

CITY OF UNALASKA  
43 Raven Way - P.O. Box 610  
Unalaska, Alaska 99685  
TEL (907) 581-1251 FAX (907) 581-4469



March 29, 2024

Ms. Angel Drobica, Chair  
North Pacific Fishery Management Council  
1007 West Third Avenue, Suite 400  
Anchorage, AK 99501

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

Dear Chair, Drobica, and Council Members,

The City of Unalaska is writing to the North Pacific Fishery Management Council (NPFMC) to state our concerns on C-2 Chum Salmon Bycatch issue. The Eastern Bering Sea Pollock Fishery is the nation's largest and most valuable fishery at close to 2.8 billion pounds harvested annually with an ex-vessel value of 300 million dollars and first wholesale value of over 1.0 billion dollars.

The Seafood Industry harvests and processes pollock, which is the economic engine for the City of Unalaska and other fishery-dependent communities of the Bering Sea region. This fishery is also of critical importance to the six CDQ groups, and support sector businesses that support the seafood industry. The Unalaska onshore cooperative catcher vessels harvest 64% of the of the shoreside pollock allocation for the 2024 fishing season that would be 361,000 MT (796 million pounds). Of that allocation, 60% is harvested during the Pollock B season, which is the season that would face the largest impacts of a very restrictive chum bycatch allocation being met, or a total pollock B season closure.

In the analysis on the impacts to the City of Unalaska (pages 194-197), the Chum Salmon Bycatch SIA and Chum Salmon Bycatch DEIS (pages 262-265) explain the high degree of vulnerability, under Alternatives 2 and 3 if restrictive Chum caps were adopted. The analysis also points out the high degree of dependence on the Pollock B season fishery. The B season Pollock fishery represents an average of 16% of the Unalaska general fund revenues, and the direct fish tax revenues from the Pollock B season average between 4.5 to 6.0 million dollars.

The above-mentioned revenues do not include the sales tax revenue generated from the 3% local sale taxes, which is driven by the large amount of fuel sales in the millions of dollars to the harvesters and processors in Unalaska. In consideration of the Pollock B season being the longest fishing season in duration for the community, Unalaska would be impacted if the B season were restricted or closed with the loss of employment in the processing sector and all other support sector businesses.

The Port of Dutch Harbor is the major shipping port for domestic and export shipping of millions of pounds of seafood. The port supports both the shore based and At Sea Processing sectors that utilize the port as their shipping and resupply base.

It is important to remember that from 2011- 2022, 52.8% of the Chum bycatch PSC amounts come from Asia Chum. The Coastal Western Alaska and Upper Yukon Combined Chum PSC for the same number of years is 19%. The Gulf of Alaska, Southwest Alaska, and the Pacific Northwest total of Chum PSC is 29%. We also must point out the importance the Pollock fishery has to the 6 CDQ communities in Western Alaska. They have invested in the seafood industry in harvesting, processing vessels, and shoreside processing plants. The Pollock fishery plays a significant role in the revenues for all CDQ communities especially with the decline in revenues from the collapse of all the major crab fisheries.

As you develop the Alternatives, we would ask that you use the best fishery and scientific information available, which already suggests that ecosystem and climate changes are the leading cause of recent Chum stock failures. Unalaska does not object to the development of new measures to reduce Chum PSC bycatch. However, overly restrictive Alternatives 2 and 3 could shut down or restrict the Pollock B season and cause great harm to Unalaska, the overall seafood industry, other fishery dependent communities, CDQ groups, and support sector businesses depend on the Pollock fishery for their livelihoods. It appears to Unalaska that Alternative 4 Incentive Plan Agreements (IPAs) would work well for Unalaska. We would ask for a complete analysis of this alternative which, may be the most effective alternative in avoiding Western Alaska Chum Salmon bycatch.

We encourage the Council during the formation of these alternatives to do outreach to all sectors involved in the Pollock fishery to get a first-hand knowledge of the potential impacts on the communities, and support sector businesses in the region. Dr. Downs 2023 Communities Profile document, linked in the DEIS, is a notable document on communities to review.

The City of Unalaska thanks the NPFMC for your consideration of are comments on C-2 Chum Salmon Bycatch issue, as it is of utmost importance to the City of Unalaska.

Sincerely,  
CITY OF UNALASKA

  
Vincent Tutiakoff Sr.  
Mayor

CC: William Homka, Unalaska City Manager  
Unalaska City Council Members  
Jon Kurland, NOAA Alaska Regional Administrator  
Doug Vincent-Lang, Commissioner of Alaska Department of Fish and Game