



## **Alaska Trollers Association**

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September 15, 2014

Water Docket # EPA-R10-OW-2014-0505  
U.S. Environmental Protection Agency  
Mail Code: 2822T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

RE: 404(c) Proposed Determination for Bristol Bay Watershed

Dear Administrator McCarthy:

Alaska Trollers Association (ATA) supports the EPA's Proposed Determination, which is aimed at protecting the Bristol Bay Watershed. We request that it be recommended and finalized.

ATA represents the Alaska troll fleet. Our members are commercial hook and line salmon fishermen who fish in both state and federal waters off the coast of Alaska. The troll fleet is the largest salmon fleet in the state and 85% of the permit holders reside in Alaska. Nearly one of every 35 people in Southeast Alaska works on the back deck of a trolling vessel, and there is a significant support sector throughout the region that relies on them. A large number of troll permit holders and deckhands live in small, rural communities. Many of our members participate in other commercial, sport, personal use, and subsistence fisheries. Our members support strong habitat protection and fisheries management, as the means to provide the wholesome, sustainable fisheries products that have been the cornerstone of Alaska's coastal economy for over 100 years.

The Alaska troll fleet knows first-hand what it means to be managed for stocks ravaged by poor development choices in critical habitat areas. As harvesters of Columbia River Basin salmon, we have borne witness to the devastation that can be wrought on the fisheries and communities that rely upon healthy salmon. The fish we harvest from that system utilize the entire watershed – mainstem river and tributaries all the way to Idaho. Over the past seven decades, billions of dollars and man-hours have been put into restoring and enhancing salmon that return to this once magnificent watershed. Fishermen from California to Canada have seen heavy restrictions placed on their fisheries, and entire communities have shriveled to near ghost-town status as people moved to the cities to find work. Given Alaska's small population and limited number of industries, there is simply nowhere for people to go should Bristol Bay salmon be harmed. Loss

of any portion of this resource will come at great cost to the seafood industry, coastal communities, the state, and the nation.

Here in Alaska, the production of seafood employs more people than any other industry. The Bristol Bay fishery contributes an average of 25% of Alaska's salmon value and 1/3 of the world's sockeye supply. In addition to the large local employment, people from dozens of states participate in Bristol Bay fisheries or are otherwise employed to handle the product.

Coastwide, our fisheries are inter-related and share a network of support sector services that are also impacted by reduced availability of seafood. Even inland communities rely on Alaska's seafood industry. For instance, products shipped to and from Alaska are often less expensive, because of savings in shipping costs derived from utilizing backhaul (e.g. cargo carried in what would otherwise be empty transport containers).

In addition to the possibility of long term, systemic impacts from large-scale, acidic mine development like the Pebble project, we want to avoid the potential for disastrous events as seen at the Mount Polley Mine in British Columbia. Imperial Mine's estimate of that tailings dam spill is the equivalent of 9,800 Olympic sized swimming pools. It will be decades until that important salmon system even begins to recover, and it remains to be seen how the Fraser River will be impacted. While the Fraser is 125 miles away, the Mt. Polley spill occurred in tributaries responsible for 20% of the epic Fraser River sockeye run. Water quality and sockeye production could be affected. This speaks to the inter-relatedness of anadromous watersheds and the need to protect them in the face of development.

EPA's review of Northern Dynasty's submission to the Security Exchange Commission (SEC) includes tallies for three mine tailings and waste rock production scenarios that range from 880 – 3,900 football stadiums in size, with a combined footprint on par with the city of Manhattan; and that's before the support facilities are factored in. The smallest of the three is anticipated to degrade over 3 miles (1,200 km) of habitat and there are ramifications for nearly 24 additional miles of anadromous streams and tributaries. If ultimately permitted, there may be key differences in how the tailings from Pebble Mine will be handled compared to older mines, but there is little doubt that a mine even a fraction of what is envisioned would disrupt a large expanse of area, and that is likely to come at a cost to local fish and wildlife resources.

But this isn't only about the Pebble project. ATA's apprehension would be the same for any development of similar proportion and scale if slated for the headwaters of an anadromous watershed; most particularly in a system as rich and diverse as Bristol Bay. Alaska's fisheries resources are too intrinsically precious and economically valuable to the state and U.S. to subject them to this kind of risk.

Typically, our association prefers that Alaska deal in-house with resource development decisions for all its industries, with federal involvement limited to the NEPA process when appropriate. After all, who knows best what's good for a region than the citizen's themselves? New jobs in all sectors are crucial in a state with very little economic diversity. So it is not that our members oppose mining, but instead that ATA agrees with former Senator Ted Stevens' who once said of the Pebble concept, *"I am not opposed to mining, but it is the wrong mine for the wrong place."*

When EPA first received a request for 404(c) involvement, it was at a time that our industry was concerned about changes to Bristol Bay Land Use Plan. This led to questions about whether or not Alaska's longstanding habitat protections would be sustained in the region. This concern was heightened as Northern Dynasty staff telegraphed their development plans to the SEC and the public. Therefore, ATA supported United Fishermen of Alaska's call for a 404(c) determination, to help inform the future permit process, and provide sideboards with regard to the placement of dredge or fill in this important and dynamic anadromous watershed.

If you move forward with the Proposed Determination, it is our strong hope that EPA will work closely with the state of Alaska, Northern Dynasty, or other developers who may apply, throughout the NEPA process, to ensure that any development in the Bristol Bay watershed provides sufficient protection for fish, wildlife, our residents and existing industries.

Thank you for considering ATA's point of view. Please don't hesitate to contact me if I can provide additional information on this or other issues of concern to the commercial fishing industry.

Best regards,

Dale Kelley  
Executive Director