

**Congress of the United States**  
**Washington, DC 20515**

June 11, 2019

The Honorable R.D. James  
Assistant Secretary of the Army for Civil  
Works  
108 Army Pentagon  
Washington, D.C.  
22202

Col. Phillip J. Borders  
Commander  
U.S. Army Corps of Engineers - Alaska  
District  
Joint Base Elmendorf-Richardson, Alaska  
99506

Dear Assistant Secretary James and Colonel Borders,

We write to express our deep concern regarding the proposed Pebble Mine in Bristol Bay, Alaska. Bristol Bay is a national treasure that supports the world's greatest wild sockeye salmon fishery, where a record-setting 62 million salmon returned last year.<sup>1</sup> Bristol Bay's wild salmon have sustained Alaska indigenous communities for thousands of years by providing subsistence food, subsistence-based livelihoods, and the foundation for culture and community. Salmon are also the economic driver in Bristol Bay, and the region supplies half of the world's sockeye salmon.

The proposed Pebble Mine, which would be located at the headwaters of the Bristol Bay watershed, threatens the entire Bristol Bay region—its people, its salmon, and the multimillion-dollar economy it supports.

Bristol Bay is the largest wild sockeye fishery and one of the largest Chinook fisheries in the world. This unique and important region also supports at least 29 species of fish, including all five Pacific salmon species found in North America, 40 terrestrial mammal species, and 190 bird species.<sup>2</sup> A 2013 report by the University of Alaska Institute of Social and Economic Research found that the value of commercial fishing activities in the Bristol Bay region account for \$1.5 billion in economic output value, including \$500 million in direct income, making it the most valuable wild salmon fishery in the world.<sup>3</sup> This economic activity fuels approximately 14,000 commercial fishing jobs as well as other salmon-related industry jobs across the United States from Alaska to Maine. The region also supports other vital economic sectors, including sport and subsistence fishing/hunting, tourism, and recreation.

The livelihoods and way of life of Bristol Bay tribes, village corporations, fishermen, hunters, anglers, local business owners, and other stakeholders will be put at risk if the U.S. Army Corps of Engineers (USACE) permits the Pebble Mine. According to the draft Environmental Impact

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<sup>1</sup> <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/989536277.pdf>.

<sup>2</sup> [https://www.epa.gov/sites/production/files/2015-05/documents/bristol\\_bay\\_assessment\\_final\\_2014\\_vol1.pdf](https://www.epa.gov/sites/production/files/2015-05/documents/bristol_bay_assessment_final_2014_vol1.pdf)

<sup>3</sup> <http://fishermenforbristolbay.org/wp-content/uploads/2013/02/CFBB-ISER-FINAL-REPORT-5-10-2013.pdf>.

Statement (DEIS) prepared by USACE,<sup>4</sup> even the “small” 1.4-billion ton mine plan would completely destroy more than 3,500 acres of wetlands and 80 miles of streams, and would require the construction of significant infrastructure, including: a minimum 6,500-foot long, 5,000-foot wide and 1,750-foot deep mine pit; an 83-milelong transportation corridor with over 200 stream crossings and 8 bridges; year-round icebreaking ferry service across Lake Iliamna with two terminals; a port site in Amakdedori Bay (critical habitat for endangered beluga whales); a 270-megawatt power plant; and a 188-mile natural gas pipeline (94 miles across Cook Inlet).

A project of this size and magnitude has understandably produced deep concern and powerful opposition from those who rely on the Bristol Bay fishery for their lives and livelihoods.

In addition to the controversy surrounding the Pebble Mine, the DEIS itself has received intense criticism for failing to address reasonably-foreseeable impacts of the Pebble Mine on Bristol Bay fisheries, communities, public lands, and cultures; for disregarding concerns about Pebble’s unprecedented water treatment plan; and for ignoring impacts associated with fully developing the Pebble Mine. The DEIS also fails to analyze impacts from a catastrophic dam failure, which could be calamitous for the entire Bristol Bay ecosystem. In addition, the DEIS is missing critical information, including a post closure and reclamation plan, tribal health impact statements, and a comprehensive compensatory mitigation plan.

The Alaska Department of Fish and Game and the U.S. Fish and Wildlife Service have both raised serious concerns about the project’s lack of baseline data, the need for site-specific studies, and the preliminary DEIS’s incomplete analysis of the project’s impact on fish, wildlife, and cultural resources. While some of these concerns were addressed in the DEIS, others the USACE plans to resolve by conducting additional field work. The results of this field work will not be released until the publication of the final EIS, at which point the public will not have any remaining opportunities to comment on the project and the accuracy of the results.

The DEIS also fails to ask whether Pebble’s mine plan is feasible. Pebble hasn’t submitted an economic feasibility study – an industry standard before seeking permits. When the USACE asked for this information, Pebble said it couldn’t disclose it without running afoul of Canadian Securities regulations prohibiting investor fraud and misrepresentation. A former Rio Tinto mining expert determined not only that Pebble is uneconomical as proposed, but that it has a net present value of negative \$3 billion.<sup>5</sup>

Given these combined deficiencies, the USACE should not move forward with permitting the Pebble Mine – let alone fast-tracking it under the current schedule. The agency’s EIS schedule seeks to expedite the NEPA process, estimating a final EIS and Record of Decision (ROD) by 2020.<sup>6</sup> This is an extraordinarily short timeline that is wholly inconsistent with a large, complex mining project which will have unavoidable, substantial, and long-term impacts to a sensitive, globally significant ecosystem. For comparison, the EIS process for the Donlin Gold Mine in Alaska took six years to complete with a ROD issued in August 2018; the Pebble Mine EIS

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<sup>4</sup> <https://pebbleprojecteis.com/documents/eis>.

<sup>5</sup> <https://www.nrdc.org/sites/default/files/mccoys-pebble-mine-economics-letter-20190328.pdf>.

<sup>6</sup> <https://pebbleprojecteis.com/schedule>.

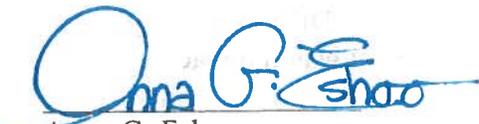
process is scheduled to be completed in two. This aggressive pace – coupled with the deficient DEIS – is indefensible.

The Pebble Mine directly threatens indigenous peoples, our maritime economy, and thousands of American jobs that rely on Bristol Bay. We urge the USACE to listen to the tribes, village corporations, commercial fishermen, hunters, anglers, and those whose lives and livelihoods depend on the integrity of the Bristol Bay watershed, and we urge the USACE to deny the permit for the Pebble Mine.

Sincerely,

  
Jared Huffman  
Member of Congress

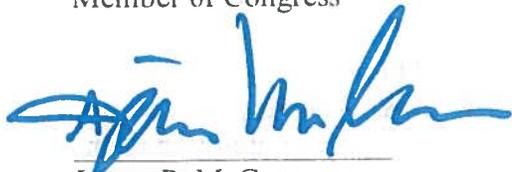
  
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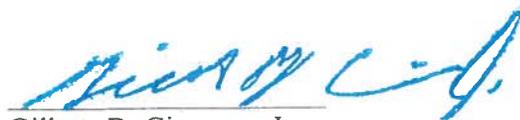
  
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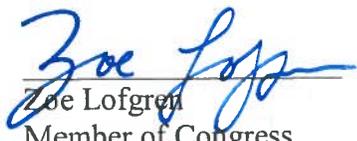
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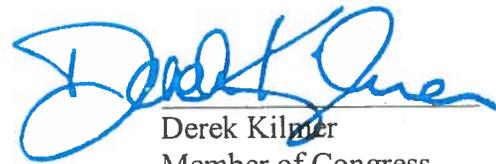
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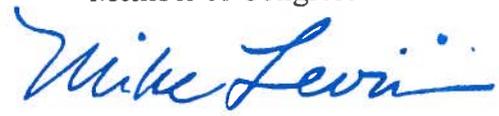
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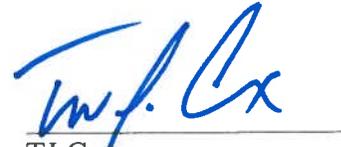
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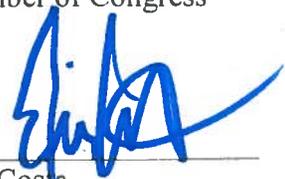
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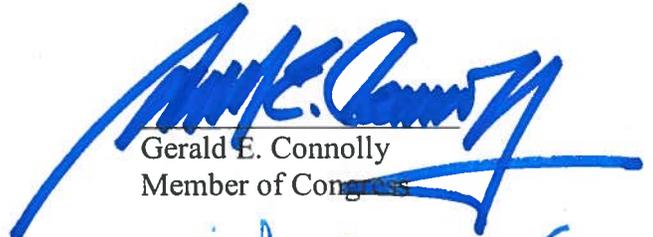
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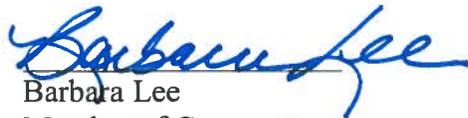
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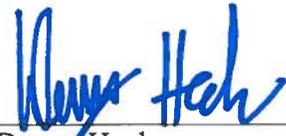
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