

**TESTIMONY OF  
SHANNON CARROLL  
COMMERCIAL FISHERMAN**

**BEFORE THE UNITED STATES SENATE COMMITTEE ON  
ENVIRONMENT AND PUBLIC WORKS**

**SUBCOMMITTEE ON FISHERIES, WILDLIFE AND WATER**

**FIELD HEARING: *IMPACTS OF THE PROPOSED WATERS OF THE UNITED STATES RULE ON STATE AND LOCAL GOVERNMENTS AND STAKEHOLDERS***

**Fairbanks, Alaska**

**April 8, 2015**

My name is Shannon Carroll, and I am a commercial fishermen and solo practitioner attorney. I thank the committee for the opportunity to testify. My comments and support for the proposed regulations are based on my experience working in the commercial fishing industries in Alaska, Washington, and Maine. As someone who has fished elsewhere in the country, I am proud to live and work in a state that takes the health of the commercial fishing industry so seriously. I also want to thank you, Senator Sullivan, for supporting the industry during your time in office thus far.

**I support this rule because clean water and healthy wetlands are essential to a vital commercial fishing industry.**

In 1977, Congress reexamined the necessity of wetland protections within section 404 of the Clean Water Act. Then, as now, commercial fishermen vocalized their support for the provision, coining the phrase “No wetlands, no seafood.” I mention this phrase because, in the case of Alaska, it could not be more apropos: with over forty-three percent of our state covered in wetlands, it is not surprising that seventy-six percent of the state’s seafood harvest comes from inshore, wetlands dependent fisheries each year.<sup>1</sup> In addition to the state’s iconic salmon fisheries, wetlands are also critical to other keystone fisheries, such as halibut, pollock, herring, and crab. I support the proposed rule because it clarifies protections to waters upon which these fisheries rely, all while preserving existing exemptions for farmers, ranchers, and foresters that encourage responsible stewardship of land and water resources.

In addition to promoting the health of our fisheries, the proposed rule further protects the brand of Alaskan seafood. As the Alaska Seafood Marketing Institute noted, “[t]he perception of Alaskan stewardship is an immeasurable but important component to the seafood and visitor industries. Millions of people eat Alaska seafood for the same reason more than one million visitors travel to the state each year—because they value Alaska’s

---

<sup>1</sup> CLEAN WATER NETWORK, FISHERIES, WETLANDS AND JOBS: THE VALUE OF WETLANDS TO AMERICA’S FISHERIES 3 (1998), available at <http://www.pcffa.org/wetlands.pdf>.

pristine environment.”<sup>2</sup> By categorically including wetlands, the proposed rule ensures that Alaskan seafood’s sterling reputation will continue into the future.

### **Alaska benefits from a vital commercial fishing industry.**

My support of healthy fisheries, and therefore the proposed rule, is not entirely out of self-interest. Fishing means business and jobs in Alaska. As Alaska’s third largest industry, recent figures place the combined annual value of Alaskan seafood exports and domestic sales at \$6.4 billion.<sup>3</sup> When secondary economic output is included, the Alaskan fishing industry accounts for \$15.7 billion in economic production.<sup>4</sup> That equals over 94,000 jobs directly tied to the industry and an estimated \$6.4 billion in labor income.<sup>5</sup> Importantly, most of these jobs stay in Alaska, with nearly one-in-eight workers in Alaska earning at least part of their income directly from the fishing industry.<sup>6</sup>

Fishing is also the backbone of Alaska’s coastal communities, employing than fifty percent of private sector workers in coastal towns.<sup>7</sup> Perhaps equally important, in places like Kodiak, Petersburg, Dillingham, and Cordova, commercial fishing is not just the engine that drives the local economy; it is a means of opportunity and mobility. These are good jobs that can provide high school-age kids with enough income to pay for college or for a down payment on a boat or a permit. These are jobs that bestow self-worth amongst those in the industry and further a tradition one is proud to pass down to the next generation. Most importantly, however, these are jobs that are built on the back of a sustainable resource, meaning that these jobs can—with proper management and self-restraint—support local communities for generations to come.

There will, no doubt, be costs associated with the proposed rule. But, it seems equitable that these costs be initially borne by those seeking to benefit from a proposed development. And, just as before *SWANCC* and *Rapanos*, development and resource extraction will continue to occur and the economy will continue to grow. I will also add that, having commercial fished in Washington and Maine, two states that formally had some of the world’s largest salmon runs, I can personally attest to the fact that there are much greater costs associated with the restoration of a damaged watershed and crippled fishery than there are with development fees and mitigation banks. Washington State, for example, has invested more than \$1 billion of public funds into its hatchery program, spending more than \$60 million dollars a year.<sup>8</sup>

Finally, as a commercial fisherman, I understand concerns regarding undue regulatory burden and government overreach. However, I also understand that sometimes rules

---

<sup>2</sup> ALASKA SEAFOOD MKTG. INST., *ECONOMIC VALUE OF THE ALASKA SEAFOOD INDUSTRY* 24 (2013), available at <http://pressroom.alaskaseafood.org/wp-content/uploads/2013/08/AK-Seafood-Impact-Report.pdf>.

<sup>3</sup> *Id.* at 1.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 57.

<sup>6</sup> *Id.* at 14.

<sup>7</sup> RES. DEV. COUNCIL, *Alaska’s Fishing Industry*, <http://www.akrdc.org/issues/fisheries/overview.html>.

<sup>8</sup> WASH. DEPT. OF FISH & GAME, *Hatcheries*, <http://wdfw.wa.gov/hatcheries/overview.html>.

serve a purpose, particularly when they are based on common sense and sound science as I perceive to be the case here. The proposed rule also serves to provide clarity to potentially affected parties, which in turn will promote fairness and efficiency in application by the relevant agencies.

In closing, I urge the Senator Sullivan and members of the Committee to consider wide reaching economic and cultural benefits that this proposed rule will have for the State. Thank you for the opportunity to testify.