

B3 ADFG Ltr to NMFS, 3-River Index 9/28/16

Department of Fish and Game

DIVISION OF COMMERCIAL FISHERIES Headquarters Office

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September 28, 2016

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 3-system index of inriver adult Chinook salmon run sizes from the Unalakleet, Upper Yukon and Kuskokwim rivers combined. The Council's action also specified a process by which the Alaska Department of Fish and Game would provide post-season abundance estimates to the National Marine Fisheries Service (NMFS) by October 1 following the salmon season each year, to determine if adult Chinook abundance in the index systems falls at or below the threshold level of 250,000 identified in the Council's action as historically poor. The performance standard and hard cap applicable to the Bering Sea pollock fishery would be lowered in the year following the year in which the index was ≤250,000 Chinook salmon.

Post-season run size estimates include all available escapement and commercial harvest data, and estimates of all other harvest in each system. Detailed information on methods and trend patterns in these assessments can be found in the Council's public review analysis. Methods and analysis used to estimate the post-season run size for the Unalakleet, Upper Yukon, and Kuskokwim river systems have not changed and are consistent with what is outlined in the Council's public review analysis. There are continuous efforts to improve assessment data, and it is anticipated that an amendment to the Kuskokwim River run reconstruction may be available in a couple of years. At that time, we will bring that new analysis before the Council and would include those new methods in the 3-system index analysis only if it is approved by the Council.

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.

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For 2016, the post-season run size estimates for Unalakleet River is 2,400, for Upper Yukon River is 82,000, and for Kuskokwim River is 186,400 Chinook salmon. **Consequently, the 3-system index is 270,800 Chinook salmon.**

Sincerely,

Scott Kelley

Commercial Fisheries Division Director

cc: Glenn Merrill, NMFS AKR