THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

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Jon Kurland, Administrator
NOAA Fisheries, Alaska Region
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Dear Mr. Kurland,

In April 2015, the North Pacific Fishery Management Council (Council) adopted an action that lowers Chinook salmon bycatch caps in the Bering Sea walleye 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. If the threshold is not met, the low performance standard and hard cap applicable to the Bering Sea walleye pollock fishery is in effect 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 substantive changes to those methods in 2025. 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 2018[3] and updated in 2025 to include additional inriver run abundance metrics.

The 2025 three-system index of inriver adult Chinook salmon run sizes from the Unalakleet, Upper Yukon, and Kuskokwim rivers is 176,334 and is below the threshold level of 250,000.

The following details the preliminary total run estimates for each system:

Unalakleet River
An extremely low run size of 517 Unalakleet River Chinook salmon returned in 2025. The preliminary estimate was based on the sum of reported commercial harvest, expected subsistence harvest, and estimated total escapement. Commercial fishing in Norton Sound Subdistrict 6

[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

(Unalakleet Subdistrict) was closed during the 2025 season. Only two Chinook salmon were incidentally harvested during the coho salmon commercial fishery and retained for personal use. The department expects approximately 60 Unalakleet River Chinook salmon were harvested for subsistence uses in 2025, based on the assumption that harvest levels were consistent with those reported in 2024 (55 fish) when similar harvest restrictions were in place. Only partial assessment of the Unalakleet River escapement was possible in 2025, due to discontinuation of the Unalakleet River weir.[4] The North River Tower operated successfully during much of the season, and estimates were made for periods of missed passage. A drainagewide estimate of escapement was developed by expanding the North River tower count (234; 95% CI[5]: 201–312) by the historical (1997, 1998, 2009–2024) average contribution (51%) of the North River to the total. The preliminary expanded total escapement of Chinook salmon to the Unalakleet River was estimated to be 455 (range: 219–1,199[6]) and is considered highly uncertain.

Upper Yukon River

An extremely low run size of 24,406 Upper Yukon River Chinook salmon returned in 2025. The preliminary total run size estimate is based on the inseason assessment of passage into Canada and expectations of the total harvest in Alaska. Chinook salmon passage into Canada was based on a sonar project operated near the U.S./Canada border, downriver from Eagle, Alaska. The preliminary end-of-season Eagle sonar count is 23,806 fish (90% CI: 23,508–24,104). The total harvest of Upper Yukon River Chinook salmon in Alaska is expected to be about 600 fish. There were no commercial salmon fisheries in the Yukon River drainage in 2025, and relevant sport and personal use fisheries were closed. Subsistence fishing was limited to the use of small mesh gillnets (≤ 4") directed at non-salmon, except for a two-week period coinciding with the peak of the Chinook salmon run when all gillnets were removed from the water. There were no selective gear subsistence opportunities in 2025 due to overlapping poor runs of Chinook salmon and summer chum salmon. The preliminary 2025 run size estimate was consistent with the preseason forecast of 24,000–37,000 and the inseason run size estimate of 25,000 (90% CI: 18,000–32,000), based on independent sonar and genetic stock identification programs operated in the lower portion of the Yukon River.

Kuskokwim River

A below-average total run size of 151,411 (95% CI: 135,017–170,811) Chinook salmon returned to the Kuskokwim River in 2025. This preliminary estimate was based on results of an updated[7] maximum likelihood model informed by sonar-based inriver run estimates, direct observations of escapement, and an expectation of drainagewide harvest. The preliminary escapement of 105,808 (95% CI: 89,414–125,208) Chinook salmon is based on information from the Kuskokwim River mainstem sonar project, four tributary weir projects, and seven tributary aerial surveys. Poor survey conditions prevented the department from obtaining reliable index counts from a subset of aerial surveys during the 2025 season. The total harvest of Kuskokwim River Chinook salmon is expected to be 45,603. Nearly all harvest occurred in the subsistence fishery, and minimal harvest occurred in test fisheries operated by the department and collaborators. No commercial or sport harvest of Kuskokwim River Chinook salmon occurred during the 2025 season, and subsistence fishing restrictions were implemented throughout the Chinook salmon run. A preliminary estimate of drainagewide subsistence harvest was generated using a nine-year relationship between partial

[4] The Unalakleet River weir was permanently discontinued prior to the 2025 season. Drainagewide escapement will be based on expanded North River tower counts consistent with historical run reconstruction methods employed by ADF&G and used by the Council to establish the 3-System Index.
[5] CI: confidence interval
[6] The range of likely drainagewide escapement values was based on the 95% CI of the North River tower estimate and the full range of historical observed contributions of the North River tower to the total escapement (26%–92%).
[7] The Kuskokwim River Chinook salmon run reconstruction model was updated to include input from a mainstem sonar and two additional weirs. Larson and Hamazaki (2024 Kuskokwim River Chinook salmon run reconstruction and 2025 forecast) provide a summary of the revised model structure and demonstrate that the median total run estimates are largely insensitive to the model changes. Comparison of the historical timeseries of total run estimates between the revised and previous model versions showed a 1% difference on average (1976–2024) with a maximum difference of 15% in 2023. Estimates from the revised model would not have changed the outcome of the 3-System Index for any year (2016–2024).

inseason harvest estimates and drainagewide post season estimates. The 2025 inseason harvest estimate was produced by the Kuskokwim River Inter-Tribal Fish Commission, through collaboration in data collection efforts with the Orutsararmiut Native Council and the Yukon Delta National Wildlife Refuge. Prior-year post season estimates were developed by the department. The preliminary total run size of Kuskokwim River Chinook salmon is consistent with the preseason run forecast of 136,000–217,000 and the inseason total run estimate of approximately 149,000, based on a sonar project operated near Bethel, Alaska plus harvest downriver.

Sincerely,

Doug Vincent-Lang
Commissioner

cc: Rachel Baker, Deputy Commissioner, Alaska Department of Fish and Game
David Witherell, Executive Director North Pacific Fishery Management Council