



Council of
Alaska Producers

**Comments on HB119
Bristol Bay Fisheries Reserve**

March 31, 2015

Representative Louise Stutes, Chair
House Special Committee on Fisheries
Alaska State Legislature
State Capitol
Juneau, AK 99801

Dear Representative Stutes,

The Council of Alaska Producers (CAP) appreciates the opportunity to provide comments on HB119, "An Act relating to the Bristol Bay Fisheries Reserve; and providing for an effective date."

CAP, a non-profit trade association formed in 1992, serves as a spokesperson for the large metal mines and major metal developmental projects in the state. Bringing together mining companies with interest in Alaska, the Council represents and informs members on legislative and regulatory issues, supports and advances the mining industry, educates members, the media, and the general public on mining related issues, and promotes economic opportunity and environmentally sound mining practices.

The Council adamantly opposes HB119 which seeks to further complicate statutes created by Ballot Measure 4 (2014). HB119 and Ballot Measure 4 add new regulatory steps for one project (a potential large scale, metallic sulfide mine) in one part of the state (the Bristol Bay watershed). Ballot Measure 4 raised significant constitutional issues about the separation of powers that are still before the courts and CAP is part of the coalition seeking to have the initiative overturned. HB 119 does not clarify these constitutional issues nor does it improve the existing large mine permitting process in the State of Alaska.

We support all efforts to fully fund and continuously strengthen the permitting functions of the resource agencies. Unfortunately HB119 simply adds unnecessary delays and costs in an effort to undermine the feasibility of one project. By creating an infinite loop of administrative and legislative approvals for any permit change, HB 119 establishes a regulatory system based on politics, not science. Ballot Measure 4 and now HB199 have and will continue to result in investment dollars leaving Alaska as investors seek jurisdictions that value science based regulatory systems that are efficient, transparent and predictable.

Given the importance of diversifying and strengthening Alaska's economy and encouraging development that provides jobs and opportunities for Alaskan families, the state should not discourage investment by politicizing the regulatory system.

Sincerely,

Karen Matthias
Managing Consultant