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Organization: Native Village of Eyak

Title: Director, Dept of the Env and Nat Res

Comments: Dear Ms. Marceron:

The Native Village of Eyak appreciates the time spent in Tribal Consultation and the opportunity to comment on the draft Land Management Plan and draft Environmental Impact Statement (EIS) for the Chugach National Forest .

As a Tribe with historic and cultural ties to the Copper River Delta and Prince William Sound, we are impacted by any land use within the Chugach National Forest, and so this Draft Environmental Impact Statement and Land Management Plan is of enormous interest.

NVE has concerns regarding the proposed alternative "C." Specifically the designation of "primitive recreation" for areas in the western end of the Sound that now are multi-purpose use. These areas support commercial fishing, hatcheries, guiding and other commercial and sport uses. The current management system has been, in large part, working well from our perspective. There is no reason to change the designation to a more restrictive model which could have a significant detrimental effect on the Prince William Sound and the State's economy. Managing for recreation and conservation over activities supportive of social and economic sustainability is not what Congress intended for National Forests, especially in Alaska.

The EIS speaks to climate change and management to preserve streams and fish populations. To this end the Forest Plan should support hatchery production as another means of fish population enhancement. Restricting development to the Forest Service's interpretation of ANILCA and gaining the right to regulate commercial activity occurring on State tidelands will have negative consequences on the ability of hatcheries to carry out their mission. This would have a huge negative effect upon State, local, and Tribal economy.

The documents mention hatcheries over 100 times, with numerous assertions that are troubling regarding the straying of hatchery fish and impacts strays may be causing. At present, The Alaska Hatchery Research Project (AHRP), initiated several years ago by the State of Alaska, has yet to determine any negative impacts or substantial genetic intrusion of hatchery fish into wild stocks. The language in this document suggests that the state of this research is much farther along than it actually is, going so far as to make fairly conclusive and indicting statements about hatchery issues the AHRP was intended to illuminate, but citing much smaller studies that merely suggest correlations and demonstrate no impacts. These types of statements are very concerning, considering the enormous economic contribution this hatchery infrastructure provides in Prince William Sound. The document provides very generalized data on commercial fisheries harvest and intercept that suggest impacts that evidence does not support. Because these issues are so numerous we will submit a letter detailing each specific issue we have regarding hatcheries and commercial fisheries, and simply state our broad concerns with how these two issues are treated throughout the documents.

We also think that the Forest Service may have misinterpreted ANILCA in its decision to expand the roadless and wilderness designated areas. We realize that the Forest Service considers such expansions part of the planning process and so not violated ANILCA. We disagree, even though this alternative is undertaken as part of the planning process, its application effectively recommends new areas for wilderness designation, which is counter to the language in ANILCA.

Again, we appreciate the opportunity to comment on these issues and look forward to continuing the discussion.

