



# UNITED FISHERMEN OF ALASKA

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September 16<sup>th</sup>, 2014

Water Docket # EPA-R10-OW-2014-0505

U.S. Environmental Protection Agency

Mail Code: 2822T

1200 Pennsylvania Ave., NW

Washington, DC 20460

Re: Support for 404(c) Proposed Determination for Bristol Bay

Dear Administrator McCarthy:

United Fishermen of Alaska (UFA) supports EPA's 404(c) Proposed Determination, to restrict the use of certain waters for disposal of dredged or fill material associated with mining the Pebble deposit in the Bristol Bay watershed. We encourage EPA to recommend and finalize this action.

UFA originally supported proactive 404(c) action in an October 2010 letter to the then EPA Administrator Jackson. This position is based on factors that include: the well-documented history of salmon and other aquatic habitat degradation brought about by the direct and cumulative impacts of large-scale development; Pebble's failure to openly detail the mine project through the state and federal permitting processes, despite years of assurances that an application would be forthcoming; and, UFA's concerns about changes in state land use designations in the Bristol Bay watershed, which could negatively impact fish and fisheries.

While Pebble representatives have not yet presented a mine permit application to state and federal agencies for scientific review and public comment, they have revealed mining concepts to the public (including UFA), which have served to exacerbate our member's habitat concerns for the region.

Additional points relevant to UFA's position in support of EPA actions to protect the Bristol Bay watershed are as follows:

- The Bristol Bay salmon fishery is an integral part of the Alaska fisheries mix and typically accounts for 25% or more of the value of Alaska's salmon harvest. It provides jobs for 7,500 harvesters alone, and an additional 6,500 jobs when processing workers, government workers and tender operators are included. Economic benefits are also realized by supporting industry sectors and accrue widely throughout Alaska and the rest of the country.<sup>1</sup>
- Maintaining the productivity of Bristol Bay through a combination of sustainable management and habitat protection is critical to the continued viability of the state's

<sup>1</sup> Economic Value of the Alaska Seafood Industry, McDowell Group, 2013

commercial fisheries economy, which includes a complex and interrelated supply chain and support network.

- The State of Alaska’s preliminary estimate of ex-vessel value for the 2014 season is currently \$197 million.
- The economic benefits of the Bristol Bay fishery are not limited to the Bristol Bay region, or even the state of Alaska. In 2011, fishermen from 42 U.S. states participated in Bristol Bay drift and set net fisheries<sup>2</sup>. This fishery clearly has a significant impact on interstate commerce.
- The Pebble deposit spans the headwaters of three different river systems. There is very real potential for this large mine to disrupt the ecology and productivity of salmon far beyond its project footprint.
- Proactive protections in the context of the overall watershed will be essential to avoid repeating the tragic history of salmon declines throughout their historical range. Many great runs have been wiped out, or severely impacted, by industrial development.
- Salmon is known to be amongst the most beneficial protein sources and there is a public health interest in conserving the large volume of salmon that return to Bristol Bay. EPA should have an active and direct role in preserving environmental quality when it directly impacts the wholesomeness and availability of America’s food supply.

UFA continues to support protecting the Bristol Bay watershed under Section 404(c) of the Clean Water Act and strongly endorses EPA’s Proposed Determination.

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 35 Alaska commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters.

Sincerely,



Julianne Curry  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Independent Fishermen’s Marketing Association • Alaska Independent Tendermen’s Association  
Alaska Longline Fishermen’s Association • Alaska Scallop Association • Alaska Trollers Association • Alaska Whitefish Trawlers Association  
Aleutian Pribilof Islands Community Development Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Reserve • Cape Barnabas Inc.  
Concerned Area “M” Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum  
Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kodiak Regional Aquaculture Association • North Pacific Fisheries Association  
Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation  
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance  
Southeast Alaska Fisherman’s Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners  
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association

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<sup>2</sup> Alaska Commercial Fisheries Entry Commission