

Department of Fish and Game

THE STATE
of ALASKA

GOVERNOR MIKE DUNLEAVY

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Dr. James Balsiger, Administrator
NOAA Fisheries, Alaska Region
PO Box 21668
Juneau, Alaska 99802-1668

Dear Dr. Balsiger:

In April 2015, the North Pacific Fishery Management Council (Council) adopted an action that lowers Chinook salmon bycatch caps in the Bering Sea pollock fishery when Chinook salmon abundance in Western Alaska is at historically low levels.¹ The Council's action identifies historically low Western Alaskan Chinook salmon abundance using a three-system index of inriver adult Chinook salmon run sizes from the Unalakleet, Upper Yukon, and Kuskokwim rivers combined at or below the threshold level of 250,000 fish. The Council's action also specified a process by which the Alaska Department of Fish and Game (department) would provide postseason abundance estimates to the National Marine Fisheries Service (NMFS) by October 1, following the salmon season each year, to determine if the combined adult Chinook salmon abundance in the indexed systems falls at or below the threshold level of 250,000 fish. If the threshold is not met, the performance standard and hard cap applicable to the Bering Sea pollock fishery would be lowered in the following year.

Methods and analyses used by the department to estimate the postseason run size for each of the three systems have been approved by the Council, and there were no changes to those methods in 2019. The methods used for the Unalakleet and Upper Yukon rivers are consistent with what is outlined in the Council's public review analysis.² Methods used for the Kuskokwim River were approved by the Council in June 2018³. As required by NMFS, the department will notify the Council of any future improvements to methods used in the assessment of the three-system index so that they may be evaluated and approved through the Council process.

The three-system index of inriver adult Chinook salmon run sizes from the Unalakleet, Upper Yukon, and Kuskokwim rivers is 315,626. The following details the preliminary total run estimates for each system.

¹ <https://npfmc.legistar.com/LegislationDetail.aspx?ID=2237783&GUID=89E4DA9C-19B8-4BDE-8643-B19D68DD9EE3>

² Public Review draft Environmental Assessment/ Regulatory Impact Review/ Initial Regulatory Flexibility Analysis for Proposed Amendment to the Fishery Management Plan for Bering Sea Aleutian Islands Groundfish Bering Sea Chinook and Chum salmon bycatch management measures, March 2015.

³ <https://npfmc.legistar.com/LegislationDetail.aspx?ID=3486558&GUID=81056FD0-C9E8-4376-BD59-C2F6084C82E9&Options=ID|Text|&Search=Kuskokwim>

Unalakeet River

The preliminary postseason run size estimate of Unalakeet River Chinook salmon is **11,862** based on preliminary assessment of total escapement, commercial harvest, and expectations of subsistence harvest. Preliminary Chinook salmon escapement in the Unalakeet River was 9,953 fish, measured by escapement projects on the North River tributary (3,312 fish; tower count) and mainstem Unalakeet River (6,641 fish; weir count). The combined escapement is considered a reliable measure of the total Chinook salmon escapement. A total of 909 Chinook salmon were commercially harvested in Norton Sound Subdistrict 6 (Unalakeet Subdistrict), and the total catch was assumed to be bound for the Unalakeet River. The preliminary expectation that 1,000 Unalakeet River Chinook salmon were harvested in the subsistence fishery was based on a 25% increase to the 2018 post-season survey estimate.

Upper Yukon River

The preliminary postseason run size estimate of Upper Yukon River Chinook salmon is **70,560** based on preliminary assessment of total escapement into Canada and expectations of subsistence harvest in Alaska. The expectation of escapement into Canada was based on a sonar project operated near Eagle, Alaska. The preliminary sonar count is 45,560. Total harvest of Upper Yukon River Chinook salmon in Alaska is expected to be about 25,000, nearly all of which was harvested in the subsistence fishery. Subsistence fishing restrictions were implemented throughout much of the Chinook salmon run in 2019, but overall, the department provided more subsistence fishing opportunity in 2019 compared to 2018. Subsistence harvest of Upper Yukon River Chinook salmon in 2019 is expected to be larger than the 2018 harvest of 19,266. A relatively small number of Chinook salmon were harvested incidentally during the summer chum salmon commercial fishery and retained for personal use or sold. It is unlikely that commercially harvested Chinook salmon were of Upper Yukon River origin, due to the late timing of the fishery openers in 2019.

Kuskokwim River

The preliminary postseason run size estimate of Kuskokwim River Chinook salmon is **233,204** fish, estimated using a maximum likelihood model. The total run estimate was informed by direct observations of escapement at 16 locations and an expectation that drainagewide harvest will be approximately 51,563. No commercial harvest of Kuskokwim River Chinook salmon occurred during the 2019 season. A total of 563 Chinook salmon were harvested in the inriver test fishery operated by the department. The preliminary expectation that 51,000 Kuskokwim River Chinook salmon were harvested in the subsistence fishery was based on a three-year relationship between partial inseason harvest estimates and final drainagewide post-season survey estimates. U.S. Fish and Wildlife Service estimated that approximately 40,000 Chinook salmon were harvested within a portion of the Yukon Delta National Wildlife refuge, during subsistence fishing openers announced by Federal Special Actions.

Sincerely,



Sam Rabung
Commercial Fisheries Division Director

cc: Glenn Merrill, NMFS AKR