

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

SEAN PARNELL, Governor

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January 22, 2010

Brian Glaspell, Ph.D.
Kodiak National Wildlife Refuge
1390 Buskin River Road
Kodiak, AK 99615

RE: O'Malley River Bear Viewing Program Compatibility Determination

Dear Mr. Glaspell:

The Citizens' Advisory Commission on Federal Areas (CACFA) has reviewed the Compatibility Determination for the O'Malley River Bear Viewing Program. This determination finds the outlined program to be compatible with the purpose of the Kodiak National Wildlife Refuge. This Commission is familiar with the substantial disagreements that occurred during the development of the Kodiak Public Use Management Plan from 1988-1994 and when the O'Malley area was first seasonally closed to general public use in 1992. Most of those seem to have resulted from lack of adequate consultation and collaboration. We appreciate the current open and collaborative process and encourage its continuation.

The Compatibility Determination indicates that the "viewing program would be patterned after the program operated by the Service at the O'Malley River site in 1992, but could differ in some respects" and also that the program will be "developed by the Service in consultation with the Alaska Department of Fish and Game (ADF&G) and other interested parties". Since the exact specifications of the program have not yet been determined, we strongly encourage that this development process be open to public involvement and that the appropriate State agencies be involved. The CACFA staff requests inclusion in this effort.

As indicated in our comments on the recently proposed rule to adjust the seasonal closure of the O'Malley River area, there is some concern that a program of this sort could lead to proposals to restrict bear hunting activities. This concern stems from the understanding that bear viewing programs can lead to habituation and that harvest of bears considered to be habituated may cause

discord among various user groups. Appendix T of the *Kodiak Archipelago Bear Conservation and Management Plan* indicates that loss of habituated bears would be primarily due to natural causes and that a “harvest of habituated bears on the O’Malley area could be expected to be less than one per year”(pg. T-3). If a bear viewing program is established it will be closely monitored to ensure continued compatibility. Should evidence contrary to these findings become available, we would expect that recommendations to the Board of Game for any hunting restrictions be made only following consultation with the ADF&G and all affected user groups.

The fifth paragraph within the *Anticipated Impacts of Use* section should be revised. It reads, in part, “The bears most likely to become habituated include females accompanied by cubs—protected from harvest by regulation—and sub adults whose small size makes them less attractive as trophy animals. However, two such bears were harvested in the O’Malley area in the fall of 2003 (Wilker 2004).” We suggest removal of this second sentence as it does not appear to be relevant to the discussion of the compatibility of a bear viewing program. Within the context of the paragraph, it is assumed that “two such bears” refers to legally harvested sub adult bears, but this is not clear. The statement also seems to imply the harvested animals may have been habituated, which is unlikely because of the long standing seasonal closure of this area. And finally, the statement only has relevance, although minimal, if this was the only area of the refuge where sub adult bears had been harvested.

Our review of the draft Compatibility Determination and other available information indicate that little habituation or displacement of bears is likely to occur from a properly structured viewing program. We agree that a viewing program is compatible and that impacts to refuge resources as well as to the other five priority public uses of the refuge, including hunting and fishing, will be minimal.

Thanks again for the opportunity to comment on the O’Malley River Bear Viewing Program Compatibility Determination.

Sincerely,



Stan Leaphart
Executive Director

Cc: Sally Gibert- ANILCA Program
Geoff Haskett- Alaska Regional Director