



**INTERNATIONAL ASSOCIATION of MACHINISTS**  
**and AEROSPACE WORKERS**  
**DISTRICT LODGE No. 160**

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September 17, 2014

Water Docket # EPA-R10-OW-2014-0505  
U.S. Environmental Protection Agency  
Mail Code: 2822T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Dear Administrator McCarthy:

I am writing in support of your agency's recent decision to move forward with a 404(c) determination aimed to protect Bristol Bay, Alaska and its valuable salmon industry. Thank you for the time you took to review this issue through the *Bristol Bay Watershed Assessment*. Finalizing this determination is a necessary step to bestow on Bristol Bay the protection it needs from the type of large-scale developments that can devastate fisheries, either through catastrophic events or chronic habitat degradation over time.

International Association of Machinists and Aerospace Workers, AFL-CIO, District Lodge 160, represents over 5000 members working for more than 300 employers in Alaska and Washington. Many of our members work directly in the fishing industry such as Alaska General Seafoods and Peter Pan Seafoods, Inc. We also represent members in industries providing direct support to the fishing industry, Fairhaven Shipyard, Pacifica Marine, Inc., Pacific Ship Repair & Fabrication, Washington Marine Repair, Inc., Fishing Vessel Owners, Foss Shipyard, Lake Union Drydock Co., Pacific Fisherman Shipyard & Electric, Vigor Shipyards, Inc. Our members working for these employers depend on a strong supportable fishing industry for their livelihood and that of their families.

As members of the U.S. 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.

Furthermore, with the recent Mt. Polley tailings dam collapse, we have sadly 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 as an example of modern mining practices, co-existing with another great wild fishery. Sadly, it is the fishermen and communities downstream who will be left to carry the burden of rebuilding something that never should have been put at risk.

The Bristol Bay salmon fishery is acknowledged across the world as a premier example of sustainable fisheries management. Mining like the proposed Pebble Mine has no place in this salmon watershed.

We support the EPA's proposed determination and believe the agency is more than justified in its decision to restrict dredge and fill material at the Pebble deposit. Furthermore, in light of the 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 have adverse impacts on the world's largest sockeye salmon fishery and the jobs and communities that it sustains.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel R. Morgan".

Daniel R. Morgan  
Directing Business Representative  
President Washington State Machinists Council