



July 8, 2024

Anne Marie Eich, Assistant Regional Administrator
Protected Resources Division, Alaska Region NMFS
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Submitted electronically at <https://www.regulations.gov>

Re: NOAA-NMFS-2024-0042

The Pacific Seafood Processors Association (PSPA) strongly opposes listing Gulf of Alaska Chinook salmon under the Endangered Species Act (ESA) and finds even general, publicly available data do not support such a listing. The initial petition did not present substantial scientific or commercial information indicating the action may be warranted. NMFS acknowledged that the petition included “numerous factual errors, omissions, incomplete references, and unsupported assertions and conclusions”, which should have disqualified the petition from consideration under NMFS’s regulations. In addition, the petition did not present “a complete, balanced representation of the relevant facts, including information that may contradict claims in the petition,” as also required in the regulations for ESA listing petitions. However, given the agency’s positive 90-finding, please consider the following comments in your status review of Gulf of Alaska Chinook salmon to determine whether listing under the ESA is warranted.

PSPA is comprised of major seafood processors operating in 21 communities across Alaska who provide markets for nearly every state and federal fishery managed in Alaska waters. Our members are shore-based and mothership processors who are the center of the U.S. seafood supply chain, and depend on sound, science-based decision making to ensure a sustainable resource and healthy coastal economies over the long-term. Commercial salmon fisheries are a mainstay of small and large processors’ operations in coastal communities across the Gulf of Alaska, from Ketchikan to Kodiak to the Alaska Peninsula. Thousands of fishermen and hundreds of support businesses and communities depend on this resource, which has been managed under sustained yield principles since statehood.

Given that the majority of scientific and commercial data relative to Gulf of Alaska Chinook salmon resides with the Alaska Department of Fish and Game (ADFG), **please ensure that NMFS both reviews sufficient data from State sources and includes ADFG staff as voting members of the status review team.** The agency has been clear that salmon research and management expertise is centered at the State level, given State management for decades, and the regulations require collecting and analyzing the best available scientific and commercial information on the species, including its biology, ecology, abundance and population trends, and threats to the species, to evaluate the status and extinction risk.

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In the initial finding, NMFS stressed uncertainty about the cause of missed escapement goals in recent years and evidence of decreasing size and age at maturity. **Yet these are not indicators of population-level risk, which is the evaluation to be made under the ESA.** Please ensure your further evaluation is completed with the context that salmon management is based on variable run sizes and conditions over time, and with an understanding of the varying types of escapement goals and their basis on maximum sustained yield, which means the greatest average annual yield from a salmon stock. The State's policy is clear that the concept of maximum sustained yield should also be interpreted in a broad ecosystem context to take into account species interactions, environmental changes, an array of ecosystem goods and services, and scientific uncertainty. Escapement goals are used with fisheries management tools and restrictions to be responsive to annual changes, such that the overall system ensures long-term sustained yield.

As has occurred in the past, fishing restrictions are in place across Alaska's Chinook salmon fisheries in response to lower productivity of Chinook statewide. This is the result of a sustainable management system, despite the fact that reduced productivity and size at age is attributed to changes and warming in the marine environment. NOAA has studied and reported on the Gulf of Alaska's marine heatwave in 2014 – 2016, its lingering effects into 2019, and then a second marine heatwave in 2019. These events were particularly strong in the spatial extent, duration, and magnitude of ocean warming from surface waters to the seafloor. Multidecadal shifts in salmon productivity have been documented prior to this current downturn, and Chinook populations are expected to improve as the Gulf returns to pre-heatwave conditions. Regardless of the factors affecting current productivity, the current data on Gulf of Alaska Chinook salmon stocks do not support a population-level risk of extinction.

Finally, given that the summer salmon fisheries are underway, we appreciate NMFS extending the public comment period to Sept 6. The significance and harm resulting from a listing to those dependent on salmon for subsistence, recreational, and commercial fisheries cannot be overstated, so allowing a longer time period for those directly affected to weigh in is necessary. Just the uncertainty associated with the year-long status review is already negatively affecting those dependent on salmon, not knowing how to plan for their livelihoods, businesses, community operating budgets, and families. Please approach this status review with diligence and scientific rigor, such that the appropriate metrics and data are reviewed and well understood by the review team. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie Decker".

Julie Decker
President, PSPA