

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY

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Chugach National Forest's Supervisors Office
Attn: Draft Land Management Plan
161 East 1st Avenue, Door 8
Anchorage, AK 99501

November 1st 2018

RE: Chugach National Forest Land Management Plan/ Draft EIS

To whom this may concern:

The Valdez Fisheries Development Association Inc., submits the following comments for consideration regarding statements made in the USDA Chugach National Forest Land Management Plan Draft EIS. VFDA is very concerned about the inferences contained within the document in the Environmental Consequences section that lead the reader to conclude without evidence that hatchery salmon negatively impact natural salmon stocks in Prince William Sound.

The draft EIS implies that hatchery salmon have a deleterious effect on natural salmon stocks. While there is ongoing research to document the interactions of hatchery pink and chum salmon on natural salmon stocks in Prince William Sound and Southeast Alaska, there is no scientific evidence that strongly supports this theory.

We find the statement, "*A number of studies on coho salmon, Chinook salmon, and steelhead trout have demonstrated that hatchery and wild fish spawning under natural conditions differ considerably in their relative ability to produce surviving offspring (Araki et al. 2008; Buhle et al. 2009; Chilcote, Leider et al. 1990). Chilcote et al. (2011) estimated that a naturally spawning population composed entirely of hatchery fish would have approximately one-tenth the reproduction rate as a population composed entirely of wild fish.*", particularly troubling as it has little relevance to current hatchery programs in Prince William Sound or species currently being propagated in significant amounts for fisheries enhancement.

The EIS cites work conducted by Hilborn & Eggers (2000) that claims that hatchery fish have largely replaced rather than supported wild pink salmon populations reproductively in Prince William Sound. This leads the reader to the conclusion that hatchery pink salmon are outcompeting natural pink salmon stocks even though there is no empirical evidence to conclude that as fact. Returns of natural pink salmon to PWS have reached record production in recent years. Also, an analysis conducted by Wertheimer et al (2001) largely concluded, to the contrary, that hatchery pink salmon have actually increased wild pink salmon production in Prince William Sound

We find that the statements made in this EIS are largely biased, offer no opposing scientific study or provide the reader with proper scientific context. Thank you for the opportunity to comment on the draft EIS.

Sincerely,
Mike H. Wells
Mike Wells
Executive Director