



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

B6 Chinook Biological Review Team

JUNE 2024

OFFICE OF THE COMMISSIONER  
Headquarters Office

1255 West 8<sup>th</sup> Street  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Main: 907.465.6136  
Fax: 907.465.2332

May 24, 2024

Jon Kurland  
Regional Administrator  
NOAA Fisheries  
Juneau, AK

Re: Biological Review Team for Gulf of Alaska Chinook Salmon

The purpose of this letter is to communicate the State of Alaska's interest in participating in the Biological Review Team (BRT) in response to the Petition to List Gulf of Alaska Chinook Salmon as Threatened or Endangered Under the Endangered Species Act (ESA).

We appreciate that NOAA Fisheries is working to ensure that the BRT has the best scientific and fishery data available for conducting the Chinooks species status review. The State shares that commitment. 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. One of the best ways to ensure the best scientific and commercial data are used and interpreted correctly would be to include ADF&G salmon experts on the BRT. We therefore request that you include two internationally recognized salmon experts from ADF&G on the BRT—Bill Templin and Andrew Munro.

We are aware that NOAA does not typically include non-federal scientists on their ESA review teams, unlike the USFWS. However, we note that per the NMFS Guidance on Responding to Petitions and Conducting Status Reviews under the Endangered Species Act document, as updated in 2021, there is an exemption that would allow officers of state governments to participate on a BRT "if they do so in their official capacity for the purpose of providing expertise on species biology or a relevant risk factor." We believe that such an exemption is warranted in this case for the following reasons: (1) the State is the primary salmon management entity in Alaska and as such it is the responsibility of ADF&G to conduct stock and fishery assessment programs necessary to sustainably manage Alaska's salmon resources, (2) while NOAA has had a prominent role in marine ecosystem assessments, NOAA has had a limited role in Alaska salmon management, (3) inclusion of state scientists will help ensure accurate interpretation of ADF&G data and information, and (4) ADF&G can share the BRT workload given the ambitious timeframe for the review.

Additionally, we request a copy of the Terms of Reference for the Chinook salmon BRT. This will help the State understand the process that NOAA is using in their assessment of Chinook stocks in the Gulf of Alaska.

In closing, we believe that state engagement on the BRT will promote a more robust, comprehensive, and defensible assessment.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Lang".

Doug Vincent-Lang  
Commissioner