



September 5, 2024

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

Re: Federal Registry of NOAA-NMFS-2024-0042: Gulf of Alaska Chinook Salmon Petition

The Kenai River Sportfishing Association (KRSA) strongly opposes the proposal to list Gulf of Alaska Chinook salmon under the Endangered Species Act. After an objective review of extensive information on biological status and statutory listing factors, KRSA cannot support a conclusion that Gulf of Alaska Chinook Salmon are threatened or endangered with extinction throughout all or a significant portion of its range within the foreseeable future. Listing under the U.S. Endangered Species Act would not address the fundamental cause of lower Chinook numbers from a recent cycle of unfavorable ocean conditions. At the same time, listing would create extensive, unnecessary and burdensome federal consultation requirements for fishery, resource management and land use activities which do not pose significant threats to Chinook viability. The long track record of sustainable management by the State of Alaska clearly demonstrates the adequacy of existing regulatory mechanisms for protection of salmon and their habitats.

Conservation and sustainability of the iconic Kenai River King salmon and its fisheries has been the essential purpose of KRSA since its founding in 1984. KRSA is a 501(c)(3) charitable non-profit organization located in Soldotna, Alaska. We foster habitat conservation and rehabilitation to maintain and improve the Kenai River watershed; fund and conduct fishery, economic, and conservation research to advance information for management; advocate for predictable and meaningful sport and personal-use fishing opportunity; and provide public education and outreach to promote resource stewardship.

KRSA's members and staff have a long history of experience and expertise in conservation and sustainable management of salmon and fishery resources. We have actively engaged in Alaska state management, regulatory and legislative processes on behalf of salmon resource sustainability for over forty years. We have supported development and effective implementation of sustainable salmon policies and management plans through active engagement with Alaska's Board of Fisheries regulatory process and Department of Fish and Game. Most recently, KRSA has advanced conservation-first action plans to address Chinook stocks of concern. Our professional staff includes fish biologists with over 90 years of collective experience in salmon fishery management, stock assessment, and population dynamics including conservation biology and Endangered Species Act applications.

Genetic and life history patterns, and the regionwide nature of the marine environmental effects that account for recent low run sizes, support broadly-defined Evolutionarily Significant Units (ESUs) for Gulf of Alaska Chinook. All Gulf of Alaska populations are spring-run, stream-type life histories and genetic stock structure is broadly geographical in nature. It is not like the Pacific Northwest where spring, summer and fall runs with distinct stream and ocean type life histories return to substantially different habitats subject to different suites of conservation risk. Chinook population parameters consistent with high levels of salmon viability demonstrate a negligible risk of extinction at current levels of abundance, productivity, spatial structure and diversity.

Chinook remain abundant in rivers and streams throughout the Gulf of Alaska. Combined escapements exceed 150,000 per year even during the recent downturn. Alaska manages salmon for escapements which consistently produce high levels of sustained yield and these goals are substantially greater than levels of reproductive impairment or conservation concern. Although Chinook numbers are lower in recent years, spawning escapements are nowhere close to critical low levels determined to threaten viability of other ESA-listed salmon stocks.

Productivity of Chinook fluctuates naturally from year to year and in long-term patterns related to climate cycles. Marine survival has declined throughout Alaska following an extended period of high returns between 1980 and 2000. Multidecadal shifts in salmon productivity are normal and have been documented prior to the current productivity downturn. Recovery from previous low levels, such as those documented from the late 1950s through the mid-1970s, demonstrates a high degree of resilience for rebounding under more-favorable ocean conditions.

The natural spatial structure of Chinook is intact throughout the Gulf of Alaska. Chinook return to moderate to large rivers and streams throughout their historical range of distribution. No significant range contractions have occurred like those observed in other listed salmon stocks. Current abundance and distribution continue to support native levels of genetic and life history diversity consistent with the historical metapopulation structure. A diverse size and age structure continues to be represented despite a widespread shift to a younger age distribution due to poor marine survival.

Significant threats to long-term viability are not evident in Section 4(a)(1) Statutory Listing Factors.

Neither habitat nor range are subject to significant loss or threat of destruction, modification or curtailment. Pristine freshwater habitats throughout Alaska provide robust protection for the long-term health, viability and resilience of its salmon populations. Alaska is not subject to the severe freshwater habitat degradation including development and dam construction, which triggered salmon ESA listings in other areas.

Significant disease or predation threats have not been identified for Gulf of Alaska Chinook Salmon outside isolated and local examples.

Alaska has a highly developed and effective fishery management system to regulate harvest within sustainable levels. Management is governed by constitutional requirements, statutes, regulations and policies specifically designed to protect salmon resources. These requirements are reflected in management plans adopted by the Alaska Board of Fisheries to guide fishery implementation. Spawning escapement goals consistent with high levels of sustained production are identified by the Department of Fish and Game based on comprehensive stock assessments. An intensive management structure has been implemented to manage fisheries based on in-season assessments of abundance in order to protect spawning escapements as the first priority. Local area managers have been delegated authority for implement timely harvest control rules based on real-time information. An extensive research program is conducted on salmon dynamics, limiting factors and emerging issues. Management policies, plans and new information and develops are evaluated in statewide and region-specific annual meetings of the Board of Fisheries charged with implementing the state's regulatory authority to conserve and develop Alaska's fisheries resources. Public processes encourage resource users and interest participation through appointments to the Board of Fisheries, service on one of 84 advisory committees across


the state, submission of proposals for regulatory change, written and oral comments on proposed changes, and work at scheduled open public board meetings.

Alaska's fishery management system, including the Board of Fisheries and the Department of Fish and Game, has clearly demonstrated adequate regulatory mechanisms to address variation in Chinook abundance over time. The state has a formal process for designating stocks of concern and adopting action plans in the event of chronic failures to meet management objectives. Substantial restrictions and/or fishery closures have been widely adopted to protect spawning escapements during periods of low abundance. In Cook Inlet for instance, the entire commercial eastside set gillnet fishery and Kenai River Chinook sport fishery have been closed to maximize escapement of recent low runs.

The continued viability of Alaska Chinook Salmon stocks will follow long-term natural and manmade climate and productivity patterns, particularly in the marine ecosystem. A listing decision now would require subjective and speculative long-term climate assumptions. Existing monitoring systems are sufficient to inform further considerations of the conservation status of Alaska Chinook in the future in the event that status begins to approach levels of conservation concern.

In conclusion, the Kenai River Sportfishing Association, after careful and thorough analysis of all information available to the organization, firmly believes that designation of Gulf of Alaska Chinook salmon as either a threatened or endangered species is unwarranted. This is not to say that we find no reason for serious concern over issues such as productivity, abundance and size and age considerations. Our organization has a solid history of pursuing these and other issues before the Alaska Board of Fisheries. Our position, however, should be made clear. These concerns do not rise to the level needed for a finding of "warranted" as described in the ESA and sought by the petitioner.

Respectfully,



Shannon Martin  
Executive Director