

INTERNATIONAL
LONGSHORE &
WAREHOUSE
UNION



PO Box 921059
Dutch Harbor, AK 99692
BUS. [907] 581-4598
FAX [907] 581-1414

Alaska Longshore Division
Unit 223

January 25, 2025

Angel Drobica, Chair
North Pacific Fisheries Management Council
1007 W. 3rd Avenue, Suite 400
Anchorage, AK 99501

Re: C-2 Chum Salmon Bycatch

Dear Ms. Drobica:

The International Longshore Warehouseman Union (ILWU) Unit 223 is located on Unalaska Island in the Aleutian Chain, eight hundred miles south west of Anchorage, in the heart of the Bering Sea. Unalaska's International Port of Dutch Harbor has been known as the nation's #1 Commercial Fishing Port based on the volume of the catch for many, years. ILWU Unit 223 has a workforce of over 200 longshoremen / truck drivers / equipment operators that are mostly homeowners and longtime residents of the community of Unalaska.

The Pollock fishery is the economic engine of Dutch Harbor / Unalaska and the other fishery-dependent communities of the Bering Sea region. A closed or reduced Pollock B season will have a dramatic negative impact on all our harvesters, seafood processors, fishery support sector businesses such as logistics and will impact the membership of the ILWU.

The Pollock B season fishery has an allocation that is larger than the Pollock A season and a longer harvest season from June 15th until early October. The Pollock fishery is now more important due to the complete collapse of most of the Bering Sea Crab Fisheries over the last few years. Crab and Pacific Cod have seen reduced harvest allocations as you may know over the last few years.

The Pollock fishery is also of critical importance to the six CDQ groups and to the support sector businesses of Unalaska that support the seafood industry and the community.

An analysis of all harvesting sectors in 2022 and 2023 shows an ex-vessel value for the B season harvest of \$264 million in 2022 and \$262 million in 2023. When you add in first wholesale value, that brings the total up to \$800-\$850 million for both years.

The analysis explains the high degree of vulnerability for the community of Unalaska under Alternatives 2 and 3 if restrictive Chum caps were adopted. The analysis also points out the high degree of dependency on the Pollock B season fishery for Unalaska and other fishery dependent communities in the region. The B season Pollock fishery represents an average of 23% of the Unalaska general fund revenues, and the direct fish tax revenues from the Pollock B season average \$7-8 million dollars annually.

The above-mentioned revenues do not include the sales tax revenue generated from the City's 3% local sales tax, which is driven by the large amount of fuel sales to the harvesters and processing plants in Unalaska. It is the second largest revenue stream for Unalaska and comes in at 29% of the general fund budget. This points out the importance of the Pollock B season to the working waterfront workforce and is a major part of their yearly earnings.

The Port of Dutch Harbor is the major shipping port for domestic and export shipping of hundreds of millions of pounds of seafood for the region. Matson, CMA, Lyden Transport, Samson Tug and Barge, and Coastal Transportational all have operations in Unalaska supporting both the shore-based and at-sea processors, both of which utilize the port as their shipping and resupply base. The Port of Dutch Harbor would be heavily impacted by a B season reduction or closure. This would in turn have a huge negative impact on the transportation sector businesses, including the families of 250-350 (including other stevedore work done by workers outside of ILWU) plus long-shore workers who live and work in Unalaska.

ILWU Unit 223 agrees with the City of Unalaska that Alternative 4 Incentive Plan Agreements (IPAs) would work well for Unalaska. The latest Incentive Plan Agreement has added six additional provisions that are on Page 59 of the analysis. It is also important to see the significant reduction the Pollock B season harvesters have had on Chum Bycatch in the past two years. The 2022 Chum Bycatch was 242,000 fish, which was reduced in 2023 by 46% to 112,000 fish. In 2024 there was another 34% reduction to 39,000 fish. This shows the measures already in place by the harvester cooperatives are working well.

The by-catch analysis from 2011-2022 by area shows the Asian/Russian Hatchery Chum bycatch at 52% of the total, Coastal Western Alaska and Upper Yukon Combined Chum PSC for the same number of years is at about 19% and the total for the Gulf of Alaska, Southwest Alaska, and the Pacific Northwest was at 29%.

As you continue to develop the Alternatives, we ask that you use the best fishery and scientific information available, which already suggests that ecosystem and climate change are the leading cause of recent Chum stock reduction.

ILWU Unit 223 does not object to the development of new measures to reduce Chum PSC bycatch, such as the development of the six new provisions for IPAs in Alternative

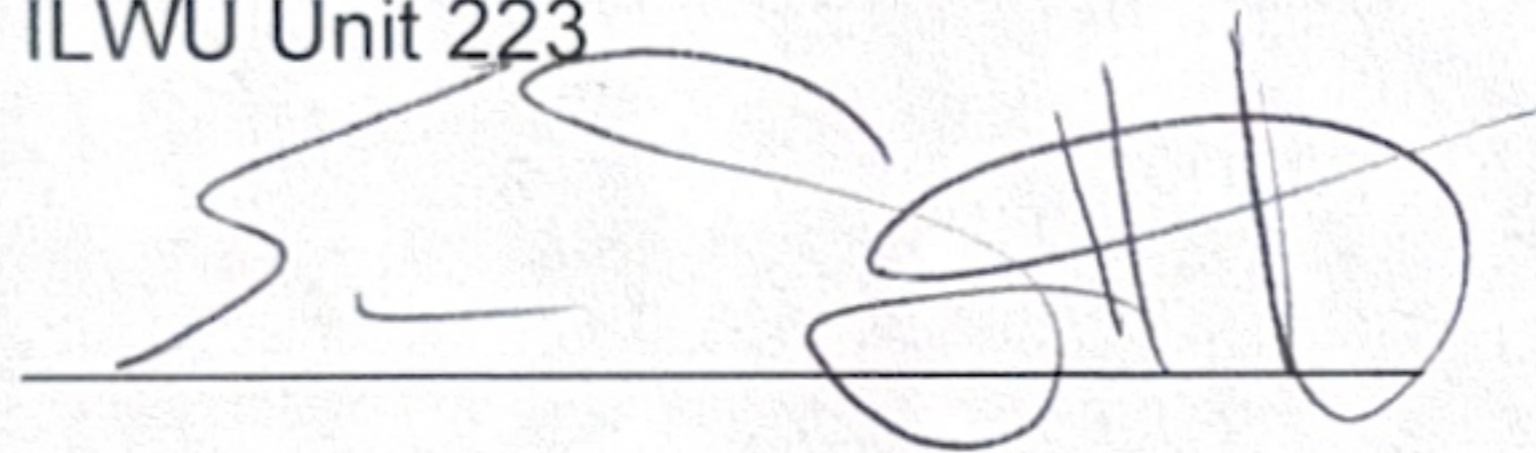
4. We also realize that some parts of Alternative 5 corridor caps or Alternative 3 PSC limits based on Chum salmon abundance returns, may be combined with Alternative 4 in the future.

In closing, we hope that the Council keeps in mind that overly restrictive alternatives could shut down or restrict the Pollock B season and would harm the ILWU workforce and our community as a whole. The community of Unalaska depends on a sustainable Pollock fishery for the community's economic wellbeing.

Thank you for your consideration of our comments on this issue, which is of the utmost importance to ILWU Unit 223 and their families.

Sincerely,

ILWU Unit 223

A handwritten signature in black ink, appearing to read 'ES', written over a horizontal line.

Eric Southworth
Business Agent / President
907.359.5208