



August 7, 2014

VIA EMAIL ONLY

OW-Docket@epa.gov

Gina McCarthy, Administrator
U.S. Environmental Protection Agency
Mail Code: 2822T
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: EPA-R10-OW-2014-0505

Dear Administrator McCarthy:

Cook Inletkeeper is a community-based Alaska nonprofit organization working since 1995 to protect wild salmon and the countless families and communities they support. I am writing now on behalf of Inletkeeper's more than 2500 members and supporters who live, work and recreate in south central and western Alaska, to urge you to finalize EPA's proposed watershed determination to protect Bristol Bay.

Just a few hundred years ago, salmon filled rivers and streams in Europe, New England and the Pacific Northwest. But short-sighted management and rampant habitat destruction led to their demise.

Today, Alaska is one of the world's last remaining salmon strongholds, and Bristol Bay supports the world's largest sockeye salmon runs. These salmon support over 14,000 sport and commercial fishery-related jobs in a fishery that generates over \$1.5 billion annually.

A large, open-pit sulfide mine such as the proposed Pebble mine would result in unacceptable, adverse impacts to the Bristol Bay watershed and the remarkable salmon jobs and economies it supports.

For example, Pebble proponents have routinely touted their commitment to "modern" mining practices which would, they insist, ensure protection for Bristol Bay salmon habitat. Yet development plans for Pebble show a project that would destroy up to 90 miles of salmon streams and up to 5,000 acres of wetland salmon habitat. There's simply no way to mitigate such devastating impacts unless we decide to trade long term, sustainable salmon economies for short term mining revenues.

Additionally, the tailings pond for the proposed Pebble mine would also present unacceptable, adverse risks to the watershed. Pebble proponents insist they can construct a tailings pond and a massive earthen dam to keep toxic wastes from entering Bristol Bay's headwaters in perpetuity. Yet the recent Mount Polley mining disaster in British Columbia – which is now threatening the sockeye run on the Fraser River – proves yet again that “modern mining practices” are inherently unsafe.

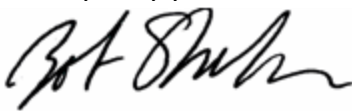
In light of repeated promises from Pebble officials to protect Bristol Bay salmon habitat, it's important for EPA to heed the words of Brian Kynoch, President of Imperial Metals, the corporation which operates the Mount Polley mine. When asked about the breach of the earthen dam which recently released billions of gallons of toxic mine waste into the Fraser River watershed, Mr. Kynoch said, “If you asked me two weeks ago if this could have happened, I would have said it couldn't.”

Accordingly, there is no way to construct and operate a large open pit sulfide mine in the headwaters of the world's largest sockeye salmon fishery without causing significant, adverse, long term impacts to the fishery and the people and economies it supports.

Therefore, please record our strong support for EPA to finalize its watershed determination under section 404(c) of the Clean Water Act. When Congress enacted the Clean Water Act in 1972, it clearly envisioned a process where the Army Corps would be the lead development agency, and EPA would retain – throughout the project review process - an important and rightful role protecting wetlands and fish habitat from unacceptable impacts. By finalizing the Bristol Bay watershed determination, EPA is simply adhering to congressional intent in the implementation of the Clean Water Act.

The state of Alaska once boasted one of the best habitat management regimes in the world. Unfortunately, that reputation has fallen to a variety of pressures which put our world-class salmon runs at risk. We truly appreciate EPA's efforts to uphold the mandates of the Clean Water Act, and to protect wild Alaska salmon for generations to come.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bob Shavelson". The signature is fluid and cursive, with a prominent initial "B" and a long, sweeping underline.

Bob Shavelson
Inletkeeper