



BRISTOL BAY

Regional Seafood Development Association

Anne Marie Eich, Assistant Regional Administrator
Protected Resources Division
Alaska Region NMFS
Attn: Susan Meyer
P.O. Box 21668
Juneau, AK 99802

Re: Gulf of Alaska Chinook Salmon Petition (Docket number NOAA-NMFS-2024-0042)

Dear Ms. Eich:

The Bristol Bay Regional Seafood Development Association (BBRSDA) is writing in opposition to NMFS's finding that the petition presented "substantial scientific or commercial information indicating that the petitioned action [the listing of Gulf of Alaska Chinook salmon as a threatened or endangered species under the Endangered Species Act] may be warranted" and NMFS's decision to move forward with its status review. The BBRSDA also writes to respectfully request that any further review of the petition include participation of the State of Alaska and its experts on staff at the Alaska Department of Fish and Game (ADF&G), particularly with respect to the Biological Review Team role in the evaluation process.

The BBRSDA is a fishing industry association directly representing the 1800 drift gillnet fishermen in Bristol Bay, Alaska. It is the largest wild salmon fishery in the world and is Alaska's, if not the United States', most important wild salmon fishery. The health and sustainability of Alaska salmon populations is of utmost importance to our mission of maximizing the value of the fishery for our members, not only for the long-term yield of the fleet's harvest but in our marketing message of sustainability as well.

BBRSDA opposes NMFS's decision on the petition in question for several reasons, including, but not limited to, the following: (1) NMFS's decision is poorly supported. The Petition Finding states, "*we identified numerous factual errors, omissions, incomplete references, and unsupported assertions and conclusions within the petition*" and lists "uncertainty" as a reason for warranting the petition. Moreover, the agency did not document what literature and information it drew upon to make the decision to open the 90-day finding beyond what was provided by the petitioner and "*other literature and information available in our files.*" *The decision failed meet the standards and requirements set forth in 50 CFR 424.14.* The lack of clarity on what data is supporting NOAA's decisions makes it challenging for affected parties to meaningfully engage in the process. If NMFS moves forward with review, we ask NMFS to use all available data, follow a transparent process, and have absolutely *no uncertainty* about this decision. (2) Readily available information contradicts NMFS' reliance on missed escapement goals and decreased size to support its decision. NMFS failed to fully consider that the State of

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Alaska and the ADF&G management teams have implemented many protections in recent years throughout the state which are proving effective in conserving Chinook salmon. In 2023 Bristol Bay ADF&G biologists adjusted management to allow for an increase in Chinook escapement while still facilitating large sockeye harvests. This past season, 2024, managers reported a continuation of the positive trend in increased Chinook escapement. The low-end escapement goal for the Nushagak river is 55,000 salmon. When the sonar counting system was shut down for the season more than 48,000 Chinook have been accounted for and it is known that many Chinook fish simply were not counted due in large part to the thousands of Sockeye salmon not allowing all of the Chinook to be accurately detected by the sonar system. The State of Alaska maintains one of the most, if not the world's best, sustainable management systems available to preserve the wild salmon runs. Similar, and more direct examples of proper management of Chinook species in other areas are provided in the statements of the Metlakatla Indian Community and the Northwest Indian Fisheries Commission. Likewise, decreasing size of Chinook salmon is not a unique or suddenly alarming issue. The literature is common and widespread; the decrease in size of a majority of species of all kinds has been occurring for decades. This factor is simply not a proven threat to the survival of Chinook salmon and it surely is not a legitimate basis for consideration of enlisting the Chinook Salmon in the Gulf of Alaska on the Endangered Species Act.

A possible decision to list Gulf of Alaska Chinook under the ESA has huge and long-lasting impacts for fisheries across the state, Canada, Washington, and the families and communities relying on salmon fisheries. As fishermen we live the results of these decisions. As an industry association the BBRSDA has invested heavily in scientific research to gather more complete data to better understand the environment that effects our salmon runs in Bristol Bay. Decisions of this magnitude cannot be made on an incomplete set of facts or without full transparency during the process.

Even when compared to the rest of Alaska's remarkably intact coastline and unpolluted waters, Bristol Bay is exemplary salmon habitat. Bristol Bay is made up of pristine river systems and clean water. Local communities and fishermen have worked hard to keep it that way. Recent years have produced some of the largest sockeye salmon runs on record. Like much of Alaska, Bristol Bay has existing regulatory mechanisms in response to lower productivity of Chinook. These protections are being implemented, and they are proving effective. Fishermen are allies in managing for the health of the salmon species we rely on, and we do not believe the ESA is an appropriate tool to address a downturn in Chinook productivity, which many believe is a temporary problem due in large part to abnormal ocean water temperatures associated with La Nina currents documented by NOAA. More recent years have not witnessed these same high temperatures in Alaska and thus, ocean conditions are expected to improve in the near future.

Finally, ADF&G scientists and biologists, as the managers and researchers of this fishery resource, are by far the most knowledgeable about Alaska salmon stocks, salmon fisheries, salmon fishery regulations and management, and the potential threats to salmon habitat. We fully support ADF&G's request to include ADF&G salmon experts on the Biological Review Team

(BRT) as one of best ways to ensure the most comprehensive scientific and commercial data are used and interpreted correctly.

Thank you for the opportunity to comment and for the extending the public comment period to September 6th.

Sincerely,



Executive Director, BBRSDA



Erick Sabo
Board President, BBRSDA