly eliminate human presence in that major bear use area and eliminate the possibility of disturbing the large concentrations of archeological resources that occur on the north side of the river where Brooks Camp is now located. See responses 13a and 14g to comments on supplement to DCP/EIS. The National Park Service believes that visitor use limits are the most appropriate way to control visitor pressure at the Brooks River area.

## COMMENTS

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further by using saved dollars to upgrade boat facilities at Lake Camp at the mouth of the Naknek River and encouraging access to Brooks via boat as an alternatve to the floatplane. Dispersal is one tool to be used in the successful management of day use. That should be the dominant thrust of Brooks River management--not costly reconstruction ventures, fixed ceilings on day visitors, and arbitrary river closures.

The only credible argument that I'm aware of for moving the present buildings is that they occupy an archeological site. I do not know who made that decision. Nevertheless it would appear that the Park Service, at least, is determined to move the present buildings. If that's the case, it makes very little sense to reproduce the identical setting a mile or two away, at great expense to the pulic purse. If the present facilities at Brooks are to be destroyed, it would appear to me that a new direction in the use of the park should be entertained.

Through design, or through default, the focus of Katmai Park at the present time is Brooks River. That has the net effect of encouraging all visitors to Katmai Park and the surrounding area, to focus on the Brooks River. That has the effect of innundating the present facilities at Brooks River, while leaving the rest of the Park essentially unvisited. By changing the focus of the Park to having King Salmon as the gateway to the Park, some pressures at Brooks would be relieved. To that end, if the present facilities are to be destroyed, then it would make more sense to make the focus of Brooks River as a daytime activity as opposed to overnight facilities. Certainly restricting visitation to the Park during the long Summer daylight hours, would minimize the impact on the bears during the rest of the 24-hour period. If people want genuine "true wilderness experiences", there are literally hundreds of sites within Katmai Park and the surrounding areas that would allow a more wilderness experience than could ever be found at Brooks. To that end, it seems to me that adequate daytime facilities and shelter should be constructed at Brooks, that limited emergency overnight facilities should be available in the case of adverse weather, and that camping should be allowed on a limited basis. This would have the net effect of allowing the maximum number of people to view these bears with the minimal impact to the bears and to the ecosystem of Brooks itself.

33h

There are a number of parks in the Lower 48, and for that matter in Alaska, in which elevated boardwalks have served the Public quite well. They have the advantage that the Public is removed

33i

## RESPONSES

33h. The National Park Service believes that the proposed action is responsive to these suggestions.

33i. Elevated boardwalks may decrease the chance of human/bear encounters while visitors are traveling to a platform, but such facilities would not eliminate other unacceptable impacts caused by allowing the existing visitor and administrative developments to remain in the prime bear habitat north of Brooks River.

from the proximity of the bears, and damage to terrain is certainly minimized. Access to the river by the bears would be unimpeded, and visitors could come and go at their leisure. A minimum number of Park Service employees would be required to supervise a large number of visitors, who would get to enjoy this experience without the regimentation of forced marches in the company of Park Rangers. This boardwalk could be build well away from the river, with multiple fingers or extensions to bear viewing platforms, which would have minimal impact on the river and would certainly have little or no impact on the bears. I have been at the bear-viewing platform outside the gate leading to the platform, when a bear walked by me, not less than 6 feet away. The point of that is that the bears are unimpacted and unrestricted by stationary objects that are elevated well above the ground. To design and build such a boardwalk is certainly feasible, and would be less expensive than the twenty million dollars proposed to redo the entire facility at Brooks.

I have some experience with the cost and economic feasibility of hotels. At the present cost as proposed, and the present rooms as proposed, there is no way that this hotel would be economically self-supportive except with Government subsidies. Furthermore, under the present proposal, the number of personnel required to supervise visitors to the Park is really significant. Maintenance of housing for employees and salaries for employees over the next twenty or thirty years would be of significant impact to the budget of the United States Government. An elevated boardwalk would minimize the number of employees of the Park Service required to adequately manage the visitors to the Park.

We have demonstrated the feasibility of water transportation to and from the Park. This method of transportation to the Park could be enhanced and developed to manage larger numbers of people with minimal impact to the environment. Furthermore, the use of water craft to transport people to and from the Brooks River facilitates the use of the rest of the Park in the Naknek Lake area. By improving the capability of increasing water transportation, and by improving the ability for the Park itself to handle larger numbers of visitors without impact to the bears or the environment, the people are far better served than to have this area locked up, as so many areas have been in Alaska.

If we change our preconceived notion about the nature of Brooks River, these arguments begin to make a great deal more sense. Brooks River is not now, nor has it been for a long time, a

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"true wilderness experience". McNeil River and Brooks River are unique onto themselves. McNeil River is managed and will continue to be managed, as a limited access bear viewing facility. Brooks River, on the other hand, should be managed for what it really is, simply put, a unique spot to view bears on this earth, in the accompaniment of other human beings.

Thank you for the opportunity to comment.

Sincerely,

David A. McGuire, M.D.

DAM:li

THE MORIARTY HAT & SWEATER SHOP

*Home of the Original "Moriarty Ski Hat"*

6/17/95

[redacted]

Dear Superintendant,

I just recieved my "Supplement to the Draft." It appears to me a lot of time and money has gone into a study that IS A WASTE of TIME! Since the 50's the bears and humans have been doing ok at Brooks River.

Four years ago I spent a week at the campground and only 10 minutes at the bear viewing platform. I went twice.

## COMMENTS

Recently I went to Dinasaur National Park.

I was impressed to find out the Dinasaurs were successful on this earth from 60,000,000 years to 140,000,000 years ago.

34a While the proposed changes at Brooks River might make Brooks River "better" for something! WHAT DIFFERENCE DOES IT MAKE? At what cost?

Ed Morrison

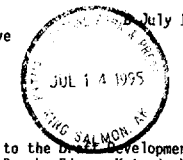
P.S. How do I make Reservations to visit Katmai?

## RESPONSES

34a. See all of "Part One: Purpose of and Need for the Plan" and "Part Two: Alternatives, Including the Proposed Action" — "Actions Common to All Development Alternatives, Limits of Acceptable Change" section.

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

July 1995




Dear Superintendent:

I have received the "Supplement to the Draft Development Concept Plan Environmental Impact Statement" Brooks River, Katmai, May 1995. Although my choice was to tear down the old facilities and not build a new one, I knew that might be asking a bit much. It appears the team has thought out this plan very well and have given the great bear a chance to roam more freely.

35a On page 16 of the Draft under "Campground" you state there will be an interpretive campfire area for the programs and that this would be managed by the lodge concessioner. I assume by this that they will be giving the nature talks, tours, slide shows, etcetera. I hate to see concessioners take over the "ranger talk" because it means so much to visitors to be given a presentation by a ranger. A concessioner is only interested in selling his product. Rangers should be selling their own product, namely Katmai! If you've ever been to Yosemite you know what I'm talking about. As savvy as my wife and I are, we didn't realize that the photo tour was a concession tour even though it was free. We learned quickly that our tour guide actually had a hidden adjenda; he was taking photographs for his own use on our time, he was trying to sell us his photo tips book, and he made sure we knew where the gift shop was. Also, being used to a ranger talk at night we went to the 8 o'clock session (most people have eaten at the concessioners restaurant by then). It was a nice presentation but questions were not allowed during the program. It was like; here's the program, watch it if you want to and then go away. I hope Katmai doesn't lose the ranger talk because visitors lose so much of the experience and views of the rangers when the concessioners take over. The concessioners get their views through, not the rangers and that is not good.

35b Also on page 16 "Implement Shuttle System". I hate these. They are noisy, obtrusive and always have the right of way. I am glad you will develop a trail but much of it is, of course, right next to the road where the shuttle will run. Why can't the trail be somewhere else where there's less noise? What backpacker or hiker with an ounce of sense would want to walk right next to a noisy thoroughfare with noisy shuttles and noisy people? If bears do not normally inhabit the area, please make hiking more interesting. If the trail must follow the road, please put it in a few hundred feet from the road.

Please keep me informed of future developments.

For the great bear,

Marc Olson

[redacted]

35a. See 30h to comment on supplement to draft DCP/EIS.

35b. No trails would be routed next to the road in the new proposed action.

Tamara L. Olson
[redacted]

11 July 1995

Bill Pierce, Superintendant
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

Dear Superintendent Pierce,

Enclosed are my comments regarding the *Supplement to the Draft Development Concept Plan / Environmental Impact Statement*; many of the comments I submitted after reviewing the *Development Concept / Environmental Impact Statement* are applicable to this supplemental document as well.

Sincerely,

Tamara L. Olson

Olson, Tamara Brooks River DCP/EIS Supplement Comments

Tamara L. Olson
[redacted]

I. Overview Comments

The alternative described in this EIS supplement seems far more reasonable than the Beaver Pond relocation Alternative 2 presented in the original EIS. However, I still have some fundamental concerns regarding the proposal described in this supplement.

36a

As I stated in comments submitted regarding the original DCP/EIS, the indicators and standards listed in Table 2 of this supplement are not adequate measures of resource conditions, particularly of the local bear situation. None of the measures listed in Table 2 will give any indication of whether the DCP/EIS stated objectives to (1) "...protect and maintain critical brown bear habitat and to (2) "make brown bear habitat accessible for bear viewing and sportfishing...to the degree that it does not significantly interfere with wildlife use and behavior" (p. 13, DCP/EIS) are met. The indicators and standards listed in Table 2 are fundamental to the development of visitor use limits and to the development of each of the proposed alternatives; yet, every standard listed in Table 2 could be met even if all bears were driven completely out of the Brooks River area. The indicators and standards shoud be redesigned to address the management objectives stated in the original DCP/EIS. Since thise supplement (and the original DCP/EIS) were developed using Table 2 as a guide, this alternative and the proposed use limits should be reevaluated using the revised indicators and standards.

My conclusion after reviewing the document and preparing the following detailed comments is that given the amount of construction required to accomplish the proposal described in this supplement, as well as the financial costs, development at the Beaver Pond site is not a viable alternative, either financially or ecologically.

36b

If Brooks Camp facilities were to be removed, it would make far more sense, in my opinion, to have the gateway community of Naknek/King Salmon provide overnight accommodations and amenities for tourists; management of Brooks River could be as a day-use area, perhaps with a small primitive campground set far off the river (as in alternative 4).

II. Specific Comments

36c

1. pp. 2-3. I agree that watercraft could be a viable transportation alternative to floatplanes. Could anything be done in the permitting process to encourage this form of transportation? I am concerned that although watercraft could be used to reach Brooks Camp, that form of transportation could receive little interest because of the already established air taxi services.

36d

2. p. 3. There is mention of guides performing services currently provided, to some degree, by the NPS (p. 3, last par.; p. 31, par. 4; etc. [meeting of arriving visitors, leading visitors to and from viewing platforms]). Who will pay for these guides? Further, I'm wondering what staffing presence the NPS would maintain along the river.

Page 1

36a. See response 20a to comment on draft DCP/EIS.

36b. See response 14g to comment on supplement to draft DCP/EIS.

36c. Unless private providers of transportation, and the mode used, have a significant negative impact on park resources or visitor experience, it is inappropriate for the National Park Service to favor one provider, and their respective mode of transportation, over another.

36d. No decision has been made regarding who, the National Park Service or the concessioner, would provide guide services if they are offered. Staffing along the river would be at the level necessary to meet the desired futures for the area. See "Part One: Purpose of and Need for the Plan" — "Introduction, Desired Futures for the Brooks River Area" section.

## COMMENTS

Olson, Tamara — Brooks River DCP/EIS Supplement Comments

36e

3. p. 7, Table 1. I believe that the proposed daily limits for Alternative 5 (and Alternative 2) are too high. The comments I submitted regarding the original DCP/EIS addressed this issue, and are relevant to the daily limits proposed in this document as well.

36f

It is unclear to me why the staffing numbers were reduced in this alternative. To manage visitation at Brooks River as described (guided groups etc.) would be a fairly labor-intensive operation; combined with Brooks Camp visitor service demands, the level of staffing specified in Table 1 seems very unrealistic.

4. p.7, Table 2. I discussed this table at length in my comments regarding the original DCP/EIS. This is the same table, and the same comments apply here.

5. p. 7, par. 3. I think that the proposed seasonal limitations on human activities would help reduce bear-human conflicts along the river. It would be important to have a catch-and-release fishery to avoid any temptation of visitors to retain fish caught in the open area above the falls; transport of such fish could result in undesirable human-bear interactions.

36g

6. p.7, par. 3. As I indicated in my comments on the DCP/EIS, until recently (1992) the lodge closing date was 10 September. This date was identified by Troyer (1980) and researchers since that time, as the typical date when autumn bear use of the river increases dramatically. To preserve bear access, this date is the very latest that Brooks Camp should be in operation. It has been clearly demonstrated that later closing of the lodge has a significant impact on bear access to Brooks River (Olson et al. 1994). Further, it should be recognized that although closing the facilities to visitors results in a substantial reduction in human activity, appreciable air traffic, etc. continues for at least 10 days after lodge closure as the facilities are winterized.

36h

I do think that some progress has been made in the development of this alternative towards balancing management concerns between the July and fall bear use periods. That said, I reiterate the significance of the area to the local bear population during both July and during the fall. Between 1988-1992, the river was used by more different bears during the fall than during July (see all reports by Olson et al., Olson, and Olson and Squibb); however, I would not characterize the difference as "...much fewer bears..." (penultimate sentence in the paragraph). Access to the river during July is important to bears because the Brooks River migration provides bears in that area their earliest access to salmon, and these migrating salmon are at their peak caloric content. Access to the river during the fall is important to bears because it has salmon available later into the fall than any other stream in the area, the closest possible alternative source of salmon during late fall being the Savonoski River, and the river's size and distribution of potential fishing sites permits a large number of bears to simultaneously forage there in preparation for denning. This kind of biological information and biological perspective are lacking in the DCP/EIS and DCP/EIS supplement.

36i

7. p. 15, bear viewing platforms. I note that a cutbank platform is not a part of this alternative (as compared to alternative 2). This is a great improvement over that previous proposal for Alternative 2, for the reasons stated in my comments submitted regarding the original DCP/EIS.

Page 2

## RESPONSES

36e. See responses 30j and 30k to comments on draft DCP/EIS. The number of day users in the proposed action has been reduced to a maximum of 85 in July and 50 in September. The NPS is confident that this number of day users represents the best possible, number in combination with the other numbers to protect the Brooks River area resources and while providing for visitor enjoyment of those resources in a way that does not have a significant negative impact on the resources.

36f. The number of staff has been increased in the proposed action to 55 during the months of June, July, and August, and to 50 during the month of September.

36g. See response 31m to comment on draft DCP/EIS.

36h. The significance of the Brooks River area to the local bear population during both July and the fall is made clear in the DCP/EIS (see "Part Two: Alternatives, Including the Proposed Action" — "Actions Common to All Alternatives, Resource Management" section). Also see response 31b to comment on draft DCP/EIS.

36i. The proposed action has been revised in the final DCP/EIS to include a mid-river platform that could be built if absolutely necessary, based on LAC monitoring called for in the "Limits of Acceptable Change" section.

Olson, Tamara Brooks River DCP/EIS Supplement Comments

36j On p. 30, par. 1, it is stated that the number of people on platforms at one time will not exceed 40. Why, then, the proposals to expand the falls platform and to construct another platform at the river mouth? The 2 platforms currently in place can easily accommodate 20 people each. The falls platform expansion seems entirely unnecessary, and could well have an impact on bear use of the falls. In

36k 1992 I recorded instances of bears specifically responding to people's movements along the walkway connecting the 2 tiers of the newly constructed platform at the river mouth. A larger platform, particularly one with a connecting walkway (as described in the supplement) could be distracting or disruptive for fishing bears or bears trying to gain access to the falls. I also think that an expansion of

36l the falls platform would make the site far too comfortable, and consequently, people would be even less inclined to stay a short while, then move on. The

36m present location of the falls platform is unnecessarily close to the river bank and falls; I believe it would be beneficial for bears using the falls and for management of human-bear interactions to move the falls platform back away from the river bank. I do not understand why handicap-accessibility is an issue for

36n the falls platform. The trail to the falls would require major upgrades to allow persons who would use such access to reach the platform in the first place (I'm personally aware of at least 1 case where someone attempted to reach the falls in a wheelchair but could not negotiate the trail and ended up sitting alone in the woods waiting for companions to return from the platform); safety could still be an issue even if such major upgrades were made.

36o I am unclear as to the structure of the proposed boardwalk that would connect the already built platform near the river mouth with a new platform near the spit at the mouth. It seems that such a boardwalk could interfere with bear movements along that side of the river.

36p 8. p. 17, Resource Management. There is much attention paid in this supplement and in the original DCP/EIS to human/bear encounters, as compared to impacts on bears. As I indicated earlier, the standards listed in Table 2 are simply not acceptable measures of resource conditions, for the reasons summarized in these comments and my more detailed comments submitted regarding the original DCP/EIS.

9. p. 18, Phasing Schedule. If construction were to occur during the summer-fall months, and continued visitation occurs, there could well be major impacts to bear access to the river for more than a few years; impacts to other wildlife, particularly waterfowl, could also be significant. Therefore, more details should be provided in this section.

36q 10. p. 28, Impacts to Fish and Wildlife. This section mentions perceived benefits but does not address potentially major construction impacts. Given the current political climate and budgetary constraints, as well as logistical constraints, it seems likely that the construction required to implement the described alternative would occur over a number of years, adding a major amount of impact to an area already heavily affected by human use. Realistically, even without bureaucratic and budgetary constraints, this proposal involves a considerable amount of construction that would have to be extended over a number of seasons. How many seasons would it require to accomplish construction of the new site, remove facilities at the old site, and rehabilitate the old site? This proposal runs the clear risk (exemplified at Yellowstone NP) of adding new developments while removing none.

Page 3

36j. The statement referred to has been corrected. The numbers should have reflected the standards developed for the "number of people" indicator. The number of people at one time on the falls platform would not exceed 40, while the number of people at one time on the narrows and river mouth platforms would not exceed 30 and 15, respectively. Also see response 30f to comment on draft DCP/EIS.

36k. See response 26g to comment on supplement to draft DCP/EIS.

36l. Crowding as a method of keeping visitors from prolonging their stay on a platform is not the answer to providing a quality visitor experience in the Brooks River area (see "Part One: Purpose of and Need for the Plan" — "Brooks River Area Significant Resource Statements" and "Desired Futures for the Brooks River Area" sections). The design of the platform and the more structured visitor management system would both account for the need to keep visitors moving if others are waiting to access the platform.

36m. The National Park Service agrees and would consider this aspect in the redesign of the platform.

36n. The statement referred to in the text is incorrect and has been revised. The Park Service would continue to comply with all laws and regulations governing handicap accessibility of facilities and programs, but this does not necessitate making the Falls platform accessible to visitors using wheelchairs. Also see response 30f to comment on draft DCP/EIS.

36o. See response 26j to comment on supplement to draft DCP/EIS.

36p. See response 20a to comment on draft DCP/EIS.

36q. See response 21d to comment on supplement to draft DCP/EIS. This should reduce impacts on bears from construction of development. Timing and duration of the construction, beyond phasing, would be detailed in the construction contract and is beyond the level of detail for this DCP/EIS. See response 31l to comment on draft DCP/EIS.

Olson, Tamara Brooks River DCP/EIS Supplement Comments

36r

The assertion that a greater number of nonhabituated bears would be attracted to the lower river under this proposal is tenuous at best. My observations of avoidance reactions of nonhabituated bears to even a few people on the lower river platform or on the ground suggest that this statement should be heavily qualified and not simply stated as fact. There simply are no data to support it. Nonhabituated adults probably tolerate people at the falls platform, albeit from a distance by using the north side of the falls and river, because the falls is such a highly attractive place for bears from an energetic standpoint. Whether bears will adjust to people on platforms in the lower river, and consequently increase their use, is unknown.

36s

11. p. 30, par. 4, last sentence. I don't understand the reference to "aggressive bears." I'm not aware of any data that suggest that many aggressive bears use Brooks River, or that people need an "escape hatch" at that particular spot. People sometimes do get surprised by bears while fishing out on the spit at the river mouth, typically because they are concentrating on fishing and are not looking around. I would not characterize those situations as involving "aggressive bears."

36t

12. Table 5 (pp.34-35). There is no mention of construction impacts to bears or other wildlife. As mentioned previously, this proposal involves a significant amount of construction that would likely occur over a number of seasons. These impacts merit specific mention.

III. Literature Cited


Olson, T. L. 1993. Resource partitioning among brown bears at Brooks River in Katmai National Park and Preserve, Alaska. M.S. Thesis, Utah State Univ., Logan, 159pp.

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_____, _____, and S. F. Fitkin. 1990. Brown bear behavior and human activity at salmon streams in Katmai National Park, Alaska. Final Rep. Natl. Park Serv. Contract A-9700-7-8028. Utah State Univ., Logan. 123pp.

_____, _____, and R. C. Squibb. 1994. The effects of increasing human activity in brown bear use of an Alaskan river. In review, *Biolog. Conserv., Nov.* 1994. 38pp.

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Troyer, W. 1980. Distributions and densities of brown bear use on various streams in Katmai National Monument. Natl. Park Serv., Alas. Reg. Office, Anchorage. 15pp. + figs.




36r. See response 31y to comment on draft DCP/EIS.

36s. The statement has been revised to read: "The third bear-viewing platform established at the river mouth would provide fishermen with a place to retreat for safety when bears are too close."

36t. See response 1e to comment on draft DCP/EIS.

[redacted]
August 2, 1995

Superintendent
Katmai National Park and Preserve
Post Office Box 7
King Salmon, AK 99613

Dear Sir or Madam,

I received the May 1995 Supplement to the Draft Plan for Katmai. It is clear that considerable time and effort have gone into this plan.

I have two serious concerns. First, the inncreased day use and the desire to provide a wilderness experience. It was my observation at Katmai that more often than not, day users had a "zoo without cages" experence, and had little interest in or concern for habitat or wilderness environment. Be careful that Katmai doesn't become a "live" Disney experience. I recognize your desire to serve as many visitors as possible, just be extremely sensitive to this issue.

37a My second concern is of a different nature but equally serious. It appears that significant input was received and incorporated from a group who believe a satisfying and significant Katmai experience (including bear observation) is not compatible with modern amenities such a in-cabin bathrooms. Does this group believe that someone who likes (or perhaps needs) convenient plumbing is not supportive of the national parks or wilderness? This attitude is selfish, and narrow. Will people really use bathrooms less if only a community facility if provided, thereby saving water and sewerage facilities? It also appears to be discriminatory toward women. (Surely you as well as I know that after dark men willurinate over the cabin railing or in the tall grass beside the cabin. This isn't very sanitary.) I would think you would want to decrease, not increase the numbers prowling around late at night. I really was appalled to read about this step backward in sanitation and comfort, when new facilities are being constructed. There are community bathrooms in the campground.

37b The bear population increased along with Katmai visitor attendance. This supports the notion ahat current or increased visitor numbers (cabin and campers) are appropriate. Keep facilities appropriate for the 21st century. and all age groups. Have log cabins if you choose, but for goodness sake provide bathroom facilities in each!

Sincerely,
Janet L. Pfeifer
Janet L. Pfeifer

37a. The proposed action calls for bathrooms with toilets and wash basins in all housing units for both lodging guests and staff.

37b. The stated implication is incorrect. The increase of the regional and local bear populations cannot be correlated with increased visitor numbers. Bear numbers have increased due to the overall effect of regulated protection and possibly due to other biological factors (food availability, winter conditions, etc.). Visitor numbers have risen as a result of the increased promotion of Alaska as a tourist destination and because, until now, there have been no limits on visitor use at Brooks River.

## COMMENTS

7/31/95

Ladies & Gentlemen:
We recently came back from a tour of parts of Alaska. One of the places we visited was Brooks Lodge in the Katmai National Park. Our experience viewing the fishing bears was memorable. However, we are bothered by the "people" intrusion.
First, we wholeheartedly support the plan to move Brooks Lodge onto the other side of the river. It's present location appears to be in the natural path that the bears take between the river and the lake. The less intrusion into their habitat the better.

38a

Second, we believe that an over-head structure should be built between the main path and the viewing platforms at the falls. There were many paths that the bears take in this area

AUG 4 1995

## RESPONSES

38a. See response 24b to comment on draft DCP/EIS.

and people intrusion should be limited.

38b

Third, it was our understanding that because of a number of charges of bears on that path, the rangers organized an escorted group walk to the viewing platform. If this was an unplanned for function, then we are sure that the rangers had to forego other duties to do the escorting. If this is so, then we urge that more rangers be assigned to this park to alleviate the pressure on the rangers.

We think the rangers and the "volunteers" are doing an exceptional job and thank them for their dedication. It certainly enhanced our visit.

We were there from 7/14 through 7/17 on a Travel Wild tour.

Very truly yours,
Donna & Mark Rand

[redacted]

cc: Superintendent
Katmai National Park
Nat'l Park & Conservation Assn

38b. See response 36f to comment on supplement to draft DCP/EIS.

August 9, 1995

Superintendent
Katmai National Park and Preserve
P.O. Box 7
King Salmon, Alaska 99613

Reference: Draft Development Concept Plan for
Brooks River Area

Dear Superintendent:

I have visited the Brooks River area five times in the past ten years. This is one of my favorite places in Alaska, and I plan to visit Brooks many times in the future. I am very concerned about some of the proposals for changes to this area. With this in mind, following are my comments on the Draft Development Concept Plan and Supplement.

1. I believe that, with one exception, there are no changes that are needed at Brooks River. The plan states that there have been increasing numbers of undesirable bear or human behavior incidents in the past few years, to the point that there were an average of four per day in 1991. In the times that I have visited Brooks River, I have never heard of this many incidents. I have seen many instances where people were in close proximity to bears, and the bears have never posed a threat to the individuals.

2. One of the nicest things about Brooks River is that campers and lodge visitors can live right in the same area as the bears. It is very enjoyable to be sitting in the campground and the be able to watch bears walking by. I agree, occasionally there is a problem bear that may tear up a tent. Moving the campground would not eliminate this possibility. I would rather live with the higher chance of this happening than to miss the current bear viewing opportunities at the current campground location.

3. I believe that day use has really gotten out of hand at Brooks River. When I was at Brooks last month there were over 200 day users per day. This resulted in over 300 people trying to find space on a 30 person platform. I fully support the efforts of the Park Service to reduce these numbers, and believe that the reduction to 60 individuals per day shown on Alternative 1. I am very opposed to Alternative 4 (Day Use Only). It is only through staying at Brooks for at least several days that a person can learn to recognize individual bears and thus learn something about bear behavior.

**IMAGE ALASKA**

4. As stated above, I am opposed to moving the campground and lodge facilities. Following are my reasons:

   a. It is too expensive. At a time when Congress is trying to cut the budget, the $15,000,000 to $20,000,000 price tag is much too high.

   b. It would ruin the visitor experience. Currently visitors can walk to the bear viewing areas when ever they want. If the campground and lodge were to be moved, to get to the viewing area would require either a much longer walk or a shuttle bus ride.

   c. There is no need to move the facilities. To date there have been no maulings at this site, an I believe that the bear/human conflict has been overrated.

39a

   d. By moving the facilities, another area will be impacted. The damage to the archeological sites at the current lodge/camp location has already occurred. What is the point of damaging another area?

In conclusion, the alternative that I prefer is a hybrid of No Action and Alternative 1. I believe that day use must be limited, and that the proposed 60 individuals per day is a fair limit. However, I do not support most of the structures that are proposed under Alternative 1. The only structures that I support are an elevated walkway through the grassy area by the falls (and if you do install this, please make it 50% wider than the walkway on the Narrows Platform) and a platform at the Oxbow. The Brooks River Area as it is now is a wonderful place. Please don't ruin it.

Sincerely,

Gary Schultz

cc: Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young

39a. The Brooks Camp facilities on the north side of the river substantially interfere with natural bear movement and bedding down patterns. Ongoing failure of old systems and the repair and maintenance of the facilities substantially threatens the rich and extensive archeological resources that lie underlie the area. These problems at the Brooks Camp development north of the river are expected to continue into the foreseeable future. Thus, the National Park Service's ability to comply with its legal resource protection mandates is significantly compromised, prompting the proposed action to remove facilities from north of the river and develop facilities on the Beaver Pond terrace where these impacts would not be expected or would be minimal.

D.G. Sobey
[redacted]
August 11, 1995

Superintendent
Katman National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Re: Supplement of the Draft Development Concept Plan
Environmental Impact Statement

Dear Sir/Madam:

With respect to the supplement to the draft development concept plan/environmental impact statement, Brooks River area Katmai (otherwise known as alternative 5) I have the following comments:

I fully support moving the current facilities from their current location to the Beaver Pond area. I also fully support making King Salmon the focus for visitor orientation and access to Katmai National Park. I believe that if more information about neighboring wildlife refuges was available more people would visit these areas potentially lowering the pressure, on Brooks River. There currently is little information locally about other areas surrounding Katmai and the ways to access these areas. I also agree with the catch and release policy for fishing.

40a However, I do not agree with what appears to be a rigid approach to managing visitors. I agree that it would be helpful that all visitors select specific time periods when they wish to go to the bear viewing platforms. However there should not be a requirement to have be led to the platforms. I believe that to truly experience the natural beauty of the area walking along the trails is a high value experience that cannot be experienced in a group of people with the attendant chatter and questions, etc. There are very few places in the world where one can truly feel nature and wilderness in solitude without the intrusion of human activity. Katmai is one of these places and people who want to experience this should be allowed to do so. If you do not allow this flexibility you would be basically turning Brooks River into a high volume (in terms of human visitation) zoo. This would diminish the experience to a level slightly above going to an urban amusement park with shuttles, guides and noise.



40a. These suggestions have merit for operational purposes and would be considered during subsequent development of the structured visitor management system.

I recommend that the controlling factor be the amount of people on the viewing platforms at any one time. People should be allowed to select the times they wish to go. There also should be a guide/interpreter/host on the platform that manages the people on and off the platform. There also should be flexibility to allow people to stay longer than their allotted time if fewer people come to the platforms.

On days when the day use visitation is predominantly fisherman this would allow for greater time to be spent bear watching by the visitors who are photographers and/or wildlife enthusiasts.

In closing I support alternative 5 except for the proposed management for visitors. More work needs to be done to define this process to allow flexibility of the system to ensure that Brooks River does not become an unnatural high volume, experience typical of tourist attractions in cities.

Thank you for this opportunity to comment, I am returning to Brooks River in September 1995 for my 10th visit. It is such a special place that I hope the final plan will achieve the right balance to keep it special for many generations to come.

Sincerely,

D.G. Sobey

[redacted]

10 August 1995

Superintendent Bill Pierce
Katmai National Park and Preserve
P.O. Box 7
King Salmon, AK 99613

Dear Superintendent Pierce:

Attached are my review comments on the May 1995 Supplement to the Draft DCP/EIS for the Brooks River Area. I appreciate your consideration of them and you incorporating them into the general public review of the Draft and Supplement.

Sincerely,

Ronald C. Squibb

REVIEW COMMENTS ON:
MAY 1995 SUPPLEMENT TO
THE DRAFT DEVELOPMENT CONCEPT PLAN AND ENVIRONMENTAL IMPACT
STATEMENT FOR THE BROOKS RIVER AREA, KATMAI NP/P, ALASKA

by
Ronald C. Squibb
[redacted]

10 August 1995

These comments are in addition to my comments dated 5 June 1994 on the original draft DCP/EIS of April 1994 which the Katmai NP/P office received in June 1994.

41a I do not clearly understand whether this Alternative 5 is intended to be the National Park Service's new proposal (preferred alternative). I presume that Alternative 2 continues to be the NPS preferred alternative and that this Alternative 5 is just another of the other alternatives.

I praise the NPS for addressing two critically important management problems in this alternative. Closing the lower river to fishing and human access, and implementing a strict schedule of rotation through the viewing platforms would accomplish a great deal towards providing bears access to the river and towards reducing the visitors' perceptions of crowding,

41b respectively. Also, dropping the idea of a viewing platform in the cutbank will provide better access for non-habituated females with vulnerable cubs to a less dangerous area fishing area.

41c I suggest changing the fall closure dates for the lower river to all of September and October. Non-habituated bears would use the river in early September if allowed access. Closing the river on September 1 would somewhat compensate for the extension of the lodge closing date to 17 September.

41d I did not find mention of the lodge closing date in this Supplement. The public cannot adequately understand the impacts of this alternative unless that date is stated.

41e I do not believe that Alternative 5 is viable given the way that the daily use limit is divided among components in Table 1. Decreases in overnight users might reduce impacts by limiting use near dusk and dawn; however, the counter argument has been made that overnight users better learn the rules. However, the increases in day use and in overall visitor use will result in a more complex problem of coordinating and scheduling visitors to platforms. This will require more staff. However -- a major weakness -- increases in day use were derived primarily from decreases in staff. With fewer staff, it will not be possible to accomplish the program.

41a. The proposed action is the alternative that the National Park Service proposes to actually put into action, and technically is no different from its preferred alternative. In the "Record of Decision" the National Park Service must indicate the environmentally preferred alternative, which may be different from the proposed action that they will implement.

41b. See response 36i to comment on the supplement to the draft DCP/EIS.

41c. Under the proposed action, bears would have unlimited access to the river throughout the summer, not just in September, because of the removal of facilities from the north side. With no lodge on the north side of the river (proposed action, alternatives 2 and 5), the need for closing the river on September 1 would also be a moot point (see response 31m to comment on draft DCP/EIS, regarding lodge closing date).

41d. Establishing the lodge closing date is beyond the level of detail for this DCP/EIS. That is established as part of the concession contracting process.

41e. New visitor management strategies will be employed when peak visitation occurs.

## COMMENTS

Squibb, Comments on Brooks R. Supplement to DCP/EIS Page 2

Statements that trips to the platforms will be guided (p. 3, ¶ 6) imply a commitment to a large staff, yet the staffing is reduced from 70 in Alt. 2 to 45 in this alternative. For the public to understand how this alternative would be feasible requires that some detail be given in the plan to the work assignments and duties of the reduced staff.

41f

Dependence on commercial guides to give "visitor information and orientations" (p.4, ¶ 2) and to keep their clients on the proper schedule to and from the platforms will not work because guides will serve their own interests by giving their clients whatever experience they want, despite schedules and rules. Further, giving orientations to visitors travelling to Brooks aboard boats on plane or in floatplanes (p. 3) would be totally impractical because of the noise. Also, air taxies cannot afford to have a seat taken by an interpreter -- the pilot is too busy with take off, landing, and communication to be involved in any substantial interpretation.

41g

If the NPS and concessioner cannot afford to move the lodge, which is likely in the current fiscal environment, then the NPS needs an alternative that would combine the strict scheduling of use and the fishing closures of this alternative (#5) with substantial reductions in use, e.g. 180 people on the ground per day. Given the budget reduction initiatives in Congress, I believe that such an alternative must be part of the final DCP and that it be designated as the chosen alternative in the event that the initially chosen alternative is not funded within two years. Otherwise, the uncontrolled growth of use at Brooks River will continue until the resource and the visitors' experience is completely ruined.

41h

Regarding Bear Ecology and Indicators and Standards

I do not agree that moving the lodge a mile from the river will be an end to the problems of bears in camp. Certainly, it will reduce these problems because salmon carcasses tend to wash north out of the river. Nevertheless, a mile is a very short distance to a bear. Rather, I see moving the lodge to the Beaver Pond terrace as a test of this hypothesis. Given that subadults and small to medium sized females with young, especially cubs of the year, avoid larger bears, and given that bears tend to prefer areas without people, then vulnerable and less competitive bears (subadults and females with young) will use habitat occupied by people in order to avoid the larger bears that are elsewhere avoiding people. That is to say, I think that there is a reasonable chance that subadults and small-medium females with young will use the area surrounding the new lodge as a bedding area, and the habituation phenomena will continue as at present.

Also note that several bears, including non-habituated females with young, have used areas off the beach south of the mouth of the river as bedding areas over the years.

## RESPONSES

41f. The mandatory bear safety message would continue to be administered by NPS staff. Some interpretation and dissemination of information could be provided during transit to the Brooks River area by suppliers of transportation.

41g. Under the proposed action, river corridor management concepts would be implemented soon after publication of the "Record of Decision" in the *Federal Register*. Development of implementation plan for use limits would also begin.

41h. With regard to bears, the primary objective of moving from north of the river is to remove human interference with natural bear movement patterns. A secondary objective is to reduce bear/human interactions in the developed area.

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41i

Table 2: Indicators and Standards (p. 7), states standards for number of fish or food stealing incidents as 0 for adolescent bears and 1-2 for adult bears. I presume that this is a typo, that the classes are reversed. Between 1989 and 1991 at Brooks River, we observed that subadults were involved significantly more than expected in these types of incidents and adults significantly less. Similarly, in my four seasons on Kodiak, the vast majority of these types of incidents on the Ayakulik and Karluk Rivers have involved subadults.

41j

Human/bear incidents are a poor measure of resource health, both as indicators unto themselves and as a repeatable and accurate estimate when attained by an opportunistic sampling scheme as practiced at Brooks River from 1989 - 1993, the sampling design that I presume was intended in the DCP. Please see my comments on the original draft of April 1994 for more details.

Incidents are a poor indicator because a single individual bear can drive the indicator over the standard even though the other 25 to 35 bears using Brooks River are all well behaved. Further, the behavior that results in the given type of incident may have been learned elsewhere or be inherent in the individual. In other words, the predisposition of the bear to emit the undesirable behavior could well be completely independent of the NPS management of Brooks River. NPS managers will likely have no way of knowing the bear's history. It is reasonable to foresee circumstances where your standards are exceeded because of circumstances totally unrelated to Brooks management. Are you going to change management over something that present management did not cause?

Consider the case of the female with one yearling that charged people 15 times during 1991; there were several charges in both July and September. There were no reports of this female charging anyone when she was single in 1988 and 1989, there were no reports of this female charging anyone when she had a cub of the year in 1990, and this female was not seen on the river in 1992. In 1991 this female charged people at the Falls platform, on the Falls trail, on the main road, and on the river bank -- basically everywhere. This was basically a random event completely unrelated to the range of management options available to the NPS. It also told the NPS very little about whether it was managing the resource such that bears had reasonable access to the resources that they needed.

Consider subadults getting food or fish from people. Subadults spend most of their waking time looking for opportunities to get food. No matter how perfect your management design, subadults will learn to exploit the opportunities that result from human error. A subadult may learn a way to get food from people elsewhere in the park or outside the park where food is less securely stored, then apply that skill at Brooks River. The

41i. The standards remain as presented; there is no typographical error. The target for adolescents would be zero fish or food stealing incidents, because although the National Park Service would accept a few such incidents involving already-trained adults, it would not tolerate similar incidents involving adolescents.

41j. See responses 20c and 21c to comments on draft DCP/EIS. Limits of acceptable change allows managers the flexibility to take any of a number of actions to bring an area within standard. It is not the purpose of this DCP/EIS to describe every possible action management might take to meet the described standards; however, implementation of the proposed use limits and new facility development are actions that would help management meet the standards.

## COMMENTS

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subadult may take food and fish from people at Brooks several times in one summer, then not be back or outgrow the habit by the next summer, as was the case with subadults at Brooks in 1989 and 1992-1993. Again, the standards being exceeded would be almost unrelated to the management scheme and it would not reflect much about the health of the resource.

The alternative does not mention what management actions would be taken when standards are exceeded, as it should. Nevertheless, should long term management be adjusted because of one subadult that may be gone or grow out of the undesirable behavior by the next year?

41k Listing the indicators and standards is not sufficient. The sampling scheme that will be used to measure the indicators should be described as part of a monitoring program. Paragraph 2, page 17, under Resource Management contains no substantive information: "During implementation of this alternative, a scientific, cultural, and natural resource monitoring program would be developed to evaluate the impacts of this alternative. Adjustments to ensure resource protection would be made based on the data collected, and appropriate mitigating measures would be implemented as necessary." (Supplement to Draft DCP, p. 17) You're going to develop a monitoring plan during implementation to evaluate the impacts of an already ongoing major construction project! How will you determine what the impacts will be when you never measured what was there before implementation began? Is this in compliance with NEPA? How can the public evaluate the plan if they do not know how, or if, you are going to monitor impacts?

The desired future conditions of the bear cohort that will use Brooks River under this Alternative is not addressed in biologically meaningful terms. There is no mention of the number of bears or their composition by sex, age, or habituation. The health of the cohort of bears cannot be addressed by counting bear incidents. Zero incidents does not equate with healthy bear ecology. Zero incidents could equate with zero bears!

41l The cohort of bears that uses Brooks River should be sufficiently insulated by the size of the park from factors beyond the control of NPS management that minimum numbers and, certainly, minimum proportions by age, sex, and habituation criteria can be defined.

I propose that NPS use indicators based on the composition of the bears using the river. The composition of the bears using Brooks River should be representative of the composition of the bears using the Naknek drainage as a whole, both because any difference would represent an impact to the bears of the drainage, and because visitors should see a representative cohort of bears in order to properly understand what a natural and healthy brown bear population is.

## RESPONSES

41k. The statement quoted by the respondent has been deleted from the text. The impacts of the proposed action (and other alternatives), including construction of proposed facilities, are evaluated in "Part Four: Environmental Consequences" of the DCP/EIS. A water quality monitoring program would be conducted as noted in the text, as well as monitoring of the established visitor use limits and of bear utilization and movement in the Brooks River area.

41l. See responses 20a and 32b to comments on draft DCP/EIS.

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Some examples of reasonable indicators follow:
1) the proportion and/or number of non-habituated large males using the river;
2) the proportion and/or number of non-habituated females with cubs of the year using the river;
3) the proportion and/or number of subadults using the river;
4) the proportion of bear use (measured in units of time) on the river by the above classes of bears.
The standards should differ between July and fall. The proportion accounted for by subadults should not become too large; the proportions of non-habituated large males and females with COY should not become too small. The total proportions by age and sex classes could be compared with those statistics for the park's bear population as estimated by existing population data.

A simple monitoring program might have intensive monitoring every five years, after Olson et al.'s methods of 1988 to 1992, to estimate indicator (4) type data. Indicator (1-3) type data could be gathered every year by assigning three rangers with regular platform duty the tasks of identifying and classifying all individual bears using the river and of corroborating the data among themselves and with photographic documentation.

Indicators must measure, and standards must be representative of, a natural and healthy population. Further, the DCP should specifically state what management actions will be precipitated if the standards are exceeded. Otherwise, the reader has no way of understanding how the system will work.

Other Inconsistencies

41m Why propose to improve "interpretive programs for archeological sites immediately adjacent to the river" (p. 8, ¶ 2) when one of the plan's central elements is keeping people on platforms and excluding anglers from the lower river?

41n Why does archeological oversight for the no action alternative cost $1,000,000, i.e. five times more than archeological oversight for Alternatives 2 and 5 (Table 3) which propose removing old facilities from the top of a major archeological site and building a new lodge on a site with unknown cultural resources? Curiously, that rounds the total NPS cost out to be approximately equal among all alternatives. Why is that so?

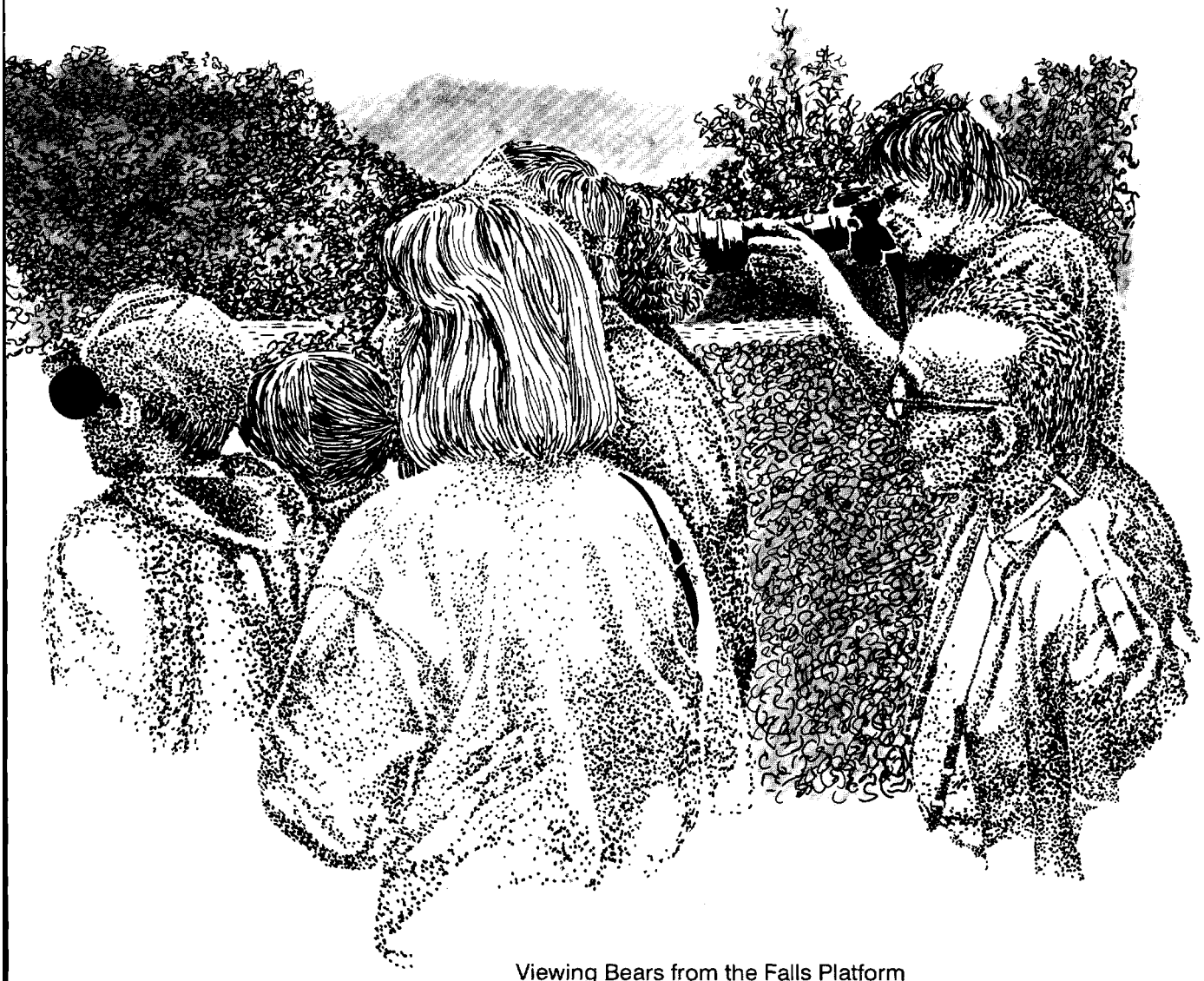
41o Am I wrong in understanding that NPS staff will eat meals in the lodge with the lodge staff? If they are required to do so, I see this plan as making their jobs of enforcing rules that the concessioner must follow more difficult.

41m. The words "immediately adjacent to the river" have been deleted from the text of the proposed action. The respondent should also note that one of the development concept plan's central elements is not "excluding anglers from the lower river." River closures would occur only in July and from mid-September through October in the presence of high bear use and would apply to all visitors, not exclusively anglers. Also see response 2c to comment on supplement to draft DCP/EIS.

41n. Archeological oversight under the no-action alternative is substantial and intense because all current facilities and activities continue on the north side of the river where the archeological resources are common and near the surface where many maintenance and repair activities can affect those resources. Thus, archeological oversight under this alternative is nearly constant during the spring, summer, and fall seasons. Under alternatives 2 and 5, removal of facilities from the north side of the river would involve no digging up of utility lines or other facilities. Utilities would simply be capped off just below the surface. The new development sites under alternatives 2 and 5 (the proposed action) do not have the cultural resources that occur north of the river, requiring minimal oversight during construction and subsequent maintenance and repair.

41o. Under the proposed action NPS and concession staff would have food preparation facilities in their living quarters.

# PART SIX:
# APPENDIXES
# REFERENCES
# PREPARERS
# INDEX



Viewing Bears from the Falls Platform

## APPENDIX A: ESTIMATED CONSTRUCTION COSTS

### TABLE A-1 – NO-ACTION ALTERNATIVE

| NPS Costs | Gross Construction Costs |
|---|---|
| Visitor center | $ 7,000 |
| Campground | 11,000 |
| Maintenance facilities | 21,000 |
| Bear viewing platforms | 105,000 |
| Replace utilities | 568,000 |
| Archeological oversight | 1,024,000 |
| Research bay wayside | 11,000 |
| Margot Falls overlook improvements | 53,000 |
| Three Forks overlook improvements | 84,000 |
| **Total Gross Construction Costs**[1] | $1,884,000 |
| **Total Planning & Design Costs** | 360,000 |
| **Total NPS Costs** | **$2,244,000** |
| **Concessioner Costs** | |
| Lodge and dining facility | $265,000 |
| **Total Concessioner Costs** | **$265,000** |

1. Includes construction costs plus construction supervision and contingencies.

## TABLE A-2: ALTERNATIVE 1

| NPS Costs | Gross Construction Costs |
|---|---|
| Visitor center | $ 809,000 |
| Eskimo barabara | 53,000 |
| Campground | 47,000 |
| Employee housing | 3,707,000 |
| Shower/laundry & community center | 410,000 |
| Maintenance facilities | 1,878,000 |
| Barge and boat dock & tie-downs | 158,000 |
| Elevated bridge and boardwalk | 478,000 |
| Bear viewing platforms | 105,000 |
| River mouth overlook | 26,000 |
| Trails | 39,000 |
| Replace utilities | 568,000 |
| Develop new utilities | 1,819,000 |
| Archeological oversight | 389,000 |
| Remove Lake Brooks facilities | 75,000 |
| Site preparation | 1,749,000 |
| Road widening | 20,000 |
| Research bay wayside | 11,000 |
| Margot Falls overlook improvements | 53,000 |
| Three Forks overlook improvements | 84,000 |
| **Total Gross Construction Costs**[1] | $12,478,000 |
| **Total Planning & Design Costs** | 2,381,000 |
| **Total NPS Costs** | **$14,859,000** |
| **Concessioner Costs** | |
| Lodge and dining facility | $265,000 |
| **Total Concessioner Costs** | **$265,000** |

1. Includes construction costs plus construction supervision and contingencies.

## TABLE A-3: ALTERNATIVE 2

| NPS Costs | Gross Construction Costs |
|---|---|
| Visitor center | $ 809,000 |
| Contact stations | 294,000 |
| Ranger station | 121,000 |
| Eskimo barabara | 89,000 |
| Campground | 111,000 |
| Employee housing | 4,411,000 |
| Shower/laundry & community center | 410,000 |
| Maintenance facilities | 1,878,000 |
| Research facility | 700,000 |
| Barge and boat dock & tie-downs | 236,000 |
| Bear viewing platforms | 210,000 |
| River mouth overlook | 26,000 |
| Trails | 541,000 |
| Fish cleaning building | 67,000 |
| Develop new utilities | 3,523,000 |
| Remove Brooks camp facilities | 537,000 |
| Archeological oversight | 210,000 |
| Remove Lake Brooks facilities | 107,000 |
| Site preparation | 6,122,000 |
| Road widening | 154,000 |
| New road construction | 1,264,000 |
| Research bay wayside | 11,000 |
| Margot Falls overlook improvements | 53,000 |
| Three Forks overlook improvements | 84,000 |
| Shuttle and support | 300,000 |
| **Total Gross Construction Costs**[1] | $22,268,000 |
| **Total Planning & Design Costs** | 4,250,000 |
| **Total NPS Costs** | **$26,518,000** |

| Concessioner Costs | |
|---|---|
| Lodge and dining facility | $1,176,000 |
| Guest cabins | 1,071,000 |
| Employee housing | 756,000 |
| **Total Concessioner Costs** | **$3,003,000** |

1. Includes construction costs plus construction supervision and contingencies.

## TABLE A-4: ALTERNATIVE 3

| NPS Costs | Gross Construction Costs |
|---|---|
| Visitor center | $ 1,011,000 |
| Contact stations | 294,000 |
| Ranger station | 121,000 |
| Eskimo barabara | 89,000 |
| Campground | 111,000 |
| Employee housing | 4,411,000 |
| Shower/laundry & community center | 410,000 |
| Maintenance facilities | 1,878,000 |
| Research facility | 700,000 |
| Barge and boat dock & tie-downs | 236,000 |
| Bear viewing platforms | 210,000 |
| River mouth overlook | 26,000 |
| Trails | 580,000 |
| Fish cleaning building | 67,000 |
| Develop new utilities | 3,691,000 |
| Remove Brooks camp facilities | 537,000 |
| Archeological oversight | 231,000 |
| Remove Lake Brooks facilities | 107,000 |
| Site preparation | 6,238,000 |
| Road widening | 154,000 |
| New road construction | 1,806,000 |
| Research bay wayside | 11,000 |
| Margot Falls overlook improvements | 53,000 |
| Three Forks overlook improvements | 84,000 |
| Shuttle and support | 350,000 |
| **Total Gross Construction Costs**[1] | $23,406,000 |
| **Total Planning & Design Costs** | 4,467,000 |
| **Total NPS Costs** | **$27,873,000** |

| Concessioner Costs | |
|---|---|
| Lodge and dining facility | $1,176,000 |
| Guest cabins | 1,071,000 |
| Employee housing | 756,000 |
| **Total Concessioner Costs** | **$3,003,000** |

1. Includes construction costs plus construction supervision and contingencies.

## TABLE A-5: ALTERNATIVE 4

| NPS Costs | Gross Construction Costs |
|---|---|
| Visitor station | $ 315,000 |
| Contact stations | 184,000 |
| Eskimo barabara | 89,000 |
| Employee housing | 2,140,000 |
| Shower/laundry & community center | 410,000 |
| Maintenance facilities | 1,695,000 |
| Research facility | 700,000 |
| Barge and boat dock & tie-downs | 236,000 |
| Elevated bridge and boardwalk | 273,000 |
| Bear viewing platforms | 210,000 |
| Trails | 39,000 |
| Fish cleaning building | 67,000 |
| Develop new utilities | 2,214,000 |
| Remove Brooks camp facilities | 537,000 |
| Archeological oversight | 173,000 |
| Remove Lake Brooks facilities | 107,000 |
| Site preparation | 1,166,000 |
| Road widening | 20,000 |
| Research bay wayside | 11,000 |
| Margot Falls overlook improvements | 53,000 |
| Three Forks overlook improvements | 84,000 |
| Shuttle and support | 100,000 |
| **Total Gross Construction Costs**[1] | $10,823,000 |
| **Total Planning & Design Costs** | 2,065,000 |
| **Total NPS Costs** | **$12,888,000** |
| **Concessioner Costs** | |
| Employee housing | $142,000 |
| **Total Concessioner Costs** | **$142,000** |

1. Includes construction costs plus construction supervision and contingencies.

## TABLE A-6: ALTERNATIVE 5: PROPOSED ACTION

IMPORTANT: These cost estimates are "class C" estimates based on similar facilities constructed in Alaska (adjusted for Brooks Camp) using government contracts. The cost estimates are consistent with the scope and quality described elsewhere in this document. They describe simple facilities that are designed for summer use only with construction practices that are common in bush Alaska. The facilities would be similar in quality, appearance, and durability to those currently at Brooks Camp. The cost estimates assume that most of the construction would occur in one phase and would be done by a single contractor. To achieve these estimates, it will be critical, during the design and construction processes, to respect the criteria described above and to avoid an increase in scope. This estimate is for FY 95 construction. Escalate costs for future years at 4% per year.

| **NPS Costs** | **Gross Construction Costs** |
|---|---|
| Contact stations | $ 58,000 |
| Orientation center/ranger station | 223,000 |
| River mouth overlook | 52,000 |
| Trails | 100,000 |
| Remove Brooks camp facilities | 537,000 |
| Archeological oversight | 210,000 |
| Remove Lake Brooks facilities | 107,000 |
| **Total Gross Construction Costs[1]** | $1,287,000 |
| **Total Planning & Design Costs[2]** | 246,000 |
| **Total NPS Costs** | **$1,533,000** |

| **Shared NPS and Concessioner Costs** | |
|---|---|
| Employee rustic housing | $1,197,000 |
| Employee laundry & community center | 283,000 |
| Maintenance facilities | 390,000 |
| Barge and boat dock & tie-downs | 236,000 |
| Develop new utilities | 1,350,000 |
| Site preparation | 264,000 |
| Margot Falls overlook improvements | 53,000 |
| **Total Gross Construction Costs[1]** | $3,773,000 |
| **Total NPS Planning & Design Costs[3]** | 472,000 |
| **Total Shared NPS and Concessioner Costs[4]** | **$4,245,000** |

| **Concessioner Costs** | |
|---|---|
| Lodge/dining facility for visitors and staff | $ 655,000 |
| Lodge utility building | 330,000 |
| Guest cabins (24 with 2 beds) | 748,000 |

| | |
|---|---|
| Hostel (12 beds) | 85,000 |
| Central shower/bathroom for hostel and campground visitors | 183,000 |
| Campground including cooking shelters | 300,000 |
| Shuttle and support | 300,000 |
| **Total Concessioner Costs[4]** | **$2,601,000** |

**Partnerships/NGO Costs[5]**

| | |
|---|---|
| Bear viewing platforms (Falls) | $210,000 |
| Barabara exhibit | 89,000 |
| **Total Partnerships/NGO Costs[6]** | **$299,000** |

**FHWA Costs[7]**

| | |
|---|---|
| New road construction | $ 544,000 |
| **Total Gross Construction Costs[1]** | 544,000 |
| **Total Planning & Design Costs** | 136,000 |
| **Total FHWA Costs[6]** | **$ 680,000** |

1. Includes construction costs plus construction supervision and contingencies.

2. Includes all NPS planning and design costs. Design costs include surveys, detailed site planning, design and construction documents, and additional project compliance activities. Existing prototypical designs will be used wherever practicable. Therefore, design costs could be significantly lower than those identified in the estimate.

3. NPS policy requires that, to the extent it is economically feasible, the concessioner undertake all costs, including design costs, relating to construction of its own facilities as well as utilities, roads, parking, and similar infrastructure. Such feasibility determination has not yet been made, but will be accomplished before implementation of this plan. The costs allocation above must therefore be regarded as tentative.

4. Includes all planning, design, and construction costs. NPS policy requires that, to the extent it is economically feasible, the concessioner undertake all costs, including design costs, relating to construction of its own facilities as well as utilities, roads, parking, and similar infrastructure. Such feasibility determination has not yet been made, but will be accomplished before implementation of this plan. The costs allocation above must therefore be regarded as tentative.

5. NGO = nongovernment organizations. Examples are nonprofit organizations, philanthropic organizations, etc.

6. Includes all planning, design, and construction costs.

7. FHWA = Federal Highway Administration.

## APPENDIX B: FEDERAL CONSISTENCY DETERMINATION BROOKS RIVER AREA DEVELOPMENT CONCEPT PLAN LAKE AND PENINSULA BOROUGH, ALASKA

The Coastal Zone Management Act requires that "each federal agency activity within or outside the coastal zone that affects any land or water use or natural resource of the coastal zone shall be carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved state management programs." 16 U.S.C. § 1456(c)(1)(A).

The state of Alaska has an approved coastal zone management program, the Alaska Coastal Management Program, which includes regulations in Title 6, Chapter 50, of the Alaska Administrative Code (6 AAC 50). The Alaska Division of Governmental Coordination coordinates review of federal consistency determinations as per 6 AAC 50.020. The Alaska Coastal Policy Council promulgates standards for the Alaska Coastal Management Program in chapter 80 of Title 6 (6 AAC 80). Guidelines for District Coastal Management Programs are provided in 6 AAC 85. The Lake and Peninsula Borough has a "Public Hearing Draft Coastal Management Plan" that is expected to be approved in the winter of 1995–96. The Alaska Division of Governmental Coordination recommends that the National Park Service follow enforceable policies set forth in the Alaska Coastal Management Program and draft Lake and Peninsula Borough/Draft Coastal Management Plan (Bukovick, pers. comm.). The Alaska Coastal Management Plan "Coastal Zone Boundaries of Alaska" Map #58 for the Mt. Katmai quadrangle, shows that all lands in the vicinity of the Brooks River area development concept plan fall within the coastal zone of the Lake and Peninsula Borough.

This section details an analysis by which the National Park Service has determined that its proposed developments in the Brooks River area of Katmai National Park and Preserve would be consistent to the maximum extent practicable with the enforceable policies of the Alaska Coastal Management Program.

The National Park Service has determined that the proposed Brooks River area developments in Katmai National Park affect land or water uses or natural resources of Alaska in the following manner:

- Public and administrative support facilities for access to an important recreational and wildlife viewing area would be relocated and improved to minimize adverse impacts on natural and cultural resources.
- Footbridges and water crossings at Brooks River would be removed, thereby reducing human disruption to aquatic habitat significant for salmon reproduction and brown bear feeding.
- Administrative and visitor facilities would be removed from a highly sensitive archeological area.

The National Park Service has evaluated the following relevant enforceable policies of the Alaska Coastal Management Program and Lake and Peninsula Borough "Public Hearing Draft Coastal Management Plan" where it is more specific or restrictive than the Alaska Coastal Management Plan:

### ALASKA COASTAL MANAGEMENT PLAN USES AND ACTIVITIES

6 AAC 80.040. COASTAL DEVELOPMENT.

(a) In planning for and approving development in coastal areas, districts and state agencies shall give in the following order, priority to:
(1) water-dependent uses and activities;
(2) water-related uses and activities: and

(3) uses and activities which are neither water-dependent nor water-related for which there is no feasible and prudent inland alternative to meet the public need for the use or activity.

*The Brooks River DCP/EIS calls for alternative facilities and access to the Brooks River area in Katmai National Park, which is accessible only by floatplane or boat. The entire project area occurs within the coastal boundary of the Lake and Peninsula Borough, which cannot be avoided given the alternatives presented. Primary activities in the area include wildlife viewing, sport fishing, sight-seeing and boating, all of which are water-dependent to some degree.*

6 AAC 80.060. RECREATION:

(a) Districts shall designate areas for recreational use. Criteria for designation of areas of recreational use are:

(1) the area receives significant use by persons engaging in recreational pursuits or is a major tourist destination; or

(2) the area has potential for high quality recreational use because of physical, biological, or cultural features.

*The Brooks River area in Katmai National Park has become a major tourist attraction in the borough for wildlife viewing, especially of brown bears feeding on red salmon. The Brooks River Archeological District, a property on the National Register of Historic Places, is now also designated a national historic landmark. The area also provides world-class sportfishing for salmon and trophy-size rainbow trout.*

(b) Districts and state agencies shall give high priority to maintaining and, where appropriate, increasing public access to coastal water.

*The proposed NPS developments at the Brooks River area would maintain public access to the Brooks River area. The development concept plan calls for development of a new dock or pier to the south of the Brooks River outlet that would eliminate the present docking area inside the mouth of the Brooks River.*

6 AAC 80.130. HABITATS.

(a) Habitats in the coastal area that are subject to the Alaska coastal management program include:

(3) wetlands and tideflats:

(7) rivers, streams, and lakes; and

(8) important upland habitat.

(b) The habitats contained in (a) of this section must be managed so as to maintain or enhance the biological, physical, and chemical characteristics of the habitat which contributes to its capacity to support living resources.

*The Brooks River DCP proposes to remove facilities from wetland areas and restore some wetlands near the outlet of the Brooks River into Naknek Lake to its original function. Removal of all facilities and creation of a people-free zone on the north side of Brooks River helps to protect important brown bear habitat and eliminates human travel across the Brooks River, thereby reducing impacts on important fish habitat. Moving fuel storage and sewage treatment facilities to locations farther from Brooks River and Naknek Lake provide additional protection for water quality and important fish and wildlife habitat.*

## LAKE AND PENINSULA BOROUGH DRAFT COASTAL MANAGEMENT PLAN, GENERAL POLICIES:

A-2 Mitigation
All land and water use activities shall be conducted with appropriate planning, implementation, and monitoring/enforcement to mitigate potentially adverse effects and/or cumulative impacts on the following resources of local, state, or national importance:

a) fish and wildlife populations and their habitats;
d) air and water quality;
e) cultural resources; and
f) recreational resources.

*The Brooks River area DCP/EIS is designed to reduce adverse effects on brown bear and salmon populations and habitat by removing overnight facilities near the river and creating a people-free zone north of the river. The new development would also remove overnight facilities from nationally significant archeological resources, thereby minimizing the potential for cumulative future impacts from subsurface disturbances like fuel leaks and leachfield failures. The potential for impacts on water quality from fuel storage leaks and leachfield systems would be reduced because these systems would be located farther from receiving bodies.*

A-3 Multiple Use
To the extent feasible and prudent, ports, piers, docks, terminals, cargo handling, storage, parking, and other facilities shall be designed and used to minimize the need for duplicate facilities. Subsequent use of facilities for other than their original intent shall also be a consideration in the siting and design of such facilities.

*The Brooks River DCP/EIS calls for the elimination of an unloading zone for fuel, cargo, and passengers on the north side of the Brooks River. Unloading of personnel and materials on the south side of the river would be moved outside of the Brooks River Archeological District. All concessioner and NPS administrative dockings and unloadings would occur in the same zone. Use of a new road to the existing Valley Road would be shared by the concessioner and the National Park Service.*

B-2 Upland Habitats
To the extent feasible and prudent, upland habitats shall be managed to avoid excessive runoff which may cause accelerated erosion, and to retain natural drainage patterns, surface water quality, and natural groundwater recharge areas. Disturbance of natural vegetation in a manner which may adversely affect slope stability or productivity of important upland habitats shall be minimized.

*The proposed Brooks River area developments would be sited to avoid steep grades and areas adjacent to steeper slopes. The single lane access road from Naknek Lake to the Beaver Pond terrace and Valley Road follows a route with the minimum available grade. Lodge facilities at the Beaver Pond terrace overlook would be placed on a level terrace landform. No sidehill development is proposed due to environmental concerns and proximity of the facilities to the Beaver Pond at the base of the terrace. Facilities would be designed to take advantage of natural topographic features while minimizing impact. Additional environmental compliance would be undertaken as specific facility locations are selected. About 3.3 acres of currently developed lands, mostly on the north side of Brooks River, would be restored in a manner suitable to local topography and soils.*

B-5 Anadromous Fish Waters and Public Water Supplies
With the exception of approved transportation and utility crossings, water-dependent structures, and uses involving the research, protection, or enhancement of anadromous fish and their habitats, no development activities, alteration of natural vegetation, excavation, placement of fill, or land clearing shall take place within a minimum distance of 100 feet from the ordinary high water mark of anadromous fish waters or public water supplies.

*The proposed Brooks River area developments would remove existing structures within the 100-foot minimum distance from anadromous fish waters and construct new facilities well over 100 feet away from anadromous waters other than shore access and bear viewing platforms. Natural water flow between the Oxbow marsh and the outlet of Brooks River into Naknek Lake would be reestablished, thereby removing any unnatural impediments to salmon migration and spawning.*

C-4 Environmental Protection Technology

To the extent feasible and prudent, equipment and procedures utilizing the most advanced and effective technology shall be required for limiting emissions and the discharge of effluent, and for the storage, handling, cleanup, and disposal of oil and hazardous materials for municipal, industrial, military, energy, and transportation facilities.

*The National Park Service is finalizing a spill prevention control and countermeasure plan (SPCC) for the fuel delivery and storage system. This plan would be updated to reflect changes in the system. The NPS uses double-walled aboveground storage tanks. Radios and various check-valve systems are used during fuel transfer operations.*

C-7 Refuse Disposal

Within the Lake and Peninsula Borough, refuse disposal and sanitary landfill sites and operations shall comply with the requirements of local, state, and federal regulations. . . .

*The proposed developments call for relocation of the incinerator to the area south of the Brooks River. The refuse handling site would be located in the administrative areas along the Valley Road, well beyond the minimum 1,500 feet from domestic water sources and 200 feet from any surface waters. Unburned residues are shipped out of the park to the borough landfill.*

C-8 Sewage Disposal

Where feasible and prudent, sewage treatment ponds and discharge locations shall be set back a minimum of 1,500 feet from domestic water supplies and a minimum of 200 feet from any surface waters. . . .

*The proposed new development would be on higher ground with more porous soils that drain more effectively, thereby reducing problems occurring with the septic system at the present Brooks River area facilities. New septic systems would be constructed so not to affect water quality in the Beaver Pond. A monitoring program would be established to document water quality trends in the Beaver Pond and at selected points along Naknek Lake and Brooks River. The system would be located beyond minimum specified distances from domestic water supplies and surface waters.*

C-9 Siting of Petroleum Storage Facilities

To the extent feasible and prudent, new facilities, or existing facilities being re-permitted for the storage, processing or treatment of 5,000 gallons or more of petroleum or petroleum products shall be sited a minimum of 1,500 feet from domestic water supplies and a minimum of 200 feet from ordinary high water or MHHW of any surface waters.

*The proposed new administrative areas along the Valley Road would house the primary fuel storage area that would service generators for the concession and administrative functions. Designs for these systems would be completed at a future date; however, with the space available in the plan the National Park Service would be able to meet requirements for minimum distances from water supplies and surface waters. Existing aboveground tanks that do not meet these minimum distances would be removed from their present locations.*

E-2 Maintaining Traditional Public Access
Restrictions on traditional methods and means of public access through municipal, state, and federal land shall be minimized. Elements of public access include roads, waterways, trails, campsites, picnic sites, and marine anchorages,

*The proposed Brooks River area developments maintain public access and overnight accommodations to the Brooks River area and seek to minimize adverse impacts on natural and cultural resources. The Valley Road to the Valley of Ten Thousand Smokes would be maintained as would trails to overlooks along the Brooks River. The campground on the north side of the Brooks River would be replaced with a new campground area on the south side of the river above the Beaver Pond terrace.*

E-4 Siting, Construction, and Operation
Transportation, pipeline, and utility facilities and corridors shall be sited, designed, and operated, using the following standards:

a) adverse impacts on habitats, biological resources, coastal resource uses, recreation, socioeconomic characteristics, and traditional subsistence and personal use activities shall be minimized;
b) to the extent feasible and prudent, transportation corridors and facilities shall be consolidated.

*The proposed developments would consolidate transportation activities to the south side of the Brooks River. This would minimize adverse impacts to brown bear populations and feeding activities. Human travel across the outlet of Brooks River would be eliminated, further minimizing impacts on important bear habitat.*

H-1 Protection of Recreation Values
Projects and activities on public lands and waters used for recreational activities, or on private lands and waters where the landowner has granted formal permission for recreational activities, shall be located, designed, constructed, and operated to minimize adverse impacts on recreation resources and activities, including access.

*The proposed developments in the Brooks River area are located and designed to reduce adverse impacts on natural and cultural resources in the area, yet maintain a high standard of public access and enjoyment of the scenic, natural, and cultural values of the area. Access to the area by floatplanes and watercraft would be maintained. Recreational activities such as wildlife viewing, sport fishing, and hiking would be maintained.*

H-7 Planning Processes
Recreational planners for federal and state lands will provide an opportunity for the Lake and Peninsula Borough to participate in recreation planning in accordance with the procedures identified in Chapter 7.0, Implementation.

*The National Park Service has provided the borough with copies of all DCP workbooks and documents, and hereby notifies the borough of the NPS overarching coastal consistency determination for the proposed developments in the Brooks River area.*

I-1 Cultural and Historic Resource Areas
Assessment of potential impacts on cultural and historic resources, and the identification of appropriate mitigation, shall be the responsibility of the developer. The potential adverse impacts of development on known historic and archaeologic values (state and federal historic resource registers) shall be evaluated early in a project's planning.

*The National Park Service has considered the boundaries of the Brooks River Historic District in its planning efforts and has endeavored to remove most existing facilities out of that district. Only day-use*

*facilities such as trails and bear-viewing platforms would persist inside the recognized district boundaries. Archeological clearance would be conducted prior to any construction at new facility sites outside of the defined district. Removal of the present Brooks River area facilities would reduce potential for future, cumulative impacts on cultural resources in the area.*

Based on the above information, data, and analysis the National Park Service finds that the proposed action in its *Development Concept Plan / Environmental Impact Statement* for the Brooks River area of Katmai National Park and Preserve is consistent to the maximum extent practicable with the Alaska Coastal Management Program and Bristol Bay Borough Coastal Management Plan. As specific plans for facilities are developed, the National Park Service will submit completed coastal project questionnaires and federal consistency determinations. This analysis serves as a programmatic consistency determination for the overall direction of the proposed developments.

By this determination that the *Development Concept Plan* for the Brooks River area is consistent to the maximum extent practicable with the Alaska Coastal Management Plan, the state of Alaska is notified that it has 45 days (plus any appropriate extension under 15 C.F.R. § 930.41(b)) from the receipt of this letter in which to agree or disagree with the NPS determination. The agreement or disagreement of the state of Alaska with the NPS consistency determination shall be sent to:

Joan B. Darnell
National Park Service
Alaska System Support Office
2525 Gambell Street, Room 107
Anchorage, AK 99503-2892

## APPENDIX C: RECOMMENDED CRITERIA FOR BOARDWALKS AND BEAR VIEWING PLATFORMS IN THE BROOKS RIVER AREA

1. The location of boardwalks and bear viewing platforms should help reduce human/bear conflicts and facilitate bear management.

2. Salmon availability to bears should not be impaired by the proximity of a boardwalk or bear viewing platform. This criterion is in reference to "salmon graveyards" where spawned out salmon collect in the eddies and backwaters of the river, and are easily taken by bears.

3. Bear travel corridors should not be disrupted by the proximity of a boardwalk or bear viewing platform. No platform or boardwalk should be located too close to the riverbank or block a major river access corridor. Bear travel corridors have been mapped during various research projects in the Brooks River area. These maps should be consulted before locating and designing boardwalks and platforms.

4. Other wildlife uses of potential boardwalk and bear viewing platform locations must be considered. Bald eagle, river otter, harlequin duck, and Arctic tern, among other species, have specific shoreline or island habitat requirements along the river.

5. Visitors must be able to see bears from the platforms, with a high probability in July and September.

6. To ensure quality wildlife viewing, the design capacity of any given platform should not exceed 20–25 people.

7. Boardwalks and bear viewing platforms should be designed to reasonably prevent bears from getting onto them.

8. Where feasible, boardwalks and bear viewing platforms should be handicap accessible.

9. No bear viewing platform should be visible from another platform along the river.

10. An ideally positioned third platform would provide a view of the Brooks River not visible from either of the existing two platforms. No other platform or facility should be visible from this new platform.

(all from NPS 1993b)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Anchorage Field Office
Ecological Services and Endangered Species
605 West 4th Avenue, Room 62
Anchorage, Alaska 99501

IN REPLY REFER TO:

WAES

Stephen E. Stone
Natural Resource Specialist
National Park Service
Denver Service Center
12795 W. Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287

APR 19 1993

Dear Mr. Stone:

This responds to your March 16, 1993, letter requesting information on the occurrence of threatened and endangered species in the vicinity of the Brooks River in Katmai National Park and Preserve. We understand that the National Park Service is preparing a concept plan and environmental impact statement for the Brooks River area.

Based on our records, no listed or proposed threatened or endangered species, for which the U.S. Fish and Wildlife Service (FWS) is responsible, occur in the project area. Therefore, no further consultation with the FWS under Section 7 of the Endangered Species Act of 1973, as amended, is necessary.

Because the address for our office used on your letter is outdated, we are providing our current address for your future reference:

Field Supervisor
U.S. Fish and Wildlife Service
Anchorage Field Office
Ecological Services and Endangered Species
605 W. 4th Avenue, Room G-62
Anchorage, Alaska 99501

Sincerely,

Mary Lynn Nation

Acting Field Supervisor

## APPENDIX E: SECTION 106 COMPLIANCE REQUIREMENTS

The proposal includes actions listed below that are subject to further consultation with the Alaska State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) under 36 CFR 800. Implementation of any action proposed within the national historic landmark would be preceded by intensive survey, including subsurface probes, and mapping of all archeological sites and ethnographic. Actions proposed outside the landmark boundaries would be preceded by cultural resource inventory studies, including archeological and ethnographic survey and subsurface testing, ethnographic studies for the presence of traditional cultural properties, and surveys for historic resources.

Every effort would be made to avoid previously unknown cultural resources during the design phases of specific actions. If it is infeasible to avoid resources that are eligible for listing on the National Register of Historic Places, mitigating measures would be developed in consultation with the SHPO and ACHP under 36 CFR 800. Mitigating measures may consist of full data recovery of remains to be impacted. The mitigating measures would be conducted within the framework of a formalized research design. Interested Native Alaskan groups would also be consulted when appropriate.

The rehabilitation of the Old Log Cabin (BL-3) would be completed only after consultation with the SHPO and ACHP under 36 CFR 800.

| Action | Resource | Compliance Requirements |
|---|---|---|
| Remove all facilities north of the river | Archeological sites BR-20, BR-9, BR-1, and BR 22 | Monitor removal of facilities; underground infrastructure would stay in place |
| Remove barge dock and tie-downs; construct river mouth platform | No known resources | Subsurface archeological testing; monitor removal |
| Provide fish cleaning building | No known resources | Subsurface archeological testing; monitoring removal |
| Provide trailhead contact station | Archeological site BR-6 | Subsurface testing to establish site boundaries; facilities would be located off the archeological site; monitor during construction |
| Rehabilitate trail to Brooks Falls | Archeological sites BR-3 and BR-5 | Boardwalks on shallow foundations (which would not penetrate the Katmai ash) would be provided on sections of the trail that are now eroding; no other actions would penetrate the Katmai ash |
| Construct expanded bear viewing platform at the falls | Archeological site BR-5 | Archeological data recovery for platform piers |
| Construct new bear viewing platform at the cutbank | Archeological site BR-6 | Archeological testing to determine site boundaries; location of viewing platform offsite if possible; data recovery and monitoring if necessary |
| Remove Lake Brooks facilities except for Old Log Cabin (former U.S. Bureau of Fisheries laboratory: BL-3) | Archeological sites BR-7 and BR-13; Old Log Cabin | Monitor removal of facilities; all underground infrastructure left in place; Old Log Cabin rehabilitated to serve as visitor contact station |

| ACTION | RESOURCE | COMPLIANCE REQUIREMENTS |
|---|---|---|
| Primary access site and facilities | Has not been surveyed for cultural resources | Cultural resource surveys; avoidance if feasible |
| Facility access road | Has not been surveyed for cultural resources | Cultural resource surveys; avoidance if feasible |
| Beaver Pond terrace development area | Has not been surveyed for cultural resources | Cultural resource surveys; avoidance if feasible |

## APPENDIX F: POTENTIAL WATER RELATED PERMIT REQUIREMENTS

### Concession and NPS Seasonal Housing Area and Utilities/Maintenance Area

- Permits for sewage/leachfield system - contact state water quality office.
- If area is a wetland, 404 permit may be needed for utility systems (placement of underground cables or tower footings) and cabins.
- If additional housing areas require stormwater discharge measures, a state 402 permit may be needed (NPDES permit).

### Barge and Tour Boat Docks and Floatplane Tie-downs

- If area is a wetland or other water of the U.S., 404 permit may be needed for placement of piers, pilings, cable anchors, buoys, and other related structures.

### Provide Fish Cleaning Building

- If area is a wetland or other water of the U.S., 404 permit may be needed for placement of fish cleaning building.
- Contact state water quality office for information on permits for disposal of fish waste into lake (402/NPDES permit).

### Valley Road Improvements

- Channel manipulation by heavy equipment above three stream crossings would require 404 permit (contact Corps of Engineers office); would also require 401 permit (contact state water quality office).

## APPENDIX G: ANILCA SECTION 810 – SUBSISTENCE EVALUATION

### BACKGROUND

Subsistence uses, as defined by section 803 of the Alaska National Interest Land Conservation Act (ANILCA) of 1980 means "the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of non-edible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade." Subsistence activities include hunting, fishing, trapping, and collecting berries, edible plants, and wood or other materials.

Section 203 of ANILCA authorizes subsistence uses by local rural residents within Katmai National Preserve. However, subsistence uses were not authorized by section 202(2) of ANILCA in Katmai National Park. NPS regulations have never authorized subsistence uses in the park, and have limited any fishing uses of waters within the park to sportfishing with a rod and reel.

### INTRODUCTION

This section was prepared to comply with Title VIII, section 810 of ANILCA. It summarizes the evaluations of potential restrictions to subsistence activities that could result from the alternative actions proposed in the *Draft Development Concept Plan / Environmental Impact Statement* (DCP/EIS) for the Brooks River area of Katmai National Park. The purpose of the planning effort is to better accommodate visitor use and protect cultural and natural resources along the Brooks River.

### EVALUATION PROCESS

Section 810(a) states:

> In determining whether to . . . permit the use. . . of public lands. . .the head of the Federal agency having primary jurisdiction over such lands or his designee shall evaluate the effect of such use . . . on subsistence uses and needs, the availability of other lands for the purposes sought to be achieved, and other alternatives which would reduce or eliminate the use . . . of public lands needed for subsistence purposes. No such . . . permit or other use . . . which would significantly restrict subsistence uses shall be effected until the head of such Federal agency -
>
> (1) gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to Section 805;
>
> (2) gives notice of, and holds, a hearing in the vicinity of the area involved; and
>
> (3) determines that (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity will involve the minimal amount of public lands necessary . . . and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions.

ANILCA created new units and additions to existing units of the national park system in Alaska. Katmai National Park was created by ANILCA Section 202(2) for the purposes of protecting habitats for, and populations of, fish and wildlife including, but not limited to, high concentrations of brown/grizzly bears

and their denning areas; to maintain unimpaired the water habitat for significant salmon populations; and to protect scenic, geological, cultural and recreational features.

A proclamation by President Woodrow Wilson in 1918 created Katmai National Monument from a reservation of approximately 1,700 square miles. Three major purposes of the monument designation were: 1) to preserve an area important to the study of volcanism, 2) to preserve the Valley of Ten Thousand Smokes, and 3) to conserve an area potentially popular with persons seeking unique scenery and for those with scientific interest. Increased in 1931 to include Lake Brooks, Grosvenor Lake, Lake Coville and part of Naknek Lake, again in 1942 to include offshore islands within five miles of the monument coastline, and again in 1969 to include the remainder of Naknek Lake, the monument grew to contain 4,361 square miles.

With the passage of ANILCA in 1980, the designation of 3.7 million acres of the monument was changed to a national park, and an additional 308,000 acres was included as a national preserve. In addition, 3.4 million acres of the park and preserve were designated as wilderness. The taking of fish and wildlife for subsistence uses is allowed by ANILCA within Katmai National Preserve, pursuant to Section 203, however, subsistence activities are not authorized within Katmai National Park.

The potential for significant restriction of subsistence uses must be evaluated for the proposed action's effect upon "...subsistence uses and needs, the availability of other lands for the purposes sought to be achieved and other alternatives which would reduce or eliminate the use" (Section 810, ANILCA).

## PROPOSED ACTION ON FEDERAL PUBLIC LANDS

The National Park Service is considering six alternatives that address development and/or relocation of Brooks Camp facilities and visitor services within the Brooks River area of Katmai National Park. The approved 1986 *General Management Plan* for Katmai National Park and Preserve directed the National Park Service to prepare a development concept plan for this area. A detailed discussion of the project and its alternatives is provided in the DCP/EIS for the Brooks River area. Briefly, the DCP/EIS alternatives are as follows:

No Action — Brooks Camp facilities would remain at their present location. Visitation and management would be a continuation of status quo.

Alternative 1: Minimum Requirements — Brooks Camp would remain in present location with slight modifications including improvements to existing facilities and construction of a new visitor center and permanent bridge across the river. Visitation levels would be limited.

Alternative 2: Former Proposal in the Draft DCP/EIS — Brooks Camp facilities would be relocated to the Beaver Pond terrace, south of the river. Within the park boundary, alternative 2 would authorize removal of all NPS and concessions facilities north of Brooks River, designation of the north side of the river as a people-free zone, construction of new visitor facilities (visitor center, lodge, campground, employee housing, maintenance facility) on the Beaver Pond terrace south of the river, establishment of day use limits for the Brooks River Area, recommendation of temporary closures on the Brooks River during times of intense bear use, and improvement of the park's interpretive program.

Alternative 3: Iliuk Moraine Terrace - This alternative is similar to alternative 2 except that Brooks Camp facilities would be relocated to the Iliuk Moraine terrace, south of the river.

Alternative 4: Day Use Area Only — Brooks Camp facilities would be removed, and Brooks River area would become a day use area only, south of the river.

Alternative 5: Proposed Action — Brooks Camp facilities would be removed north of the river and relocated on the Beaver Pond terrace south of the river. Within the park boundary the proposed action would authorize removal of all NPS and concession facilities north of Brooks River, designation of the north side of the river as a people-free zone, construction of new visitor facilities (lodge/dining facility, hostel, campground, staff facilities, employee housing, and maintenance facility). The lodging and staff housing would be modest and rustic. A cutbank platform would not be built unless monitoring indicated it was required. Brooks River area orientation would occur at a facility at the Beaver Pond terrace. Access and fishing on the Brooks River would be closed in July from 100 yards above the falls to the river mouth and from the Oxbow closure line downstream to the river mouth from mid-September through October. There would be fewer trails.

## AFFECTED ENVIRONMENT

A summary of the affected environment as it pertains to subsistence use is presented in this section. Lands within Katmai National Park are closed to subsistence uses. However, ANILCA authorized subsistence uses within Katmai National Preserve, and on adjacent federal public lands managed by the Bureau of Land Management and the U.S. Fish and Wildlife Service. Becharof National Wildlife Refuge shares a common boundary with the park.

Regional subsistence activities that occur outside the park include hunting, fishing, trapping, berry picking, and plant gathering. Caribou moose, beaver, snowshoe hare, fox, lynx, mink, wolf, wolverine, river otter, ducks, geese, waterfowl eggs, edible plants and berries, salmon, trout, pike, whitefish, and white spruce constitute the major subsistence resources used by local residents.

Lowlands within the park support nesting habitat for ducks, geese, and swans, grouse, and ptarmigan. Large mammals within the region include caribou, moose, and brown bears. Smaller mammals include wolverine, wolf, red fox, lynx, porcupine, snowshoe hare, mink, marten, weasel, beaver, river otter, arctic ground squirrel, and red squirrel. Caribou and moose are distributed along both sides of the Naknek River, Lake Brooks, Naknek Lake, and west of the Valley of Ten Thousand Smokes. Moose are also present in forested areas between the Three Forks overlook and Naknek Lake.

The Brooks and Naknek Rivers provide spawning habitat for salmon that migrate from Bristol Bay. Brooks River is part of the Naknek River system. Subsistence harvest of salmon happens in the Naknek River downstream of the park boundary. Most salmon harvested in the Naknek River system have been produced within Katmai National Park.

The proposed project development sites are located at Brooks River, the Beaver Pond terrace, and the Iliuk Moraine terrace. For a comprehensive description of the study area, refer to the DCP/EIS.

The National Park Services recognizes that patterns of subsistence use vary from time to time and from place to place depending on the availability of wildlife and other renewable natural resources. A subsistence harvest in a given year may vary considerably from previous years because of weather, migration patterns, and natural population cycles.

## SUBSISTENCE USES AND NEEDS EVALUATION

To determine the potential impact on existing subsistence activities, three evaluation criteria were analyzed relative to existing subsistence resources that could be impacted.

The evaluation criteria are:

the potential to reduce important subsistence fish and wildlife populations by (a) reductions in numbers; (b) redistribution of subsistence resources; or (c) habitat losses;

what affect the action might have on subsistence fisherman or hunter access;

the potential for the action to increase fisherman or hunter competition for subsistence resources.

### The Potential to Reduce Populations

**Alternative 1: Minimum Requirements.** Brooks Camp remains in present location with slight modifications. The land near this river is used by large mammals, particularly bear, moose, and to a limited extent caribou. Similarly, furbearers and small mammals (wolf, lynx, wolverine, beaver, otter, mink, weasels, fox, hare, squirrel, grouse) use these areas. The Becharof National Wildlife Refuge and Katmai National Preserve are the closest lands to the Brooks River area where subsistence is allowed. The boundary between the park and the refuge is irregular; the closest refuge land to Brooks Camp is a distance of 16 miles. Some movement by individuals of these species onto refuge or other lands where subsistence uses are allowed probably occurs.

Impacts on the sockeye salmon population used for subsistence in the Naknek River system below the park are unlikely. Salmon and salmon eggs would not be disturbed by the proposed development. Under alternative 1, impacts on populations and habitat would be negligible. Significant population reductions would not be expected.

**Alternative 2: Former Proposal in the Draft DCP/EIS, Beaver Pond Terrace.** Disturbances caused by new construction and removal of facilities may displace wildlife. This may affect some individual animals as they move onto wildlife refuge lands from the park. However, impacts would not be of a magnitude to significantly reduce wildlife populations or their habitats.

Salmon spawn in certain streams of the park and are major subsistence species along the Naknek River system. Construction of proposed facilities is not expected to affect fish populations within the region.

NPS regulations and provisions of ANILCA provide adequate protection for fish and wildlife populations. Under alternative 2, impacts on populations and habitat would be negligible. Significant population reductions would not be expected.

**Alternative 3: Iliuk Moraine Terrace.** Under this alternative, wildlife and habitats are subjected to potential impacts and disturbances caused by new construction and removal of facilities similar to alternative 2. However, these potential impacts would not be of a magnitude to significantly reduce wildlife populations or their habitats.

NPS regulations and provisions of ANILCA provide adequate protection for fish and wildlife populations. Under alternative 3, impacts on populations and habitat would be negligible. Significant population reductions would not be expected.

**Alternative 4: Day Use Area Only.** Under this alternative, wildlife and habitats are subjected to potential impacts and disturbances caused by new construction and removal of facilities. As in alternatives 2 and 3, slight impacts on individual animals moving into the Becharof National Wildlife Refuge may occur. However, these potential impacts would not be of a magnitude to significantly reduce wildlife populations or their habitats.

NPS regulations and provisions of ANILCA provide adequate protection for fish and wildlife populations. Under alternative 4, impacts on populations and habitat would be negligible. Significant population reductions would not be expected.

**Alternative 5: Proposed Action.** Disturbances caused by new construction and removal of facilities may displace wildlife. This may affect some individual animals as they move onto wildlife refuge lands from the park. Air traffic could be greater than that of alternative 2 because of the differing day use limits. This may affect some individual animals that cannot tolerate increased disturbance. Increased visitor use throughout the Naknek drainage may impact wildlife populations that migrate onto other federal public lands and may be used by subsistence hunters. Impacts from the proposed Brooks Camp action would not be of a magnitude to significantly reduce wildlife populations or their habitats.

Proposed limits on fishing in July and September and a catch-and-release only policy for other periods could potentially benefit spawning salmon populations and be of potential benefit to subsistence users downstream of the park.

NPS regulations and provisions of ANILCA provide adequate protection for fish and wildlife populations. Continued implementation of ANILCA provisions should mitigate any impacts on subsistence populations. Under the proposed action, impacts on populations and habitat from the Brooks Camp development would be negligible. Significant population reductions would not be expected.

### Restriction of Access

All rights of access for subsistence harvest on NPS lands are granted by Section 811 of ANILCA. None of the alternatives under consideration would in any way affect the access to resources by local subsistence users. No restrictions on access to subsistence users or resources are proposed within any of the alternatives.

### Increase in Competition

None of the alternatives under consideration would in any way produce any significant increase in competition for subsistence resources.

## AVAILABILITY OF OTHER LANDS

The availability of other lands outside and within the park and preserve have been considered in the proposed actions. The proposed actions are consistent with NPS mandates. Because the proposed actions occur on federal lands that are not available for subsistence use, the proposed actions do not affect the availability of federal land for subsistence use. No major impact on subsistence uses is expected under the proposed actions.

## ALTERNATIVES CONSIDERED

The evaluation has described and analyzed the alternatives of this draft DCP/EIS, with emphasis on the proposed actions.

## FINDINGS

This analysis concludes that the proposed actions would not result in significant restriction of subsistence uses.

## SELECTED REFERENCES


Alaska Department of Fish and Game

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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 historical 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 U.S. administration.

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