

PERMITTING PROCESS FOR PROPOSED PEBBLE MINE FAILS TO MEET BASIC STANDARDS



Keenan Troll

Bristol Bay, Alaska, is home to North America's most productive wild salmon fishery and is a stronghold for sustainable American jobs. For more than a decade, scientists, Alaska Natives, fishermen, chefs and a majority of Alaskans have strongly opposed a massive mine that threatens the salmon, a \$1.5 billion fish-based economy, and way of life. Given what's at stake, any permit for the proposed Pebble mine deserves careful scrutiny. Unfortunately, the current permit review process falls well short of this basic standard. There are dozens of shortcomings, but the most egregious are summarized below. **The permitting process for Pebble must stop until these issues are addressed.**

1

A DECEPTIVE & INCOMPLETE MINE PLAN

The Pebble Partnership applied for a permit to mine just 1/8th of the known mineral deposit while repeatedly bragging to potential investors that it intends to expand and build a much larger mine. Government regulators are allowing Pebble to deceive the public and downplay the immense and unacceptable risks of the mine it actually intends to build.

"Although we're only trying to permit a 20-year mine, this would be a 200-year mine at this scale."

- Pebble VP of corporate communication Doug Allen (Jan. 2019)

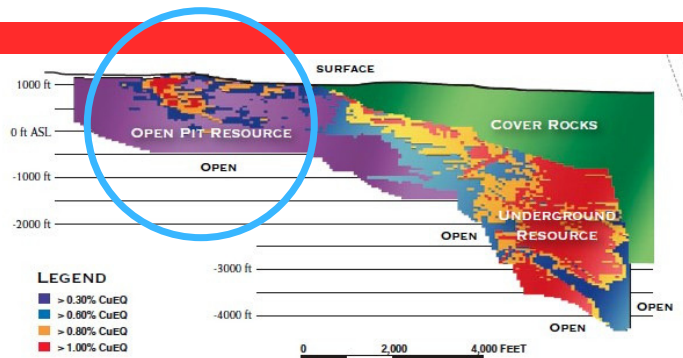


Figure above: The permit application proposes only to mine a fraction of the deposit (added circled area) while leaving the most valuable minerals, shown in warm colors.

Source: Pebble Limited Partnership publication (approx. publication date 2012)

2

NO PROOF OF ECONOMIC FEASIBILITY

Building and operating the mine will require a significant initial investment in infrastructure that would need to be recuperated over time to turn a profit. The Pebble Partnership has failed to submit standard documentation demonstrating its current plan is economically feasible. Meanwhile, every major "partner" of the Pebble Partnership has walked away from the project, and an industry expert determined the net present value of the plan to mine 1/8th of the deposit is negative \$3 billion.

3

PROCESS RUSHED & INADEQUATE

The U.S. Army Corps of Engineers (Corps) intends to review the permit application in a fraction of the time it has taken to review projects of smaller size in less environmentally-sensitive areas. Issues with the expedited timeline include: allowing changes to the permit application in the middle of the public comment period, releasing the scoping report before the scoping comment period ended, limiting tribal and agency consultation, and allowing baseline data collection and various scientific studies to occur *after* environmental review (EIS) and permitting decisions are made.

4

WATER MANAGEMENT PLAN IS UNPRECEDENTED & UNTESTED

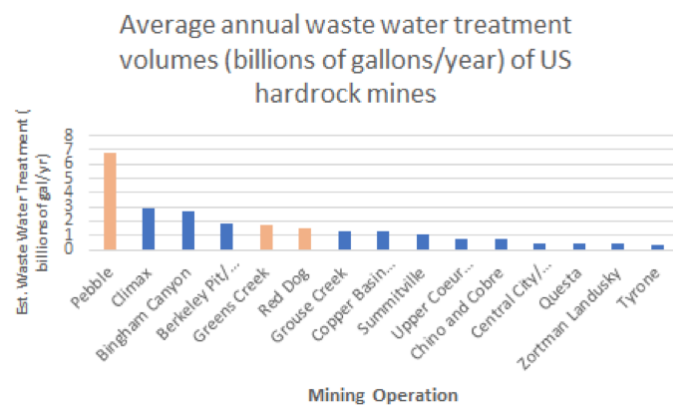
The process of mining the Pebble deposit is highly likely to introduce toxic materials from metal leaching and acid rock drainage into the watershed. These pollutants will need to be stored and maintained without accident in an open pit and tailings storage facilities forever. Mining just the first 1/8th

(Continued on reverse side)



(Continued from front)

of the deposit would generate 6.8 billion gallons of wastewater annually during operation and 11.8 billion gallons annually upon closure. After closure, the mine pit would contain more than 61 billion gallons of wastewater that would persist forever and cause a permanent hazard to the world's largest wild salmon fishery and local wildlife. For reference, filling the entire 80,000-seat Dallas Cowboys Stadium would take just over one billion gallons. **No other operating mine in the U.S. treats anywhere near this volume.** A 2012 review of 14 operating U.S. copper mines, accounting for 89% of U.S. copper production, found 92% failed to capture and treat mine seepage that caused significant water quality impacts.



5

FAILS TO CONSIDER FORESEEABLE IMPACTS

The National Environmental Policy Act (NEPA) requires permitting agencies to consider reasonably foreseeable impacts, yet many potential impacts to the Bristol Bay region are missing from the Corps' DEIS. Impacts of climate change, expansion to mining the full deposit, a catastrophic tailings dam failure, and subsequent mine development in the area (made possibly by infrastructure from the proposed Pebble mine) on fisheries, communities, public lands and cultures should be thoroughly detailed and considered, but are not.

6

IGNORES SCIENCE RELATED TO FISH AND WATER QUALITY IMPACTS

Federal regulators refuse to consider a variety of potentially harmful impacts and are moving forward despite an incomplete and inadequate scientific basis. Wetlands, rivers and streams that will be impacted by the proposed mine have not been mapped. Fish, water quality, hydrologic studies and wildlife surveys are missing or incomplete. The Pebble Partnership has not submitted a detailed mitigation plan, water management plan, economic feasibility study, or completed many of the baseline studies that are typically required of similar projects. Still, the Corps plans to issue a final decision before any of the missing information will be available. Meanwhile, likely impacts are ignored or downplayed (e.g. various hazardous contaminants, fish migration past proposed culverts, changes to water quality, critical habitat loss, and other indirect ecological effects.)

7

IMPACTS IN PHASE ONE ALONE ARE ALREADY MASSIVE

In its current form, impacts from phase 1 of the mine would exceed limits proposed for the Bristol Bay region in 2014 by the Environmental Protection Agency following a peer-reviewed Watershed Assessment and more than 1 million public comments. It would completely destroy more than 3,500 acres of wetlands and 80 miles of streams. It plans for: a massive pit (over a mile-long, nearly a mile-wide, and a 1/3 mile deep); more than 4 times as much wastewater as any other large mine in Alaska; an 83-mile long transportation corridor with more than 200 stream crossings; a year-round ferry across the massive Lake Iliamna; a port site in critical habitat for endangered beluga whales; a 270-megawatt power plant; and a 188-mile natural gas pipeline.



Until these issues are addressed, the permitting process for the proposed Pebble mine must stop.