



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

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May 11, 2022

Sean Rielly, Wilderness Program Manager
US Forest Service
Admiralty Island National Monument
8510 Mendenhall Loop Road
Juneau, AK 99801

Submitted electronically: sean.rielly@usda.gov

Dear Mr. Rielly:

The State of Alaska reviewed the scoping proposal to expand the permitted and managed season at Pack Creek and to limit visitation to 24 people/day. The following comments represent the consolidated views of state resource agencies.

Thank you for the opportunity to provide input on the Pack Creek Bear Viewing Area visitor management proposal. The Alaska Department of Fish and Game (ADF&G) is a cooperative management partner with the United States Forest Service (USFS) at the Pack Creek Cooperative Management Area (PCCMA). ADF&G has managing authority over the Stan Price Wildlife Sanctuary located within the boundaries of the PCCMA. ADF&G recognizes the management issues resulting from the continuing increase in visitation of this area. Accordingly, we support the USFS proposal to extend the managed visitation season that currently runs from June 1st to September 10th to April 15th to September 30th and to extend the daily visitor limitation to a maximum of 24 throughout this new managed season at the PCCMA.

General Comments:

The Stan Price State Wildlife Sanctuary consists of state managed tidelands and submerged lands within the project area and should be depicted on project maps and described in project documents. It is important to make the public aware of this successful state/federal partnership that provides educational and recreational opportunities and visitor enjoyment of wildlife in Alaska. We request this management proposal and future project information include maps of the PCCMA which depict the Stan Price State Wildlife Sanctuary. Additional information including mapping information can be found at <https://www.adfg.alaska.gov/index.cfm?adfg=stanprice.main>.

The USFS should clearly identify that the Pack Creek Viewing Area is co-managed with ADF&G in this management proposal and in future NEPA and other project documents. The co-management of the PCCMA is defined in the Challenge Cost Share Agreement (CSSA) between ADF&G and the USFS. We request that the CCSA for the PCCMA be referenced in this and future documents to demonstrate the successful co-management of the PCCMA. The purpose

statement of the CCSA states: “The purpose of this agreement is to document the cooperation between the parties in the management of the Pack Creek Cooperative Management Area...”¹

Visitor Management:

Increasing numbers of visitors coming and going from float planes, boats, and along the trail to the viewing tower can lead to a higher rate of disturbance and displacement from feeding opportunities for bears frequenting Pack Creek. The current limit of 24 visitors per day during the peak season for Pack Creek was set in 1988. This long-established threshold of visitor use has served the viewing program and bears well. Experience over the last five years indicates that exceeding that number of visitors during any portion of the season stresses bears and places greater demands on staff who manage visitors.

Currently, the uncapped portion of the general permit season, June 1 to July 4 and August 26 to September 10, allows for more than 24 visitors per day. Prior to 2018, exceeding 24 visitors per day during these times was uncommon, just one or two days per season. Beginning in 2018, the visitor numbers during these periods began increasing. For example, in 2018, 7 days exceeded 24 visitors; in 2019, 14 days exceeded 24 visitors; and in 2021, even with guides and independent visitors limited by COVID, 10 days exceeded 24 visitors. At times, the number of visitors present has doubled or tripled the 24-visitor guideline. The trend suggests this high level of visitation will become the norm rather than the exception and it is both unsustainable and inconsistent with current PCMMA management objectives which are:

- Protecting bears and other wildlife and their habitat
- Providing visitors with opportunities to view wildlife, especially brown bears
- Providing for the safety of bears and human visitors
- Providing visitors with semi-primitive wilderness setting with the minimal management presence needed.

Visitation prior to the general permit season has also greatly increased in the past 5 years. Prior to 2015, use in May was generally below 60 visitors for the entire month with use concentrated in late May just prior to the managed season. By 2017, guided use during May had jumped to over 200 visitors distributed throughout the month. Visitation during May remains at that level. Currently, only permitted guides are required to report use in May. Use by independent groups is undocumented. Expanding the permit season into April and May will allow managing agencies to better monitor use and will both limit and distribute visitor use. Distributing use more evenly will benefit bears that rely on the Pack Creek estuary for food as they emerge from the denning period. During spring most foods available to bears are in the intertidal or beach fringe areas. These areas are also where bears are most likely to be displaced by visitors arriving by float plane and boat. Further, unfavorable experiences with unmanaged visitors during May could negatively affect bear behavior and viewing opportunities for visitors later in the summer.

In June 2000, at the direction of the Alaska Board of Game, a diverse group of stakeholders and agency representatives developed the Southeast Alaska Unit 4 Brown Bear Management

¹ Challenge Cost Share Agreement between the Alaska Department of Fish and Game and the USDA, Forest Service Alaska Region, Tongass National Forest [Admiralty National Monument], Pack Creek Cooperative Management Area (PCCMA), p.1.

Strategy that continues to guide management decisions at Pack Creek and elsewhere in Game Management Unit 4. Regarding managing people around habituated bears, the Strategy makes several recommendations: 1) place human use secondary to use by bears; 2) increase control of human activities as the number or regularity of human use increases; and 3) limit visitor group size by the space limitations of the viewing site and by acceptance as indicated by bear behavior. These three principles form the core of ADF&G's and the USFS' shared management strategy for Pack Creek and support extending the managed visitation season and setting the number of visitations at the PCCMA.

Thank you for the opportunity to comment regarding the Pack Creek managed season extension. We would welcome opportunities to coordinate with you, and request that you include us in future review stages of this project. Please contact me at (907) 269-0880 if you have any questions or for follow up discussions with State staff.

Sincerely,

A handwritten signature in blue ink that reads "Catherine Heroy". The signature is written in a cursive, flowing style.

Catherine Heroy
State ANILCA Program Coordinator