



June 26, 2019

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

Dear Program Manager,

The Draft Environmental Impact Statement released by the Army Corps of Engineers for the proposed Pebble Mine is inadequate. The document fails to address the mine that is actually proposed. It fails to address the reasonably-foreseeable impacts of the Pebble Mine on Bristol Bay fisheries, communities, public lands, and cultures.

The mine as currently proposed is different from the one discussed under the scoping process that took place in 2018. The Pebble Limited Partnership has already increased the projected amount it intends to mine, and consequently the amount of tailings and other mine waste the project will generate. It is not possible to adequately evaluate the reasonably-foreseeable impacts of a mine unless the actual scope of the mine is known and studied.

The Pebble Mine Draft Environmental Impact Statement (DEIS) process has been rushed, leaving little time for communities to process information provided in the DEIS, and is being fast-tracked through the permitting phases. For over 15 years, Alaska Native people, sportsmen, commercial fishermen and partners have vocally opposed further development of the Pebble Mine project. Despite the massive opposition, Pebble continued to apply for a permit without a clear plan for development, discarding the voices of the residents who would be left with the long-term drastic impacts to the environment and ways of life. This is not the way that we move Alaska forward.

The proposed Pebble Mine poses a direct threat to the way of life that has sustained Alaska Native people, communities, habitat and culture since time immemorial. It is essential to ensure the delicate balance of life is adequately and thoroughly reviewed, communities are involved in the decision making process, the habitat and fisheries are not impacted, and the culture and people of the region are respected. The Pebble Mine has the potential to change the way of life in this region for many generations so is it not unreasonable to ask that the Army Corps take additional time to address all the foreseeable impacts the Pebble Mine could have on Bristol Bay fisheries, communities, public lands, and cultures. If mine waste seeps in to the ecosystem this would directly affect the world's largest salmon spawning grounds, and a commercial fishery that has been successfully operating for 130 years.

Legally, the Corps of Engineers must take a hard look at the reasonably-foreseeable impacts of proposed mine. This hard look must include the likely impacts of a complete mine and infrastructure buildout as well as potential catastrophic events. Among the most foreseeable impacts of an open pit



mine is failure of the tailings dam holding back massive amounts of toxic mine waste. Pebble proposes an earthen tailings dam. Over ten percent of earthen tailings dams have failed worldwide. A catastrophic failure of a tailings dam in Bristol Bay would permanently alter the landscape and lifeways of the region. However, the Army Corps has declined to study this issue at all. This is an inexcusable oversight the Army Corps must correct before it considers any decision on a permit for the Pebble Mine.

We respectfully ask the Army Corps of Engineers to withdraw the draft EIS and drastically improve before being reintroduced to the public for review and comment. We also request additional time and meetings for the public to review and digest the information proposed in the draft EIS. It is important that this project is reviewed with the utmost care and consideration. We deeply care about protecting our traditional way of life and ensuring that Alaska will remain a culture and salmon rich state for our future generations.

Sincerely,

Kendra Kloster
Executive Director
Native Peoples Action