

Nancy Lord

PO Box 558
Homer, AK 99603
907-299-1274

June 2, 2019

The Honorable Patricia A. Seitz
United State District Court for the Southern District of Florida
Ferguson, Jr. United States Courthouse
400 North Miami Avenue, Room 11-4
Miami, FL 33128
seitz@flsd@uscourts.gov

Re: Case Number 16-20897-CR;
United States v. Princess Cruise Lines, Ltd.

Dear Judge Seitz:

I am a long-time Alaska resident, former commercial fisherman, and former naturalist/historian on small adventure cruise ships. I am also a former Alaska Writer Laureate and current educator. My books include *Fishcamp* (a memoir/natural and cultural history based on my fishing life), *Beluga Days* (a natural and cultural history related to the endangered Cook Inlet beluga whales), and *Made of Salmon* (an anthology concerning the significance of salmon in the lives of Alaskans.) I'm writing because of my concern about pollution caused by cruise vessels operated by the Carnival Company and Princess Cruise Lines in Alaska waters.

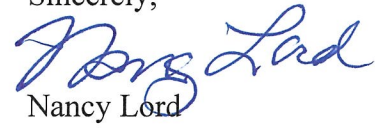
There is nothing we value more in Alaska than our clean air and water and our fisheries. Tourists, as well, are drawn to Alaska for its "pristine" and productive nature. And yet, industrial tourism such as that involving megaships, unless well regulated, threatens those very qualities.

As you know, most of the cruise ship industry in Alaska is in Southeast waters. In my part of the state, the industry is growing, with more ships stopping in Homer each year and some of these traveling up Cook Inlet to Anchorage. We must hold these ships to best practices for legal discharges, or the debasement of our water quality will affect even more of the water bodies and fisheries that I and all Alaskans depend upon.

I ask that you look very closely at Carnival's past and continuing practices, particularly regarding the dumping of wastes in our waters. There are proper ways of handling wastes, and polluting our waters must not be allowed. The state and federal agencies responsible for regulation are, at best, overworked. They need encouragement to do their jobs, just as Carnival needs encouragement to obey best practices and the law.

Based on my lifetime of living and researching the value of marine life environmentally, economically, and culturally in the lives of Alaskans, I ask that you give this issue your closest attention.

Sincerely,

A handwritten signature in blue ink that reads "Nancy Lord". The signature is fluid and cursive, with the first name "Nancy" and the last name "Lord" clearly distinguishable.

Nancy Lord

Ronn Buschmann
Post Office Box 1367
Petersburg, Alaska 99833

June 2, 2019

The Honorable Patricia A. Seitz
United State District Court for the Southern District of Florida
Wilkie D. Ferguson, Jr. United States Courthouse
400 North Miami Avenue,
Room 11-4
Miami, FL 33128
seitz@flsd.uscourts.gov

Re: Case Number 16-20897-CR; United States v. Princess Cruise Lines, Ltd.

Dear Judge Seitz:

I am writing as an Alaskan resident. My family settled in the Petersburg, Alaska in the late 1800's. I have been a resident of, and commercial fished out of, Petersburg for 40 years.

I have observed pollution in the waters of Southeast Alaska that obviously stems from cruise vessels operated by the Carnival Company, including by Princess Cruise Line, which I believe is owned by Carnival.

Petersburg is my home. I have fished for years in the waters of the Alexander Archipelago, especially in Icy Straits, Cross Sound, Clarence strait and in Lynn Canal. All of these marine waters are frequented by Princess Cruise Line vessels and other large passenger vessels owned by Carnival.

In the last 25 years, I have provided tendering services on the fishing grounds, that is buying salmon from the smaller boats and transporting it to our processor. As a result, I accept delivery of fish from many commercial fishermen. I am in frequent contact with fisherman who roam the waters of northern Southeast Alaska

because my tendering operations are located near the fishing grounds and I have a chance to see cruise vessels pollute and talk to fisherman who observe cruise vessels spewing smoke into the air and dump pollution in Alaska waters.

It is also obvious to me that cruise vessels have been dumping plastics into the waters of Southeast Alaska. In the not too distant past, when we would fish in lower Chatham Straights during the summer, we would come upon flotillas of white and black garbage bags jettisoned from the cruise ships before they entered the open ocean. There were no towns in that area to observe this behavior but an occasional fishing boat would. We never said anything about it because, although dumping garbage was considered bad form, I didn't know it was specifically illegal.

More recently, while tendering salmon in Lynn Canal we would usually be running all night after picking up fish in the evening and intending to deliver the next day. It was during these trips that we regularly encountered oily bilge water and stinky brown sludge being dumped from the cruise ships. I remember the Holland America boats in particular because they had on board cell/WIFI. If we got within a mile our cell phones would connect to their system, it being the only signal in that area, and we would receive roaming charges for any downloads.

Last year I was surprised by the pall of petroleum exhaust pollution in Stevens Passage. We have all become familiar with the summer exhaust plume over Juneau, a beautiful town surrounded by mountains that contain the pollution, but Stevens Passage is a broad body of water and that day was breezy, although foggy earlier. I left Taku Harbor and was proceeding towards Petersburg when I observed two cruise ships bound for Juneau with this trail of haze 300 or 400 feet above them stretching to the southern horizon. As I got closer, I could see that one of them was belching gray air pollution.

Another point worth making is that scrubber sludge, while legal to dump under proper circumstances, is chemically destructive to our Southeast Alaska environment. Scrubbers allow the cruise ships to

burn bunker fuel, a highly toxic residue from the petroleum distillation process. Many localities, such as the State of California forbid scrubbers, foreseeing the potential for environmental damage. The cruise lines then shift over to more expensive diesel fuel when they approach within 24 miles of the California coast. The scientific community has already been warning us about the acid rain fallout from Chinese and Korean coal fueled power plants and the resulting ocean acidification. The relatively small changes in ocean pH interfere with the ability of some particular small crustacea to form shells. This crustacean is a key food source for small pink salmon, which returns have been sputtering the last few years.

Cruise ship scrubbers turn noxious air pollution into SO₃ and SO₄, key elements of ocean acidification. These chemicals are being spread throughout Southeast Alaska, including estuaries important to fish and crustacea rearing. Because the chemicals are in concentrations too toxic to be released into the environment, they are diluted with huge pumps mixing with seawater.

It has always seemed counterintuitive that the cruise ship companies advertise and propose that they celebrate the natural wonders of Southeast Alaska while succumbing to this institutional money lust that causes them to avoid paying for effective pollution control measures.

As a resident of Petersburg, there are many issues related to these huge cruise ships coming into our small towns. Petersburg has been an "off the beaten track" destination in the past. Now, however, as other Alaskan ports have become overwhelmed, the cruise ship industry is planning a move to include Petersburg as a port of call. The community voted not to build the deep-water dock that would allow cruise ships to dock many years ago. So, the cruise companies are planning to anchor and lighter their passengers in small boats. These enormous vessels have a dramatic impact on how we live, not just because the vessels are fouling our ocean waters and air but because of the impacts helicopter tours, fishing charters and tour operations have on our communities. We're getting overwhelmed up here and we need help at least making sure that the dumping of waste into the waters we use for fishing and recreation are protected. We need help stopping the kind of air pollution that makes the clean

air we have enjoyed for decades look like some third-world country with no laws.

I speak for myself, but I know there are dozens of residents and individuals who make their living working on the waters of Alaska who share my beliefs. I really wish all of us had more notice about your hearing tomorrow and I hope this letter gets put into the record.

If you have any questions for me, I'll try and answer them. If you can, get up to Alaska and see for yourself what a shame it is for Carnival to be using Alaska's marine waters as a dumping ground for the pollution their ships create.

Thank you very much for listening to our concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ronn Buschmann', with a long, sweeping underline.

Ronn Buschmann

ronnbuschmann@aol.com

(907) 723-1642

Responsible Cruising in Alaska

819 Goldbelt Avenue
Juneau, Alaska
99801

May 30, 2019

Honorable Patricia Seitz,
United States District Judge
United States District Court
Southern District of Florida.
Miami, Florida

RE: US v. Princess Cruise Lines, Ltd.;
Case No.: 16-20897 – CR-Seitz

Judge Seitz:

I am writing on behalf of Responsible Cruising in Alaska and also as a long-time Alaska resident with regard to the proceedings over which you are presiding in the above-referenced case. I commend you for acting in a forthright manner in regard to the behavior of Princess Cruises, a subsidiary of Carnival Corporation, and other Carnival brands subject to the probation agreement and Environmental Compliance Program. This encompasses not only Princess Cruises ships, but also other subsidiary brands that frequent Alaska: Holland America Line, Carnival Cruise Line, and Seabourn Cruises. The repeated acts of Carnival in regard to the pollution of our nation's waters and air across brands and while on probation warrant significant sanctions.

My personal involvement with Carnival Corporation and their unwillingness to follow our national and state laws addressing pollution goes back to the 1990's. I have worked with numerous individual citizens in Alaska and other states to require Carnival to operate their vessels in a manner that minimizes impacts on the water and air quality of the ports in Alaska and other places in America. I have also skippered vessels on the waters of Southeast Alaska and observed first-hand air and marine water pollution discharged by large cruise vessels.

To an extent that is remarkable in 2019, Carnival has continuously and repeatedly engaged in a pattern of pollution. It would appear that Carnival's internal corporate culture views environmental laws and the need to protect the clean air and marine waters we all use as aspirational. In Alaska, Carnival has a record of polluting and counting on casual enforcement by regulatory

agencies to insulate them from sanctions. To a degree that is embarrassing to me and many Alaskans, enforcement of Alaska laws designed to prevent pollution of our marine waters and protect our air quality have been ignored by both Carnival and the Alaska Department of Environmental Conservation.

In regard to the lack of meaningful enforcement by the Alaska Department of Environmental Conservation, I urge you to direct the court appointed monitor for Carnival to comb through the records produced by the Alaska Ocean Ranger program. It is conceivable to me that the kind of systemic pollution you are dealing with based on the evidence you presently have will be amplified if you review state records.

The pattern is clear, at least up here: Carnival talks about how their customers desire clean air and water, even while refusing to adopt available technology that would insure compliance with our air and water quality standards. When the citizens grumble about obvious air pollution or discharges from cruise ships, Carnival deploys legions of lawyers and lobbyists to positively spin the media and pressure decision makers in order to quell any meaningful enforcement.

It is not wrong to conclude that Carnival is basically a rogue entity that simply doesn't harbor a core value related to protecting the very environment that their customers desire to see and experience while cruising. This disconnect is not just related to some quest to maximize a return on investment. It appears to me to be a deeply entrenched attitude, related to control, and founded on the belief that just because they operate under a flag of convenience that somehow the laws of the United States and the State of Alaska do not apply to them.

The issue before you is what to do about a corporate entity that has routinely engaged in lawbreaking activities and continued to do so while on probation.

My father was an agent of the Federal Bureau of Investigation and I recall him using the term "scofflaw" occasionally. My old dad was a pretty tough guy, having flown B-24's over Europe during World War II and I remember distinctly how he reserved special disdain for scofflaws. Being as I was kind of a rebellious guy back in the 60's and a bit of a provocateur, I asked him why he was so hard on scofflaws. He thought about it for a bit and went on a little riff about how ignoring the law, that is, scoffing at the law, was one of the reasons that societies fall apart. Rebellious person that I was, I was inclined to think he was talking about me but as I matured, I take his point.

Micky Arison, Arnold Donald, and their crew do not understand that ignoring the law is unacceptable. There are obvious health issues related to polluting the marine waters that all of us use for commercial fishing, sport fishing, and subsistence fishing in Alaska. There are obvious negative health consequences that result from Carnival's decision to use bunker fuels that pollute the air we breathe in Alaska. Carnival says the company cares, but it apparently does not care about the water and air pollution laws enacted by the Congress of the United States and by the State of Alaska.

I have listened to a variety of individuals in Alaska who are impacted by Carnival's operations. The strong sense I have based on these discussions is that in order to alter results in Carnival's beliefs and conduct, you are required to levy a serious financial fine and also restrict Carnival's freedom to operate in an unrestricted fashion. Carnival, by their behavior and decision to ignore our national and state laws has earned sanctions that should include restrictions on Carnival's ability to sail wherever they desire.

Given the repeated failure of Carnival to live up to the terms of settlement agreements where Carnival promised to alter their conduct and stop polluting, I would respectfully recommend general sanctions that would compensate the residents of Alaska impacted by Carnival's callous disregard of national and state pollution requirements. First, levy the maximum fines that have been suspended in previous cases where Carnival's lawyers agreed to deferred prosecution agreements conditioned on adherence to federal and state laws. Secondly, any additional documented violations of federal or state water or air quality laws that are presently before your court should result in the maximum statutory fine being levied against Carnival. Carnival's repeated failure to follow the law warrant the maximum fine allowed by law.

In terms of restricting access to critical marine waters and sensitive areas, please consider precluding all Carnival vessels from entering the interior waters of Glacier Bay National Park and Preserve in Alaska. Glacier Bay is one of the most esteemed conservation areas in North America and a genuine treasure that belongs to the people of the United States. Carnival's casual dumping in this area of international significance reflects a serious problem and debarring Carnival and the other cruise lines from entering Glacier Bay for a period of 3 to 5 years commencing in the 2021 cruise season is an appropriate punishment.

My thinking here is based on both the importance of Glacier Bay but takes into account the long lead time cruise vessels are scheduled as well as the possible negative impact that an abrupt cancellation of vessels scheduled to sail in Glacier Bay would have on Alaskan ports. It has been widely reported in Alaska that you may be considering banning Carnival vessels from American waters. Tempting as this remedy may be, ports in Alaska and other states would likely lose significant direct and indirect revenue from a complete ban. Debarring Carnival and associated Carnival company vessels from entering Glacier Bay would serve as a significant punishment given that routine customer surveys of cruise travelers to Alaska suggest that trips into Glacier Bay are highly desired by the public.

If you do elect to ban Carnival and Carnival owned vessels from the waters of Glacier Bay, do give some consideration to holding the National Park Service harmless from any consequent loss of revenue derived from Carnival operations. At present federal law provides that customers entering Glacier Bay on cruise vessels pay a fee that is used to operate the park and preserve as well as maintain necessary infrastructure within the park. It seems to me that the Park Service could provide you with a calculation on the number of visitors that arrive on Carnival vessels that would allow you to assess an additional fine on Carnival for the loss of passenger traffic that stem from an order preventing the company from entering Glacier Bay. The logic here is to prevent a federal agency from losing a predictable revenue source as a result of corporate wrongdoing.

Lastly, I have listened to various individuals and organizations in terms of how to mitigate and compensate individuals and communities that have been harmed by Carnival's legal failings.

Cruise vessel operations in Alaska are conducted on increasingly large vessels that are essentially floating cities in terms of production of waste water and air emissions. The newer cruise vessels have as many as 5,000 passengers and crews exceeding 2,000. It is not uncommon for multiple large cruise vessels, including vessels operated by Carnival and Carnival's sister companies, to exceed the entire population of the town in which they are berthed. Even in a relatively large port like Juneau which has population of 32,000 souls, there are days when there are significantly more passengers and crew members in Juneau than the entire population of the town. This size and scale of the cruise industry in Alaska is having an increasingly large impact on our communities. There are numerous health and safety problems associated with large-scale industrial cruise operations that go beyond the

obvious marine water and air pollution concerns that Carnival has elected to ignore.

In order to address these obvious concerns and provide some relief to individuals and communities who have been negatively impacted by Carnival's illegal conduct, I recommend you consider allocating some of the fines imposed on Carnival for the following tasks:

- ✓ Direct payment of a portion of any fines levied against Carnival to the City of Ketchikan and the Gateway Borough (essentially Ketchikan), for the express purpose of establishing infrastructure to mitigate and offset the large numbers of cruise passengers who visit that city during a compressed tourist season.
- ✓ Direct payment of a portion of any fines levied against Carnival to the City of Hoonah, Alaska, for the express purpose of paying off the outstanding debt Hoonah incurred building a cruise ship facility. Hoonah is a predominately Native community and historically Glacier Bay was the ancestral home of many Natives now residing in Hoonah.
- ✓ Consider directing a large portion of what is anticipated to be a hefty fine to be paid by Carnival to the National Park Service for two purposes, as follows:
 - A. For upgrades and improvements to the existing lodge within Glacier Bay Park & Preserve located in Bartlett Cove. The lodge is dated, needs maintenance and is nowhere near as majestic as lodges in similarly grand national parks like Yellowstone and Yosemite, just to select a couple of obvious comparisons.
 - B. Research within Glacier Bay Park & Preserve as directed by National Park Service. Glacier Bay is a wonderful natural place but also a natural laboratory that warrants study of historic cultural practices, glacier formation and retreat, wildlife migration and measurements related to climate alteration.
- ✓ Direct that a large portion of the fine against Carnival be allocated to the City and Borough of Juneau, Alaska for the express purpose of installing electrical connections that will allow cruise vessels calling on Juneau to utilize shoreside power derived from hydroelectric

sources and eliminate or significantly reduce the need for vessels to burn fossil fuels while moored. The health benefits of eliminating or reducing use of shipboard generators powered by diesel or other hydrocarbons would be good and mitigate substantially the negative impact on Juneau residents and cruise passengers, especially the elderly, youth and individuals with respiratory ailments.

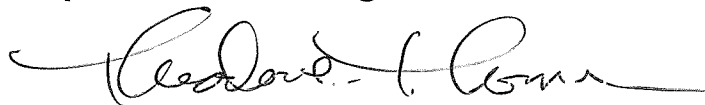
- ✓ Allocate several million dollars of any fine levied against Carnival to each of the following:
 - A. The National Science Foundation, possibly in conjunction with the National Oceanographic & Atmospheric Administration, for a comprehensive study on the impact large cruise passenger vessel operations have on whales and other marine mammals. Cruise vessels regularly strike whales and the impact of cruise passenger propulsion systems on whales and other marine mammals is thought to be significant but largely unknown. Because cruise passengers relish observing marine mammals, it would be appropriate for a portion of the fines to be paid by Carnival for the purpose of understanding the impacts cruise vessels have on marine mammals and how to mitigate these impacts.
 - B. The National Institute of Health, in conjunction with the Center for Disease Control, for a comprehensive study about the impact large scale cruise passenger activities have on the health of passengers and port communities. Cruise vessels are significant point sources of air pollution and may contribute large number of fine particulates and other problematic air pollution to the environment of Alaska and other coastal communities. Conducting the basic research on the effects of these floating cities is essential to devise thoughtful responses to this industry.
 - C. The National Science Foundation, possibly in conjunction with the Environmental Protection Agency and the National Oceanographic & Atmospheric Administration, for a much-needed study of the impact discharge of scrubbed air emission residues has on the marine waters of Alaska. At present, it is obvious to many of us in Southeast Alaska that the various Carnival shipping brands are using relatively inexpensive bunker fuels with high sulfur content as a fuel source. In order

to comply with air quality standards, the companies are “scrubbing” the air emissions, a process that concentrates residues which are then dumped into the marine waters of our nation in some instances. These scrubbed air emissions are essentially converted into a marine pollution problem of unknown harm. While the scrubbed emissions routinely leave a faint sheen on the marine waters of Southeast Alaska, the discharge of these concentrated wastes is apparently not regulated by any federal agency or the State of Alaska. Stories abound up here about fishing vessels running into a foamy brownish residue that has been discharged by cruise vessels as a result of their scrubbing technique. While scrubbing might marginally save a few dollars compared to burning cleaner, lighter forms of fuel, the potential health impacts on humans and marine life forms is likely negative. Using part of the fine Carnival should pay to gather data on the actual impact of their decision to dump scrubbed emissions would be just.

Coastal Alaska is a wonderful place. What we call Southeast Alaska is a national treasure. The islands and fjords that make up this part of coastal Alaska deserve care and protection from depredation by outlaw entities like Carnival. With your assistance we can rectify past transgressions and use a portion of the fines Carnival ought to be required to pay to address how we can sensibly regulate Carnival and other large cruise vessel operations in a manner that works for visitors and residents of this wonderful place I am pleased to call home.

Thank you for addressing these matters of significant health and safety issues that impact those of us living in coastal Alaska.

Responsible Cruising in Alaska



Theodore Thoma,
President



F/V Ocean Gold

Ed & Kathy Hansen
Phone: 907-209-5400
Fax: 907-917-5470

1008 Fish Creek Rd
Juneau, Alaska 99801
Email: gillnet@ak.net

June 2, 2019

Honorable Patricia Seitz,
United States District Judge
United States District Court
Southern District of Florida
Miami, Florida

RE: US v. Princess Cruise Lines, Ltd.
Case No: 16-20897-CR-SEITZ

Dear Judge Seitz,

We are a commercial fishing family that came to Southeast Alaska in 1985 with our two-year old. We have participated over the years in the Southeast drift gillnet fishery, troll fishery, 2-C halibut, Dungeness crab fishery, tanner & king crab fishery, herring fishery, longline for cod and rockfish, and pot shrimp. At this point in our life the only fishery we are still involved in is the SE drift gillnet fishery mainly in the Stephens Passage area.

As commercial fishermen clean water and clean air is essential to our livelihood as it is to all commercial, sport, charter and native subsistence fisheries. Maintaining the pristine conditions in Southeast Alaska is critical to the sustainability of our industry. These values are the same reasons that cruise ship passengers come to Alaska for their dream trip.

When we first started gillnetting in Stephens Passage in 1985 you would only encounter a cruise ship occasionally to today's schedule where you have up to seven cruise ships docking in a day in Juneau. Over this 34-year time-period we have seen many changes affecting the environment and not for the better. The air

quality in Southeast Alaska goes from nice clean air throughout the winter and early spring to by the end of May there is a continual heavy smoke haze and personally every summer we feel the effect of the air quality in our health. At times, the smoke exhaust in Stephens Passage actually smells like coal and we have actually quit fishing because the smell and heavy air is too difficult to work in. The number of whales that are killed due to ship strikes has substantially increased. Up in Skagway at the 2-300 ft level where the ship exhaust hits the shoreline there is a band of dead trees due to the heavy metals contained in the exhaust.

While it is legal for the cruise ships to dump wastewater in the contiguous zones, these are just small slivers of areas within the inside passageways. With the tenfold increase in numbers of cruise ship as well as the larger size of the vessels traveling through this area, too much "greywater" is being dumped not allowing for the dispersal of the pollution in the inside waters of Southeast Alaska. There is no way this pollution will not affect the fishery resources over time. When the cruise ships dump in these areas and you fish just after they have gone through you will find on your nets or troll lines a thick brown sludge on the gear.

We have lived and fished in Southeast Alaska for years. The cruise ships, including vessels operated by various Carnival companies, routinely pollute the fishing grounds we use, often during the night hours when they are in transit to another port.

We have directly observed waste being dumped into our marine waters. We routinely observe terrible pollution from Carnival vessels. There are times when the formerly pristine air in Stephens Passage looks like the lousy air in Los Angeles in the 1970's. We have videos of these smoking ships I can send you if you wish.

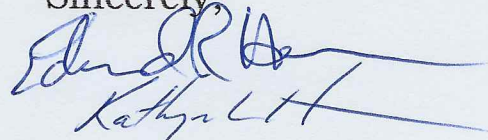
The impact on our personal lives, particularly from air pollution both on the fishing grounds and while we are at home in Juneau, has been noticeable. We both have experienced diminished health and breathing concerns as a result of increased air pollution in Juneau. We are especially concerned about the health of our son, daughter-in-law and grandchildren who live close to the downtown

Juneau harbor. Attached below is a picture of the Ruby Princess emitting significant pollution on April 28, 2019. Our grandchildren and every other resident and the visitors to our community should not have to breath the kind of foul air emitted by burning cheap hydrocarbon fuels just so Carnival can make a few more dollars.

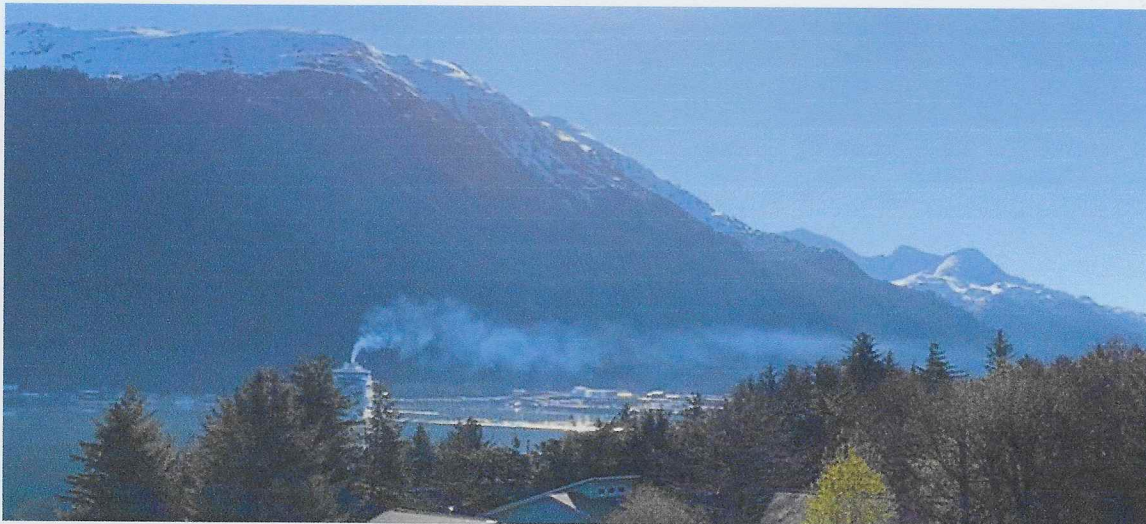
Not only do the Carnival ships pollute our marine waters and air, they force small commercial fishing vessels to fish and maneuver in restricted areas.

We need your help. Please take into account our concerns which we believe are shared by the great majority of residents and visitors alike. There is no reason in 2019 to allow pollution like Carnival spews into our water and air to continue.

Sincerely

Handwritten signatures of Ed and Kathy Hansen in blue ink. The signature for Ed is on top, and the signature for Kathy is below it.

Kathy and Ed Hansen



May 29, 2019

Honorable Patricia Seitz,
United States District Judge
United States District Court
Southern District of Florida

Judge Seitz:

I am a 73-year-old, resident of Alaska since 1962. I am a veteran of the commercial fishing and industrial boat industries, among other things. My sense of self is grounded in the pristine waters, environment, and fish and game of Alaska. I continue to fish commercially and my livelihood has always been dependent on being able to market clean, fresh fish.

I am writing in regard to US v. Princess Cruise Lines, Ltd., Case No.: 16-20897 – CR, a case that has been publicly discussed in Alaska and of considerable interest to me.

My commercial fishing activity occurred over 40 years in what is known as regulatory area 2C, specifically south of the town of Juneau in Stephens Passage and west of Juneau in western Icy Strait at, and including, the waters at the entrance to Glacier Bay. In these waters interaction with, and observation of the behavior of tour ships was a daily event for me. Countless times I communicated with tour ship wheelhouses advising of fishing gear location and making arrangements for safe passage.

Carnival Corporation-owned Princess Cruises, Holland America Line, Seabourn, and Carnival Cruise Line ships all frequent Alaska during cruise season, including visits to Glacier Bay. On a daily basis, I observed the cruise ship industry and the ships owned by Carnival Corporation themselves violate the letter and the spirit of environmental law. Over the last thirty years this has included dumping gray and black water in inside passages and offshore waters. Up through about 2015–2016 I would regularly go fishing in these very waters.

I fished for halibut in this area, which involves ground-line sets that remain anchored in place for hours at a time. So I had occasion to be on the water at

all hours of the 24-hour cycle and personally observed contaminated water in the tide race.

I have repeatedly encountered heavily polluted water in this area. These incidents included masses of a chemical-laden tan-colored foamy substance that was slippery to the touch. It appeared to be akin to what you would find discharging from a sewage plant. Before the cruise ships began frequenting these waters I never encountered anything like this; it is nothing like any of the various natural phenomena I have encountered in my years of fishing in this region. However, once the cruise ships made Juneau's port a frequent stop, I repeatedly ran into these masses in huge quantities in the water column where I was fishing. I would commonly see this pollution on the early morning tide after the cruise ships came to dock.

These sorts of stories are legion, and I am well aware that in a court of law they would have no standing because of course it's just one old fisherman's word against a double handful of company lawyers all demanding certified water tests, air sampling, proof of veracity, etc. But a simple thought experiment sort of proves my point: how many days worth of sewage from six or eight thousand individuals can a cruise ship hold until it has to hang out a giant, "Bathrooms out of Order" sign? Of course they say they are treating the sewage, but this does not remove all of the pharmaceutical and other chemicals that may be in it and that can have negative impacts on our fisheries and our health. How much oily bilge water can the engine rooms hold until the water goes over the cat walks?

A complex mix of issues drives and informs cruise ship behavior. They stay tied up in towns during the shopping day allowing passengers and crews to shop and sightsee. Then they travel at night to the next location. This gives them the opportunity to do pretty much anything they want to do on a 24-hour cycle.

As of this year, there is a new twist in that there is a new cruise ship terminal at Icy Straight Point next to the town of Hoonah, Alaska. Carnival's subsidiary lines all call at this new port, including Princess, Holland America Line, Seabourn, and Carnival Cruise Line. Many cruise ships exit Glacier Bay at 4:00PM, but don't want to show up in Hoonah, which is only 90 travel-minutes away, until early hours the next day. So they have created what they call "wilderness sightseeing" which entails exiting west out North Inian passage to the open Gulf of Alaska, doing a giant rectangle that uses

up the night hours, and returning east to arrive in Hoonah to start the tour day. Some Carnival ships call this a “scenic cruising” day and purportedly are going to look at the Hubbard Glacier. My understanding is that a governing purpose of this odd loop into the Gulf is to dump their tanks off shore.

I have also repeatedly seen oil sheens in these waters, even though the water currents in these areas mask most of the oil pollution from view with the naked eye. Indeed, the waters of western Icy Strait and the entrance of Glacier Bay are subject to the strongest tidal currents in Southeast Alaska, and one consequence is that these sweeping currents mask cruise-ship dumping.

Air pollution from Carnival ships was also readily observable on multiple occasions. I have witnessed the ships burning heavy fuel oil leaving miles of air-borne pollution observable in early morning hours in calm weather. I regularly see miles-long streaks of black air emissions coming from these cruise ships.

I was not surprised, but I was incensed at the revelations in the 1st Annual Report of the Court Appointed Monitor: that Carnival brand ships burning heavy fuel oil off the coast of Alaska without even the scrubbers online for nearly seven hours and that they dumped effluent – including gray water – in Glacier Bay while on probation for illegal dumping is inexcusable.

Such illegal dumping and air pollution have a direct and negative impact on myself and other fishermen and members of port communities along the Alaskan coast.

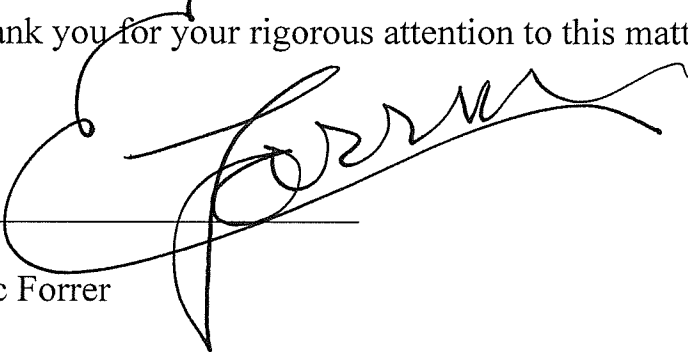
The off-shore Gulf waters are described by the cruise ship and commercial fish industries as the “pristine icy waters of the North Pacific” from which Black Cod, Salmon, Crab, ground fish, and prawns are harvested for market. Turns out, between four and ten cruise ships a day are dumping tens of thousands of gallons of sewage and hydrocarbon-contaminated waste streams into these same pristine waters on a daily basis, and have been doing so for decades – and that includes Carnival-owned ships.

Judge Seitz, throw the book at these guys. We know the situation, we know they are driven by their bottom line, and we know they will fight standards for a cleaner world.

They will only come around when being dirty is more expensive than being clean.

There are lots of other issues with Carnival Corporation, of course. But from the point of view of a resident of the State of Alaska and a fisherman who has spent decades relying on these waters for my livelihood, just getting the ships cleaned up is the first and most important step. This directly impacts residents' health and the fishing industry, which is every seafood consumer's health as well.

Thank you for your rigorous attention to this matter.

A handwritten signature in black ink, appearing to read "Eric Forrer", written over a horizontal line. The signature is stylized and cursive.

Eric Forrer

Box 210972, Auke Bay AK, 99821