



August 19, 2024

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Submitted electronically at <https://www.regulations.gov>

Re: NOAA-NMFS-2024-0042

The Petersburg Borough Assembly strongly opposes listing Gulf of Alaska (GOA) Chinook salmon as a threatened or endangered species under the Endangered Species Act (ESA). The National Marine Fisheries Service (NMFS) issued a positive 90-day finding on the Wild Fish Conservancy's petition, which requested ESA listing and designation of critical habitat of any GOA Chinook subpopulations, even after NMFS acknowledged that the petition has "numerous factual errors, omissions, incomplete references, and unsupported assertions and conclusions within the petition."

When Alaska assumed management authority of its salmon fisheries in 1960, many of the State's salmon runs were depressed and its salmon fisheries were struggling. Governor Egan stated that the Alaska Department of Fish & Game (ADF&G) "was handed the depleted remnant of what was once a rich and prolific fishery." Using the concept of sustainable management, which prioritizes spawning escapement based on maximum sustained yield, and timely reductions in Chinook exploitation rates (by fishery closures, reduced fishing time, etc.), ADF&G rebuilt salmon runs from abundances that were far lower than they are today. This is a glaring example of the resilience of GOA Chinook stocks and ADF&G's sustainable management practices that are highly regarded around the world.

The ESA is an inappropriate tool to address a downturn in Chinook productivity. ADF&G's management is designed to protect the long-term productivity of salmon stocks when productivity is low. Timely reductions in fishing pressure in response to downturns in productivity are indicators of Alaska's strong and responsive management approach to ensure the long-term health of subsistence, commercial and recreational fisheries, rather than evidence of salmon stocks potentially going extinct.

The current downturn in Chinook productivity in Alaska is largely attributed to changes in the marine environment (i.e., not freshwater habitat). Shifts in salmon productivity are normal and have been documented in the past. The State of Alaska has made substantial investments in salmon research to better understand the causes of recent declines, identify potential solutions, and consider how to better incorporate climatic variability into fishery management.

ESA listing of Chinook salmon will significantly harm subsistence, commercial, and recreational fisheries, causing cultural and economic harm to our coastal communities. Thousands of fishermen, support businesses and communities depend on this resource and will be severely impacted by an ESA listing.

A threatened or endangered ESA listing would transfer the management of the listed salmon and their critical habitats from the State of Alaska to the federal government. The Petersburg Borough Assembly wishes to go on record in strong opposition to this possible listing and management transfer and in strong support of ADF&G's sustainable management practices.

Further, we urge NMFS to review sufficient data from State sources and include ADF&G staff as voting members of the status review team investigating the idea to list Gulf of Alaska Chinook salmon as a threatened or endangered species under the ESA.

Respectfully,

Mark Jensen, Mayor  
Petersburg Borough