



Ounalashka Corporation
PO Box 149
Unalaska, Alaska 99685-0149
(907) 581-1276 | ounalashka.com



January 29, 2025

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

Re: C-2 Chum Salmon Bycatch

Dear Ms. Drobnica:

The Ounalashka Corporation (OC) is the Alaska Native Village Corporation formed under the Alaska Native Claims Settlement Act for Unalaska, Alaska. Unalaska Island is located in the Aleutian Chain, eight hundred miles west of Anchorage, in the heart of the Bering Sea fisheries. Unalaska has been inhabited by Unangan people for more than 10,000 years. Our ancestors worked together to help create the community that is now the City of Unalaska (City). OC is a major landowner in the City and a majority of our business relies on commercial fishing and the fisheries support industry.

The Pollock fishery is the economic engine of 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, shareholders, and community members.

When you review Section Four of Economic and Social Assessment at page 196, you see the large dependence Unalaska has on revenues from the Pollock B season. Looking at 2022 and 2023, the local 2% raw fish tax brought in \$10 million, and the state shared taxes for those two years came in at \$8 million. The \$8 million in fish tax revenues in 2023 is almost 23% of the City of Unalaska's General Fund budget of \$34 million. Roughly 40% of Unalaska's revenue comes from our local fish tax and the state shared fisheries taxes. The seafood industry is the only industry we have and impacts the entire community.

The Pollock B season fishery has a larger allocation 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. 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.

We believe one section of the analysis on Unalaska could use more work in the document that would be on the support sector investments made in Unalaska, we have many pending projects by the private sector and the City of Unalaska that will have positive impacts on the quality of life in the community. Pending projects include dock and harbor upgrades, utilities and road paving and green energy projects. If hard cap alternatives are implemented, the likely result would be restrained investment in Unalaska. Who would want to gamble on a long-term investment in Unalaska if Russian or Asian hatchery Chum bycatch could shut down the Pollock B season?

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 350 plus longshore workers who live and work in Unalaska.

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% and Coastal Western Alaska and Upper Yukon Combined Chum PSC for the same number of years is at about 19%. 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 failures.


Unalaska 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 and Unalaska will keep an open mind and weigh the potential impacts of a hybrid alternative if it moves forward.

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 greatly harm the City of Unalaska, as well as OC, and our seafood industry partners and the support sector businesses. We all depend on the Pollock fishery for economic wellbeing.


Thank you for your consideration of our comments on this issue.

Sincerely,

OUNALASHKA CORPORATION


Vincent M. Tutiakoff, Sr.
Chairman of the Board

OUNALASHKA CORPORATION


Natalie A. Cale,
Chief Executive Officer