



# UNITED FISHERMEN OF ALASKA

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October 12, 2010

Lisa Jackson, Administrator  
Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Administrator Jackson,

United Fishermen of Alaska (UFA) is a trade association comprised of 38 Alaska commercial fishing organizations that collectively represent the interests of commercial fishermen throughout the state. UFA has a keen interest in maintaining environmental quality that allows for sustainable harvest of Alaska's fishery resources. While any planned development that potentially affects water quality and aquatic resources receives UFA's attention, the risks associated with large scale mining developments such as the Pebble Mine prospect in Alaska's Bristol Bay watershed are of particular concern.

Recognizing that the Bristol Bay region's salmon typically account for more than a quarter of the state's ex-vessel salmon value and provides an economic foundation for fishermen, tenders, processing, support businesses, and communities, it is critically important for the commercial fishing industry to be concerned about industrial development that may disrupt or degrade the area's fishing economy. While the operational plans for the Pebble Mine are not yet fully revealed the scope of likely future mining operations, construction and support activities are large and complex enough so that negative impacts to the Bristol Bay salmon fishery are unlikely to be avoided. Consequently, UFA opposes development of the Pebble Mine.

Since the Clean Water Act is our nation's primary law to prevent the pollution of waterways in the United States, UFA believes that it is appropriate for the EPA to utilize their authority under section 404c of the Clean Water Act to regulate the placement of dredge or fill materials that would affect water quality in the Bristol Bay Watershed, and to carefully tailor restrictions on the discharge of dredge or fill materials in U.S. waters within the Bristol Bay watershed. Thus, we urge the EPA to proactively initiate the 404c process on this issue.

Sincerely,

Mark Vinsel  
Executive Director

Cc: Bob Abbey, Director Bureau of Land Management  
John Jarvis, Director National Park Service