

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

SOUTHCENTRAL REGIONAL OFFICE
3601 "C" STREET, SUITE 370
ANCHORAGE, ALASKA 99503-5930
PH: (907) 269-7470/FAX: (907) 561-6134

CENTRAL OFFICE
P.O. BOX 110030
JUNEAU, ALASKA 99811-0030
PH: (907) 465-3562/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 271-4317/FAX: (907) 272-0690

May 12, 1999

Ms. Heather Todd
Environmental Protection Specialist
National Park Service
2525 Gambell Street, Room 107
Anchorage, AK 99503-2892

Dear Ms. Todd:

Re: Environmental Assessment, Brooks River Bear-Viewing Facility
Katmai National Park and Preserve

The State of Alaska resource agencies have reviewed the above-referenced document. We offer the following general comments, followed by page-specific comments.

Facility Development Priorities:

Over the past several decades, the State has consistently raised the concern that replacement of the floating bridge across the Brooks River should be the highest priority for facilities at Katmai. The floating bridge, which provides visitor access to the current and proposed viewing facilities, should be replaced with an elevated bridge.

In June 1992 the State of Alaska reviewed an EA for a bear viewing platform and associated walkways which have subsequently been built. At that time, we noted:

The State is also concerned that the proposed project does not address the very serious visitor safety problem of the adjacent floating bridge. Visitors arriving by plane or staying at the lodge must use the floating bridge across the Brooks River to access some sport fishing areas, walk to the bear viewing areas, or ride to the Valley of Ten Thousand Smokes. The bridge is believed to be an impediment to bear movements, and the National Park Service is investing considerable staff effort into assuring the safety of

visitors crossing the bridge. The EA concludes that the proposed bear viewing platform may actually necessitate additional staff and higher operating costs at this location to assure the safety of visitors.

We question whether the National Park Service has considered the costs and liability risk of choosing to construct an additional platform on the south side rather than elevating the floating bridge. In contrast, elevating the bridge to allow unimpeded bear passage would not only reduce the serious bear/human encounters at the crossing but could also serve as an additional bear viewing platform regardless of whether Brooks Camp is eventually moved to the south side.

When the State of Alaska reviewed the Brooks Camp Development Concept Plan in November 1996, we informally suggested that the Record of Decision commit to a high priority of replacing the floating bridge at the Brooks River with a combination elevated access walkway/viewing platform. We have consistently requested that NPS consider this alternative to closing/limiting public visitation in the area. In particular, if funding is not available to move Brooks Camp lodge facilities, this would provide both a major reduction in bear/human encounters while increasing viewing opportunities that separate humans from bears, and long-term reductions in bear/human encounters without unnecessarily limiting public use opportunities. Such actions will be necessary whether or not the lodge is moved.

As recently as last month, NPS requested a permit from the Alaska Department of Fish and Game (ADF&G) to replace the floating bridge, to which the Department responded:

As an advisory, ADF&G continues to be concerned that the floating bridge will be used by brown bears. Although the new design eliminates the stabilizing floats that were traditionally used by the bears, the increased width of the deck provides adequate space for them to travel, rest, nap, and fish. Bear use of the floating bridge and the adjacent river/lagoon restricts human use of the structure and increases the potential for undesirable bear/human encounters. We strongly recommend that the NPS place a high priority on elevating the bridge above the river so that the NPS's required bear/human separation distances can be maintained. This action would simultaneously reduce restrictions on human use of the bridge and increase bear viewing opportunities for the area.

Given that the NPS is going to replace the floating bridge with a new floating bridge this season, we urge the design be revised immediately to elevate it above the river to resolve these concerns. We urge this be done before construction of any further facilities, including the new proposed bear viewing platform.

Other Significant Issues:

The EA appears to lack any discussion of the riparian environment. Specifically, we are concerned about the proximity of the proposed platform structure to the riparian zone and any associated impacts to fish and other aquatic resources. If the riparian zone is affected, a discussion on proposed mitigation is warranted.

We are also concerned that the proposed platform may impact sport angling opportunities. The EA makes no mention of the potential impacts to this use. Past history has shown that as new platforms are built, problems for anglers have arisen. We continue to have concerns for this legitimate user group and wish to emphasize the importance of preserving angling opportunity on the Brooks River.

Page Specific Comments:

Page 11, fourth bullet – We request that any temporary closures of the Brooks River during times of intense bear use only be implemented in close coordination with ADF&G, to ensure opportunities for sport fishing are not inappropriately closed.

Page 14, Proposed Action Alternative - This section appears to consider but makes no reference to the "Recommended Criteria for Boardwalks and Bear Viewing Platforms in the Brooks River Area" (Final DCP/EIS Brooks River Area, Appendix C., page 558), nor are the criteria mentioned anywhere else in the document. We recommend the Environmental Assessment include reference to the recommended criteria.

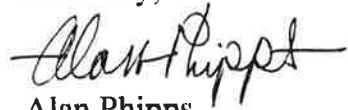
Page 21, 1st paragraph - Population level effect is a very difficult standard to prove. If the NPS is not mandated to use this standard and is doing so by choice, other appropriate standards might be considered. In addition, it may be appropriate to wait until the NPS research is completed prior to design and expansion of bear viewing facilities.

Page 23, 2nd paragraph - The numbers in Table 1 do not reflect that "Visitor numbers have increased substantially in recent years . . ." Given the decreased visitation in 1997 and 1998, this section may warrant some discussion regarding possible reasons for the decrease.

Page 29, 2nd paragraph - The Alaska Department of Fish and Game does not consider the brown bears at Brooks River to be a sub-population.

The State of Alaska appreciates the opportunity to provide these comments. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Phipps". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Alan Phipps

Project Review Coordinator

cc: John Katz, Governor's Office, DC
John Sisk, Governor's Office, Juneau
Frank Rue, Commissioner, DFG
John Shively, Commissioner, DNR
Gabrielle LaRoche, Acting Director, DGC

Bcc: Tina Cunning, DFG
Terry Haynes, DFG
Patty Bielawski, DNR
Elizabeth Barry, AG
Stan Leaphart, CACFA