PSPA

PACIFIC SEAFOOD PROCESSORS ASSOCIATION

Est. 1914

March 26, 2018

Shane McCoy
U.S. Army Corps of Engineers Alaska District
Anchorage Field Office, Regulatory Division (1145) CEPOA-RD
1600 A Street, Suite 110
Anchorage, AK 99501-5146

Dear Mr. McCoy:

The Pacific Seafood Processors Association (PSPA) requests that the scoping period for the draft Pebble Project Environmental Impact Statement (EIS) be extended to 120 days, the Corps invite full participation by federal and state resource agencies and tribal government entities as cooperating agencies, and additional locations be added to the list of sites for scoping meetings.

PSPA is a nonprofit trade association representing nine seafood processing companies in Alaska and around the U.S. Our members, along with our harvesting partners and hundreds of support sector businesses, are heavily dependent on the healthy and abundant salmon populations that return to Bristol Bay annually. Bristol Bay s wild sockeye fisheries brought in 242 million pounds and 206 million pounds of sockeye in 2016 and 2017, respectively, and support more than 12,000 jobs in harvesting, processing, and other direct activities, allowing us to deliver healthy, sustainable sockeye to consumers in the U.S. and around the world.

PSPA is greatly concerned about the proposed Pebble mine project, one of the largest and the most controversial projects in the history of Alaska, utilizing a minimal 30-day scoping period and process for public participation. A longer scoping period is consistent with past practice on large resource development projects such as the Donlin Gold project (106 days), the Nanushuk Project (118 days), and the Alaska Stand Alone Pipeline, for which even the supplemental EIS included a 75-day scoping period. The mining activities proposed by Pebble Limited Partnership (PLP) could lead to significant, permanent changes to the habitat upon which sockeye depend, leading to potentially permanent harm to Alaska s sockeye fishery. There is no one who disagrees that the low-recovery rate, acid-generating mining process at the headwaters of Bristol Bay will generate waste that will need to be monitored and managed in perpetuity. Additionally, PLP has submitted a new proposal for review, and the scope and scale of this proposed open-pit mine, associated gas pipeline, and transportation infrastructure remains expansive and worthy of detailed review. We find that 30 days is insufficient for allowing the public to provide meaningful and relevant information that should be considered in preparing an EIS.

Moreover, the eight locations identified for public scoping meetings are not sufficient for ensuring that concerned fisheries stakeholders are able to attend in person, and they do not

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capture the range of communities potentially directly impacted by the proposed mine. Meetings should be planned for the following communities in the affected region to allow for greater awareness of the proposed project, and to identify relevant issues, alternatives, and mitigation measures to be incorporated into the EIS, as envisioned by the scoping process under NEPA. All meetings should allow for the airing of oral comments, in addition to written.

Dillingham
New Stuyahok
Igiugig
Pilot Point or Point Heiden
Iliamna
Nondalton
Ekwok
Egegik
Pedro Bay
Kokhanok
Koliganek
Togiak
Chignik, Chignik Lake, or Chignik Lagoon
Newhalen
Naknek or King Salmon
Manokotak
Levelock

In addition to holding scoping meetings within the Bristol Bay region, the Corps should ensure that scoping meetings are held in locations with other directly affected stakeholders such as commercial fishermen, sport fishermen, and businesses that rely upon Bristol Bay salmon or other resources potentially impacted by the proposed mine, including its transportation corridor. Such locations should include the Pacific Northwest, Kodiak, Anchorage, and throughout the Kenai Peninsula.

Large scale mines such as Pebble take decades to reach development. In the case of Pebble, the past decade or so has been spent in anticipation of the mine proponents submitting a mine plan. Now that a plan has been filed, interested stakeholders should be given adequate time to review and comment. The Corps should be at least as thorough in its review as the developers were in developing a plan.

Our concerns are consistent with those expressed by Environmental Protection Agency (EPA) Administrator Scott Pruitt. In an article published in The Hill on January 26, 2018, Pruitt announced that the EPA believes the Pebble Mine project would be unacceptably harmful to Bristol Bay and its tributaries. Pruitt said he made the decision after speaking with various stakeholders involved in the decision, citing serious concerns over the impact from mining and mining waste on Bristol Bay:

> We have restored process, reviewed comments, and heard from a variety of stakeholders on whether to withdraw the proposed restrictions in the Bristol Bay watershed, Pruitt said in a statement. Based on that review, it is my judgment at this time that any mining projects in the region likely pose a risk to the abundant natural resources that exist there. Until we know the full extent of that risk, those natural resources and world-class fisheries deserve the utmost protection.

Given this perspective, the public should be given reasonable time to comment, both verbally and in writing, on the proposed Pebble mine. Our goal is to promote a full, inclusive, and transparent scoping process for this forthcoming EIS, so that all potential impacts and alternatives can be properly analyzed. Additional time and outreach will advance that goal. Thank you for considering our request.

Sincerely,

Glenn Reed
President

cc: Honorable Bill Walker, Governor of Alaska
Honorable Byron Mallott, Lt. Governor of Alaska
Honorable Lisa Murkowski, U.S. Senate
Honorable Dan Sullivan, U.S. Senate
Honorable Don Young, U.S. House of Representatives
Honorable Pete Kelly, Alaska State Senate President
Honorable Bryce Edgmon, Alaska Speaker of the House
Chris Hladick, EPA Region 10 Administrator
Todd T. Semonite, U.S. Army Corps of Engr s, Commanding General & Chief of Engr s Lt. General Michael Brooks, U.S. Army Corps of Engr s Alaska District Commander Col. David S. Hobbie, U.S. Army Corps of Engr s Alaska District, Chief of Regulatory Division
Andy Mack, Commissioner, Alaska Department of Natural Resources
Larry Hartig, Commissioner, Alaska Department of Environmental Conservation
Sam Cotten, Commissioner, Alaska Department of Fish & Game