



May 31, 2019

## DRAFT COMMENT LETTER

Program Manager  
US Army Corps of Engineers  
615 G St, Ste 100-921  
Anchorage, AK 99501

To Whom it may concern;

On behalf of the North Pacific Fishery Management Council, I am pleased to submit these comments related to the Pebble Project Draft Environmental Impact Statement. The North Pacific Fishery Management Council (NPFMC) is one of eight regional councils authorized under the Magnuson-Stevens Fishery Conservation and Management Act tasked with conservation and management of our nation's Federal fisheries and fishery resources. The Federal fisheries off of Alaska are our nation's most productive, sustainable, and valuable fisheries, and the NPFMC is resolutely committed to maintaining the resources, value, and quality of North Pacific fisheries and the reputation that these fisheries have earned.

The Pebble project lies between two important large marine ecosystems (LMEs) where the NPFMC manages Federal commercial fisheries, the Bering Sea and the Gulf of Alaska. Bristol Bay is connected to the Pebble project through myriad rivers and streams that provide Essential Fish Habitat (EFH) to salmon stocks that are essential to the livelihood of thousands of commercial and subsistence fishers; it is the source of almost all of the sockeye salmon eaten by US consumers. Cook Inlet, in the Gulf of Alaska, also has large salmon runs and productive halibut fisheries that support thousands of commercial, recreational, subsistence, and personal use fishers. The economic and cultural value of these fisheries to Alaska, Washington, Oregon, and other states including domestic and international markets cannot be overstated and must be comprehensively evaluated in any analysis that considers development of a large-scale mine in the area.

The value and reputation of commercial fisheries in Alaska has been earned by consistently providing a superior product to global markets. Both the value and reputation of Bering Sea, Gulf of Alaska, and other Alaska fisheries are dependent on the pristine waters of Alaska's LMEs, and the Alaska Seafood Marketing Institute has worked to ensure that the well-earned reputation is a hallmark of North Pacific fisheries. Any analysis that considers development of a large-scale mine in the area must also consider reasonably foreseeable future actions, including the potential impacts not only on fish populations and habitat, but also on both the value and reputation of North Pacific fisheries.

Essential Fish Habitat for salmon species in Alaska includes the anadromous waters that provide spawning and rearing habitat for all five salmon species in Alaska. The Magnuson-Stevens Fisheries Conservation and Management Act calls for Federal agencies to consider the potential impacts of developments on Essential Fish Habitat, and consult with NOAA Fisheries to identify actions to avoid or mitigate such impacts. We understand that the USACE is currently working with NOAA Fisheries to schedule the assessment of potential impacts to Essential Fish Habitat, including cumulative impacts.

The NPFMC requests that the USACE schedule the assessment to coincide with a NPFMC meeting, and suggests that December 2019 would be an opportune time for the NPFMC to review and comment on the assessment.

The NPFMC again thanks the USACE for this opportunity to comment on the Pebble Project Draft Environmental Impact Statement.

Sincerely,

Simon Kinneen  
Chair