



# UNITED FISHERMEN OF ALASKA

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

Via [drafteis@comments.pebbleprojecteis.com](mailto:drafteis@comments.pebbleprojecteis.com)

Via [poaspecialprojects@usace.army.mil](mailto:poaspecialprojects@usace.army.mil)

**Re: Pebble Mine Draft Environmental Impact Statement - CWA Permit POA-2017-00271**

Dear Sir or Madam,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast.

After reviewing the Draft Environmental Impact Statement (DEIS) for the proposed Pebble mine project in Bristol Bay, the United Fishermen of Alaska has concluded it is not a thorough or scientifically-sound assessment of the risks the Pebble Project poses to the water quality, fisheries, and people who live near and around Bristol Bay. Nor does the DEIS acknowledge the impact the Pebble project would have on the entire Alaska seafood industry – the state's largest private sector employer. The DEIS is fundamentally flawed because it is based on faulty assumptions resulting in inaccurate conclusions about the long-term risks of the Pebble Project to the Bristol Bay watershed and its already existing industries. UFA requests the Army Corps select the "no action" alternative and deny the application for a CWA §404 dredge and fill permit.

Of utmost concern to UFA and its members is that the DEIS underestimates the potential impacts of the Pebble project to Bristol Bay's local fish populations, their habitat, and the overall sustainability of Bristol Bay's fish resources. The Army Corps' estimates are not based on well documented, widely accessible, peer reviewed research and data. Instead, the DEIS relied heavily on the Pebble Limited Partnership's Environmental Baseline Document (EBD) which inadequately characterizes the area's salmon spawning, rearing, and habitat data. The procedure used to estimate the in river salmon population is not standardly accepted, nor is it presented in a manner in which it can be reproduced. This results in data that may be imprecise, biased, and is incomparable to escapement data by the Alaska Department of Fish and Game.

Due to the fact that the Pebble Limited Partnership failed to make available a post-operation reclamation plan, an economic feasibility study, and calculation of surety guarantees to cover the total costs of perpetual waste water, waste rock, and tailings treatments, it is nearly

impossible to assess the long-term economic and ecological impacts of a fully-developed Pebble Mine. This is of great concern to Alaska's commercial fishermen who have invested hundreds of thousands of dollars into fishing permits, boats, and gear. Bristol Bay's salmon support 14,000 jobs (including 8,000 commercial fishing jobs) and is currently home to 1,456 commercial Bristol Bay salmon fishing permits worth \$174.3 million. The Bristol Bay fishery employs approximately 4,500 Alaskans who may be in jeopardy of losing their livelihoods should the Pebble Project move forward. The DEIS dismisses the economic risks to these stakeholders.

When evaluating impacts to the world's largest sockeye salmon run and America's most valuable wild salmon fishery, UFA expects the strongest scientific review be available so that our federal agencies can make the best informed decisions possible. The current DEIS falls short of this and brings to question the integrity and transparency of this permitting process. Due to the inherent risks of the proposed project and the incomplete nature of the DEIS, UFA concludes that the US Army Corps of Engineers should select the "no action" alternative and deny the application for a CWA §404 dredge and fill permit.

Sincerely,



Matt Alward  
President



Frances H. Leach  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association  
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association  
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Fishing Vessel Owners Association • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai  
Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific  
Fisheries Association • Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture  
Corporation • Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance  
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners  
Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association