COMMUNITY INVOLVEMENT PLAN
BRISTOL BAY WATERSHED ASSESSMENT
REVIEW DRAFT May 9, 2011

Community Involvement Plan

This is EPA's draft plan for engaging community members and stakeholders in the Bristol Bay watershed assessment. This plan is based on information gathered from local residents, stakeholders and other interested parties. This plan will be updated as needed and we welcome your ideas for improving our outreach and engagement efforts.

EPA pledges to conduct all work on the Bristol Bay watershed assessment in an open and transparent manner. Good science must consider a full range of perspectives about the unique Bristol Bay environment and how unprotected parts of the watershed might be impacted by large scale development.

In addition to the community engagement activities identified in this plan, in March 2011, EPA invited 31 Bristol Bay tribal governments to enter formal consultation with EPA. We recognize that there will be overlap in tribal and community outreach, because many of the communities in Bristol Bay are mostly tribal members.

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Community Involvement Goals

- Provide opportunities for public participation and comment that will effectively incorporate community concerns into the watershed assessment.
- Provide useful and timely information about progress on the watershed assessment.
- Establish open communication and respond to questions and concerns as they arise.
- Evaluate how well community involvement activities work and make changes as needed.

For More Information:

Website: www.epa.gov/region10/bristolbay
E-mail: r10bristolbay@epa.gov
Community Involvement Coordinator: Judy Smith 503-326-6994
Tribal Liaison: Tami Fordham 907-271-1484

About the Bristol Bay, Alaska, Watershed Assessment

EPA is conducting a scientific analysis of the Bristol Bay watershed in southwest Alaska to help us understand how future large-scale development may affect water quality and the salmon fishery. The information we gather will help guide our future actions to protect the watersheds, ensure the sustainability of that fishery and promote sustainable development.

EPA's efforts will focus primarily on two areas -- the Nushagak and Kvichak watersheds -- that are not currently protected as parks or wildlife refuges. Our process will include scientific peer review, tribal consultation, federal and state agency participation, as well as public and industry input.

Bristol Bay Demographics

The area within the scope of EPA's watershed assessment includes all or part of the Bristol Bay Borough, the Lake and Peninsula Borough and the Dillingham Census Area. This section explains some of the population statistics according to Census 2000 data.

The Bristol Bay Borough has 1,258 people living in 490 households. The population density is about 1.4 people per square mile. About 44% of the residents are of Native heritage.

The Dillingham Census Area has 4,922 people in 1,529 households. The population density is 0.235 people per square mile. About 70% of the residents are of Native heritage.

The Lake and Peninsula Borough has a population of 1,823 in 588 households. The population density is 0.05 people per square mile. About 74% of the residents are of Native heritage.

There are about three dozen towns or villages in these areas. All are located adjacent to a water body. The largest town is Dillingham with a population of 2,800. There are also smaller villages that are seasonally occupied. In most of the communities between 2 and 20% of the population speak Yup'ik as their primary language at home. There are five communities in the study area where between 25% and 75% of the residents speak Yup'ik at home.

What We Heard So Far

Each person we talked with cares deeply about the land, waters and fisheries of Bristol Bay. Passionate opinions about appropriate future use range from keeping the area in a pristine condition to pursuing large scale development in the area in an environmentally sensitive manner. Ensuring a livelihood and preserving a way of life is extremely important to both supporters and opponents of large scale development in the region.

Here is a sample of some of the things we heard from Bristol Bay communities:

"Mining development must be of a scale and size that the environment can support.."

"Fish and wildlife are clearly the priority. Mining cannot be allowed to harm fish and wildlife resources."

"EPA also need to consider global warming, fault lines, and the negative impacts Pebble has already caused."

"Villages that are not on the coast do not have the benefit of the commercial fishery. We were lucky enough to have a gold mine in our back yard but now people are trying to take that away from us."

"Economics should be a big part of the EPA assessment".

"EPA must be objective and the process must be open and transparent. We must treat every person and every viewpoint equally and fairly."

"Stick to science and keep the political and emotional bias out of your assessment."

Here is what we heard about how you want to be informed and involved:

Most people EPA talked to said they would use a website to get information about EPA's work and they would also like to get information by e-mail. Tribal members also suggested using the EPA grant project officers who they talk to on a regular basis.

We were asked to avoid holding meetings during prime subsistence seasons including June, July and late August through early September. Good times are August before the 20th and September after the first week.

EPA should consider holding meetings in Dillingham, Illiamna, a village along the Nushagak River. Some people did not think that either King Salmon, or Anchorage meetings were needed.

Some people encouraged EPA to consider summaries written in Yupik, but others felt it wasn't needed, because most people also read English.

Appendix D contains a summary of meetings held in February, March and April 2011. In addition, EPA received and acknowledged approximately 12,000 form letter e-mails during this timeframe.

How We Will Keep You Informed

EPA will use a variety of tools to keep you informed and involved on this project

Web Site: EPA and Alaska DEQ will share information and draft documents on the internet at: www.epa.gov/region10/bristolbay.

E-mail updates: EPA has established a listserv for the purpose of providing e-mail updates to everyone who wants to stay informed about the ongoing work. You can subscribe to this list by going to the website listed above and following the subscription link. Or you can contact Judy Smith at smith.judy@epa.gov and ask to be added to the list.

Fact Sheets: EPA will summarize information about the watershed assessment in fact sheets that will be available on the EPA Bristol Bay website.

Meetings: Public meetings will be held at two times during the preparation of the watershed assessment. The first meetings will be held when the draft watershed assessment is available. The second set of meetings will be to share the final draft (after community, agency and scientific peer review comments have been incorporated) and provide EPA's findings. EPA plans to hold each meeting in Anchorage and two or three communities, such as Dillingham and Iliamna, so that more people have the opportunity to attend. We will also endeavor to schedule these meetings to minimize conflicts with seasonal fishing and subsistence schedules.

Mailings: An initial fact sheet will be mailed to all households in the study area to make sure that those who are most affected have access to the information and know how to reach EPA with their comments and questions. Other fact sheets and post cards may be mailed to those who request it.

Opportunity to comment on the draft document: The draft watershed assessment for Bristol Bay will be open to public scrutiny. The draft document will be posted on the EPA Bristol Bay website. Documents will also available by mail upon request from EPA. A public comment period will be advertised and communities will be notified by e-mail when the document becomes available. EPA will incorporate public concerns into the document and public comments will become part of our project file..

Informal contacts: EPA project team members would like to talk with those who have questions, concerns or local knowledge that can help inform the Bristol Bay watershed assessment. Please contact Judy Smith at 503-326-6994 or smith.judy@epa.gov if you would like to talk with someone at EPA.

News Releases: Significant project news and milestones will be shared with local and regional news outlets. Articles may also be submitted to science publications and trade journals. .

Action Plan 2011 – 2012

Activity	**Timeframe**	Progress
EPA Bristol Bay website	February 2011	done
E-mail listserv	February 2011	done
Project e-mail box	February 2011	done
Community Interviews by telephone to supplement info	Spring 2011	
Circulate this CI plan for community input	Late spring 2011	
Fact Sheet #1	May 2011	
FAQ about EPA's work	May 2011	
Web feature story	May2011	
Fact Sheet #2 Progress Report (or feature story)	June 2011 for mining session	
Fact Sheet #3 Progress Report (or feature story)	August 2011	
Fact Sheet #4 Executive Summary about Draft Watershed Assessment	Fall 2011	
Notice mailed to mailing list	Fall 2011	
Meeting notices placed in Bristol Bay Times and other outlets	Fall 2011	
Public Comment Opportunity	Fall 2011	
Public meetings in Dillingham, Iliamna and Anchorage		
Summarize public input	End of 2011	
Final Watershed Assessment Available	Spring 2012	
Fact Sheet or Executive Summary about the Final Watershed Assessment	Spring 2012	
Public Meetings (locations to be identified)	Spring 2012	

APPENDIX A – Summary of public meetings held in February 2011

February 7, 2011 – (add input from session where announcement was made)

February 21, 2011 – Richard Parkin, EPA was invited to participate in a meeting held in Ekwok hosted by the Ekwok Tribe. There were 27 attendees, plus three on the phone. Participants included representatives from the villages of Ekwok, New Stuychock, Aleknagik, Levelock, Curyung, Igiugig and Nondalton. Tribal entities included Nunamta Aulukestoi and the BBNC. There were also representatives from the U.S. Fish and Wildlife Service, the Wilderness Society, Trout Unlimited and National Parks Conservation Association

Meeting attendees shared their concerns about the effect development might have on their established way of life. Recommendations to EPA included use local knowledge; find out where the core of fresh water comes from for the Kuktoli River and Tallarick Creek because if the groundwater is disrupted it will destroy the fish; look at historical performance of mining and the historical performance of the State in monitoring and enforcing; ensure that drilling chemicals that are being used now for exploration are not contaminating the water; ensure spawning areas are protected from drilling muds; and look into dust problems that will result from mining.

February 22, 2011- Richard Parkin, EPA was invited to participate in a meeting held in Iliamna. The meeting has 34 attendees, representing the villages of Iliamna, Newhalen, Kokhanok and Nondalton. Tribal entities included Nuna Resources, Iliamna Development Corporation and Iliamna Natives LTD. There were also representatives from Alaska Peninsula Corporation, Lake and Peninsula Borough, Lake and Peninsula School District, Pebble Limited Partnership and Iliamna Air Taxi,

Meeting attendees were supportive of PLP activities in the area and did not trust EPA or encourage our involvement. Attendees shared concerns that a 404(c) action would restrict their current practices and way of life. For example they wouldn't be able to use ATVs off the road. They wouldn't be able to build structures such as the building we were in. Some expressed disappointment that Lisa Jackson visited Dillingham but not Iliamna, which is further from the affected area. Because of the way the fish are managed and the Stevens Magnuson Act they have lost most of the economic benefits of the fishery. They are 50 miles away from the coast and they don't get a fish quota like the Nushagak River Tribes. This is due to the CDQ program. They used to have a robust sport fishery there in the lake but it is gone.

APPENDIX B - **E-Mail Input received by EPA**

Between February 3 and March 10, 2011, EPA Region 10 received 11,330* e-mails regarding Bristol Bay and the Pebble Mine. Of these, 9,350 were received in a one-week period between 2/8/2011 and 2/15/2011, with 3,368 arriving on 2/8 and 2,951 arriving on 2/14.

Approximately 11,225 of the e-mails received by EPA were one of three similar form letters. These letters stated opposition to development of the Pebble Mine and supported EPA action. Of the remaining 75, 32 had a different subject line, but contained identical content to one of the form letters. Another 37 e-mails used some form letter language, but also had unique content authored by the sender. Finally, EPA received three e-mails with unique content that opposed the Pebble Mine and three e-mails that stated support for development of the Pebble Mine.

Three different form letters were used in the e-mail campaign to EPA that used the following subject lines:

Protect Bristol Bay from the Pebble Mine (9900 e-mails)
Stewardship and Justice for Bristol Bay (775 e-mails)
Sportsman's Request: Protect Bristol Bay from the Pebble Mine (550 e-mails)

EPA sent the following e-mail acknowledgement to each e-mail sender in early March and is now sending the following e-mail acknowledgement to each e-mail sender:

> Thank you for sending the U.S. Environmental Protection Agency (EPA) your thoughts about the future of the Bristol Bay watershed in Alaska. I want to acknowledge that we received your input, even though we are not able to respond individually because of the large volume of e-mails we are receiving on this topic.
>
> During 2011, EPA is completing a scientific analysis of the Bristol Bay watershed to better understand how future large-scale development may affect water quality and the salmon fishery. The information we gather will help guide our future actions to protect the waters and promote sustainable development. EPA's efforts will focus primarily on two areas -- the Nushagak and Kvichak watersheds -- that are not currently protected as parks or wildlife refuges. Our process will include scientific peer review, tribal consultation, federal and state agency participation, as well as public and industry input.
>
> To receive EPA e-mail updates about the progress of Bristol Bay watershed assessment and learn about upcoming public involvement opportunities, please follow this link to subscribe to the EPA Bristol Bay listserv .
>
> As it becomes available, information will be posted on the EPA Bristol Bay website
>
> Sincerely,
>
> Richard Parkin, Associate Director
> Office of Ecosystems, Tribal and Public Affairs, EPA Region 10

Text of form letters:

Protect Bristol Bay from the Pebble Mine (or Please Protect Bristol Bay from the Pebble Mine)

> Thank you for your attention to the proposed Pebble Mine in Bristol Bay Alaska. I am writing today to encourage you to use your authority under the Clean Water Act to take a hard look at how this proposed mine will impact our nation's biggest wild salmon fishery, the commercial fishermen and Alaska Natives who depend on it, and the local businesses who make their living off of this wild landscape in Southwestern Alaska.
>
> If built, Pebble mine will produce between 2 and 10 billion tons of toxic waste that will have to be treated for hundreds of years. This waste will threaten Bristol Bay, an area widely recognized as one of the last remaining strongholds for healthy salmon populations in North America and the world. The region provides pristine spawning grounds for trophy rainbow trout and all five species of Pacific salmon, including the largest sockeye salmon runs on Earth, and a variety of other fish and wildlife species that depend on the nutrients from salmon, clean water, and undisturbed habitat.
>
> I urge you to initiate a Clean Water Act 404(c) process in Bristol Bay immediately. Alaska Natives, sportsmen, commercial fishermen, churches, and conservation organizations deserve a public and science-based process to determine if the Pebble Partnership's plans to build the biggest open pit mine in North America will harm one of our nation's greatest fisheries.

Stewardship and Justice for Bristol Bay

> As a person of faith, I am called to seek justice for the vulnerable among us and protect God's great creation for future generations.
>
> The proposed Pebble Mine in Bristol Bay, Alaska would threaten the well-being of the Alaskan Natives who have lived around the Bay for more than 12,000 years and destroy creation in irreparable ways. Bristol Bay, as home to one of the last great salmon fisheries in the world, is a unique and irreplaceable part of God's Creation.
>
> While the development of the mine would provide short term resources and jobs, future generations of Alaskan Natives could not continue their cultural way of life in this area.
>
> We urge you to oppose Pebble Mine and do whatever you can to ensure protection for Bristol Bay and its communities. Taking preemptive action would provide a clear signal to the company that this mine has no place in Bristol Bay.

Sportsman's Request: Please Protect Bristol Bay from the Pebble Mine

> Thank you for your attention to the proposed Pebble Mine in Bristol Bay Alaska. I am writing today to encourage you to use your authority under the Clean Water Act to protect our nation's biggest wild salmon fishery.
>
> The Pebble Mine will produce between 2 and 10 billion tons of toxic waste that will affect the land for centuries. This waste will threaten Bristol Bay and the fishermen, local businesses and Alaska Natives who depend on this wild landscape for their livelihoods.
>
> The region provides pristine spawning grounds for trophy rainbow trout and all five species of Pacific salmon. The area is home to the largest sockeye salmon runs on Earth, and a variety of fish and wildlife species depend on the nutrients from Bristol Bay's salmon, clean water and undisturbed habitat.
>
> I urge you to initiate a Clean Water Act 404(c) process in Bristol Bay immediately. Alaska Natives,

sportsmen, commercial fishermen, churches and conservation organizations deserve a public and science-based process to determine if the Pebble Partnership's plans to build the biggest open pit mine in North America will harm one of our nation's greatest fisheries.

Text of the three messages supporting the Pebble Mine or against EPA involvement:

Bristol Bay and the Pebble Mine

Thank you for your attention to the proposed Pebble Mine in Bristol Bay Alaska. Unlike the vast majority of persons sending you pre-drafted emails that merely echo the causes of those whose livelyhood depends on stirring up causes, I have been there and have seen what could transpire with my own eyes. I am writing today to say that your actions to date have been so counterproductive to our environment and our country. It is a beauracratic boondogle of the highest proportion that you are now foisting on the People of Alaska. They do not want you. Your only goal is to protect your own beauracratic rear end and your public trough pension by appearing to be of some use. Nothing could be further from the real truth. Let the jobs be created and the people prosper using the resources that we have in a responsible way, in spite of your misguided and self indulgent attempts to justify your employment at real taxpayer expense. Bristol Bay will be just fine. Environmental Destruction is not good business and will be avoid completely dispite your worthless selves trying to be meaningful, but missing all the points. Your whole governmental department is a collossal waste of human flesh and invalid excuse for justifying your existence.

Support for the Pebble Mine

Thank you for your attention to the proposed Pebble Mine in Bristol Bay Alaska. I am writing today to encourage you to use your authority help permit and start operations at the Pebble Mine.

If built, Pebble mine will provide jobs and economic growth and stability to the region. Modern mining has adopted methods and practices that make it safer and more efficient. This operation should be permitted.

I urge you to help the interests of the Pebble Mine. Many Alaska Natives, sportsmen, commercial fishermen, churches, and local organizations favor the science-based process currently used to determine that the Pebble Partnership's open pit mine in North America is safe and plans to use the best practices available to ensure safe operation and prevent environmental harm.

Pro Pebble and Pro Fishing

Thank you for your attention to the proposed Pebble Mine in Alaska. I am writing today to encourage you to use your authority to allow Pebble Mine to continue to invest in Alaska's natural resources and Alaska's future. There truly is room in Alaska for both mining and fishing.

I urge you to follow the legal process. We, all Alaskan's, Alaska Natives, sportsmen, commercial fishermen, miners, investors, churches, and organizations deserve a public and science-based process as the Pebble Partnership has provided, year after year. Their continued investment in Alaska shows a commitment few partnerships have shown in the past.

To the continued success of Alaska's future, in both mining and fishing.

APPENDIX C – **Community Interview Questions**
Information that will help us keep you involved

What is your current source of your information about Bristol Bay?

What information do you need to find out from EPA about the watershed assessment?

What are your biggest issues, concerns and/or fears about protection or development of the Bristol Bay watershed? Are there additional issues, concerns or fears you have heard voiced by others in your community?

What is most important for EPA to know about Bristol Bay or the affected communities that will help EPA make a decision about whether to use our 404C authority under the Clean Water Act?

What (local) activists, organizations or community or groups are concerned about the site? Are there local civic or service clubs that could help share EPA information? Would it be helpful to post information at a community location such as a store or library?

How do you typically get information about important issues?

Would you use an EPA website about Bristol Bay to get information? Are there other ways we should share information that would be more useful to you?

Should EPA provide Yup'ik translation services in order for community members to participate in a meeting? Do you have recommendations and/or contact information for trusted translators? Does spoken or written information need to be translated?

If EPA needs public input during fishing or hunting season, what can we do to ensure that everyone has an opportunity to be involved? What are the minimum time frames for meaningful review and comment periods?

Who else in the community should we be talking with? (Such as Village Corporations, City Councils, other groups?

Do you think EPA a credible, trustworthy source of information?

Are there newspapers, or TV and radio stations that you use for information? (Contacts?)

What locations should EPA hold meetings? Dillingham, Iliamna, King Salmon? Others?

Are there major fishing or subsistence seasons that EPA should try to avoid for public comment processes?