

CITY OF UNALASKA
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January 30, 2024

The Honorable Gina M. Raimondo
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave N.W.
Washington, DC 20230

Re: Opposition of the Request for an Emergency Rule Petition for Zero Bycatch on Chinook Salmon in the Bering Sea Pollock Fishery

Dear Secretary Raimondo,

The City of Unalaska is writing to you today to express our great concern and strong opposition to the emergency petition you have received from six Alaska Native Tribal Groups. A petition filed in 2022 did not meet the criteria for an emergency rule. The City of Unalaska believes this new petition, dated January 14, 2024, will not meet the criteria once again.

The City of Unalaska is home to the International Port of Dutch Harbor, the largest commercial fishing port in the nation for over 27 years. It is the largest fish and crab processing community in the State of Alaska. Our island community of 4,500 year-round residents is in the middle of the Aleutian Islands 800 hundred miles west of Anchorage. Unalaska is also a vital transportation, shipping, and economic hub in the Arctic region.

The new petition requests elimination of Chinook salmon bycatch in the Bering Sea Pollock fishery setting a bycatch rate at zero for a period of 180 days to start with. The Eastern Bering Sea Pollock Fishery is the nation's largest fishery with annual harvests of over 2.8 billion pounds. It's the nation's most valuable fishery, with a yearly ex-vessel value of over \$400 million and a first wholesale value of \$1.2 billion.

The key to our thriving community is being centrally located to the sustainably managed fisheries resources of the Bering Sea. The fishing industry is Unalaska's only industry. Specifically, the pollock processed in Unalaska is the economic engine for the entire community. The Pollock fishery not only supports the harvesters and processors in Unalaska, but a whole host of support sector businesses that depend on the fishing industry for their livelihood. This includes marine repair facilities, grocery marine supply stores, fuel suppliers, shipping companies, longshoremen, and more.

If the petition is implemented then Unalaska and the industry that supports the community face a dire situation. The impact to Unalaska, especially the requirement for zero bycatch of Chinook salmon will effectively shut down the entire Pollock fishery of the Bering Sea. It is important to remember that all commercial fisheries have some amount of bycatch.

Closure of the Pollock fishery, would reduce Unalaska's fishery landing taxes estimated at \$14 million annually. If the Pollock fishery were closed, general fund revenues of 34 million would be reduced by 20%. In addition, Unalaska has a 3% sales tax-driven by the sale of fuel and other goods and services to the fishing fleets, large processing plant operations, and other goods and services provided in the community. This vast revenue stream of close to \$10 million would also experience significant reduction. Unalaska has been addressing the impact from the Bristol Bay Red King Crab fishery total closure; and a two-year total closure of the Bering Sea Snow Crab fishery in 2022-2023 and 2023-2024 seasons. This impact is another \$3.0 - \$4.0 million dollars. Unalaska experienced a similar situation in 1981 when the Bristol Bay Red King fishery collapsed. This fishery was the primary revenue source for the community like the Pollock fishery is today. At that time the community faced plant closures, unemployment in all community sectors, and a mass exodus of residents. We do not want to face that situation again.

We acknowledge the importance of subsistence harvests and the traditional way of life to the people of western Alaska. The Unangan people of Unalaska have practiced subsistence hunting and fishing for thousands of years and it continues to be an important part of their life. We believe there can be no guarantee that granting this petition, to close the Pollock fishery would increase Chinook returns to the river systems in western Alaska. It is uncertain how much of the decline is based on climate and ecosystem. We believe that this needs to be addressed, with additional research and funding.

The North Pacific Fishery Management Council is recognized as our nation's finest fishery council. The Pollock fishery bycatch and discard percentage in the Pollock fishery is less than 1% in a fishery of 2.8 billion pounds. The fishery in the Bering Sea fleet is 100% observed, as are the processing operations onshore. The industry spent hundreds of thousands of dollars on gear changes, real-time monitoring programs for their fishing cooperatives, and other measures to reduce bycatch.

In closing, the City of Unalaska believes the emergency petition should be denied, because it does not meet the criteria for an emergency rule. If approved, the petition would cause irreparable harm to the City of Unalaska, the seafood industry, and support sector businesses that support all the fishery-dependent communities in Southwest Alaska. We believe that the focus should be shifted to increase research on climate and ecosystem changes that may be impacting the river systems in western Alaska. Thank you for your consideration of our comments on this extremely critical issue.

Sincerely,
CITY OF UNALASKA



Vincent Tutiakoff Sr.
Mayor

CC: William Homka, Unalaska City Manager
Unalaska City Council
Jon Kurland, National Marine Fisheries Service Alaska Regional Administrator
Angel Drobnica, Chair Women North Pacific Fishery Management Council