

## UNITED FISHERMEN OF ALASKA

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February 5, 2013

Senator Kelly and Senator Meyer Co-Chairs Senate Finance State Capitol, Rm 516 & 518 Juneau, AK 99801-1182

RE: RECOMMENDATIONS - SB 29 CRUISE SHIP WASTEWATER DISCHARGE

Dear Senator Kelly and Senator Meyer,

United Fishermen of Alaska (UFA) is the largest statewide commercial fishing trade association, representing 34 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. Thank you for the opportunity to provide our recommendations regarding SB 29.

UFA believes that the control of all forms of cruise ship wastewater discharge should be directed to occur seaward of the territorial sea boundary (approximately three (3) miles from adjacent shorelines) or discharged into land based systems and that for the purposes of this requirement the "doughnut holes" (federal waters) present within some interior waters of Southeast Alaska and Prince William Sound shall be closed to discharge except, as allowed under special circumstances, by the Commissioner of the Department of Environmental Conservation.

In the absence of requirements to discharge outside of three miles, UFA continues to urge the cruise industry to sit down with affected parties and individuals to establish reasonable no discharge zones. UFA also supports restricting discharges in critical or sensitive habitat.

UFA also supports a requirement for an applicable technology review, for the purposes of requiring upgrades to improved discharge, at the five (5) years permit reissue. If the technologies for improvement are found to exist there would be a period, not exceed two operational years, for vessels to come into compliance with the improvements.

Thank you for considering our recommendations, please let us know if you have any questions.

Sincerely.

Julianne Curry
Executive Director