



September 12, 2024

Jon Kurland, Administrator  
NOAA Fisheries, Alaska Region  
PO Box 21668  
Juneau, Alaska 99802-1668

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.<sup>1</sup> 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 changes to those methods in 2024. The methods used for the Unalakleet and Upper Yukon rivers are consistent with what is outlined in the Council's public review analysis.<sup>2</sup> Methods used for the Kuskokwim River were approved by the Council in June 2018<sup>3</sup>.

**The 2024 three-system index of inriver adult Chinook salmon run sizes from the Unalakleet, Upper Yukon, and Kuskokwim rivers is 197,359 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 887 Unalakleet River Chinook salmon returned in 2024. The preliminary 2024 run size estimate was based on the sum of reported commercial harvest, expected subsistence harvest, and estimated total escapement. Commercial fishing in Norton Sound Subdistrict 6 (Unalakleet Subdistrict) was limited during the 2024 season, and 5 Chinook

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

<sup>2</sup> 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.

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

salmon were commercially harvested and retained for personal use. The department estimates approximately 100 Unalakleet River Chinook salmon were harvested for subsistence uses in 2024. Subsistence harvest in 2024 is expected to be smaller than the 2023 harvest (489 fish) due to reduced fishing opportunities in response to not meeting the established Chinook salmon escapement goal on the North River. The North River Tower and Unalakleet River weir operated successfully during much of the target operational period, and estimates were made for periods of missed passage. The preliminary total escapement of Chinook salmon to the Unalakleet River was estimated to be 782 and is considered reliable (95% CI<sup>4</sup>: 586–1,016).

### **Upper Yukon River**

An extremely low run size of 24,748 Upper Yukon River Chinook salmon returned in 2024. 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 end-of-season sonar count is expected to be 24,048 (90% CI: 23,753–24,343). The total harvest of Upper Yukon River Chinook salmon in Alaska is expected to be about 700. Nearly all harvest occurred in research test fisheries operated by the department and collaborators, and minimal harvest is expected to have occurred incidentally during non-Chinook subsistence fisheries. Conservation actions were implemented to protect Chinook salmon in 2024. There were no commercial salmon fisheries opened in the Yukon River drainage in 2024, and relevant sport and personal use fisheries were closed. Subsistence fishing was limited to the use of small mesh gillnets ( $\leq 4''$ ) 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. Late-season subsistence opportunity was provided to harvest summer chum salmon with selective gear, but all Chinook salmon were required to be released alive. The preliminary 2024 run size estimate was consistent with the pre-season forecast of 19,000–28,000 and the inseason run size estimate of 28,000 (90% CI: 21,000–35,000), based on independent sonar and genetic stock identification programs operated in the lower portion of the Yukon River.

### **Kuskokwim River**

A below-average run size of 171,724 (95% CI: 127,038–232,131), Kuskokwim River Chinook salmon returned in 2024. The preliminary total run size estimate was based on results of a maximum likelihood model informed by direct observations of escapement and an expectation of drainagewide harvest. The preliminary escapement estimate (142,998) is uncertain (95% CI: 98,311–203,404) because the model was informed by only one weir project and eight aerial surveys. Poor survey conditions prevented the department from obtaining reliable index counts from a subset of aerial surveys during the 2024 season. Additionally, extended periods of missed passage resulted in the inability to produce escapement estimates at two of three weirs that operated in 2024. The total harvest of Kuskokwim River Chinook salmon is expected to be 28,726. Nearly all harvest occurred in the subsistence fishery, and minimal harvest occurred in test fisheries operated by the department and collaborators. Conservation actions were implemented to protect Chinook salmon in 2024. No commercial or sport harvest of Kuskokwim River Chinook salmon occurred during the 2024 season. Subsistence fishing restrictions were implemented throughout the Chinook salmon run in 2024. A preliminary estimate of drainagewide subsistence harvest was generated using an eight-year relationship between partial harvest estimates and drainagewide post season estimates. The 2024 inseason harvest estimate was produced by the Kuskokwim River Inter-Tribal Fish Commission, through collaboration in data collection efforts with the Orutsarmiut 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

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<sup>4</sup> CI: confidence interval

Kuskokwim River Chinook salmon exceeded the preseason run forecast of 108,000–160,000 fish and the independent total run estimate of approximately 163,000 Chinook salmon, based on a sonar project operated near Bethel, Alaska plus harvest downriver.

Sincerely,

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

Doug Vincent-Lang  
Commissioner

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