



UNITED FISHERMEN OF ALASKA

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Anne Marie Eich, Assistant Regional Administrator
Protected Resources Division
Alaska Region National Marine Fisheries Service

Attn. Susan Meyer
P.O. Box 21668
Juneau, AK 99802

RE: Proposed Rule NOAA- NMFS-2024-0042

September 6, 2024

Dear Ms. Eich,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 36 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. UFA also maintains a membership of approximately 500 individual fishermen and industry supporters. UFA **strongly opposes** listing Gulf of Alaska Chinook Salmon as threatened or endangered under the Endangered Species Act (ESA).

The ESA process, which is considered one of the most important wildlife conservation laws in the United States, is being undermined by the petition filed by the Wild Fish Conservancy (WFC). The petition lacked substantial scientific information indicating that a listing may be warranted. NMFS acknowledged that the WFC's petition included "numerous factual errors, omissions, incomplete references, and unsupported assertions and conclusions." Furthermore, the petition did not present "a complete, balanced representation of the relevant facts, including information that may contradict claims in the petition," which is required by the regulations for ESA listing petitions. The WFC's petition is designed to use conservation law to meet its own agenda, which is to end commercial harvest of wild caught Gulf of Alaska Chinook Salmon.

Based upon the information provided by the WFC, the petition to list Gulf of Alaska Chinook as threatened or endangered under the ESA should have received a negative finding. The petitioners provided unsupported assertions and a listing of environmental threats that are common to salmon up and down the coast. The petitioners also failed to provide a robust review of the status of Gulf of Alaska Chinook salmon, analysis of factors threatening the stock, nor did they provide analysis of mitigation or protective measures being deployed by the State of Alaska to manage the Chinook stocks for sustainability. For these reasons, despite the low bar for a positive 90-day finding, it is unclear how the WFC's petition met the minimum requirements.

A listing of endangered or threatened under the ESA is meant to protect a species from extinction. While NMFS stressed missed escapement goals as part of its rationale for why an ESA listing “may be warranted,” we believe that there is a big difference between a population missing escapement goals in some years and that population being “threatened or endangered.” The ESA defines an endangered species as one that is in danger of extinction in all or a significant part of its range, while a threatened species is one that is likely to become endangered in the near future. These definitions present a significant threshold to cross, and based on Alaska Department of Fish and Game data, Gulf of Alaska Chinook stocks do not demonstrate a population-level risk of extinction. The State of Alaska manages fisheries for maximum sustained yield (MSY), which represents the number of returning fish a stock needs to sustain itself and provide for a maximum level of harvest. While a failure to achieve an escapement goal might indicate that the stock cannot support a maximum level of harvest, it does not mean that the stock itself is in danger of going extinct. Escapement goals are utilized to aid in management, both annually as well as in-season, allowing for rapid response by the Alaska Department of Fish and game to ensure long-term sustainability of the stock.

The Alaska Department of Fish and Game and the Alaska Board of Fisheries have reduced Chinook catch rates substantially in recent years in response to the downward trend of returning Chinook. Action plans with prescriptive management measures have been developed and employed in response to the smaller returns. The restrictions, put in place to ease harvesting pressure on Chinook stocks, are examples of adaptive and responsive management approaches to ensure the long-term health of Chinook salmon and should not be confused as being evidence of salmon stocks potentially going extinct.

We urge NMFS to ensure that the appropriate data and metrics are provided to the review team and that ADF&G staff are included as voting members of the status review team. We remain hopeful that reason and common sense will prevail. UFA appreciates the opportunity to comment on this issue that has the potential to materially impact fisheries, subsistence users, businesses, and communities, and we would like to thank NMFS for extending the public comment period to ensure adequate time for response from stakeholders throughout Alaska.

Regards,



Matt Alward
President



Tracy Welch
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel
Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest
Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast
Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association