

June 5, 2019

Col. Phillip J. Borders  
U.S. Army Corps of Engineers - Alaska District  
645 G St.  
Suite 100-921  
Anchorage, AK 99501

Re: Public Input on the Proposed Pebble Mine Project (POA-2017-271)

Dear Colonel Borders, Mr. McCoy, and Ms. Newman:

The undersigned entities, which represent hundreds of thousands of sportsmen and sportswomen, provide these comments requesting that the U.S. Army Corps of Engineers require from the Pebble Mine applicant all the information necessary to reach a fully informed permitting decision. We further request that the ongoing administrative process to consider the Pebble Mine permit application be suspended until this vitally important additional information is received.

Sportsmen and sportswomen strongly support an appropriate role for federal-level deliberation and analysis of the varied views and scientific aspects of land and water use decisions. This type of deliberative process is especially vital in situations such as the proposed Pebble Mine, given the significant and potentially long-lasting threats it could pose to one of the foremost sport fishing and hunting regions in the world. Specifically, a robust, deliberative, and informed public process cannot occur on the Pebble Mine permit application without a mine economic feasibility report and environmental baseline studies for Bristol Bay and Cook Inlet.

It is important to note that the permitting decision on Pebble Mine is about far more than choosing between natural resource development and the environment. It is also about ensuring that impacts created by one natural resource dependent industry do not displace or disproportionately impair another. Sport fishing and hunting contribute more than \$60 million annually to Bristol Bay's regional economy and support thousands of jobs. Additionally, all anglers depend on healthy populations of Bristol Bay's five salmon species (including its famed run of sockeye salmon) in order make a living and feed their families.

In previous communications to the Army Corps, we have requested that the Corps conduct a fair, rigorous, science-based permitting process. We have also shared our concerns about the Army Corps' rushed timeline and missing information in the Pebble Partnership's permit application. The Draft EIS released on February 20, 2019 only reinforces our concerns. Accordingly, we submit the following comments to the Draft EIS for the proposed Pebble Mine in Alaska:

- **Size of proposed mine.** The DEIS should look at the environmental impacts of a larger mine as an action alternative given that Pebble has made clear it plans to mine the nearly 11-billion-ton deposit in Bristol Bay over time. Applicable law requires the Corps to consider all impacts including direct, indirect and cumulative impacts that are reasonably foreseeable, yet none of the action alternatives in the DEIS consider the potential for

future expansion. While the DEIS recognizes that the cumulative impacts of mining the entire deposit must be analyzed, the DEIS fails to do so. The Corps should consider the cumulative impacts of mining the entire deposit and not just review the initial phase of development that is contemplated by the pending permit application.

- **Thorough and realistic analysis of a potential tailings dam failure.** The tailings dam failure assessment in the Draft EIS is inadequate and only looks at a small fraction of what is possible and likely to occur over the lifespan of the mine. Given that the tailings dam will be a permanent structure that exists in Bristol Bay in perpetuity, it is critical that the Army Corps look at the full range of impacts and increased probability of failure over time.
- **The Draft EIS is inadequate because it lacks an economic analysis of potential impacts to already existing industries and businesses.** This includes but is not limited to the outdoor recreation and seafood industries, which depend on Bristol Bay's intact habitat and clean water. Given Bristol Bay's reputation for pristine wilderness and pure, wild seafood, the Draft EIS must look at Pebble's impacts on the public perception and market value of the "Bristol Bay" brand.
- **The Draft EIS is inadequate because it lacks a mitigation plan that includes compensatory mitigation for Pebble's adverse impacts on the Bristol Bay watershed.** The proposed Pebble Mine threatens thousands of existing jobs, businesses, and industries that depend on the productivity of Bristol Bay's salmon populations. The Draft EIS needs to include details about how Pebble will address its adverse impacts on the entire Bristol Bay watershed.

Given the continued shortcomings of the permitting process, we once again ask the Army Corps to suspend its review until the Pebble Partnership delivers sufficient environmental baseline and economic data, including cumulative data, as well as a comprehensive mitigation and reclamation plan. The NEPA process should ensure transparency and a thorough analysis of environmental impacts, especially in places like Bristol Bay that provide irreplaceable public goods and benefits. In that light, especially, sportsmen and women and others whose livelihoods are inextricably linked to the rich natural treasures of Alaska's Bristol Bay are entitled to understand and comment on every aspect about this proposed mine and its expected impacts during the permit review process. The undersigned entities request that the Army Corps pause its review of the Pebble Partnership's permit application until additional essential information is provided.

We appreciate your consideration of the future of Bristol Bay's tremendously productive lands and waters. Individual organizations signed on below may submit further comments for the Draft EIS record.

Sincerely,

American Fly Fishing Trade Association  
American Sportfishing Association  
Bass Pro Shops  
Camp Fire Club of America  
Coastal Conservation Association  
Congressional Sportsmen's Foundation  
Delta Waterfowl  
Fly Fishers International  
Guy Harvey Ocean Foundation  
Houston Safari Club  
International Game Fish Association  
Izaak Walton League of America  
Marine Fish Conservation Network  
Mule Deer Foundation  
National Wildlife Federation  
The Orvis Company  
Pheasants Forever  
Pope & Young Club  
Quail Forever  
Quality Deer Management Association  
Shimano North American Holding Inc.  
Simms Fishing Products  
Theodore Roosevelt Conservation Partnership  
Trout Unlimited  
Wild Sheep Foundation  
Wildlife Forever  
Yamaha U.S. Marine Business Unit