

Scoping for the U.S. Army Corps of Engineers' environmental analysis/permit application review Public Comment Guide - Army Corps Needs to Hear From YOU!!!!

Pebble Scoping: Spring 2018
April 1-June 29

Background:

What is Scoping and what is the Army Corps Looking at?

In December 2017, Pebble applied for the dredge and fill permit it will need from the U.S. Army Corps of Engineers (USACE). This is the FIRST state or federal development permit Pebble has applied for, and it's a big one that should take several years. The application includes plans for the 1750' deep tailings pond, 83-mile road, deep water port, ice-breaking ferry across Iliamna Lake, 230 MW power plant, and other infrastructure- it is a mine bigger than Mt. Polley and the science of the Bristol Bay Watershed assessment concluded this size mine would devastate the fishery. We must push for a full, thorough review all along the way, as Pebble is trying to fast-track the permit.

The USACE is the federal agency leading the review of this application, which centers on an Environmental Impact Statement (EIS). The EIS (essentially a very long report) will look at the environmental impacts of the mine Pebble wants to build and will be used to help guide the USACE decisions on permitting. An EIS looks at impacts to the natural and physical environment, and how that could impact people (socially, culturally/spiritually, and economically). To protect our water and way of life, we must weigh in at every possible opportunity! The scoping process and public comment period is one of the most important times the public can have our voices heard to ensure the agencies are considering all impacts in the EIS.

MORE INFO: www.pebbleprojectEIS.com

Scoping comments to the Army Corps can focus on any of the potential impacts the Pebble Mine will have on the lands, waters, people, fish, and game of the region.

Bristol Bay people are the EXPERTS on how this will impact our people, our livelihoods, our communities, and our traditional way of life. The USACE needs to hear how the Pebble Mine could impact hunting, fishing, and gathering, our cultures, and the health of our communities and future. **Without citizens raising outlining how this will impact us, the Army Corps will draw as small a scope of review as possible and omit many of the downriver and broader impacts of the Mine. WE MUST RAISE EVERY POTENTIAL ISSUE WE WANT THE ARMY CORPS TO CONSIDER.**

Analysis of the project will look at direct, indirect and cumulative effects. **We must raise every impact we want considered! The USACE outlines how they categorize impacts:**

Direct Effects: Impacts caused by the proposed Pebble mine project itself and all of its related components. **This could include immediate loss of hunting and fishing grounds and waters or berry picking sites, etc. because of the mine tailings, transportation corridor, and/or a noisier environment hindering hunting and fishing because of increased traffic/population, industrial activities, etc.**

Indirect Effects: Impacts caused by the proposed Pebble mine project that are later in time and farther removed in distance. These include things like changes in land use patterns, population changes, impacts of transporting ore, impacts of the power plant, tailings dams, etc., and all of the related effects on air and water and the environment from these effects. **For communities closest to the mine, this might be an increased population and stress on local resources, cultures, etc.**

Cumulative Effects: The impacts on the environment resulting from the incremental impacts of the proposed Pebble mine when added to other past, present, and reasonably foreseeable future actions. **For example: this could be development of the rest of the Pebble deposit and additional mines in the area once the infrastructure is in place for Pebble. This could also be the impact on the long-term survival of the areas indigenous cultures.**

Now more than ever it is important for Bristol Bay's people to stand strong against the Pebble Mine and have our voice heard: we want our watershed and all it sustains protected. The U.S. Army Corps is trying to determine the breadth of its analysis of Pebble's project. We must be clear that we do not support this mine, and that it will have WIDE-SPREAD and devastating impacts on our land, water, and way of life.

Tips for Comments & Testimony

Written comments can be submitted at the hearings, online at <http://utbb.org/get-involved/> or directly to:

US Army Corps of Engineers, Alaska District
Program Manager, Regulatory Division
Attn: DA Permit Application 2017-271, Pebble Limited Partnership
PO Box 6898
Joint Base Elmendorf Richardson
AK 99506-0898

Don't be intimidated: Bristol Bay's people are the real experts on why our home needs to be protected! Personalize your testimony! The Army Corps needs to hear a broad array of concerns.

- Share what you love. Why do you think Bristol Bay should be protected? Make your enthusiasm for our home come across in your testimony!
- What worries you about the mine? How will it impact you, your family, your community? What concerns do you want to voice? This is the time to say them!

Ask the U.S. Army Corps to consider what this project will mean to YOU and YOUR LIFE!

- ❖ What is your life in Bristol Bay like RIGHT NOW? How do you think the mine might change it; what might it change for your children and their children? Tell your personal story!
- ❖ Tell the Army Corps what specific issues related to water quality, air quality, noise, land ownership, transportation, and human health you think the mine and its related infrastructure could cause.
- ❖ Will your daily life change if the mine is built? If there is an accident? Explain this to the Army Corps.
- ❖ How would the Pebble Mine impact your culture and traditional way of life?
- ❖ How will the mine and its vast transportation infrastructure impact your life and community?
- ❖ How could the mine change your right to hunt, fish, gather, & other traditional practices? Do you think your children and future generations will be able to continue their cultural traditions?
- ❖ Tell the Army Corps what it would mean to you if the Nushagak or Kvichak no longer had robust salmon runs.

Other Key Points you can include!

- ❖ USACE must analyze impacts related to: geology, soils, surface water hydrology, groundwater hydrology, water quality, air quality, noise and vibration, vegetation, wetlands, wildlife, fish and aquatic resources, endangered and threatened species, recreation, socioeconomics, cultural resources, subsistence, human health, existing transportation AND MORE!
- ❖ This project has substantial unavoidable adverse effects related to Bristol Bay water: lowered water table in the vicinity of the mine, flow reduction in Upper Talarik Creek, North Fork Koktuli and South Fork Koktuli, alteration of streamflow by damming Bristol Bay headwater tributaries, catastrophic tailings dam failures or spills during transportation (ferry or truck) could pollute surface waters; pipeline failure under Lake Iliamna or rivers

and streams could pollute surface waters, and surface pit lake water drainages into BB headwaters will exceed water quality standards for some metals and other pollutants and would discharge in perpetuity.

- ❖ Pebble has not submitted any permit applications with the State of Alaska and seems to be trying to force the state's hand to issue its permits quickly as the federal permitting process is already underway.
- ❖ This project has substantial adverse effects related to Bristol Bay plants and animals: – the Pebble mine project proposes to destroy 4,000 acres of wetlands; fish will be impacted by permanent changes in habitat (including effects of wetland and stream destruction), direct habitat removal, stream flow and temperature changes, and sedimentation; the project will cause permanent changes in habitat, direct habitat removal, disturbance, and risk of injury or mortality from shipping collisions. (include something about toxic tailings being held in perpetuity?)
- ❖ The process so far has NOT made it easy for Bristol Bay to weigh in. Short term, limited opportunities for comment. Bristol Bay needs to be heard!
- ❖ Pebble does not have a solid plan. They do not have an economic feasibility study, baseline data for their transportation corridor and port site, and other data is out of date. They should be required to have up-to-date information before permitting proceeds.
- ❖ The federal government's trust responsibility to Tribes to protect tribal resources including fishing, hunting, and subsistence areas. This permit would violate that trust and our people's right to clean water and our cultures.
- ❖ Bristol Bay people's health and wellbeing is intrinsically connected to the health and well-being of our environment. If Pebble is developed, our watershed and therefore our people and way of life will be devastated.
- ❖ Science and history prove the Pebble Mine will devastate Bristol Bay salmon and the fishery. This is the wrong mine in the wrong place. Pebble is now claiming it will build a smaller mine than previously discussed, but there is NO DOUBT that it will eventually grow into a mega mine. Reports have shown that Pebble will not be profitable unless it is massive – this is clearly just a stunt to garner support. If allowed to develop and put in the infrastructure, Pebble will open the door to transform Bristol Bay into a mining district as there are over 20 other active mining claims throughout the watershed. We know that NO size Pebble mine is acceptable.
- ❖ The Bristol Bay watershed supports the last great sockeye salmon cultures and commercial/sport fishery on the planet. We provide over 50 percent of the world's wild sockeye salmon population and is the most valuable commercial salmon fishery on earth. The sustainable fishery provides over 14,000 American jobs and 1.5 billion dollars to the economy year after year.
- ❖ The EPA did an extensive "Watershed Assessment" that concluded Bristol Bay SHOULD BE PROTECTED. The mine size scenarios determined without a doubt this proposed type and size of mine is not safe and cannot coexist with the fishery in Bristol Bay. This science is still relevant!
- ❖ Pebble has already proven that they are not careful stewards of our environment. Their exploration work left a toxic mess. Why would we trust them again? The federal government and the USACE MUST protect our rights.
- ❖ Pebble Mine has been an issue looming over our heads for over a decade. It has caused economic uncertainty for those invested in our fisheries and for those that live here. Everyone who depends on the fishery deserves certainty, and protection.
- ❖ Pebble will never get our support. Bristol Bay has been steadfast in our dedication to protecting our salmon and the cultures, communities, and livelihoods it sustains for over a decade and we aren't going anywhere.

How to provide oral testimony

- Speak slowly and clearly
- USACE will be available for questions about the environmental review process
- If a translator is needed please let us know so we can ensure you have one!
- Testimony will be limited to three minutes. Practice ahead of time to ensure you are within the limit!
- For DILLINGHAM, testimony is likely to be in a private room with a court reporter. This may also be an option for other communities.

Tentative Public Hearing Schedule

Community	UTBB Prep Room	Hearing	Notes
NAKNEK	April 8-9	April 9	
KOKHANOK	April 9-10	April 10	
NEWHALEN	April 11-12	April 12	
NEW STUYAHOK	April 12-13	April 13	
NONDALTON	April 15	April 16	
DILLINGHAM	April 16	April 17	
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Homer and Anchorage hearings are scheduled for April 11 (Homer) and April 19 (Anchorage). Oral testimony will be taken in a private side-room, and written testimony will also be taken.