



April 25, 2016

M. Earl Stewart, Forest Supervisor
Tongass National Forest
648 Mission Street
Ketchikan, AK 99901

Dear Mr. Stewart:

The State of Alaska reviewed the Shoreline II Outfitter and Guide Draft Environmental Impact Statement (DEIS), which proposes to allocate a portion of visitor capacity to outfitter and guide use on lands in the Admiralty Island National Monument, and Hoonah, Juneau, and Sitka ranger districts. The following comments represent the consolidated views of the State's resource agencies.

Outfitting and guiding opportunities are important to the local and regional economies of Southeast Alaska. We support alternatives featuring higher allocation of service days for outfitter/guide businesses to operate in the shoreline zone, while also managing forest resources on a sustainable basis that ensures long term economic growth in the region. The State has the responsibility and the means to sustainably manage fish and wildlife resources under all of the alternatives. Commercial recreation is also essential to achieving the Secretary of Agriculture's desire to transition the Tongass National Forest to a more ecologically, socially, and economically sustainable forest management program. The plan indicates that by allowing for needed economic growth in the region, Alternative 4 is aligned with that transition strategy.

Wilderness

We are concerned with the plan's overarching implication that wilderness character would be protected by reducing guided use in wilderness areas. Behavior is often the driving factor behind perceptions of crowding, and simply reducing guided use in designated Wilderness does not necessarily equate with an improved wilderness experience. The Wilderness Commercial Needs Assessments (WCNAs) all conclude that guided users and the wilderness resource benefit from a guide's specialized knowledge, skills and equipment, including preventing or resolving user conflicts in the field can lead to the perception of crowding. We encourage the Service to give greater consideration to the recognized benefits of guided use for the public and the wilderness resource when making wilderness allocation decisions.

Solitude Indicators

The effects analysis section of the plan focuses on two solitude indicators - remoteness from human activity both inside and adjacent to wilderness (page 3-92). The indicator for activities within wilderness identifies several evaluation criteria, including cabin reservations, guided visitors, group

encounters, recreation sites and trails. While we do not necessarily agree that all of these criteria are good indicators for measuring solitude, they are at least activities that occur within the wilderness areas. We do not agree that activities occurring *outside* designated wilderness should be monitored and factored into the plan's existing condition or the effects analyses.

In addition, the standards of analysis are not clear. In particular, the plan does not quantify "low-intensity" as used in the solitude indicator "percentage of days monitored with low-intensity or no encounters" (page 3-87). The Wilderness Character Monitoring Plan for the Tongass National Forest (Attachment D), which the DEIS references, identifies a standard of 4 out of 5 days with no "medium" or "high" impact encounters. While it is also not clear what constitutes "medium" or "high impact encounters, the monitoring plan also states that the standard is *not to be used for management purposes* (3-78). The 2008 Tongass National Forest Land and Resource Management Plan states that "encounters should be less than three groups per day to maintain the more primitive experience" (page 3-19), which suggests a higher encounter rate than the monitoring standard. The DEIS needs to clearly identify and cite all standards used as a basis for evaluating wilderness character.

The plan also does not explain why the Service is evaluating activities that are occurring outside a wilderness area. Instead, the plan specifically states that private lands and other public lands and waters outside the Service's jurisdiction are not part of the analysis (Summary, page i). This approach also appears to be inconsistent with the Service's existing guidance for wilderness monitoring practices. The Tongass Wilderness Encounter Monitoring Protocol limits encounters to those occurring *within* wilderness.

*An "encounter" occurs when a person or groups becomes aware of the presence of another person or group **within the wilderness** (definition from "A Guide to Monitoring Encounters in Wilderness," Broom, T. J, and Hall. T.E., University of Idaho College of Natural Resources). [Emphasis added]*

The Forest Service publication "A Guide to Monitoring Encounters in Wilderness" also supports a limited focus.

*The protocol lays out clear guidance about where to monitor (e.g., **not outside the wilderness boundaries**; only when the observer is on the trail; where segments begin and end). [Emphasis added, Page 40]*

By including observation encounters with boating and others activities occurring outside of wilderness as equivalent to groups encountering each other on a trail within designated wilderness, the plan inappropriately inflates encounter rates and skews related conclusions. This seems especially inappropriate considering marine waters in Southeast Alaska serve as a highway for communities that aren't connected by a road system.

We therefore request the plan remove the "adjacent to wilderness" solitude indicator and re-evaluate the existing condition and effects analyses to consider only those activities that are occurring within the designated wilderness areas. We also request the Service consider a variety of ways to evaluate and address perceived impacts to wilderness character, including considering available opportunities for solitude within designated wilderness outside the limited shoreline zone. Under the limited approach in

this plan, absent consideration of any other management tools, including those provided by skilled guides, the plan concludes that Alternative 4 negatively impacts all wilderness areas, which we anticipate will foreclose the Service's ability allow for increases in guided use within wilderness areas on the Tongass. This is especially important in wilderness areas where there is a higher demand for use due to their proximity to communities or the unique features that led to their designation. To meet the purpose and need for the plan, the balancing policy of the Wilderness Act,¹ and the transition strategy for the Tongass, the Service needs to apply management strategies that are designed to encourage, rather than reduce or eliminate, use opportunities within designated wilderness.

Wilderness Commercial Needs Assessments

We support the inclusion of the WCNA's as appendix F in the DEIS. These documents are the basis for several decisions proposed by the Service and they provide the public with an opportunity to review and meaningfully comment on the analyses and conclusions. However, we encourage a more thorough and clear explanation of the purpose of WCNAs and their relationship to the draft plan and EIS.

For example, the WCNAs for Kootznoowoo, Tracy Arm-Ford's Terror & Chuck River, South Baranof and West Chichagof-Yakobi wilderness areas determined that floatplane landing tours were "not necessary" for realizing the wilderness purposes, or compatible with the preservation of wilderness character. However, the plan only identifies the categories that were found necessary and does not disclose or explain the effects of the negative determinations (i.e. not necessary), in this case, for floatplane landing tours. The result of which is a prohibition on a category of guided use, which does not take mitigation measures into consideration.

Further, while WCNAs are tailored toward specific wilderness areas, the justification provided for these negative determinations do not rely on individual characteristics of a particular designated wilderness. For example, the WCNAs fundamentally contradict the Misty Fiords National Monument WCNA's finding for floatplane landing tours (also posted on the wilderness.net website), which acknowledges that accessing remote alpine lakes requires the services of a skilled and licensed pilot "...because the knowledge and skills required to maintain and fly an airplane are beyond the average person's ability." Floatplane landing tours also provide opportunities for "...the disabled and elderly to access certain areas, and participate in recreational and educational opportunities." Unlike the WCNAs in this plan, the Misty Fiord WCNA does not identify the act of viewing the wilderness from the air or spending short periods of time on the ground as being inconsistent with the scenic or other wilderness purposes, or being incompatible with preserving outstanding opportunities for solitude or a primitive and unconfined type of recreation.

According to *On the Outside Looking In* - an article from the International Journal of Wilderness (August 2008, pg. 19-23) "Flightseers often talked about unique aspects of scale and how they gained appreciation for the size and scale of [of wilderness] during their flights." While most wilderness experiences in the United States involve gaining a sense of humility from hiking or paddling under self-power, the humility flightseers experience comes from realizing the scale of Alaska's Wilderness. Additionally, airplanes are an allowed mode of access in designated wilderness in Alaska. They can be

¹ Section 2.(a) ...*these [areas] shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use as wilderness....*[emphasis added]

managed to minimize impacts on wilderness characteristics but they are not “incompatible” with wilderness characteristics.

We also question the delineation of remote setting nature tours and floatplane landing tours as separate, distinct actions. The WCNA's find point to point transporters who drop off clients to engage in remote setting nature tours as “necessary” but do not find float plane tour operators “necessary” to conduct essentially the same activity. We recommend either finding floatplane landing tours as a needed commercial service activity or combining floatplane landing tours into the remote setting nature tour category.

The DEIS also does not discuss a strategy or policy for considering newly proposed guided activities not previously examined in the WCNA's. As noted in our scoping comments dated July 31, 2014, individual WCNA's establish a very high bar for Districts to update needs assessments in order to consider new proposals – either a modification of a category that was previously analyzed or a new service not previously considered. Currently, WCNA's will only be updated in between revision cycles “*when substantial changes occur in natural systems and/or commercial recreation service markets.*” We are concerned that pre-determining the necessity for certain commercial service activities in advance of a specific request from an operator does not take into consideration mitigation measures that could reduce or eliminate impacts to wilderness character, such as limiting hours of operation in certain high use areas.

To ensure requests for new guided opportunities in designated wilderness areas are not categorically refused consideration because they were not previously evaluated, either as a whole or in part as presented in the existing WCNA's, we request the Service establish an open-ended process, either by regional policy or in the plan (possibly as part of the adaptive management strategy), in which additional or modified categories of guided use may be considered on a case by case basis, in between WCNA revision cycles. We are available to assist the Service in that effort.

Lastly, the public involvement section of the DEIS lists the completed WCNA's that relate to the project area. Since they were internal and not publicly reviewed documents, it seems inappropriate to reference them in this section of the plan. We request they be instead referenced as discussed above. We also recommend including the Tongass Wilderness Character Monitoring Plan as an appendix for reference.

Adaptive Management

The plan states that outfitter guides could be liable for additional fees if they request additional use when an area's actual use falls within 80% to 110% of the total allowed allocation for any season. Since this planning process has already considered the impacts of 100% of the allocation of the proposed alternative, this seems unnecessarily onerous. Additionally, the DEIS considered 130,655 service days which is over 160% of the allocation for the proposed action. We recommend that this Adaptive Management option be used if the proposed increase in additional use is over 100% of the allocation. Associated costs or fees should be minimal if use is within the range of alternatives considered in the final EIS.

Fish and Wildlife Management

We support the recognition in the DEIS of the State's responsibilities for the sustainability and management of all fish and wildlife, including for subsistence purposes, regardless of land ownership or designation, unless specifically preempted by federal law. Should there be any issues regarding fish and wildlife resources or state management activities during plan implementation, we request the Service work cooperatively with the Alaska Department of Fish and Game (ADF&G), and as appropriate, fully utilize the Boards of Fisheries and Game processes, to seek resolution.

Further, we encourage increased coordination and consultation between the Service and the ADF&G biologists responsible for the management of fish and wildlife resources within the project area. ADF&G staff remain available for consultation as the Service proceeds with finalizing the plan. Increased consultation typically results in more complete information in the DEIS, which benefits both the public and decision-makers.

Marine Mammals

The following resource-specific information is provided to supplement the information in the DEIS.

1. **Harbor seals:** while pupping activity can occur anywhere along the shoreline, areas with higher abundance of animals are more likely to include this activity. Please see the attached maps with harbor seal abundance designations within the Analysis Area identified by color (red includes the most animals, followed by green, yellow, blue); for map-use permission and data questions please contact ADF&G marine mammal biologists. Data is shown in "polygon" areas which are defined as units of 10-15 km of coastline but do not show specific haul-out locations within each polygon. This is due to the fact that there are shifts in the exact haul-out locations from year to year.

The draft DEIS plan very thoroughly includes Marine Mammal Protection Act (MMPA) information and National Marine Fisheries Service (NMFS) regulations and guidelines in an effort to minimize disturbances, especially to hauled-out seals. However, allowing additional Large Group Areas or more service days in the high abundance areas (especially red or green) should be given careful consideration for the following reasons:

- a. Protections under the MMPA can be difficult to enforce.
- b. Disturbances to an individual or a few seals may result in the flushing into the water of an entire group of hauled-out animals, which is especially disruptive during pupping season and can cause loss of life due to permanent mother/pup separation.
- c. Unlike Steller sea lions where specific haul-out locations can be predicted year-to-year, the locations where seals haul-out are dynamic and can depend on ice flows, tidal change of mudflats, weather, time of day, etc. It can be difficult for a user to adequately identify hauled-out seals from the beach or water and often not until close enough that a disturbance will occur.

2. **Steller sea lions:** Chapter 3-183. The paragraph above Table 3-31 states:

"Major rookeries and haul-outs in southeast Alaska are identified in 50 CFR 226. There is one rookery and eight haul outs designated as critical habitat within the Analysis Area. Biali Rock is listed in the CFR as a haul out but is now known to also be a rookery (NMFS 2013b). There are numerous other

locations where smaller numbers of sea lions regularly haul-out which are not documented or mapped (such as navigation markers). "

In addition to the designated critical habitat rookery and haul-outs, there are more documented and mapped Steller sea lion haul-outs within the Analysis Area recognized by the NMFS. The KML files and location information of these haul-outs can be found here: <http://www.nodc.noaa.gov/cgi-bin/OAS/prd/accession/details/129877>.

3. The following **NOAA federal guidelines** (<https://alaskafisheries.noaa.gov/pr/mm-viewing-guide>) in regards to preventing disturbances to marine mammals from the air should be included:
 - a. Maintain a 1500-foot minimum altitude when viewing marine mammals from the air.
 - b. Buzzing, hovering, landing, taking off, and taxiing near marine mammals on land or in the water is likely to harass the animals.

Big Game Guide Management

Number of Guides – The DEIS reports that the Forest Service has succeeded in reducing the number of brown bear hunting guides operating in Game Management Unit 4 from 38 to 20 guides, as recommended in the Unit 4 Brown Bear Management Strategy (BBMS). We believe that keeping the number of guides at 20 will help ensure total brown bear mortality remains within the recommended three-year running average of 172 bears.

One-Third Permit Hold-back – The DEIS proposes to end the one-third hold-back of Forest Service permits when guiding businesses change ownership. The intent of this provision was to reduce the number of guides operating in Unit 4 through attrition by reducing the number of permitted hunts available to new business owners when guiding businesses changed ownership. Because guide numbers have been reduced to the level recommended in the BBMS, we believe it is appropriate to end the one-third hold-back provision. However, we recommend withholding the nine hunt permits currently in the hold-back pool to ensure harvest in Unit 4 remains within guideline levels.

Guided Hunter Success Rate – Working documents associated with development of the June 2000 BBMS indicate the planning team assumed a guided hunter success rate of 50%. In recent years ADF&G records indicate guided hunter success rate has ranged from 70% to 85%. The department believes that change is more likely related to improvements in the boats, equipment, and experience of guides than an increase in bear abundance. The DEIS should recognize this change in guided hunter success and the resulting increase in bear harvest relative to the number of guided hunts permitted.

Recommended Maximum Bear Mortality – The DEIS uses the outdated number of 166 bears for the three-year running average of total human-caused bear mortality. Based on a population estimate by the department for northeast Chichagof Island and a 2013 finding by the Board of Game, that number was increased to a maximum three-year running average of 172 bears per year.

Proposed 60% Spring and 40% Fall Hunt Distribution – The DEIS proposes to allocate 60% of each guide's hunt permits to the spring season and 40% to the fall season. Historically about 70% of guided hunts and actual bear harvest have taken place during the spring and 30% during the fall. Due to the more challenging hunt conditions a higher proportion of female bears are usually taken during the fall season. Requiring guides to conduct more hunts during the fall could result in an increased harvest of

female bears. Under the BBMS harvest of females exceeding 1.5% of the female bear population can trigger hunt closures. Previous hunt closures have disproportionately affected resident hunters because it is unproductive for guides to hunt after bears leave salmon streams in late September, whereas residents value the chance to opportunistically harvest a bear while deer hunting late into the fall.

Sport Fisheries

The current regulations for trout and steelhead trout have been developed to sustain fish and the associated sport fisheries. Current trout and steelhead trout regulations in the area are some of the most conservative on the West Coast of the U.S., protecting a majority of female trout until they have spawned at least once, and preventing over 97% of the adult steelhead trout caught from being harvested through catch and release practices. Use of bait in the fresh waters of the region is typically only allowed during two fall months, when it is primarily used in the coho fishery, minimizing unintended mortality in the trout and steelhead trout fisheries. Other areas prohibit use of bait on a year round basis to provide additional needed protection from mortality. In summary, trout and steelhead trout regulations are set conservatively to protect the sustainability of small populations while knowingly foregoing harvest opportunity on larger populations. In addition to these conservative regulations, the managers of the sport fisheries have emergency order authority to modify regulations at any time in order to protect the sustainability of fish populations.

Currently ADF&G monitors Southeast Alaska fresh water sport fisheries effort and harvest through three programs: the Statewide Harvest Survey (SWHS), Freshwater Sport Fish Guide Logbook, and the Southeast Alaska Cabin Survey, conducted in cooperation with the U.S. Forest Service. The SWHS is an annual postal survey sent to a random sample of sport fishing license holders. It provides estimates of harvest for freshwater species by drainage and primary sport fishery management areas. The benefits of the SWHS are that it provides a consistent annual estimate of all sport harvest that can be further divided into harvests by resident and nonresident anglers, as well as guided and non-guided anglers.

Freshwater Sport Fish Guide Logbook (logbooks) have been required in Southeast Alaska since 2004, and all guides who take clients fishing are required to report harvest and fishing effort on a trip-by-trip basis. Guides are required to provide the number of anglers fishing and their residency, license number or permanent license number, as well as the number of Chinook salmon, coho salmon, sockeye salmon, cutthroat trout, rainbow trout, steelhead trout, and Dolly Varden harvested, and the number of cutthroat trout, rainbow trout and steelhead trout released. ADF&G, in cooperation with the Forest Service, has conducted a mail in Cabin Survey in Southeast Alaska since 1999 at a three year interval. Questionnaires are sent to parties reserving Forest Service recreational cabins that are located on cutthroat trout and rainbow/steelhead trout systems, and are used to describe trout and steelhead trout catch, harvest and the number of cabins users who fished. Estimates of angler catch and harvest from the cabin survey can, in some cases, provide more specific information for individual systems, and for different areas, than the SWHS.

ADF&G research has been conducted within this project area that estimated population parameters for both anadromous and resident species. This information was and is used to design the current regulations that protect sustainability while allowing fishing opportunity and harvests in the waters of Southeast Alaska.

Please contact the following area staff for additional information or assistance on incorporating this information into the final plan.

Daniel Teske – Juneau Area Management Biologist, Division of Sport Fish
Phone: (907) 465-8152
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Troy Tydingco – Sitka Area Management Biologist, Division of Sport Fish
Phone: (907) 747-5379
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Rich Chapell – Haines/Skagway Area Management Biologist, Division of Sport Fish
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Page Specific Comments

Description of the Project Area, Summary, page i. The plan identifies areas that are not part of the analysis, including “Private lands and other public lands and waters outside the jurisdiction of the Forest Service (i.e. submerged islands, marine waters, Alaska State Parks.” We request the final plan clarify that this also includes state-owned and managed waters where there is not an associated upland use. See also above comment regarding factoring activities in marine waters into the wilderness solitude impact analysis.

Management Indicator Species, Alexander Archipelago Wolf, Chapter 3-166. We question the selection of the Alexander Archipelago Wolf as a management indicator species when these wolves only occur on the Juneau Ranger District within the Analysis Area. These wolves are not present on Admiralty, Baranof, or Chichagof Islands.

Management Indicator Species, Bald Eagle, Chapter 3-167. We recognize that National Bald Eagle Management Guidelines recommend that aircraft avoid operating aircraft within 1,000 feet of the nest during breeding season; however the guidelines in this plan omit two important caveats in these guidelines. We request the following edits that better recognize national management guidelines.

This plan provides recommendations for avoiding habitat alterations and disturbance (including repeated human activity) within 330-660 ft. (depending on the activity type) of bald eagles nests and that aircraft avoid flying within 1000 ft. of nests during the breeding season, except for authorized biologists trained in survey techniques or where eagles have demonstrated tolerance for such activity.

Steller Sea Lions, Chapter 3-183. The paragraph above Table 3-31 states:

"Major rookeries and haul-outs in southeast Alaska are identified in 50 CFR 226. There is one rookery and eight haul outs designated as critical habitat within the Analysis Area. Biali Rock is listed in the CFR as a haul out but is now known to also be a rookery (NMFS 2013b). There are numerous other locations where smaller numbers of sea lions regularly haul-out which are not documented or mapped (such as navigation markers). "

In addition to the designated critical habitat rookery and haul-outs, there are more documented and mapped Steller sea lion haul-outs within the Analysis Area recognized by the NMFS. The map files (KML format) and location information of these haul-outs can be found here:
<http://www.nodc.noaa.gov/cgi-bin/OAS/prd/accession/details/129877>.

Aquatic Concerns, Chapter 3-220. “It is important to understand that the management and regulation of fish populations is wholly the responsibility of ADF&G. Sport fish populations are managed by applying regulations.” This statement is somewhat simplistic as there are many additional steps that enter into the management of fishery populations. We recommend the regulatory process conducted by the Board of Fisheries be referenced here (Alaska Statute 16.05.251). Specific Board of Fisheries information can be found on the ADF&G website at <http://www.adfg.alaska.gov/index.cfm?adfg=process.main>, while sport and commercial fisheries management information can be found at <http://www.adfg.alaska.gov/index.cfm?adfg=fishingSport.main> and <http://www.adfg.alaska.gov/index.cfm?adfg=fishingSubsistence.main>.

In addition, charter operators and guides are required to register with the state and abide by those regulations for this activity (Alaska Statute 16.05.395 & Alaska Administrative Code 5 AAC 75.075, 5 AAC 75.076, 5 AAC 75.077). In combination with the Forest Service outfitter/guide permitting, this represents long standing efforts to administer the commercial guided use industry.

Salmon, Chapter 3-226, Paragraph 2. “Though not highly pursued by sport fishers....there is little harvest of this species by sport fishers because their flesh tends to be pale.....” We request that the reference to pink salmon be revised to reflect that pink salmon actually provide important recreational fishing opportunities for anglers in Southeast Alaska. Their abundance and aggressive behavior makes them a highly pursued species in fresh and salt waters, particularly for non-resident anglers. Catch of pink salmon in freshwater by non-resident anglers often exceeds that of all other salmon species except coho in Southeast Alaska (Statewide Harvest Survey) Reference:

Jennings, G. B., K. Sundet, and A. E. Bingham. 2015. Estimates of participation, catch, and harvest in Alaska sport fisheries during 2011. Alaska Department of Fish and Game, Fishery Data Series No. 15-04, Anchorage.

Salmon, Chapter 3-226, Paragraph 5. “Summer run coho are targeted by the guided public.” This statement would indicate that most, or all, effort for coho in freshwaters would target summer run coho. Most coho populations in Southeast Alaska are fall run and are targeted by both guided and unguided anglers.

Salmon, Chapter 3-226, Paragraph 6. “King salmon...” Fish Creek is an enhanced run with annual returns of hatchery-produced Chinook salmon and we request this information be included in the paragraph.

Trout and Char, Chapter 3-227, Paragraph 1. This paragraph does not accurately characterize or reflect the status of Alaska Sportfish regulation development for freshwater species in Southeast Alaska. This

paragraph would benefit from updating current regulatory status and the process for when, why and how the current regulations were established. Reference:

Harding, R. D., and C. L. Coyle. 2011. Southeast Alaska steelhead, trout, and Dolly Varden management. Alaska Department of Fish and Game, Special Publication No. 11-17, Anchorage.

Trout and Char, Chapter 3- 227, Paragraph 2. We recommend the following edit: “Steelhead ~~is~~ are the anadromous form of rainbow trout...”

Trout and Char, Chapter 3-227, Paragraph 2. We recommend the following edit: “Steelhead tends to prefer medium-sized and larger...”

Trout and Char, Chapter 3-227, Paragraph 2/3. The steelhead trout narrative would benefit from a sentence describing the small size of most steelhead trout populations in Southeast Alaska, most consisting of 200 or fewer adults, making it important to monitor local index streams for relative levels of abundance and to have conservative regulations related to harvest. Reference:

Coyle, Carol L. 2014. Southeast Alaska steelhead trout escapement surveys: 2014 and 2015. Alaska Department of Fish and Game, Regional Operational Plan.SF.1J.2014.02, Anchorage.

Harding, R. D. and C. L. Coyle. 2011. Southeast Alaska steelhead, trout, and Dolly Varden management. Alaska Department of Fish and Game, Special Publication No. 11-17, Anchorage.

Trout and Char, Chapter 3-227, Paragraph 3. The literature cited is a bit dated. This paragraph would benefit from referencing the most recent research on steelhead trout in Southeast Alaska rather than making generalized statements about steelhead trout production declines and or abundance. Sustained production is stable under current sport fishing regulations. Reference:

Coyle, Carol L. 2014. Southeast Alaska steelhead trout escapement surveys: 2014 and 2015. Alaska Department of Fish and Game, Regional Operational Plan.SF.1J.2014.02, Anchorage.

Love, D.C., D.J. Reed, and R.D. Harding. 2012. Steelhead trout production studies at Sitkoh Creek, Alaska, 2003–2009, and 2009 and final report. Alaska Department of Fish and Game, Fishery Data Series No. 12-82, Anchorage.

Trout and Char, Chapter 3-227, Paragraph 4. “The Shoreline II O/G EIS project area populations are likely stable with annual fluctuations due to no changes in fishing regulations by ADF&G. Regardless, it appears evident that steelhead trout populations are or can be highly sensitive to high levels of sport fishing pressure, especially when regulations allow for moderate harvest”. This statement does not recognize the conservative nature of the region-wide steelhead trout regulations. Due to size limit restrictions for harvest, current regulations requiring catch and release practices and limits on use of bait protect approximately 95-97% of adult steelhead trout. Reference:

Harding, R.2008. Southeast Alaska Steelhead and Dolly Varden Management. Alaska Department of fish and Game, Special Publication no 08-21, Anchorage.

Endangered, Threatened, and Candidate Species, Chapter 3-228. Table 3-50 does not match Table 3-31 on page 178 for steelhead trout. Upper Columbia River stocks are incorrectly labeled as “Endangered” in Table 3-31. They should be labeled as “Threatened” based on the most up to date information on the National Marine Fisheries Service (NMFS) website.

<http://www.nmfs.noaa.gov/pr/species/esa/listed.htm#fish>

Subsistence Fishing, Chapter 3-228. References are made to ADF&G subsistence harvests, but no information is provided on the harvest by permitted federal subsistence users. This information should also be included as any permitted activity could adversely affect outfitter/guide service days (or vice versa as is stated in the document).

Subsistence Fishing, Chapter 3-228 and 235. There is no mention of subsistence or personal use shellfish fishing which occurs in waters and tidelands directly adjacent to TNF project area. Were potential conflicts with subsistence shellfish users or impacts to these fisheries considered in the analysis?

Activities Considered Relevant, Chapter 3-230, Paragraph 10. Timber Sales- Were proposed commercial thinning/young growth harvest activities included in analysis of “Connected Actions, Past, Present, and Foreseeable Activities Relevant to Cumulative Effects Analysis”? The Forest Service Sitka Ranger District recently distributed an Environmental Assessment for young growth timber harvest and commercial thinning activities at False Island and Corner Bay. Both of these locations fall within the project area and have been identified as recreation sites in the Peril Strait and Tenakee Inlet use areas. The timber sales paragraph states that there are no proposed sales in the immediate project area and consequently no effects on fisheries resources.

Salmon, Chapter 3-234. “ADF&G prohibits fishing for them (Chinook salmon) in freshwater systems on the Tongass”. ADF&G allows angling with a liberal bag limit for Chinook salmon in some freshwater areas that do not have natural runs of Chinook salmon. For example, freshwaters draining into Sitka Sound have a liberal bag limit of Chinook salmon (up to 10 per day) and the annual limits for nonresidents don’t apply.

Salmon, Chapter 3-234. By regulation (5 AAC 47.023 (e)(1)(A)(iii)), freshwater drainages crossed by the Juneau road system are open to Chinook salmon fishing as there are no wild indigenous stocks of Chinook salmon on the road system. All fish harvested are hatchery origin and the daily bag and possession limit for all anglers is 4 fish any size and these fish do not count toward the non-resident annual limit.

Trout and Char, Chapter 3-234. Cutthroat and Dolly Varden are captured as incidental catch while angling for steelhead trout or salmon”. Trout and char are commonly targeted by guided anglers and their catch and harvest are not necessarily incidental. Additionally, this statement conflicts with the Trout and Char section in Chapter 3 p. 226.

Chapter 3-234. The following reports should be referenced showing the most recent final estimates of freshwater harvest and participation according to ADF&G’s guide logbook program:

Powers, B., and D. Sigurdsson. 2016. Participation, effort, and harvest in the sport fish business/guide licensing and logbook programs, 2014. Alaska Department of Fish and Game, Fishery Data Series No. 16-02, Anchorage.

Sigurdsson, D., and B. Powers. 2014. Participation, effort, and harvest in the sport fish business/guide licensing and logbook programs, 2013. Alaska Department of Fish and Game, Fishery Data Series No. 14-23, Anchorage.

Sigurdsson, D., and B. Powers. 2013. Participation, effort, and harvest in the sport fish business/guide licensing and logbook programs, 2012. Alaska Department of Fish and Game, Fishery Data Series No. 13-37, Anchorage.

Adaptive Management and Mitigation Measures, Chapter 3-238, Table 3-52. This table describes mitigation measures that may directly impact and/or limit sport fishing access and opportunity. While damage to riparian vegetation and stream bank areas from heavy use is a valid concern, potential mitigation measures should seek to maintain fishing access and opportunity whenever possible.

Specific actions described in response to “Fish Displacement” include a trigger that indicates the intent to limit fishing time to less than 30 minutes in one location. This is not a trigger, rather an adaptive action. Additionally, limiting fishing time in one location does not align with existing ADF&G sport fishing regulations. The plan also does not explain how this would be implemented. This is an ambiguous action and would be difficult to enforce in many situations. Barring convincing evidence that such a restriction is necessary for conservation purposes, we request this mitigation measure be removed.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan Magee
ANILCA Program Coordinator

cc: Carey Case, Team Leader