Lake and Peninsula Borough
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June 29, 2018 Via Email

Program Manager, Regulatory Division
U.S. Army Corps of Engineers, Alaska District
ATTN: DA Permit Application 2017-271, Pebble Limited Partnership
P.O. Box 6898
Joint Base Elmendorf-Richardson, Alaska 99506-0898

Dear Sir or Madame:

This letter provides scoping comments from the Lake and Peninsula Borough (LPB) for the Environmental Impact Statement (EIS) for the proposed Pebble Mine. The purpose of these scoping comments is to ensure that the Corps of Engineers understands the issues and concerns of our citizens. Therefore, this letter does not provide LPB opinion about whether the mine should be permitted; it does provide subjects that should be studied as part of the EIS.

LPB is the local government in the area of the Pebble Project. The borough government represents approximately 1650 people and seventeen villages. Our Borough covers the area most affected by the mine: almost all of the road and all of the mine facilities would be in the Borough. Our people would experience the most impacts, both positive and negative, if the mine were to be built.

As the EIS will be used by agencies in their decision about whether to permit the mine, it is important that the EIS contain the best information, and that it investigate the subjects which concern our people. Local residents should have answers to their questions; the EIS should investigate concerns so that people know whether an impact will truly occur and the extent of the particular impact of concern. For that reason, LPB included in this letter issues our residents have spoken about to borough officials, and issues that our residents spoke about in the recent public meetings. Staff and borough officials attended the public meetings, and staff or consultants read the transcripts of each meeting held within the LPB.

The list of issues which should be added to the EIS is below. Not every LPB resident believes that each and every issue is important, and it is possible that some of the potential impacts in this list may not occur, but at least one resident was concerned enough to voice each of these issues. For that reason, the borough believes that the scientific process should address all of them. Finally, this is not a comprehensive set of issues for the EIS. They are in addition to the issues typical for a mining EIS involving tailings facilities, water quality, stream flow impacts, dam safety as well as increased demands of public facilities and services, etc.

The concerns are organized by facility.

Ferry

- Effect of the ferry on seals both from the ferry itself, and from the open-water channel made by the ferry in the winter.

- Effect of the ferry on salmon smolt, especially from the ice channel in which smolt may concentrate, and on adult salmon during the summer salmon runs. These may include direct effects, indirect effects such as the potential for increased predation of smolt and of an adult salmon, and effect of noise on the fish.

- Effect of the ferry on residents' winter travel. Residents use the frozen lake to travel between villages.

- Effect on other wildlife including otters, beavers, and seagulls (residents eat the eggs from the seagull nests on islands in the lake).

- There is concern of the ability of the ferry to dock and unload on the northside Iliamna Lake port, because it is an area open to waves and winds, especially from the east.

- There may be gravesites of other cultural resources of concern on the road route on the south side of Iliamna Lake near Gibraltar Lake and on the route to the south ferry dock.

- The EIS should describe the probability and potential effects of fuel and other hazardous chemicals to spill in the lake.

Natural Gas Pipeline

- Effects on boating, fish, or wildlife.

- Effects on the lake from a leak or accident.

Road

- Effect of road dust impacts on human health, and on the health of subsistence foods including berries, wildlife, and other foods.

- Potential for disruption of caribou use from the road corridor due to traffic and noise impacts.

- Concern about moose displacement impacts from traffic and noise the road corridor from the mine site to Lake Iliamna, which is where residents frequently hunt moose.

- Effects from road accidents; spills, chemical releases, etc.

Amakdedori Port

- Area is long-used historical site. Therefore, concerns over archaeological resources with potential gravesites in the area.

- Effects of the offshore marine dredging on marine life.

- Displacement of wildlife.

Water Quality and Streamflow

- Water quality and flow effects on fish from normal operations
- Water quality and flow effects on fish from accidents – water treatment plant upsets, possible tailings dam leaks, etc.
- Water quality and flow effects on Lake Iliamna, North and South Fork Koktuli, Upper Talarik Creek, Middle and Lower Talarik Creek, Kashanak Creek and others.
- Water quality and flow effects on groundwater.

Mine Site Facilities

- Air quality effects on people, plants, and wildlife; this effect could be from facility emissions (i.e., power plant, etc.), or from dust.
- Noise effects, including those from blasting, on people and wildlife.
- Wind and wave erosion could stir up the water in the tailings lake and the underlying tailings causing erosion, and increased acid generation.
- Effects on waterfowl from water tailings facility, especially the potentially acid-generating tailings facility.
- General displacement of wildlife from the industrial area and nearby road corridors.
- Effects on salmon from all the potential impacts.
- Need analysis of impacts from potential failures of the system including tailings dam failure, water quality treatment plant upsets, etc.

Concerns unrelated to specific facilities

- 20-year mine plan? Concern expressed that the 20-year mine plan was only the beginning; that after the mine plan was completed that the mine project would continue and expand to the rest of the deposit; therefore, the EIS should look at the larger mine potential.
- Cumulative impacts – other mines. This mine may cause other mines in the area to be developed: Ground-hog prospect, etc.
- Inadequate baseline studies, especially for the lake, road, and port area.
- Concern over mine plan with respect to extreme weather events, seismic events, and global warming.

- How does one plan for 10,000 years of maintenance? Assess long-term effects for the entire life of the potential impacts.

Social Effects. Note that not all impacts are negative. Some of the potential impacts noted below may be positive.

- Population influx. Will there be a population influx and could it...
    - Change the culture and feeling of existing villages. Would today's population be overrun or outnumbered by newcomers? Would they no longer be Native villages? Would new voters dramatically reduce the power of today's voters? If up to 2,000 people move into a region with a small population, it could dilute the local voice.

    - Overrun community infrastructure including waste management, housing, schools, and other community infrastructure.

- Increased employment in the Borough's villages; increased income.

- Increased opportunity for locally owned or operated businesses.

- Decrease (or increase) number of residents on welfare.

- Could employment opportunities allow kids to stay in-region, or stabilize villages that are losing population?

- Effect of project on village culture

- Decrease prices for goods, services and electricity, transportation out of region.

Subsistence

- Direct effect on fish, wildlife, and other subsistence resources through water quality changes, streamflow changes, dust, hazardous spills, etc. This includes effect on salmon, effect on caribou calving and migration, etc.

- Displacement effects on wildlife through avoidance of mine facilities, roads.

- Increased competition for subsistence resources through population change.

Thank you for this opportunity to provide issues for the EIS process.

Sincerely,

Glen Alsworth
Mayor