



## THE WILDLIFE SOCIETY ALASKA CHAPTER

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28 June 2013

Office of Environmental Information  
Docket # EPA-HQ-ORD-2013-0189  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, D.C.

Dear Acting Administrator Perciasepe:

The Alaska Chapter of The Wildlife Society appreciates the opportunity to comment on the draft Bristol Bay Watershed Assessment conducted by the EPA. The Alaska Chapter is one of the largest state Chapters of the The Wildlife Society. We have more than 200 members that are wildlife professionals employed by government agencies and private organizations.

The Alaska Chapter of TWS supports objective assessments of wildlife and fisheries resources in the Bristol Bay watershed, and evaluation of the possible effects of mineral development on those resources. We believe that it was appropriate for EPA to conduct such an assessment given its authority under the Clean Water Act. Such reviews are essential to future permitting for the Pebble development or other mining activity that may occur in the region.

The Assessment correctly identifies the importance of wild salmon to ecosystems in the Bristol Bay watershed. Salmon are the foundation of the region's food web, and 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 freshwater and terrestrial habitats for a variety of species. Significant reduction in the salmonid food base would likely result in a cascade of changes to multiple species across trophic levels and habitats.

We believe the risk assessment conducted by EPA is reasonable given that development of the Pebble deposit could result in a large scale mining district that would be operational for decades and would generate mining waste that would potentially be hazardous for centuries. The risks associated with contamination of aquatic habitats by

routine mine operations are realistic. It was appropriate for the Assessment to consider large-scale impacts that result from failure of tailings storage facilities given that there is little precedent for maintenance of mine waste over a period of centuries.

The Assessment appropriately considers the cumulative risks that result from associated infrastructure, such as pipelines and a transportation corridor. The Assessment also appropriately recognizes that development of smaller mines becomes more likely as infrastructure to support the Pebble project is established.

We recommend that the Summary of Uncertainties and Limitations in the Assessment (ES-28) be amended to better elucidate the uncertainty of mine impacts to terrestrial wildlife in the project area. Large scale mine operations and infrastructure could affect terrestrial wildlife in a number of ways. These include (1) effects on distribution and movements of large mammals, (2) alteration of aquatic habitat on waterbirds, (3) effects that changes in salmon abundance could have on populations of their terrestrial predators such as brown bears and wolves, and (4) the potential for increased human sport and subsistence harvest of wildlife that could occur with improved access to the region. The Assessment should also acknowledge uncertainties regarding changes in terrestrial food webs that could result if the salmonid food base is reduced. This includes possible effects of increased predation on moose and caribou if salmonid prey base for brown bears is reduced. Although some of these uncertainties cannot be addressed until more specific mine plans are in place, baseline studies are needed to facilitate future assessments.

Sincerely,

Jerry Hupp  
President, Alaska Chapter of The Wildlife Society