

## THE WILDLIFE SOCIETY

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27 June 2013

Office of Environmental Information  
(Mail Code: 28221T)  
Docket #EPA-HQ-ORD-2013-0189  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Dear Acting Administrator Perciasepe,

The Wildlife Society appreciates the opportunity to comment on the Environmental Protection Agency's revised draft of the Bristol Bay Watershed Assessment. Founded in 1937, The Wildlife Society is a non-profit scientific and educational association of nearly 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and habitats worldwide.

It is appropriate for EPA, exercising its authority under the Clean Water Act, to conduct a watershed assessment given the potentially large scale and long-term impacts of mineral development in the Pebble project area. In fact, it is especially appropriate given that the State of Alaska has thus far not conducted a similarly extensive assessment of the impacts of large-scale mining in the Bristol Bay watershed. This watershed assessment accurately demonstrates that allowing large scale mining in the Bristol Bay region will greatly and irreparably effect wildlife and its habitat, as well as damage one of the world's best hunting and fishing destinations.

Large-scale mining would jeopardize the entire Bristol Bay ecosystem even without any failures. Mine tailings and impacts from leaching of copper, stream acidification, and dredge and fill activities would impact dozens of miles of streams. Copper leaching alone could directly impact up to 35 miles of river beyond the mine site, and indirectly impact 51 stream miles. All of this assumes a best-case scenario where the mine tailings, which must be treated in perpetuity, are successfully contained. The waste stream from this mine will inevitably damage the salmon and the ecosystem for which they are a keystone species.

As the assessment notes, this is one of the world's best remaining salmon fisheries, which at an average run of 37.5 million fish, constitutes 46% of the world's sockeye salmon. The area is not only known for its fishery, but also supports high densities of water fowl, ptarmigan, brown bear, moose, and caribou that attract hunters from around the world. The assessment correctly identifies the importance of wild salmon to ecosystems in the Bristol Bay watershed. Salmon are a major food source for terrestrial predators such as brown bears, bald eagles, and in some areas wolves. Marine nutrients delivered by salmon directly or indirectly affect nutrient cycles in

freshwater and terrestrial ecosystems for a variety of species. Significant reduction in the salmonid food base would likely result in a cascade of changes to multiple species across several trophic levels and habitats.

We do have some changes to suggest to the Summary of Uncertainties and Limitations section (ES-28). We recommend that this section recognize the uncertainty of mine impacts to terrestrial wildlife in the project area, specifically, the effects of:

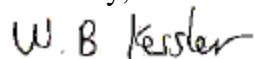
- (1) mine infrastructure and transportation corridors on the distribution and movements of large mammals,
- (2) alteration of aquatic habitats on waterbirds,
- (3) changes in salmon abundance on populations of their terrestrial predators such as brown bears and wolves; and
- (4) increased human access to sport and subsistence harvest of fish and wildlife.

The assessment should also acknowledge uncertainties regarding changes in food webs that could result if the salmonid food base is reduced, such as possible increased predation on moose and caribou if the salmonid prey base for brown bears is diminished.

Development of the Pebble deposit could result in a large-scale mining district that would be operational for only decades but generate mining waste that would potentially be hazardous for centuries. There are real risks associated with contamination of aquatic habitats from routine mine operations. The assessment accurately characterizes the potential for large-scale impacts resulting from failure(s) of tailings storage facilities. The assessment also appropriately considers the cumulative risks that result from associated infrastructure, such as pipelines and a transportation corridor on landscape ecological processes and wildlife populations.

The watershed assessment clearly demonstrates the significant value Bristol Bay provides to hunters and anglers across the country, and suggests it should be protected so that it may be enjoyed by future generations of sportsmen. We urge the EPA to move forward with a 404(c) determination under the Clean Water Act, allowing the agency to institute restrictions on mining activities that would threaten this incredible ecosystem.

Sincerely,



Winifred B. Kessler  
President