

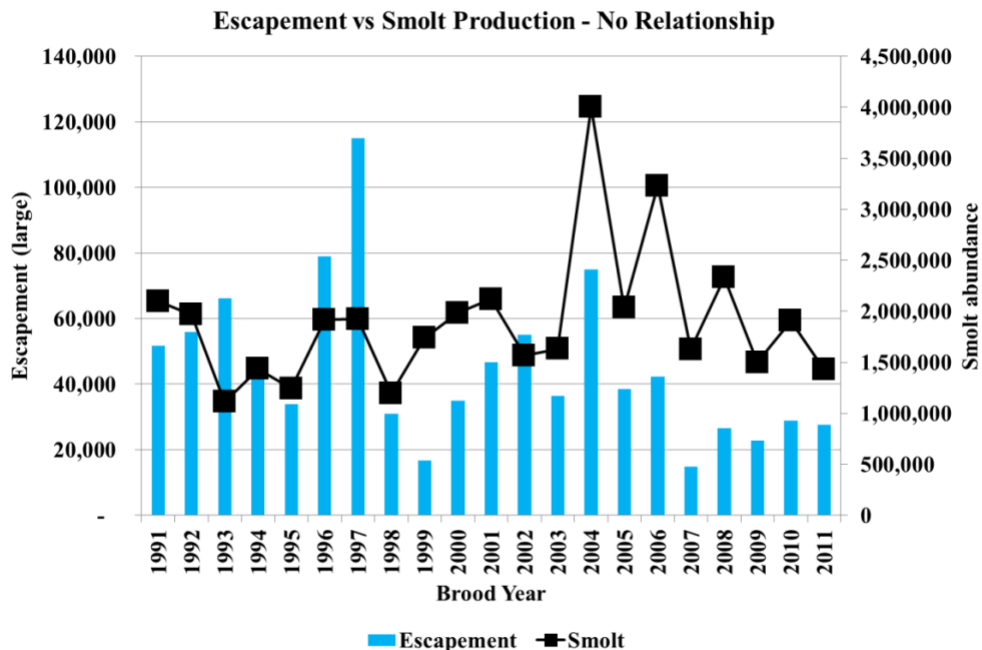
SEAGO Opposes Use of ESA for Alaska Chinook Stocks

Southeast Alaska Guides Organization strongly opposes NOAA Fisheries' consideration of listing some or all of Gulf of Alaska king salmon as an endangered or threatened species under the Endangered Species Act (ESA).

We support the State of Alaska's position that the ESA is the wrong tool to address a downturn in Chinook productivity. Downturns have been cyclical and Alaska management has proven over the course of sixty years that it is robust against terminal threats to Alaska salmon stocks.

The rationale of the Wild Fish Conservancy Petition that NOAA found warranted relies heavily on falling short of ADFG escapement goals but fails to acknowledge that those goals are based on maximum sustainable yield (MSY) targets and not on biological minimums for avoiding extinction. ADFG management has triggers to address varying levels of stock concern- listings addressing yield, management, and ultimately conservation to avoid a circumstance that would jeopardize sustainability of any evolutionary significant unit (ESU).

Additionally, scientific study produces no direct correlation between any MSY under-escapement and smolt production with some of the lowest escapement years producing average smolt counts.



(Taku and Chilkat River Chinook Salmon Stock Assessment presentation, Phillip Richards et. al. ADFG 2017)

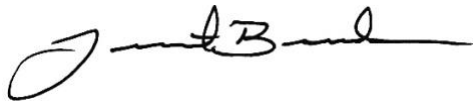
There is also consequently no data supplied by the petition that would suggest a scientifically defensible bottom line production level we are near crossing needed to preserve an ESU. The document speaks in generalities about the rearing needs of Chinook without providing evidence that we have neared a biological threshold.

The petition implies much about Alaska Chinook systems it has listed that is simply untrue. It speaks of habitat degradation, abnormal water flow fluctuations, and abnormal instream water temperatures that are descriptive of problems outside Alaska but not prolific in the Gulf.

The petition correctly describes a general decreasing size at age and trend toward younger returns in chinook populations but fails to correlate those facts as a clear threat to GOA stocks.

The listing of king salmon as an endangered or threatened species under the ESA could be economically and culturally devastating to the small rural Alaskan communities that rely upon them. We ask that any further federal investigation recognizes and respects in full the conservation-based management practices and autonomy of the State of Alaska over its resources.

Respectfully,



Forrest Braden, Executive Director- SEAGO



Kim Landeen, Assistant Executive Director- SEAGO