



# UNITED FISHERMEN OF ALASKA

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March 4, 2016

Senator Cathy Giessel, Chair  
Senate Resources Committee  
Alaska State Legislature  
State Capitol  
Juneau, AK 99801

**Re: Opposition for SB 163 as written regarding Outstanding Natural Resource Waters**

Dear Senator Giessel and Committee Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 34 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. Fifteen of our 36 member organizations represent salmon fisheries that are dependent on Alaska's outstanding water quality and habitat for continued production, and another eight are salmon aquaculture associations that are subject to APDES permitting for discharges.

In 2014 UFA submitted comments to DEC regarding proposed implementation methods for Alaska's water quality antidegradation policy regulations (attached). In our 2014 comments we expressed concern about the legislature's ability to approve or deny applications for Tier 3 Outstanding Natural Resource Waters (ONRW) within the very short time frame of a legislative session. We also suggested a process within DEC or a multi-agency effort to adjudicate ONRW applications.

On that note, we are opposed to SB 163 as it is currently written. We believe that Tier Three water quality designation decisions should be made by the professional water quality managers at DEC and other state agencies. This process should not be forced into the political arena. UFA believes a multi-agency process that includes DEC, DNR and ADF&G should be implemented to determine which Alaska waters should be designated for tier 3 protection with a public hearing as part of the process.

We thank you for the opportunity to provide testimony.

Sincerely,

Jerry McCune  
President

Mark Vinsel  
Executive Administrator

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 • 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 • Kenai Peninsula Fishermen's Association  
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 Cook Inlet Drift Association • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association