



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Natural Resources

COMMISSIONER'S OFFICE

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Col. Michael Brooks  
Commander  
U.S. Army Corps of Engineers – Alaska District  
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JBER, Alaska 99506-0898  
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Dear Colonel Brooks,

I write regarding the anticipated publication of the US Army Corps of Engineers' (USACE) Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) set to be published in the Federal Register this week. It is the State of Alaska's understanding that the USACE intends to announce a 30-day scoping period for the proposed Pebble Project. For a variety of reasons, explained below, the Alaska Department of Natural Resources (DNR) requests that the USACE extend the scoping period to at least 90-120 days for the proposed Pebble Project EIS.

The Code of Federal Regulations defines scoping as an "early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action" (40 CFR 1501.7). Although the USACE has conducted some outreach with tribes and stakeholders, including DNR, following receipt of Pebble Limited Partnership's 404 application, and proactively posted the application along with draft scoping materials on-line ahead of the NOI, it does not relieve the USACE from offering a scoping period commensurate of the scale and importance of the Pebble Project.


The proposed Pebble Project envisions an open pit mine, a mile across, near the headwaters of the most prolific salmon fishery in the world. The region supports villages and subsistence activities year-round. Due to the size and potential impact of the proposed mine, a 30-day scoping process is likely insufficient for the public to identify, and the USACE to address, issues of concern, studies that are needed, and alternatives to be examined.

The scoping process will rightfully include several public meetings with those affected by the proposed project. Western Alaska is not always easily accessible because travel is often affected by weather and distance. With multiple meetings scheduled across the state, should just one scoping meeting be delayed it could jeopardize the Corps' 30-day scoping process. Thus, from a practical standpoint, USACE should consider a longer scoping period.

The scoping period for the proposed Donlin mine included a National Environmental Policy Act (NEPA) review, was led by the USACE, and lasted from December 14, 2012 to March 29, 2013, a total of 105 days. In that scoping process, the USACE conducted 14 public meetings across Western Alaska, one nearly each week of the entire scoping period. The State of Alaska requests that the USACE follow a similar scoping process to that of the Donlin mine.

The scoping process will be extremely important to a thorough evaluation of environmental impacts from the proposed Pebble Project. We encourage the USACE to take every opportunity to accept comments and suggestions from the public as this project moves forward. The most effective way to achieve this is by ensuring a sufficient scoping period.

Sincerely,



Andrew T. Mack,  
Commissioner

cc: Sheila Neuman  
USACE Regulatory Division Program Manager