



June 26, 2019

U.S. Army Corps of Engineers, Alaska District  
ATTN: DA Permit Application 2017-271, Pebble Limited Partnership  
645 G Street, Suite 100-921  
Anchorage, Alaska 99501

*Re: POA-2017-00271*

Dear U.S. Army Corps of Engineers:

Thank you for the opportunity to provide comments on the proposed Pebble Mine project in Bristol Bay, Alaska and the associated Environmental Impact Statement (EIS). As a seafood stakeholder, we have watched the decline of too many fisheries due to loss of habitat and do not feel that the EIS appropriately considers detrimental impacts to aquatic ecosystems, businesses, and communities under current and future climate conditions and circumstances. For this reason and the additional ones set forth below, we oppose the permitting of the Pebble Mine project.

## I. Introduction

PCC Community Markets is a community-owned, co-operative food market that began as a food-buying club of 15 Seattle families in 1953. Today, we have 66,000 active member-owners and 11 stores in seven cities throughout the Puget Sound region, generating \$288 million in annual sales and making us the largest consumer-owned and operated grocer in the United States. We are a triple bottom line organization, meaning that impacts to the environment and community factor into all that we do.

PCC's 11 stores in Seattle and adjacent cities sold more than \$2.8 million in fresh salmon in 2018, the large majority of it sourced from Alaska. For Chinook salmon, PCC sourcing is exclusively from Alaska.

## II. PCC, Bristol Bay, and Salmon

Bristol Bay is one of the last great wild salmon fisheries left in the world, with an average of 40 million sockeye salmon returning to its waters annually. Bristol Bay's salmon fishery is a pillar of the Alaska Seafood brand and has employed Americans for over 130 years. Today, it supplies over 40 percent of the world's sockeye salmon, provides over 14,000 jobs, and generates \$1.2 billion in annual economic activity.<sup>1</sup> Unlike many salmon fisheries in the West Coast region, including the Puget Sound, Bristol Bay

---

<sup>1</sup>Economic Benefits of the Bristol Bay Salmon Industry, July 2018, Wink Research & Consulting, <https://static1.squarespace.com/static/56b0dfb660b5e98b87fc3d52/t/5b7b3867c2241b4f57c808ea/1534802033907/Economic+Benefits+of+Bristol+Bay+Salmon+Full+Report+-+July+2018+-+updated+082018.pdf>.



saw increased returns of sockeye salmon last year.<sup>2</sup> It is also one of the largest Chinook fisheries in the world. PCC depends on Bristol Bay as a reliable source of sustainable salmon.

Salmon and the Puget Sound region are connected through our history, culture, and economy and this connection is not limited to local fisheries. Protecting Bristol Bay’s prolific salmon fishery is critical to many of the commercial fishermen in the Puget Sound region, who depend on Bristol Bay for their livelihood. Countless Washington consumers and businesses, PCC included, are also dependent on maintaining healthy and wild salmon fisheries such as Bristol Bay—now even more so.

### III. EPA Findings

As the USACE is aware, the U.S. Environmental Protection Agency (EPA) conducted an ecological risk assessment of the proposed Pebble Mine project. After three year of study, two rounds of public comment, and independent, external peer review, EPA released its report. Within this report, we found these statements to be indicative of the overall assessment:

- “The Bristol Bay Assessment established that the extraction, storage, treatment, and transportation activities associated with building, operating, and maintaining one of the largest mines ever built **would pose significant risks to the unparalleled ecosystems that produces one of the greatest wild salmon fisheries left in the world.** In simple terms, the infrastructure necessary to mine the Pebble deposit jeopardizes the long-term health and sustainability of the Bristol Bay ecosystem.”<sup>3</sup>
- “[S]tream losses for just the 0.25 stage mine would equal a length of more than 350 football fields and the 0.25 stage mine wetland losses would equal an area of more than 900 football fields. . . . **These stream, wetland, and other aquatic resource losses also would reverberate downstream,** depriving downstream fish habitats of nutrients, groundwater inputs, and other subsidies from lost upstream aquatic resources.”<sup>4</sup>
- “Known compensatory mitigation techniques are unlikely to offset impacts of the nature and magnitude described in the proposed restrictions.”<sup>5</sup>

The EPA Proposed Determination was unequivocal in its findings and PCC, along with countless other seafood stakeholders, supported this precautionary, science-based approach to preserving an essential ecosystem and fishery.

---

<sup>2</sup> 2018 Bristol Bay Salmon Season Summary, Alaska Dept. of Fish and Game Division of Commercial Fisheries, <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/989536277.pdf>.

<sup>3</sup> U.S. Env’t Prot. Agency (EPA), Proposed Determination Executive Summary, July 2014 page ES-3.

<sup>4</sup> *Id.* at ES-4.

<sup>5</sup> *Id.* At ES-7.

#### IV. EIS Findings and Gaps

Despite the clear findings of the 2014 EPA Proposed Determination, work resumed to permit the proposed Pebble Mine project and USACE created the subject EIS.

Unfortunately, the EIS evaluations and alternatives seem to minimize the scope and potential impacts of the proposed project and ignore many of the previously identified problems outlined in the EPA Proposed Determination, particularly with regard to fish habitat and commercial fisheries.

At the outset, the EIS does note a number of “potential direct and indirect impacts to fish and aquatic habitat and aquatic invertebrates for all proposed action alternative and variants.”<sup>6</sup> These include:

- Physical loss of stream, lake, estuarine, and marine habitat
- Blockage of stream channels preventing fish or other aquatic species passage
- Aquatic habitat effects due to instream flow reductions from mine water withdrawal or capture, and redirection of groundwater
- Sedimentation of aquatic habitat due to surface erosion of mine and port access roads, stockpiles, or other activities
- Erosion from vegetation removal; shoreline erosion associated with ship or ferry wakes; benthos disturbance/mortality from docks and pipelines
- Changes of freshwater and marine water quality such as temperature, turbidity, pH, dissolved oxygen, and metal or chemical contaminants
- Injury or mortality of fish or other aquatic species.<sup>7</sup>

Unfortunately, in its discussion of alternative development plans beyond no action, USACE seems to dismiss these potential impacts and offer startling reliance on outdated comparisons and mitigation concepts.

For example, in discussing the potential for mine development to impact the value of Bristol Bay sourced salmon, the EIS draws a comparison to Copper River salmon, stating “[t]he Copper River salmon fishery exists in the remains of the historic Kennecott Copper Mine...in the headwaters of portions of the fishery.”<sup>8</sup> To be clear, the Kennecott Copper Mine is an inactive mine that began operating around 1911 and concluded operations in 1938, thus neither the infrastructure, scale, nor ecological circumstances could compare to the present day. To draw a comparison between the potential impacts of the proposed Pebble Mine and the Kennecott Copper Mine is thus misleading and misguided.

---

<sup>6</sup> PEBBLE PROJECT DRAFT EIS / EXECUTIVE SUMMARY 49.

<sup>7</sup> *Id.* at 49.

<sup>8</sup> *Id.* at 53.



Concerning subsistence, the EIS states “[i]mpacts to fish and wildlife would not be expected to impact harvest level, because there would be no decrease in resources and abundance.”<sup>9</sup> This seems to be in direct conflict with EPA’s previous findings.

Overall, the EIS demonstrates a head-down, status quo approach to environmental impact analysis and fails to meaningfully analyze and address many of the broader concerns and issue that we now know must be considered in a proposed project of this nature.

## V. Conclusion – No Action Alternative

In the region and across the world, we are at a critical juncture in world history where we must look at destruction, even disturbances, of natural resources with a new lens. We must consider the impacts of development beyond the boundaries of the site blueprints and maps and look downstream and across oceans to extents not previously envisioned. The more we learn about human development impacts, the more we must strengthen the precautionary principle and place greater values on previously excluded considerations. We can no longer rely on reparations and mitigations that we know will not work or whose costs will be more than can be borne by future generations.

While we recognize the efforts invested in creating the EIS, overall the research and evaluations fail to contemplate the expanded range of project impacts, including ecological, economical, and social.

We cannot emphasize enough the critical juncture that all levels of the food system are facing when it comes to salmon populations. To consider any development that would impact a successful and thriving salmon ecosystem and fishery, in any way, would be turning a blind eye to the significant monetary investments and efforts being made to repair what has already been destroyed by human development and impacts.

For these reasons, and many more, PCC does not support the development of the Pebble Mine and would ask USACE deny all permits and suspend further consideration of this project.

Sincerely,

**Aimee M. Simpson, J.D.**  
Director of Product Sustainability  
PCC Community Markets

---

<sup>9</sup> PEBBLE PROJECT DRAFT EIS / EXECUTIVE SUMMARY 31