



June 3, 2024

Jon Kurland
Regional Administrator
NOAA Fisheries Alaska Region
PO Box 21668
Juneau, AK 99802-1668

Submitted by e-mail at jon.kurland@noaa.gov

Re: Request to extend deadline for comments on the 90-Day Finding on a Petition to List Gulf of Alaska Chinook Salmon as Threatened or Endangered Under the Endangered Species Act

Dear Mr. Kurland:

On behalf of the State of Alaska, the Alaska Department of Fish and Game (ADF&G) requests that the National Marine Fisheries Service (NMFS) extend the deadline to provide comments and information on the 90-day finding on a Petition to List Gulf of Alaska Chinook Salmon as Threatened or Endangered Under the Endangered Species Act from July 23, 2024, to at least September 6, 2024.

As the state's fisheries management agency, ADF&G has a vested interest in the management of Chinook salmon. Scientific data collected by ADF&G for stock assessment, stock biology, stock distribution and timing, stock genetics, catch accounting, catch composition, and fishing effort play a critical role in the sustainable management of Chinook salmon populations and will be crucial information for the Gulf of Alaska Chinook salmon ESA status review. In addition, the management and conservation of Chinook salmon have a broad impact on the social, cultural, and economic well-being of coastal Alaska communities.

The Wild Fish Conservancy's petition is for a status review in "southern Alaska", a geographic region that they define as encompassing "all Chinook populations that enter the marine environment of the Gulf of Alaska (GOA)." The area of interest represents a sizable geographic area encompassing a broad swath of coastline from the Canadian border out through the Aleutian Islands. This is akin to carrying out a single status review for all Chinook salmon in California, Oregon, Washington, and Idaho.

In light of its significant interests as the primary salmon management entity in Alaska, ADF&G seeks an extension of time to synthesize data and submit comments. The July 23, 2024, comment deadline is unworkable because, in addition to the broad geographic area of interest and sheer scope of this undertaking, the comment period timeframe coincides with the onset of the 2024 salmon fishing season. ADF&G biologists will be actively managing fisheries during most of the summer months. Additionally, this status review will be the first of this nature conducted for

Alaska salmon. Therefore, an extension of time would allow ADF&G to provide a much more comprehensive data set and thorough analysis, which will be of mutual benefit.

Thank you for your consideration.

Sincerely,



Doug Vincent-Lang
Commissioner

Cc: Chris Krenz–Wildlife Science Coordinator, ADF&G Division of Wildlife Conservation
Dani Evenson–Extended Jurisdiction Program Manager, ADF&G Division of Commercial Fisheries
Bill Templin–Chief Fisheries Scientist, ADF&G Division of Commercial Fisheries