



15 September 2014

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

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

Dear Administrator McCarthy:

The Pacific Coast Federation of Fishermen's Associations (PCFFA), represents working men and women in the West Coast commercial fishing fleet. Through its 14 member organizations, PCFFA represents some 750 individual fishing vessel owner/operators - "fishing families."

Our fishing family livelihoods depend on healthy watersheds and coastal ocean waters necessary for the production of abundant and sustainable fish and shellfish populations. PCFFA, as a result, strongly supports EPA's recent decision to move forward with a 404(c) determination aimed to protect Bristol Bay, Alaska and its valuable salmon industry. We greatly appreciate the time you took to review this matter through the Bristol Bay Watershed Assessment. Finalizing this determination is a necessary step to provide Bristol Bay the protection it needs from the type of mega-developments that can devastate fisheries, either through catastrophic events or chronic habitat degradation over time.

As members of America's oldest industry, we know what happens when fisheries and watersheds are not cared for. We know first-hand the impact of fishery decline due to loss of habitat - from Central Valley Rivers and the Bay/Delta estuary, to the Klamath, to the Columbia River basin - and we have seen that even billions of dollars cannot fully restore most of those fisheries following inappropriate development.

STEWARDS OF THE FISHERIES

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Moreover, the recent Mt. Polley tailings dam collapse in British Columbia has made it clear what can and will happen by 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.

PCFFA supports the 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 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. We respectfully request, therefore, that you 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 black ink on a light-colored background. The signature reads "W.F. 'Zeke' Grader, Jr." in a cursive script. The "Zeke" is written in a stylized, slightly larger font than the other parts of the name.

W.F. "Zeke" Grader, Jr.
Executive Director