




National Park Service
U.S. Department of the Interior

Katmai National Park and Preserve
Alaska

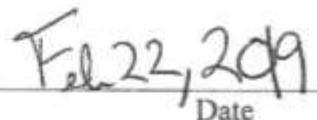
FINDING OF NO SIGNIFICANT IMPACT
Brooks Campground Trail Relocation

Recommended:



Mark Sturm

Superintendent, Katmai National Park and Preserve



Date

Approved:



Herbert C. Frost

Regional Director, Alaska, National Park Service



Date

1. Introduction

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to relocate the Brooks Campground Trail within Katmai National Park and Preserve. The project is needed because the current trail alignment along the Naknek Lake shoreline tends to place visitors in an area of high bear concentration. Bears typically use the beach along Naknek Lake for traveling north and south through the area but also frequently come inland and use the current trail system, especially when there are high water periods on Naknek Lake. Visibility along the current trail is also reduced due to the dense growth of alder that colonize the upper limits of the beach which makes unexpected bear encounters more likely along the current trail. This puts wildlife and people in close proximity and creates a risk of undesirable encounters between bears and humans.

The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

2. Selected Alternative and Rationale for the Decision

Based on the analysis presented in the EA, NPS selected Alternative 2: Relocate the Trail (Proposed Action and Preferred Alternative). The selected alternative will provide for the relocation of the Brooks Campground Trail to a new alignment inland from the Naknek Lake shoreline.

The newly aligned trail will originate near the NPS Ranger Station in Brooks camp and will follow a relatively straight alignment north to the south gate of the Brooks Campground. Two east-west oriented spur trails will be constructed to assist visitors arriving and departing by float planes along the Naknek Lake shoreline with accessing the new trail and the shoreline; one being half way between the Generator Trail (currently the northern most east-west oriented trail in Brooks Camp) and the southern gate of the Brooks Campground, and the second being located just south of the Brooks Campground south gate. The newly aligned trail will improve safety conditions in Brooks Camp by increasing the separation of people and bears, increase the level of access to the campground by improving the trail surface to be compliant with accessibility standards contained in the Americans with Disabilities Act (ADA) and the Architectural Barriers Act (ABA), and will involve youth by utilizing a trail crew from the Student Conservation Association (SCA) to complete the trail work; giving young people an increased sense of pride and ownership in the management and stewardship of their national parks.

Relocating the Brooks Campground Trail will result in adverse effects to the Brooks Campground Cultural Landscape. These adverse effects include the construction of the southern portion of new alignment of the Brooks Campground Trail, construction of the two spur trails, and abandoning the current Brooks Campground Trail allowing it to slowly return to a natural condition. These adverse effects are being mitigated through a Memorandum of Agreement (MOA) with the State Historic

Preservation Office (SHPO) as required by the National Historic Preservation Act (NHPA) §106. The impacts to the Brooks Camp Cultural Landscape will not result in a significant impact under the National Environmental Protection Act (NEPA).

Additionally, Alternative 2 will result in no significant adverse impacts to wildlife, vegetation and soils, and visitor use and experience. The impacts to these park resources is considered minor and temporary mainly centered around the trail construction period, and will gradually fade over time as the new trail is completed. There will be no effects to subsistence resources in the area because the project occurs within an area of Katmai National Park and Preserve that is closed to subsistence use.

Rationale

Alternative 2 was selected because it best meets the project purpose to:

- Improve safety conditions along the trail by moving the trail away from an area in the park that sees high concentrations of Brown / Grizzly Bears.
- Make the trail accessible to visitors with mobility impairments by constructing the new trail to be compliant with the accessibility standards set forth by the Americans with Disabilities Act (ADA) and the Architectural Barriers Act (ABA).

3. Mitigation Measures

In order to avoid impacting mating and nesting bird species along the new alignment of the Brooks Campground Trail vegetative clearing activities necessary for trail construction will not be conducted during late spring (April through July).

The trail construction will avoid removal of large diameter trees (diameter greater than 6') by routing the trail as dynamically as possible while preserving the general course and direction of the trail.

Trail construction excavation will go no deeper than the 1912 Katmai Ash layer to prevent inadvertent disturbance to, or discovery of, previously unidentified cultural resources. In the event of an inadvertent discovery, all construction work will cease, and the Cultural Resources Management Specialist will be notified.

The construction period for this project (August – October) closely aligns with the period when bears are at their highest numbers in the Brooks Camp area. In the event that bears are active within or approaching the construction site work shall cease and the construction crew shall vacate the area until such time as the bears leave on their own accord, or are compelled to move along in accordance with the Katmai National Park and Preserve: Bear-Human Conflict Management Plan.

The NPS has entered into an MOA with the State of Alaska SHPO and are working to implement measures to mitigate the adverse effects to the Brooks Camp Cultural Landscape in accordance with NHPA §106.

Public Involvement/Agency Consultation

The EA was placed on the NPS Planning, Environment and Public Comment (PEPC) website on October 1, 2018, where it was available for public review and comment through October 31, 2018. Consultation letters regarding this project were sent to the following Alaska Native Claims and Settlements Act (ANCSA) village corporations, ANCSA regional corporations, and Alaska Native Descendant organizations culturally-affiliated with KATM: Alaska Peninsula Corporation, Ugashik Village, Alutiiq Village of Old Harbor, Village of Clark's Point, Bristol Bay Native Corporation, Village of Iliamna, Chignik Bay Tribal Council, Chignik Lake Village, Cook Inlet Region Incorporated, Council of Katmai Descendants, Curyung Tribal Council, Egegik Village, Fortier & Mikko, P.C., Heirs of Palakia Melgenak, Igiugig Village, Ivanof Bay Tribe, Kaguyak Village, King Salmon Tribe, Kokhanok Village, Koniag Incorporated, Levelock Village, Manokotak Village, Naknek Village Council, Native Village of Afognak, Native Village of Akhiok, Native Village of Aleknagik, Native Village of Chignik Lagoon, Native Village of Ekuik, Native Village of Ekwok, Native Village of Karluk, Native Village of Larson Bay, Native Village of Ouzinkie, Native Village of Perryville, Native Village of Pilot Point, Native Village of Port Lions, New Koliganek Village Council, New Stuyahok Village, Newhalen Tribal Council, Nondalton Village, Paug-Vik, Inc. Ltd., Pedro Bay Village, Port Heiden Village Council, Portage Creek Village, South Naknek Village, Sun'aq Tribe of Kodiak, Tangirnaq Native Village, The Native Tribe of Kanatak, Traditional Village of Togiak, and Twin Hills Village.

The State of Alaska SHPO was notified of the project by letter in 2017 and again in 2018. Formal in person consultation occurred between the NPS and the SHPO on this project and lead to the development of an MOA to mitigate the adverse effects to cultural resources.

Notice of the availability of the EA for public comment was sent to local and statewide newspapers, radio networks, television channels, and other publications including magazines and journals. The information was also published on the Katmai National Park Website and sent out through Katmai social media channels. The project received four (4) comments during the public comment period. The comments did not change the conclusions in the EA regarding the environmental effects of the action. Responses to substantive comments are found in Appendix A.

4. Finding of No Significant Impact

As described in the EA, the selected alternative will result in impacts to wildlife, vegetation and soils, visitor use and experience, and cultural landscapes; however, no potential for significant adverse impacts was identified.

- **Wildlife:** Bears, birds, and other wildlife species will likely be temporarily disturbed by construction activities resulting from the realignment of the Brooks Campground Trail. After construction, no new impacts are expected.
- **Vegetation and Soils:** The proposed trail relocation will result in approximately 0.2 acres of vegetation being cleared and the removal of 2,100 cubic feet of soils.

- **Visitor Use and Experience:** The new Brooks Campground Trail will not provide views of Naknek Lake which will somewhat diminish the overall experience when using the trail. Localized short term impacts will occur to visitors using the campground and those walking through the area during the construction period. After construction, no new impacts are expected.
- **Cultural Landscapes:** The existing Brooks Campground Trail will be adversely affected by being abandoned in place and no longer receiving maintenance. New trail being constructed within the Brooks Camp Cultural Landscape, including the two new spur trails, will also be an adverse effect.

There will be no significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law. The NPS has prepared a Non-Impairment Finding that is included as Appendix B.

5. Conclusion

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

This action complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 12898 and 13175. There will be no significant restriction of subsistence activities as documented by the ANILCA Title VIII, Section 810 summary evaluation and findings.

Appendices Include:

- Appendix A: NPS Responses to Public Comments on the Environmental Assessment for Brooks Campground Trail Relocation
- Appendix B: Non-Impairment Finding on the Environmental Assessment for Brooks Campground Trail Relocation

Appendix A:

NPS Responses to Public Comments On the Environmental Assessment for Brooks Campground Trail Relocation

Katmai National Park and Preserve

In response to the environmental assessment, the NPS received 4 comments through the Planning, Environment & Public Comment (PEPC) system, 0 comments were sent in through postal mail, and 0 comments were delivered by hand to the King Salmon Visitor Center. Described below are the substantive comments and the NPS responses.

1. Comment #1 Individual: Please do not use plastic geo cube path stabilization grids. Fewer bear encounters near the beach would be welcome so moving the camp path further back is sensible. How might you stop chartered planes dropping campers off by directly accessing the camp site from the beach? I assume they have attended a bear school training prior to arrival in Brooks?

NPS Response: Plastic geo-cells are effective materials that prevent the degradation of trail surfaces and are used commonly throughout National Park Service units for a variety of purposes. The benefit of using this type of material is that the park will achieve compliance with the Americans with Disabilities Act and Architectural Barriers Act standards for accessibility while allowing the trail surface to have a rustic appearance and reduce maintenance requirements over time.

The park is not in any way attempting to stop people from landing on the Naknek Lakeshore north of the Brooks River mouth. The practice of visitors and park and concession staff arriving or departing by floatplane on the Naknek lakeshore will continue after the campground trail has been relocated further inland. The primary purpose of the two trail spurs to be constructed from the main campground trail to the Naknek Lakeshore is to help visitors access the new trail.

Bear orientation training is provided to visitors once they arrive at Brooks Camp. The current park policy is that every visitor to Brooks Camp travels immediately to the NPS visitor contact station where they receive bear orientation training by NPS rangers.

4. Comment #2 Individual: On my family's recent camping trip to Katmai National Park in late August 2018, we had a fantastic visit and loved seeing bears at the falls and on the beach of Naknek Lake. We did find the walks along the existing trail between the campground and Brooks Lodge/Visitor Center area very nerve-wracking. The beach and the trail itself are used heavily by bears and while we took all NPS-recommended precautions, we had several close encounters. All ended safely for all parties (bears and humans), but it felt that our safety depended on luck. The Proposed Action is an intelligent and needed action to keep the area safe for campers and bears alike. We support the move to a direct path further away from the highly used beach corridor.

We hope you will keep the existing main campground gate open, as having multiple entrance/exits is useful. We had to use the side gate during one encounter to get away from playful sub-adults who were wrestling and chasing around the existing main gate/trail area. We also hope you will keep the corridor undergrowth maintained to allow for campers to avoid alders or other dense shrubs from creating a tunnel feeling along the proposed path.

The EA doesn't explain what changes may occur within the campground, and whether campsites might be removed or shifted to create a more developed trail through the campground. We hope you retain as many campsites as possible to allow as many campers as possible to stay at Katmai.

Please consider keeping the vegetation cleared near the lake/campground convergence to allow some visual connection and views of the lake.

Thank you for the opportunity to comment.

NPS Response: We are glad to hear that your visit to Brooks Camp was enjoyable! The park is planning to keep all of the current gates into and out of Brooks Campground open and this will not be changed by the relocation of the campground trail. The main change that visitors will experience is that the primary gate into and out of the campground will shift to the south gate, rather than the east gate as it is currently.

The new campground trail will include a buffer of vegetative clearance on either side of the trail, which should reduce the “tunnel feeling” that was associated with the current campground trail. The route of the new trail also travels further inland through an area dominated by white spruce forest where the shrubs and low-lying plants are much smaller than those located along the existing trail. This should allow for greater visibility in all directions surrounding the trail and minimize close encounters between humans and bears.

There are no changes to Brooks Campground associated with this project. The campground will remain in use at previously established levels.

Appendix B:

Non-Impairment Finding

On the Environmental Assessment for

Brooks Campground Trail Relocation

Katmai National Park and Preserve

A determination of non-impairment is made for each of the resource impact topics carried forward and analyzed in the environmental assessment for the preferred alternative. The following criteria was used as a basis for determining the significance of the resource and whether or not impairment would occur:

- Necessary to fulfill specific purposes identified in the enabling legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the Park;
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance.

Vegetation and Soils

Management for vegetation and soils is not specifically identified as a purpose in the establishing legislation of the park and is not specifically identified in the park's general management plan as being of significance. Alternative 2 will impact approximately 0.2 acres of vegetation and 2,100 cubic feet of soils and will not result in impairment.

Wildlife

Wildlife; specifically brown/grizzly bears, are included in the General Management Plan for Katmai National Park and Preserve, the Foundation Statement for the park, and the park's enabling legislation as a resource of significant value.

"Katmai National Monument ... 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 the water habitat for significant salmon populations; and to protect scenic, geological, cultural and recreational features."

- ANILCA Section 202 (2)

Alternative 2 will temporarily impact wildlife species, including brown bears, during the construction period and will not result in impairment.

Visitor Use and Experience

Visitor use and experience is intertwined with many of the resources that are deemed to be significant throughout the park and is specifically mentioned in the park's General Management Plan related to the use of the Brooks Camp area. Alternative 2 will impact the visitor experience by removing views of Naknek Lake from the new trail, and will temporarily impact visitor use and experience during construction activities. These impacts will not result in impairment.

Cultural Landscapes

Cultural Resources are included in the General Management Plan for Katmai National Park and Preserve, the Foundation Statement for the park, and the park's enabling legislation as a resource of significant value. The park's general management plan identifies cultural resources as a significant resource and the protection of cultural resources is key to the natural or cultural integrity of the park.

“Katmai National Monument ... 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 the water habitat for significant salmon populations; and to protect scenic, geological, cultural and recreational features.”

- ANILCA Section 202 (2)

Alternative 2 will result in impacts to cultural landscapes by abandoning a trail that was integral to the historic use of Brooks Camp, and by the construction of new trails located within the Brooks Camp Cultural Landscape. The impacts to cultural landscapes from Alternative A are mitigated to the maximum extent practical and will not result in impairment to the Brooks Camp Cultural Landscape.

Conclusion

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of park resources and values from implementation of Alternative 2.