



# UNITED FISHERMEN OF ALASKA

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July 23, 2012

Lisa Jackson, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

**RE: Docket # EPA-HQ-ORD-2012-0276 – Draft Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska**

Dear Administrator Jackson,

United Fishermen of Alaska (UFA) is the largest statewide commercial fishing trade association, representing 37 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters.

We offer the following comments on the EPA's draft document, *An Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska*.

We appreciate your office's response to our 2010 letter asking for implementation of the 404(c) process under the Clean Water Act, and we appreciate your clarifications that the initiation of the 404(c) process is not a decision to prohibit mining in the Bristol Bay watershed, and that any decision will be based on the best available science and modern mining practices.

Recognizing that the Bristol Bay region's salmon resources typically account for more than a quarter of the state's ex-vessel salmon harvest volume and value and are integral to an economy that provides for fishermen, tenders, processing, support businesses, communities and families in and beyond the local area, it is critically important for the commercial fishing industry to assure that other industrial development does not disrupt or degrade the area's fishing economy. Based on available science and in consideration of modern mining practices, UFA is concerned that future mining operations, as well as the collateral impacts of construction and temporary population boom, and the long term storage of metal-laden by-product contaminants will cause significant impact in the Bristol Bay region.

Thank you for initiating the study and for conducting it as thoroughly as time has permitted, in advance of the forthcoming application(s) for large scale mining projects in the Bristol Bay region; for considering the entire region; and for considering the broader cumulative impacts beyond solely the Pebble mine project.

We are aware that some individuals and organizations question whether the EPA should be involved in this assessment at this time, and offer the following justifications:

- The economic impacts are not only to the local area or Alaska. In 2011, there were active commercial salmon fishermen in the Bristol Bay district's drift and set net fisheries from 42 U.S. states<sup>1</sup>. The economic impacts are clearly a matter of interstate commerce.

-There are potential effects from a single large project into multiple systems due to the geology of the area – for instance the Pebble project spans the headwaters of three different river systems. In addition, many of the river systems of the area flow across land ownership boundaries of state, federal and private ownership. It is clear that even one large mine project has the potential to disrupt the ecology and productivity of salmon, far beyond its project footprint, and across land ownership boundaries.

-The history of the decline of salmon in the majority of their historical range has been a “death by a million cuts” in which a given run was eliminated or severely impacted by the combined effects of decisions that each taken singularly may not seem a drastic impact. To preserve salmon in Bristol Bay we will have to make development choices with a new mindset to avoid that history. It is more feasible to avoid degradation than it is to restore damages. Proactive protections in the context of the overall watershed will be essential to avoiding the tragic history of the decline of great salmon runs elsewhere.

-Considering that the large volume of sockeye and other salmon harvest from Bristol Bay is consumed increasingly by a wide range of U.S. consumers at competitive market prices, and that salmon is among the most beneficial proteins sources for health, there is a public health interest in preserving the entire Bristol Bay run. While the EPA is not the federal agency responsible for nutrition, EPA should have an active interest in preserving environmental quality when it directly impacts food safety. UFA has long embraced the concept of coordination of various federal and state agencies on complex topics with interrelated effects and impacts. The consideration of large scale mining in the Bristol Bay region is clearly in this category.

In summary, the development of large mines in the Bristol Bay region poses clear risks to the water quality of the region, which in turn would be likely to affect future salmon harvests, and the livelihoods of individuals not only in the Bristol Bay region but across many other areas and U.S. states. We ask that the EPA pay careful attention and help avoid disastrous harm to the world's largest sockeye salmon run in the Bristol Bay region.

We look forward to the final report, and ongoing interest by the EPA as well as other state and federal agencies in preserving the valuable public resource of Bristol Bay's salmon.

Sincerely,



Mark Vinsel  
Executive Director

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<sup>1</sup> Alaska Commercial Fishery Entry Commission yearly permit list for 2011, available online at <http://www.cfec.state.ak.us/plook/>.