Data Submitted (UTC 11): 10/31/2018 8:00:00 AM
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Comments: Comments on EIP for the Chugach National Forest Land Management Plan

1. On page 164, under Current Activities, Main Bay Hatchery is identified as a chum salmon hatchery. That was true when it was initially constructed, but with improved understanding of sockeye salmon culture it was converted to a sockeye salmon hatchery and has been and is currently operating as a sockeye salmon hatchery. That is not noted and should be if it is described as a [ldquo]Current Activity[rdquo].

2. First paragraph on page 165 seems to contradict its self. Fish Hatcheries are allowed under ANILCA. It is and was a common understanding when ANILCA was passed that Fish Hatcheries, fish ladders and other fisheries enhancement activities would manipulate natural processes. The wording suggests a negative state [ldquo]Although allowed.[hellip][rdquo] The author seems to be suggesting that this was a mistake in ANILCA. These activities are allowed and the person views of the author need to be eliminated. The first sentence in that paragraph needs to be deleted.

2. (a) (Same paragraph) The hatcheries were constructed and currently managed and operated to minimize adverse effects on the wilderness character of the area. The hatcheries are painted in colors to match surrounding habitat, power generation is from a quiet turbine at one and the generators at the other have been placed in a building to reduce any noise of operation for example. So the second sentence is correct.

3. On page 166 under Trends, the paragraph talks about the use of drones in a negative sense in the wilderness area referring to restricted use in the lower 48 states. Alaska is quite different from the lower 48 states. Drones can and are being used to assist in the management of commercial fisheries and hatchery operations. A drone can be in the air for approximately 15 minutes to complete its mission without the use of fossil fuel and minimal noise. The other option is to fly a full size aircraft to circle the area for several minutes with a pilot and passenger on board to observe fish build up and passage. This burns hundreds of gallons of fossil fuel and creates considerable noise. The lower 48 states do not have a robust commercial fishery as does Alaska and thus technology such as drones should be embraced in Alaska as a means to enhance the wilderness experience instead of the author[rsquo]s personal negative view of drones, especially if climate change is being discussed in this plan, which it is, and the need to burn fossil fuel in an aircraft when a simple drone flight would suffice.

4. On page 205, the EIS finally identifies Main Bay hatchery as a sockeye salmon hatchery. That counters what was said on page 164. You need to correct page 164 to bring it up to current operations to avoid confusion.

5. On page 207 under Trends in Land Use, it states the hatcheries are undergoing reconstruction of their aging

facilities. The sentence should read [ldquo][hellip] for 30-plus years and are annually being maintained and upgraded to minimize adverse effects on the wilderness character of the area.[rdquo]

6. On page 290 under the Kenai Peninsula Geographic Area, the first paragraph has a sentence in it that states [ldquo]It is notable that these fisheries are sustained entirely without supplementation from hatchery produced fish.[rdquo] As the next paragraph notes Chinook salmon are not be sustained (season closures for sport and commercial use), sockeye salmon fluctuate widely. However, the author should research sockeye salmon stockings from Trail Lakes Hatchery into Hidden Lake. This statement is not true and needs to be deleted.

7. On page 292 top paragraph, it says that there is no indication that either species is increasing or decreasing since 1960 for pink salmon and 1970 for chum salmon. This is false. Escapements are harvests in the 1970[rsquo]s were extremely low, to the point of no commercial fisheries. It was not until the late 1980[rsquo]s that escapements and harvests started increasing. To make this statement correct the stating date would need to be 1990 for both species. The disastrous returns of the 1970[rsquo]s are what started the formation of the FRED Division in ADF&G and enhancement projects statewide including hatcheries. The hatchery system actually started in the mid-1970[rsquo]s and was completed in the 1990[rsquo]s.

8. (a) On page 292 top paragraph, a citation of Brenner, et al., 2012 is used to make a point about stray salmon and fitness of wild salmon. This has so many problems. First, it is not a USFS responsibility to manage fish populations in Alaska so why is a salmon straying issue even discussed? Second, this study is not the only study conducted on the issue. There are current studies taking place on a statewide basis, funded by the State of Alaska, Salmon Processors, and Hatchery Operators that are examining the straying of salmon and its genetic effects. It is a multi-year study and preliminary information on pink salmon draws a different conclusion than Brenner, et al. Third, a study done by Sharp in the early 1990[rsquo]s funded by EVOS found that wild pink salmon strayed into other wild systems at rates similar to hatchery straying indicating it is a common occurrence for pink salmon. Other studies have indicated that straying by pink salmon is a survival mechanism since pink salmon do not have multiple year classes to repopulation a system in the event of an environmental disaster (floods, channel changes, volcanic events, etc.). Finally if the EIS is going to get into this issue then it needs to do a thorough job of research and not rely on the bias opinion of the author.

9. On page 295 second paragraph from the bottom, the last sentence discusses how sockeye from in systems without lakes migrate to the ocean soon after emerging from the gravel. I know of no suck location in PWS where a lake is not involved with a sockeye salmon life cycle. It is also an odd sentence since the preceding paragraphs go into great detail about the life cycle of sockeye salmon and their need of fresh water lakes. There are extremely rare cases where sockeye do not use a freshwater lake, but use a brackish estuary as a substitute. The sentence in this paragraph needs deleted.

10. Page 296 fourth paragraph. Delete the first sentence. To start out saying that chum salmon usually spawn in the fall and then proceed to talk about the two races, summer run and fall run. The summer run in PWS spawn in July, that is not fall.

11. On page 297 sixth paragraph talks about number of watersheds and percent of stream systems that contain certain species. This information is wildly incorrect. The number os pink salmon streams is the number of index streams used by ADF&G for stream surveys until recent budget cuts reduced the number of streams surveyed. There are over 1000 streams in PWS that contain some pink salmon on any given year. There is no mention of the systems on the Kenai that contain sockeye salmon. Is the second to the last sentence supposed to say sockeye salmon and not Chinook salmon? This paragraph is not well constructed contains errors and either needs to be deleted or corrected.

12. On page 300 the first paragraph talks about the reduced amount of marine derived nutrients because of commercial fisheries. The author apparently does not understand the boom and bust cycle of unmanaged salmon populations, particularly sockeye salmon. Alaska maintains an escapement goal management system to insure robust returns in following years. This system has proven considerably better than the federal system used prior to statehood. This system is also quite different than systems in the lower 48 states. The reference of Shindler, 2003 is misleading as that reference is referring to the southern portions of N. America (lower 48) where salmon runs have been deleted from habitat loss and not commercial fishing. The escapement goals used by Alaska provide streams with the optimum number of salmon to meet the streams needs. Adding entire returns will ensure a collapse in the returns at some point reducing marine derived nutrients even more. Refer to Coghill Lake over escapements and the resulting run failures. Again, the author is presenting a bias view and shows a lack of understanding of fisheries management. The paragraph should say something to the effect that fisheries management through commercial fisheries has supplied marine derived nutrients at a steady level and take out the speculation. It is apparent that the author thinks wilderness is the only answer to forest land management.

12. (a) The second paragraph on page 300 refers to a period of time after 1900 in 20 lakes in western Alaska where the marine derived nutrients show a marked decline. I again refer to the above paragraph and the relation to federal management verses state management. The federal management system collapsed the states salmon fisheries and the marine derived nutrients that went into those systems. That needs to be highlighted that state management is providing a better system and insuring marine derived nutrients are reaching these systems today.

12. (b) The third paragraph on page 300 refers to harvests of salmon in PWS. Those numbers are for PWS and the Copper River. As written it is incorrect.

12. (c) The fifth paragraph under Hatchery Influence on Wild Salmon is misleading and incorrect. The references cited regarding the survivals of hatchery salmon spawning under wild conditions are referring to salmon that are reared in hatchery systems from fry to smolt generally one year in duration such as coho salmon or Chinook salmon. Lower 48 salmon hatcheries have over the generations selected fish that survive in hatcheries not the wild. The hatcheries in PWS incubate chum salmon and pink salmon (with the exception of Main Bay) and those fish are released within weeks after they leave the incubators. Those fish are not selected to survive in the hatchery raceways for a year, but are subject to natural survival conditions the same as fry coming out of a wild system. There are no studies documenting PWS hatchery wild spawning success although the Hatchery-Wild study currently underway will be looking at that issue. As a result, the references cited do not apply to PWS pink

and chum salmon.

12. (d) The fifth paragraph same section also refers to Hilborn and Eggers (2000). That paper was printed in the transactions of the American Fisheries Society and was rebutted by Wertheimer et al. also published in the Transactions of the Amercian Fisheries Society. The bias of the author is blatantly obvious since they are not presenting a complete picture by leaving out other published information as mentioned. Again, I question why the USFS is involved in fish population issues if this is a land management EIS. Fish population issues are not within the scope of USFS mandates. Fish population issues are a state of Alaska issue and this entire section should be removed.

12. (e) The sixth paragraph is a repeat of previously mentioned information and again has Main Bay hatchery back as a chum salmon hatchery. That entire paragraph is a repeat and adds nothing except for the last sentence which can be stated simply by saying [ldquo]The Main Bay and Cannery Creek hatchery contribution to [hellip].[rdquo]

13. On page 301 the second paragraph is completely false! 65,000 sockeye, 31,000 coho and 9,500 pink salmon do not equal 9.4 million fish. Someone needs to do the math. Also, only using even year data is misleading, pink salmon have odd and even year cycles which are quite different. If a comparison is to be used then both even and odd years need to be included.

13. (a) The first paragraph under Fish Pass Structures and Impoundments states that the fish pass structures enhance the production of wild salmon verse hatchery programs that produce hatchery fish. It should be point out that some of the fish ladders are on systems that were stocked with sockeye salmon from hatchery production which has led to a self-sustaining population. This sentence is not entirely correct and should address that error. Again, the bias of the author against hatcheries is showing and that needs to be eliminated.

14. On page 494 the last paragraph regarding Indirect Effect of Hatchery Fish lists studies on fish in the lower 48 states with species that are not propagated in large numbers in PWS hatcheries. The majority of fish released are pink and chum salmon. Those fish are not long term reared in a hatchery environment, thus studies regarding salmon reared for one or more years in a hatchery prior to release have little bearing on PWS hatcheries. The Main Bay hatchery rears sockeye salmon which require a lake system to survive because of their life cycle. If they stray to a stream that does not have a lake then the resulting fry would not survive thus those strays would not be interacting with wild populations. Few stray sockeye salmon have been found in PWS. None of the relevant information regarding PWS is presented in this paragraph and is simply inserted to provide the bias of the author regarding hatcheries. Again, this is a land management EIS and the hatchery/wild interaction is a fish population issue and belongs to the state of Alaska and has no place in this EIS.

15. On page 495 the second paragraph refers to hatchery stocking of rainbow trout along the road corridor and since they are triploid cannot create a self-sustaining population. The paragraph fails to mention sockeye salmon stocked in Hidden Lake. Again, the author did not do a thorough job of information collection and this paragraph is in error.

16. On page 502 the second paragraph under fish resources fails to mention the sockeye stocking into Hidden Lake on the Kenai River system. This statement is incorrect and needs to be researched and corrected.

17. On page 506 under Fish Resource the same issue as #16 above. If the Boston Bar includes the Kenai Lake system then it is incorrect.

18. On page 509 the top sentence has the same issue as #17 above.

19. On page 512 the third paragraph is full of speculation. It says they [ldquo]likely stray[rdquo]. This paragraph again shows the bias of the author. If there is no information to support a statement then that statement needs to be eliminated. The author says the degree of mixing is not known nor is the impact, however based on studies [ldquo]elsewhere[rdquo] the impacts are likely negative. Why is this paragraph even written into this document? It offers no information, it is simply speculation. Either find facts to add or delete this paragraph.

20. On page 519 under Fish Resource the last sentence again refers hatchery salmon not impacting this area. Other than showing the author[rsquo]s bias against hatcheries, it is irrelevant. The second to the last sentence can be eliminated and the paragraph would be accurate. Although some do sport fish for coho salmon on that system, but the effort is low.

21. On page 524 the first paragraph under Fish Resource indicates that because of the commercial fishery between 1990 and 2011 that the number of fish on the spawning grounds has been reduced from the natural historic condition. If the spawning escapement data is examined from that time period it is obvious that stream escapements were reaching all time high levels since records were being kept. Ocean survivals increased, foreign interception on the high seas was reduced and as a result marine derived nutrients were being supplied to the stream systems. To blame a commercial fishery on reducing the marine derived nutrients when stream escapements are at high levels is disingenuous. It might be better to say that marine derived nutrients are now being replaced at higher levels under stat management.

22. On page 525 under Fish Resource at the top of the page fails to mention that the donor stocks for these hatcheries came from the local wild stock systems. It also fails to mention that the stray salmon are pink salmon. A previous discussion regarding the survival mechanism for pink salmon is to stray was mentioned above. It fails to mention that ADF&G along with funding from processors and aquaculture associations are currently conducting studies to determine hatchery straying rates and if they are having any genetic effects on wild pink salmon populations. Again, that is a fish population issue which is a State of Alaska responsibility and has no place in this EIS. Finally, if marine derived nutrients are an issue as in the preceding paragraph then hatchery strays maybe an alternate way to achieve the desired condition.?

23. On page 526 the first paragraph says that Main Bay hatchery and set net camps provide the most persistent impacts on solitude. What is not mentioned is the very popular sport fishery that occurs in front of Main Bay Hatchery. If someone is looking for solitude they have several million acres to explore instead of at a location where an intense sport fishery is occurring. So, does the USFS wish to eliminate a popular sport fishery so a few individuals can have a wilderness experience on 10 acres of land when they have 2 million acres elsewhere they can go? The EIS seems to be trying to justify a wilderness area designation at the expense of recreation and commercial fishing activities.

24. On page 528 under land use authorization it again appears that the EIS is trying to justify the wilderness study area by disparaging and authorized use under ANILCA. The USFS seems to be very willing to try to eliminate an approved use with an estimated annual ex-vessel value of $5 million and an highly popular sport fishery to allow for a few people to have a solitude experience when 2 million acres of area are available elsewhere on the forest for them to have that experience.

25. On page 531 the first paragraph is a repeat of the paragraph on page 525. I have the same comments on this paragraph as I did on the paragraph on page 525.

25. (a) The second paragraph from the bottom speaks to the opportunities for solitude and the activities that occur in marine waters that may impact that solitude. The USFS manages the land of the Chugach National Forest and not the marine waters or lands outside of the National forest boundaries. It is irrelevant to complain about activities that might impact solitude in areas outside of the jurisdiction of the USFS. This paragraph needs to be re-written to indicate where a person can go to find solitude other rather than complain about these active areas. The best option would be to reduce the amount of area being considered in the Wilderness Study Area so that the areas south of Whittier are excluded. Rewrite or eliminate this paragraph.

26. On page 532 under the opportunity for primitive recreation, there is a comment in the forest paragraph about recreation activities are high, but commercial fishing occurs especially near the hatcheries. Intense recreational fishing occurs near the hatcheries as well as commercial fishing. Commercial fishing activities are regulated to certain days and certain hours, yet recreational fishing can occur at any time. This paragraph fails to mention the recreational fishing aspects and opportunities near the hatcheries.

27. On page 536 the second paragraph is a repeat of the paragraph on page 525 (comment #22). I have the same comments for this paragraph.

28. On page 540 the second paragraph from the bottom is the same as the paragraph on page 524. I have the same response as comment #21.

28. (a) On page 540 the last paragraph is a repeat of the paragraph on page 525. I have the same comments as found in comment #22.

29. On page 544 the second paragraph is a repeat of the paragraph on page 525. I have the same comment as found in comment #22.

30. On page 547 the second paragraph from the bottom is a repeat of the paragraph on page 525. I have the same comment as found in comment #22.

31. On page 551 under Fish Resource the bottom of the paragraph refers to hatchery fish in transit in the Copper River. Once again the author is showing their bias against hatchery fish by even mentioning the fact that they might be transitioning up the Copper River. It is irrelevant that the fish are there for this EIS, but it reiterates the bias that is being introduced by the author regarding hatchery fish.

32. On page 555 under Fish Resource the bottom of the paragraph refers to hatchery fish in transit in the Copper River. Once again the author is showing their bias against hatchery fish by even mentioning the fact that they might be transitioning up the Copper River. It is irrelevant that the fish are there for this EIS, but it reiterates the bias that is being introduced by the author regarding hatchery fish.

33. On page 558 under Fish Resource the bottom of the paragraph refers to hatchery fish in transit in the Copper River. Once again the author is showing their bias against hatchery fish by even mentioning the fact that they might be transitioning up the Copper River. It is irrelevant that the fish are there for this EIS, but it reiterates the bias that is being introduced by the author regarding hatchery fish.

34. On page 561 the paragraph is repeated as on page 551. I have the same comment as #31.

Overall comment on the fisheries related narrative in this EIS for the Chugach National Forest Land Management Plan.

The fisheries narrative continues to delve into fish population issues that are not relevant to the USFS mission.

The USFS should stay clear of state of Alaska fishery issues and stay focused on land habitat conservation, improvement and restoration. There are many places where this EIS delves into commercial fishing and marine water activities which have no place in this EIS. It is very apparent that the author of the fisheries section has an anti-hatchery perspective and repeatedly implies a negative connotation when referring to hatchery salmon production. It was also apparent that the author only looked for literature references that supported their anti-hatchery view. It was obvious the author was trying to justify a Wilderness designation in the wilderness study area and appeared to find fault with ANILCA for allowing some activities to exist in the area. ANILCA is the law and regardless of what the author thinks or feels that is what this EIS needs to project. Several sections are poorly written and provide false information and need to be corrected.

I hope these comments help in providing a clear and accurate EIS for the fisheries portions of the document. Thank you for the opportunity to comment.

Sincerely,

Timothy L Joyce

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Re: Chugach NF Comment CARA Database Issues

Please find my comments attached. Thank you

Timothy L Joyce

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From: FS-Chugach Forest Plan Revision <chugachplanrevision@fs.fed.us>

To: FS-Chugach Forest Plan Revision <chugachplanrevision@fs.fed.us>

Sent: Wednesday, October 31, 2018 9:53 AM

Subject: Chugach NF Comment CARA Database Issues

On October 26th we became aware of an issue with the U.S. Forest Service Comment and Analysis Response Application (CARA) database. Commenters checking to confirm the receipt of their comments on or around October 24th to the 26th may not have seen their comments accurately reflected in the reader's guide (many saw a 2016 letter related to the Sierra, Sequoia, and Inyo National Forests).

We learned from the national developers of the CARA database, that due to a software update, the Chugach National Forest, as well as other forests, experienced some comment submissions appearing incorrectly in the reader's guide. The software problem has been corrected and all comments submitted to date are correctly associated with the Chugach National Forest draft Land Management Plan. If you submitted comments during this timeframe, you can check the reading room for your submission. To view comments in the reading room click here.

We value your input and can confirm comments received in the CARA database were never changed or lost during this software update.

In addition to submitting comments electronically to the CARA database at www.fs.usda.gov/goto/chugach/plancomments, there are other options (below) for submitting your comments including the addition of a dedicated email address:

1. FAX to (907) 743-9476

2. Send or deliver written comments to:

Chugach National Forest's Supervisor's Office

Attn: Draft Land Management Plan

161 East 1st Ave., Door 8,

Anchorage, AK 99501

3. E-mail comments to: chugachplanrevision@fs.fed.us

If you have additional questions or want to speak to anyone further please contact

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