



January 30, 2025

Angel Drobnica
Chair, NPFMC
1007 West Third, Suite 400
Anchorage, AK 99501

Dear Chair Drobnica & Council Members:

On behalf of UniSea, Incorporated, I appreciate the opportunity to submit the following comments on NPFMC Agenda item C2- Chum Salmon Bycatch. UniSea is a primary shorebased processor of Bering Sea pollock, cod, crab, and other finfish species, dependent on catcher vessels delivering into Unalaska. UniSea has continuously operated shore-based production facilities in Unalaska participating in the BSAI Federal and State managed fisheries since 1974. For 50 years, UniSea has been a cornerstone of the Unalaska community, employing over one thousand workers including a dedicated team of 250 skilled Alaskan residents driving our success.

UniSea supports the January 31 PSPA comment letter submitted to the Council on this agenda item. We particularly encourage the Council to consider PSPA's comments related to expanding the analysis of alternatives and options that would impact the pollock sector, CDQ, and dependent community revenues. Each option analyzed under the RIR should include cost impacts to the pollock fishery participants and dependent communities compared to potential benefits. In addition, UniSea supports an expanded discussion on additional impacts to the shore-based processing sector, as well as fishermen, on non-pollock fisheries to include the ability of processors to continue participating in the non-pollock BSAI fisheries and remain viable absent the ability, or reduced accessibility, of the volume pollock fishery that constitutes the most activity and revenue that processors and communities in this region depend upon.

As you are aware, the pollock industry is under extreme pressure from unfair global competition. Any action to reduce or limit access to the pollock resource to BSAI pollock sector participants and Alaska communities will certainly exacerbate the already difficult environment that we prosecute the fishery under. The analysis indicates the pollock fishery has a minimal impact in the total removals of western Alaska chum salmon. Draconian changes to the current management of chum bycatch reduction efforts will only take a tragic environmental crisis in the western rivers of Alaska and add an economic crisis to the pollock participants, CDQ, and dependent communities, with little impact on the return of chum salmon. We hope the Council can explore options that meet the purpose of the action and make improvements to bycatch management without harming the Aleutians region.

Thank you for the opportunity to provide comments on this important matter. We hope that future iterations of the analysis will help the decision makers better understand all potential impacts of the alternatives analyzed.

Sincerely,

A handwritten signature in blue ink that reads "Tom Enlow".

Tom Enlow – President & CEO
UniSea Inc. Tel: +1 907 252 9307 mobile +1 425 861 5145 Direct
tom.enlow@unisea.com