



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

ANILCA Implementation Program

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November 23, 2016

Via Electronic Mail: OIRA_Submission@omb.eop.gov

Desk Officer, Department of Interior
OMB-OIRA

Re: Information Collection Request: Glacier Bay National Park and Preserve Bear Sighting and Encounter Reports

To whom it may concern:

The State of Alaska reviewed the Information Collection Request for the Glacier Bay National Park and Preserve (GLBA) Bear Sighting and Encounter Reports. The Federal Register Notice (Vol. 81, No. 206) issued October 25, 2016, indicates that the National Park Service (Service) is seeking approval from the Office of Management and Budget on two forms, which visitors will be required to complete and submit in an effort to aid the Service collecting information on bear sightings and interactions within GLBA. Submission of Form 10-405 will be required when a visitor exits the backcountry. Form 10-406 will be required whenever a bear “enters camp, approaches the group, damages gear, obtains food, and/or acts in an aggressive or threatening manner towards the group.” The following comments represent the consolidated views of state resource agencies.

We agree with the Service on the value of obtaining information on bear sightings and interactions in the management of park resources and visitor safety. However, as detailed below, we have concerns regarding observation bias and requirements that potentially intrude on a visitor’s experience. Further, it is unclear how the Service would evaluate the reported information, therefore, we found it difficult to assess whether the information would have practical utility for management purposes.

An observer’s knowledge of and experience with bears can impact reporting accuracy. For example, one would expect an experienced wildlife biologist with years of professional experience to provide accurate information on bear species and behaviors, as requested in the forms. Visitors, however, may not have the necessary knowledge or skills to provide accurate information. The emotional experience associated with bear sightings and conflicts may also influence the information reported.

We are also concerned that the “requirement” to complete and submit these forms is unnecessarily onerous to visitors, from both a practical and experiential standpoint, especially requirements to submit Form 10-405 regardless of a bear sighting and to report on activities of other visitors. Since Alaska park units do not charge entrance fees and visitors are not funneled to one central location upon entering or leaving the park unit, it is unclear how park staff will disseminate the forms and determine compliance. Nor is it clear if visitors would be cited for non-compliance.

We agree that leaving campsites in poor conditions is inappropriate under any circumstance, however, requiring visitors to report such activities is troubling. In addition to the unknown consequences for failure to report, “unsafe or inappropriate” behavior is subjective. It is also possible that required reporting of other people’s

activities could conflict with the Service's desired conditions for wilderness management. It may also intrude on visitors' backcountry or wilderness experiences by making them responsible for watching other groups and assessing and reporting their activities – essentially requiring the recreating public to be surrogates for Service field and enforcement staff.

Due to the above concerns, we request the forms be distributed only for *voluntary* compliance. It is likely that most visitors would reach out to park staff in the event of a negative bear encounter or inappropriate activities regardless and both forms contain 24-hour emergency contact information, which should be adequate to address visitor safety and compliance issues. We support the dissemination of visitor information that educates the public on bear safety and "Leave No Trace" practices, and explains the benefits of reporting observations as a means to encourage participation. Voluntary compliance combined with education outreach would allow the Service to obtain the desired information without inadvertently subjecting visitors to the threat of citation or intrusion on their personal experiences.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee", written in a cursive style.

Susan Magee
ANILCA Program Coordinator

cc: Madonna L. Baucum, Information Collection Clearance Officer, National Park Service