



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

August 4, 2016

Sam Cotton
Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Commissioner Cotton:

On July 11, 2016, NMFS published a final rule to implement Amendment 110 to the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area. Amendment 110 and the final rule improve the management of Chinook and chum salmon bycatch in the Bering Sea pollock fishery by creating a comprehensive salmon bycatch avoidance program. An important part of this new program is the State of Alaska's (State's) annual estimate of Chinook salmon abundance using a 3-System Index (also called the 3 River index) for western Alaska. The 3-System Index is based on the post-season in-river estimate of Chinook salmon run size for the Kuskokwim, Unalakleet, and Upper Yukon aggregate stock grouping. When the 3-System Index is less than or equal to 250,000 Chinook salmon, NMFS will apply a lower performance standard of 33,318 Chinook salmon and a lower prohibited species catch (PSC) limit of 45,000 Chinook salmon for the following year. NMFS will implement this change in the performance standard and PSC limit through its annual Bering Sea groundfish harvest specifications.

The North Pacific Fishery Management Council (Council) requested that the State provide this 3-System Index by October 1 of each year to provide the opportunity for review by the Council, the Council's Scientific and Statistical Committee, and the public, prior to the annual harvest specifications process. In a letter dated March 4, 2016, you wrote, "We [the State] will provide the 3 River Index estimate to NMFS annually by October 1 and are committed to maintaining a transparent and accessible process for stakeholders as we improve our understanding of these systems. For the purposes of federal management, any substantive changes to the methodology used in developing the 3 River Index will be presented to the Council's Science and Statistical Committee and vetted through the Council."

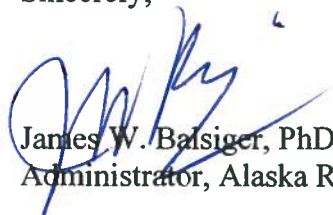
We agree that a transparent public process is necessary for ensuring that the 3-System Index represents the best available scientific information. As part of this process, we request that the State include the supporting methods, data, and analysis used to generate the 2016 3-System Index when it provides this 3-System Index to the Council and NMFS by October 1, 2016.



We are committed to working with the Council and the State to develop a transparent process to ensure that the data and methods used in the 3-System Index continue to incorporate the best available scientific information and provide a reliable indicator of Chinook salmon abundance.

If you have any additional questions, please contact Gretchen Harrington on my staff at gretchen.harrington@noaa.gov, or (907) 586-7228.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Balsiger', is written over the typed name and title.

James W. Balsiger, PhD.
Administrator, Alaska Region