

August 22, 2018

Mike Wilkins, Dist. Ranger, NRD  
Andy Gaston, Dist. Ranger, T&CRD  
Richard Thornburgh, Dist. Ranger ARD  
Johnny Wills, Wildlife Biologist, NNF

Dear Rangers Wilkins, Gaston and Thornburgh, and Mr. Wills:

This is the response of the Appalachian Trail Conservancy (ATC) to your request for comments regarding the proposed *Requirement for Overnight Campers in Some Areas to use Bear Resistant Food Containers*. This proposal would apply this requirement to all the Appalachian National Scenic Trail (A.T.) within the National Forests in North Carolina (NFsNC), i.e. the Appalachian, Cheoah, Nantahala and Tusquitee Ranger Districts. This proposal would also apply to Panthertown which does not include the A.T.

For the last several years the ATC has been “strongly recommending” that all A.T. campers use bear canisters along the whole A.T. because there has been a coincidence of increasing A.T. use and increasing bear incidents along the A.T. We believe that A.T. campers must take full responsibility for taking every precaution to prevent bears from becoming habituated to human food. Habituation can lead to aggressive behavior on the part of bears seeking easy food sources, injuries to campers and ultimately to removal or euthanization of bears.

ATC also believes that bear-resistant personal food storage containers are currently the best way for campers to achieve keeping bears wild. Installation of food storage devices at designated campsites helps but is very expensive and since dispersed camping is allowed on the NFsNC, user chosen campsites that are not designated do not include food storage facilities. ATC’s strong preference is for A.T. campers to carry their own bear-resistant food storage containers to transfer the facility cost to the campers – where it should appropriately rest. Adding more facilities encourages campers to be less prepared – we want A.T. campers to plan ahead and prepare.

However, ATC would like to see more specificity in the proposed NFsNC A.T. requirements:

1. As with the Panthertown recommendation, we believe there needs to be a spatial descriptor attached to the A.T. so that campers a few feet from the A.T. cannot claim exemption from the requirement. ATC suggests that at a minimum, this spatial descriptor match that of the proposed A.T. Management Area description in the revised Forest Plan, i.e.: “Those lands mapped as foreground area visible from the A.T. (here, we suggest you substitute ½ mile on either side of the A.T.) and associated Trail shelters, overnight use sites, viewpoints, water sources and spur trails.” ATC would also like to encourage your consideration of a Forestwide food storage requirement as the Cherokee National Forest recently did. This would be the ultimate, and least confusing, spatial descriptor.
2. We suggest that you cite a list of approved bear-resistant personal food storage containers from a reputable source, i.e. the Interagency Grizzly Bear Committee. The IGBC has a testing program for food storage containers. Additionally, the IGBC list is cited in the NPS Appalachian National Scenic Trail Superintendent’s Compendium (the NPS equivalent of Supervisor’s Closure Orders) and covers all the land that they administer along the A.T. This list includes many bear canisters as well as some soft sided containers. Many A.T. campers, who also try their best to lighten

their pack weight, prefer the soft sided containers for their ease of packing and lighter weight than bear canisters. After several ATC employees attended the Human-Bear Conflict workshop in Gatlinburg this past March, we realized that there have been advances in soft sided food container technology, and more importantly, two other things: some rigid bear canisters are failing, and there is little data at this point which indicates that current models of soft sided containers are failing at a greater rate than rigid canisters.

3. Future advances in technology may yield even better solutions, so we encourage you to keep your description of permitted bear-resistant personal food storage containers open-ended enough to allow for new improvements, i.e. we encourage you not to limit this requirement to bear canisters.

ATC is committed to helping acquire the data needed to help determine which food containers are most effective, and to that end have recently provided a new bear incident report, available online, which consolidates bear incident reports from across the US, including USFS, NPS and State reports, plus bear researcher generated questions to help determine the causes of bear attacks. The ATC bear incident report form can be found at <[www.appalachiantrail.org/bears](http://www.appalachiantrail.org/bears)>

ATC considers the habituation of bears to human food to be a regional issue and is heartened to see the NFsNC join the Cherokee NF in efforts to deal effectively with this issue. We also hope that the Chattahoochee and George Washington Jefferson National Forests will follow suit to create a requirement of such A.T. length that it will be a tipping point to a new paradigm of user responsibility to keep bears wild and campers safe.

ATC appreciates the opportunity to comment on this proposed A.T. food storage requirement and appreciates your continued interest in the appropriate stewardship of the Appalachian National Scenic Trail.

Sincerely,

Laura Belleville  
VP of Conservation

CC: Allen Nicholas, Supervisor, NFsNC  
Suzanne Dixon, Pres./CEO, ATC  
Wendy Janssen, Supt., NPS A.T. Park Office