

COMMERCIAL FISHERMEN FOR BRISTOL BAY

U.S. Environmental Protection Agency
Mail Code: 2822T
1200 Pennsylvania Ave., NW
Washington, DC 20460
OW-Docket@epa.gov

Re: Water Docket # EPA-R10-OW-2014-0505

Dear Administrator McCarthy:
2014

September 19,

Commercial Fishermen for Bristol Bay (CFBB) supports the U.S. Environmental Protection Agency's (EPA) Proposed Determination Pursuant to section 404(c) of the Clean Water Act, to restrict the use of certain waters in the Bristol Bay watershed for disposal of dredged or fill material associated with mining the Pebble deposit, released on July 21st, 2014. We urge your agency to finalize a 404(c) determination that will protect the aquatic ecosystems, including salmon resources, of Bristol Bay generally – and Alaska's Nushagak and Kvichak River watersheds in particular – from all adverse impacts generated by metallic sulfide mining.

CFBB is a network of nearly 100 commercial fishing organizations and businesses working to protect the 14,000 jobs, \$1.5 billion in annual income, and over half the world's wild sockeye salmon provided by Bristol Bay's 125-year old commercial fishery.

As members of the commercial fishing and seafood industries, we know what happens when fisheries and watersheds are not cared for. We have watched the decline of too many fisheries due to loss of habitat, and we have seen that even billions of dollars cannot fully restore most of those fisheries following inappropriate development. All too often, attempts to reverse the damage are less effective and more expensive than prevention. Fishermen and former fishermen across the nation have experienced this.

In March 2012, CFBB expressed support for a 404(c) action in Bristol Bay, reminding EPA of their authority under the Clean Water Act, which could bestow on Bristol Bay the protection it needs from the type of large-scale developments that can devastate fisheries through catastrophic one-time events or chronic, long-term habitat degradation. CFBB also expressed support for the findings in the Bristol Bay Watershed Assessment, which confirmed that a project like the proposed Pebble Mine would pose an unacceptable risk to Bristol Bay's world-class fishery and the jobs it supports.

With the recent failure of the Mt. Polley Mine tailings dam, we have seen the result of allowing open-pit copper and gold mining within essential salmon habitat, with no way to guarantee against unplanned outcomes. This very mine has been held up by Pebble Mine's

proponents and engineering consultants as an example of how modern mining practices can successfully co-exist with a great wild fishery. Sadly, it is the fishermen and communities downstream from Mt. Polley who now bear the burden of rebuilding something that should never have been put at risk.

The Bristol Bay salmon fishery is acknowledged across the world as a premier example of sustainable fisheries management. There remains no doubt that a massive mining operation such as the proposed Pebble Mine has no place in this salmon watershed.

CFBB supports EPA's proposed determination and believes the agency is more than justified in its decision to restrict dredge and fill material at the Pebble deposit. Furthermore – in light of the economic and cultural value of the Bristol Bay fishery, the sensitivity of its habitat, and the impossibility of guaranteeing against a catastrophic accident in open-pit mining – it is clear that large-scale mining activity poses unacceptable risks to the Bristol Bay watershed and should be prohibited.

Please promptly issue a final 404(c) determination that will guarantee that large-scale mining will not adversely impact the world's largest sockeye salmon fishery and the jobs and communities that it sustains.

Sincerely,

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