

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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May 6, 2011

Susan Boudreau
Superintendent
Glacier Bay National Park and Preserve
P.O. Box 140
Gustavus, Alaska 99826

Dear Ms. Boudreau:

The State of Alaska reviewed the April, 2011 Environmental Assessment (EA) concerning the DIDSON Sonar Installation on the Bartlett River prepared by the Glacier Bay National Park and Preserve. This letter contains consolidated state agency comments compiled by the State's Alaska National Interest Lands Conservation Act (ANILCA) Program covering ANILCA and other state interests. I understand your office has already received the March 31, 2011 letter from the Division of Coastal and Ocean Management concurring with your determination that this project is consistent to the maximum extent practicable with the Alaska Coastal Management Program.

Sustainability

The State acknowledges that the available data regarding fisheries resources on Bartlett River is limited; and we agree that accurate and reliable quantitative data assists management decisions. In that regard, the Alaska Department of Fish and Game (ADF&G) looks forward to obtaining additional information about the Bartlett River coho salmon population. However, ADF&G, as the responsible agency for the sustainability of fish and wildlife in the State of Alaska, does not feel there is a current or near term risk of insufficient escapement of coho salmon in the Bartlett River. Stock assessment studies in Southeast Alaska have shown that coho salmon are capable of sustaining high levels of harvest. In addition, based on the fact that relatively few anglers report fishing in the Bartlett River (through the ADF&G's Statewide Harvest Survey) and because there is no terminal-directed commercial fishery, the total harvest of Bartlett River coho salmon is likely less than what has been observed in other Southeast systems. As with other coho stocks in Southeast Alaska, we feel that the current fishery management and monitoring tools are sufficient to ensure sustainability. In addition, ADF&G recognizes the potential for changes in population dynamics due to climate change and high uplift rates (page 2); however, state management is sufficiently nimble to address any trends that may arise.

Definitive estimates of harvest and effort generated from ADF&G's Statewide Harvest Survey (SWHS) are not available because of the small number of responses reporting sport fishing activity in the Bartlett River. Accurate SWHS estimates are typically only available for streams or areas that generate a statistically sufficient level of responses. However, although limited, SWHS responses from Bartlett River anglers are sufficient to suggest a downward trend (1997- 2009) in sport fishing effort. Sport harvest of coho salmon in the Bartlett River from 1997 to 2008 appears to be somewhat variable with no significant trend.

Survey Counts

Survey counts are not intended to "accurately enumerate" a population. They can provide a minimum value for the number of spawners present in the river at one point in time. However, more often, if conducted annually, they are used to provide an annual index of abundance that can show changes in the population over time. We recommend that this study include survey counts in an appropriate section of the river that is easy to walk and spot fish for comparison with the final sonar count. Multiple years of combined sonar and survey data may show a reasonable correlation, which could be used to expand future survey counts to provide estimates of the total escapement in years when other methods are not feasible or warranted.

The "visual survey methods" described (page 3, paragraph 3) are not intended to estimate the population, as implied. If the Park wants to compare the benefits of the DIDSON sonar over other methods, we suggest the comparison be with other methods that would provide a total escapement count (e.g., rigid weir) or a total escapement estimate (e.g., a mark-recapture study). We would also like to note that fish weirs do not "halt" fish passage; implemented and managed properly, they briefly delay fish passage.

Apportionment and Data Collection

The apportionment sampling will be the key to good data collection. We suggest more sampling time will be needed than described on pages 26-27 while coho, pink, sockeye, and chum salmon runs overlap. As the coho salmon run develops and after sampling crews catch only coho salmon three days in a row, sampling could be curtailed. We recommend consulting a biometrician to determine the number of coho salmon needed to sample from the total escapement for enumeration purposes. In addition to species identification and measurement (mideye to fork of tail), we recommend collecting standard scale samples for purposes of ageing, and determining the sex of the coho salmon to help reconstruct the run. Using a fish pen to hold the fish after net retrieval can reduce stress on fish awaiting sampling.

Given the complexities of the DIDSON unit, we recommend budgeting for a contingency site visit by a DIDSON expert. This can cost \$1,000 a day plus travel expenses. In addition, an electric bear fence may help prevent damage to critical installation equipment.

Consistent with our scoping comments, we recommend that the Service provide human/bear interaction and safety training to employees that will be working on this

project, especially those who will be capturing fish. The Service has a good program and the staff at Glacier Bay is very aware of the potential for interaction.

Permits Needed to Implement Project

A Fish Resource Permit is missing from the list of permits in this EA. This permit is required by AS 16.05.930 for physical sampling such as the use of fyke or seine nets. ADF&G is the custodian of the fish resources of the state and permits are required for all collections of fish not covered by existing regulations. The requirement includes methods and means (gear), numbers, locations, seasons, or the possession and/or transportation of live fish in any life-stage outside of existing sport, personal use, aquatic farm, and commercial regulations. For additional information please contact Bob Piorkowski at 465-6109. The turnaround on these permit applications is 30 days, due to the number of permit requests this year.

Purpose of the Park

We appreciate the bullet list of abbreviated ANILCA purposes on page 4 of the EA; however, ANILCA did not state these purposes as specific directives for management of Glacier Bay National Park and Preserve. A majority of the page 4 bullets are portions of the general purposes of Alaska conservation areas established under ANILCA. If we had been provided a draft of the EA, we would recommend using the language of the Act, including the Park-specific purposes, and removing the management direction more appropriate for the General Management Plan section.

Thank you for the opportunity to provide these comments. Unless otherwise noted in this letter, if you have any questions please contact Jason Cheney at 267-2300, jason.cheney@alaska.gov; or me at 907-269-7477, sally.gibert@alaska.gov.

Sincerely,



Sally Gibert
State ANILCA Program Coordinator

cc: Allison Banks, Glacier Bay National Park and Preserve