

To: Shane McCoy
Program Manager
US Army Corps of Engineers
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Anchorage, AK 99501

Transmitted Via Online Portal: <https://pebbleprojecteis.com/publiccomments/neweiscomment>

1 July 2019

RE: Pebble Project Draft Environmental Impact Statement, Bristol Bay, AK (DEIS 20190018)

Dear Mr. McCoy,

Thank you for taking the time to consider our comments on the draft EIS for the Pebble Project. We join millions of other concerned citizens in Alaska and beyond who believe this project could have long lasting, devastating impacts to the environment, the quality of life for local residents, and the economy. We, therefore, strongly encourage the Corps of Engineers (Corps) to deny this permit.

RE Sources for Sustainable Communities is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

VIOLATION OF THE CLEAN WATER ACT:

The proposed pebble mine will cause long lasting, irreparable harm to this ecologically rich and sensitive area that is home to more than 190 species of birds, 40 species of mammals, and 29 species of fish, including all five of the North American Pacific Salmon. Over 4,500 wetlands will be destroyed and 80 miles of critical stream habitat will be obliterated by the construction of a massive open-pit mine, 270-megawatt power plant, 833 miles of roads, 200 plus stream crossings, 8 large bridges, 188 miles of



natural gas pipelines, and a large new port and ice-breaker system. Even if the operation goes as smoothly as planned there is clearly severe enough impacts to violate the Clean Water Act (40 CFR 230.10(c)). But in reality, mining operations do not go as planned; 93% of U.S. open pit copper mines fail to adequately capture and treat wastewater resulting in significant impacts to water quality¹. Copper, even in miniscule amounts, can be harmful to salmon adversely affecting their behavior^{2,3}. It is also unrealistic that in this seismically prone area that the 11.8 billion gallons of wastewater will be maintained *in perpetuity*. In reality, the habitat and wildlife in this area will be compromised *in perpetuity*.

In addition, the fossil fuels used to construct this mine and then remove and transport these metals will contribute to global climate change that will further impact these sensitive habitats through increased air and water temperatures and decreased snowpack. Global climate change has already affected weather patterns resulting in heavier rainfall events that could impact the proposed mining activities, this draft EIS does not consider that impact.

DETRIMENTAL TO QUALITY OF LIFE:

This is not just an environmental issue, but a social justice issue as well. The vast majority of Alaskans - Bristol Bay residents, tribal communities, and commercial fishers alike strongly oppose the construction of this mine. Simply stated, it would undermine their way of life. Rural communities who rely on this land for sustenance as well as cultural and spiritual reasons will be most affected and are often the communities that are most marginalized.

DAMAGING TO THE ECONOMY:

The world's greatest wild salmon fishery occurs within the footprint of the pebble mine. This industry brings in 1.5 billion dollars annually and has been a constant, dependable source of income for many native Alaskans. The predicted 20-year metal supply that this mine will provide pales in comparison to the annual income salmon fishing brings. It is speculated that many of the mining jobs will be filled by mining employees from out of state and those that are hired locally will be temporary, whereas, fisher jobs support local people and are also *in perpetuity* as long as the salmon runs are protected.

This draft EIS falls short of addressing the widespread ecological, sociological, cultural, and economical effects on Bristol Bay and the surrounding environment. The Environmental Protection Agency already determined that this Pebble Mine Project will cause and contribute to significant degradation of Alaska's water in 2014⁴ and 2018⁵. This permit must be denied on the basis of violating the Clean Water Act.

Thank-you for taking the time to read these comments and all the others that have been submitted that express concerns as well. We trust the Corps will make the right decision.

Sincerely,

Kirsten McDade
Pollution Prevention Specialist
RE Sources for Sustainable Communities

Resources:

¹Earthworks, Pebble Mine: Unprecedented Waste Water Capture and Treatment Requirements, May 2019. Retrieved from: <https://earthworks.org/blog/pebble-mine-unprecedented-waste-water-and-perpetual-pollution>.

²Baldwin, D.H., Tatara, C.P., and Scholz, N.L. 2011. Copper-induced olfactory toxicity in salmon and steelhead: extrapolation across species and rearing environments. *Aquatic Toxicology*, 101:295-297

³McIntyre, J.K., Baldwin, D.H., Beauchamp, D.A., and Scholz, N.L. 2012. Low-level copper exposures increase the visibility and vulnerability of juvenile coho salmon to cutthroat trout predators. *Ecological Applications*, 22:1460-1471.

⁴U.S. Environmental Protection Agency. 2014. Proposed Determination of the U.S. Environmental Protection Agency Region 10 Pursuant to Section 404(c) of the Clean Water Act Pebble Deposit Area, Southwest Alaska.

^{5x}U.S. Environmental Protection Agency. 2018. Notification of Decision Not to Withdraw Proposed Determination to Restrict the Use of an Area as a Disposal Site; Pebble Deposit Area, Southwest Alaska, 83 Fed. Reg. 8668.