

July 1, 2019

Program Manager  
US Army Corps of Engineers  
645 G St., Suite 100-921  
Anchorage, AK 99501

RE: Pebble Project Draft Environmental Impact Statement - POA-2017-00271 [and CWA permit]

Dear U.S. Army Corps of Engineers,

I am commenting on the draft environmental impact statement (DEIS) and proposed permit as a lifelong Alaskan, Alaskan fishery participant, and as the Marketing Program Manager for the Bristol Bay Regional Seafood Development Association (BBRSDA).

BBRSDA has separately submitted comments through its counsel on this matter, Faegre Baker Daniels. My comments herein focus on my knowledge of fisheries and their importance to the State of Alaska and my expertise on the marketability of the Bristol Bay Sockeye Salmon brand and the unique attributes that are critical to differentiating it in the market place.

This DEIS lacks both the scope and depth that is required under the NEPA process. It neglects to account for, or openly dismisses, negative ecological, biological, and economic impacts of the Pebble Project.

This DEIS has been conducted on a proposal for a 20-year mine that has no indications of being economically feasible and therefore requires a thorough vetting of the cumulative impacts of a mine expansion. The expansion scenario addressed in the DEIS, seemingly arbitrarily chosen, did not present a thorough vetting and therefore cannot be considered adequate.

An environmental impact assessment on a project that is economically viable that evaluates the magnitude (ecologically, biologically, and economically) of the cumulative impacts, based on scientific and economic study, is required.

Specific Issues:

- This DEIS does not acknowledge the importance of spatial and temporal diversity to the ecological health of the watershed as a whole and to the stability of wild salmon runs in the Nushagak River basin. Brennan et al show the importance of this in *Shifting habitat mosaics and fish production across river basins*.
- This DEIS does not address effects on spawning habitat of salmon of sedimentation, water level reduction, and leaching in the watershed.

- This DEIS does not consider the implications of a catastrophic tailings dam failure as provided by Lynker in *A Model Analysis of Flow and Deposition from a Tailings Dam Failure at the Proposed Pebble Mine*.
- This DEIS does not address the lack of precedent for this method of bulk tailing storage as detailed in the AECOM memo *Re: Review of Tailings Thickening Experience in Cold Regions*.
- This DEIS does not adequately address the implications of maintaining the infrastructure supporting a mine (roads, culverts, etc.) on the watershed.
- This DEIS does not address the impact of copper dust on regional salmon productivity.
- This DEIS does not consider the full value of the Bristol Bay fishery nor the larger economic impacts to the Alaska seafood industry.

Andy Wink, Fisheries Economist and Executive Director of the BBRSDA noted in his comment that there is \$1.2 billion invested in capital assets in the Bristol Bay fishery. A significant portion of these assets cannot be relocated to be employed in other fisheries nor will they have any resale value without a resilient fishery in Bristol Bay.

Furthermore, fishermen and processors alike survive in Alaska fisheries because of diversification. Many Bristol Bay permit holders participate in other fisheries and most Bristol Bay processors operate facilities in other ports. Revenue generated in the Bristol Bay fishery is critical to the larger business plans of many fishermen and processors and any negative impacts to that revenue will be felt not only in region, but in other fisheries and regions throughout Alaska. The DEIS does not acknowledge this nor provide an evaluation of those impacts.

- This DEIS inaccurately characterizes the value of Bristol Bay sockeye salmon in the market place.

The BBRSDA launched the Bristol Bay Sockeye Salmon regional brand in 2016 to capitalize on the unique attributes of Bristol Bay sockeye salmon as a sustainable, hand harvested, wild salmon product from a pristine environment. Those attributes influence consumers buying decisions and allow Bristol Bay sockeye salmon to command a premium price at retail.

The BBRSDA Marketing Program has invested over \$2 million to support the Bristol Bay Sockeye Salmon brand and Bristol Bay sockeye salmon sales at retail. Our numerous successful retail promotions have proven the value of the brand and importance of those attributes to consumers.

Sustainably harvested, wild sockeye salmon from a healthy, pristine environment is the selling point that continues to drive the Bristol Bay Sockeye Salmon brand. A mine of any size linked to the Bristol Bay watershed will devalue the brand in consumers' minds and reduce the price point that they would be willing to pay. This DEIS neglects to account for that and inaccurately describes Bristol Bay sockeye salmon as a price taker.

Finally, this DEIS does nothing to consider the value that has yet to be realized by the Bristol Bay fishery. Seafood consumer demographics and psychographics are changing as more consumers are conscious of where and how their food is sourced. Bristol Bay is in a category of its own in seafood and has the capacity to continue to build demand and support a long term sustainable industry for the region and the state. An EIS cannot ignore that future value nor ignore that any mine operating in the same watershed will impact it.

Conclusion:

This environmental impact assessment is inadequate in its evaluation of the ecological, biological and economic impacts of the Pebble Project. USACE should not issue a final EIS based on the current draft and should deny the application for permit.

Sincerely,  
Cameo Padilla  
BBRSDA Program Manager