



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT &
PERMITTING

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March 1, 2013

Robert Dalrymple, District Ranger
Wrangell Ranger District
P.O. Box 51
Wrangell, AK 99929-0051

Dear Mr. Dalrymple:

The State of Alaska reviewed the US Forest Service (Service) scoping letter regarding a proposed 10-year management plan update for the Anan Wildlife Observatory. We understand that an Environmental Assessment (EA) is forthcoming and will be available for public review. The following comments represent the consolidated views of the State's resource agencies.

We support the Service's efforts to increase user capacity for the Anan Wildlife Observatory and understand that the proposed split shift system is intended to allow for an increase in visitors (both guided and independent) to address concerns expressed by the public and commercial operators, as well as changing site conditions. This visitor increase will also benefit local economies and commercial guiding businesses.

We request the Service work with Area Wildlife Biologist, Rich Lowell, at the Alaska Department of Fish and Game (rich.lowell@alaska.gov) to address the bear issues identified in the scoping notice.

To better assist reviewers in determining the effects of the proposed action, we also request the EA include the following information:

- Identify how many days during a typical season the observatory is at full capacity, with all passes allocated.
- Indicate whether the capacity issue exists throughout the 52-day high use season or if it is an issue specific to certain periods within the high use season.
- Estimate the number of potential visitors, both independent and guided, currently unable to visit because of capacity limits (e.g. the number of unsuccessful independent lottery applicants, the number of visitors turned away by guide companies due to lack of capacity, etc.).

- Identify the user groups (independent or guided) most affected by the current capacity restrictions.
- Identify the number of passes that go unused on a typical day, either due to lack of applicants or cancellations.
- Provide details on how the new reservation system will differ from the current system. For example, under the current system the final 12 passes (20% of the total allocation) per day are only released for reservation three days prior to the visiting date in order to accommodate last-minute visits.
- Identify the current average length of visits to the observatory.
- Analyze the effects of the split morning/afternoon schedule on visitor travel time and expense compared to visitor experience. For example, under the new half-day system visitors arriving by boat may spend a greater proportion of time in transit compared to time at the observatory than under the current full-day system.

Lastly, we recommend the EA consider changes to the current cancellation policy in order to increase visitation opportunities. The current policy provides little incentive for individuals or guides to notify the Service of cancellations, resulting in otherwise available spots going unused. The current policy also unnecessarily reduces opportunities for spontaneous visits to the Wildlife Observatory. Currently, the website indicates there is no refund for individual cancellations and cancellations must be made on-line through the reservation system. In addition, guides do not receive re-allocations for cancellations less than three days in advance.

We recommend considering a wider variety of options to accommodate cancellations, such as allowing phone cancellations; providing refunds or partial refunds for individual cancellations; requiring guides to notify the Service of cancellations as a condition of their permits; and making an up-to-date list of cancellations available to the public.

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

Sincerely,

/ss/

Susan Magee
ANILCA Program Coordinator

cc: Dee Galla, Outdoor Recreation Planner
Rich Lowell, Alaska Department of Fish and Game