



January 29, 2025

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

**Re: C-2 Chum Salmon Bycatch**

Dear Ms. Drobnic:

The Qawalangin Tribe of Unalaska is a nationally recognized Tribe with over five hundred members. The City of Unalaska is their home, eight hundred miles west of Anchorage, in the heart of the Bering Sea fisheries. Unalaska Island has been inhabited by the Unangan people, of the Aleutian Islands, for more than 10,000 years.

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.

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, and fishery support businesses. Many of the tribal members work in many of the support sectors businesses in the community be it with the City of Unalaska, fishing, transportation sector, longshoring or many other support businesses in the community.

The Pollock B season fishery has a larger allocation than the Pollock A season and a longer harvest season from June 15<sup>th</sup> until early October. The Pollock fishery is now more important to Unalaska due to the complete collapse of most of the Bering Sea Crab Fisheries over the last few years, plus reduced Pacific Cod allocations for the past few years.

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 support sector business which provides employment for tribal members.





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 all the support sector's employees in the community.

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, Alaska Marine Lines, 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 plus long-shore workers who live and work in Unalaska.

Qawalangin Tribe 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 during 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 is the largest percentage at 52%, Coastal Western Alaska and Upper Yukon Combined Chum PSC for the same number of years is at about 19%.the balance of 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.

Qawalangin Tribe does not object to the development of new measures that will 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 we will keep an open mind and weigh the potential impacts of a hybrid alternative if it moves forward.





In closing, we hope that the North Pacific Fishery Management Council keeps in mind that overly restrictive alternatives could shut down or restrict the Pollock B season, which would impact Unalaska residents and the support sector businesses we depend on for the seafood industry's economic wellbeing.

Thank you for your consideration of our comments on this issue, which is of the utmost importance to Qawalangin Tribe of Unalaska.

Sincerely,

A handwritten signature in dark ink, appearing to read 'K. McGlashan', written over a horizontal line.

Qawalangin Tribe of Unalaska  
Katherine McGlashan  
Interim Qawalangin Tribal Administrator  
Qawalangin Tribe Council President

