



September 6, 2024

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Protected Resources Division, Alaska Region NMFS
P.O. Box 21668
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Submitted electronically at <https://www.regulations.gov>

Re: NOAA-NMFS-2024-0042

Thank you for the opportunity to submit comments on the Status Review of Gulf of Alaska Chinook salmon under the Endangered Species Act (ESA). The Alaska resource associations represented below oppose listing Gulf of Alaska Chinook salmon under the ESA and urge your commitment to using science-based and transparent processes when undertaking the status review. We do not believe the initial petition presented the required substantial scientific or commercial information indicating the action may be warranted, especially given the “numerous factual errors, omissions, incomplete references, and unsupported assertions and conclusions” acknowledged by NMFS. 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 required in the regulations for ESA listing petitions. However, given the agency’s positive 90-finding, please consider these comments in your evaluation of the relevant data during the status review.

Commercial and recreational fisheries are a significant part of Alaska’s economy, with commercial fisheries alone generating \$6 billion annually in economic activity in Alaska. Alaska is the center of the nation’s seafood industry, comprising more than 60% of U.S. harvests, and the level of infrastructure and direct and indirect employment generated from fisheries is only possible with sustainable, reliable access to fisheries across Alaska’s coast. Thousands of Alaska fishermen and hundreds of support businesses and communities depend on this resource, which has been managed under sustained yield principles since statehood.

We are also extremely concerned about the impact an ESA listing and subsequent critical habitat designation could have on development projects in and around the entire Gulf of Alaska. The unintended consequences of such a designation will impact community and other non-fisheries resource development, including transportation, shipping, and infrastructure. Maintaining and improving infrastructure across our state is dependent on marine transportation access. We are concerned over the long-term that mitigation measures will result in lost opportunities for communities and projects in Alaska.

We remind the agency that the petition was specific to listing Gulf of Alaska Chinook salmon as a whole and did not provide any supporting documentation or request to evaluate subsets of the population.

Thus, the biological entity to be evaluated by NMFS is Gulf of Alaska Chinook salmon, and the question is whether this species faces a population-level risk of extinction in the foreseeable future throughout all, or a significant part of, its range. As the majority of scientific and commercial data relative to Gulf of Alaska Chinook salmon reside with the Alaska Department of Fish and Game (ADFG), we are pleased to understand ADFG staff will be part of the status review team. Given the lack of relevant and representative data provided in the petition, it is critical NMFS comprehensively review both State and Federal data to meet the regulatory requirement to collect and analyze the best available scientific and commercial information on biology, ecology, abundance and population trends, and various threats to the species, to evaluate the status and extinction risk.

The harm resulting from a listing to those dependent on salmon for subsistence, recreational, and commercial fisheries, is highly significant. As would be any potential effects on transportation and shipping, given the reliance on products, equipment, food, and fuel transported through the Gulf of Alaska to Alaska communities. This is what makes it possible to reside here.

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,



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Pacific Seafood Processors Association



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Executive Director
Resource Development Council



Rebecca Logan
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Pacific Seafood Processors Association (PSPA) is a nonprofit trade association representing Alaska seafood processing companies in the policy, regulatory, and legislative arenas since 1914. PSPA is dedicated to supporting and advocating for the Alaska seafood industry and the sustainable use of fishery resources.

Established in 1975, the **Resource Development Council for Alaska (RDC)** is a statewide business association whose mission is to grow Alaska through responsible resource development. RDC is comprised of individuals and companies from Alaska's fishing, forestry, mining, oil and gas, and tourism industries. RDC's diverse membership also includes Alaska Native corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

The **Alaska Support Industry Alliance** is a professional trade organization representing more than 500 companies and 35,000 employees who support the development of Alaska's oil, gas and mineral resources.

The **At-sea Processors Association (APA)** is a trade association representing five member companies that own and operate 15 U.S.-flag catcher/processor vessels that participate principally in the Alaska pollock fishery and west coast Pacific whiting fishery.

Alaska Metal Mines (AKMM) is a professional association formed in 1992 to represent Alaska's large metal mines and advanced projects. We work to inspire Alaskans to support a growing mining industry that produces essential minerals while prioritizing safe operations, community partnerships, and environmental protection.

Alaska Miners Association (AMA) is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. AMA's more than 1,400 members come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Alaska's miners are individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska's mining industry.

The **Alaska Travel Industry Association (ATIA)** promotes Alaska as a top visitor destination and works to increase the economic impact of tourism in Alaska while remaining stewards of the state's natural resources, cultures, and unique quality of life.

Alaska Oil and Gas Association (AOGA) is a professional trade association whose mission is to foster the long-term viability of the oil and gas industry in Alaska for the benefit of all Alaskans. AOGA's 17 member companies account for the majority of oil and gas exploration, development, production, transportation, refining, and marketing activities in Alaska, which includes various operations in the Gulf of Alaska.