July 23, 2012

Office of Environmental Information (OEI) Docket (Mail Code: 2822T)
Docket # EPA-HQ-ORD-2012-0276
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Email: ORD.Docket@epa.gov
http://www.regulations.gov

Re: Comments on “An Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska” (Docket # EPA-HQ-ORD-2012-0276)

Dear Administrator Jackson:

On behalf of Environmental Entrepreneurs (“E2”), we write today in support of EPA’s draft “Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska” (“Watershed Assessment”). E2 is a non-partisan, national community of business leaders who promote strong environmental policy to grow the economy. We are entrepreneurs, investors, and professionals from every sector of the economy who collectively have been involved in financing, creating or working in the early development of more than 1,100 companies, which have created over 500,000 jobs. Our members manage over $90 billion in private equity capital that will flow over the next several years into new companies.

EPA’s Watershed Assessment provides a detailed analysis of the Bristol Bay watershed’s natural resources and the half-billion dollar annual economic benefits associated with those resources. That analysis is based on sound science and stakeholder input, and will be immensely important to inform future decision making.

The Assessment documents the incredible value and diversity of Bristol Bay’s fisheries and wildlife. It recognizes that Bristol Bay is home to the world’s largest wild salmon fishery, supporting tens of millions of returning wild salmon each year. According to the Watershed Assessment, Bristol Bay’s wild salmon fishery and other ecological resources provide 14,000 full and part-time jobs and are valued at about $480 million annually. The long-term value of its fisheries is equal to that of the proposed Pebble Mine – except that the salmon value is sustainable and distributed throughout the region and Pacific Northwest, as opposed to profiting only foreign mining conglomerates. Indeed, the 1,000 permanent mining jobs promised by the proposed Pebble Mine cannot compare to the 14,000 permanent and part-time jobs that Bristol Bay salmon already support.

Commercial and sport fishing play an integral role in the Pacific Northwest economy. For instance, around one thousand people from Washington hold commercial fishing permits in Bristol Bay and, in turn, support thousands more fishery and cannery jobs. This is a prime example of how renewable natural resources can create jobs and sustain communities.

But according to the Watershed Assessment, large-scale mining in the Bristol Bay watershed would have potentially staggering impacts, threatening wild salmon – and the economies and jobs that depend on them. The Watershed Assessment concludes that large-scale mining activities in the Bristol Bay watershed, like the proposed Pebble Mine, would eliminate or block 55 to 87 miles of salmon streams and destroy 2,512 to 4,286 acres of wetlands — key habitat for sockeye salmon and other fish. The Watershed Assessment also evaluates four types of large-scale mine failures and found that “at least one or more accidents or failures could occur, potentially resulting in immediate, severe impacts on salmon and detrimental, long-term impacts on salmon...
habitat.” Moreover, the Watershed Assessment determines a 98% probability of a pipeline spill with potential contaminant release into streams and wetlands.

The Watershed Assessment provides more than enough information to find with absolute certainty that large-scale mining in the Bristol Bay watershed would pose enormous harm to the watershed’s natural resources and the economic benefits associated with those resources. These findings are even more notable given the fact EPA’s analysis actually underestimates the overall risks.

In the Pacific Northwest, the health of the Bristol Bay salmon fishery is integral to the health of our economy. We must do everything we can to protect this resource – as well as all the business owners and operators who rely on it.

This is why we are asking EPA to take the next logical step and protect those resources. EPA has the power under section 404(c) of the Clean Water Act to prohibit or restrict the discharge of dredged or fill materials if they pose an “unacceptable adverse effect” on fisheries, wildlife, waters or recreational areas. EPA’s Watershed Assessment clearly demonstrates that large-scale mining would have unacceptable adverse effects on the Bristol Bay watershed. We therefore urge EPA to use its authority under section 404(c) to prohibit large scale mining in the Bristol Bay watershed.

Protecting the Bristol Bay watershed – and the thousands of jobs that rely on it – must be a top priority. Please act swiftly to ensure that Bristol Bay remains a national treasure\(^1\) for future generations.

Sincerely,

**James Marvin**
Founder & CEO, Federal Green Solutions.
Commander, US Navy (Ret.)
*Chapter Director, E2 Pacific Northwest*

**Michael Brian Orr**
Senior Computer Scientist, Adobe Systems.
*Chapter Director, E2 Pacific Northwest*

**Mark Liffmann**
Vice President of Business Development, Clean Power Research.
*Chapter Director, E2 Pacific Northwest*

**Trevor Winnie**
Research Analyst, CleanEdge.
*Chapter Director, E2 Pacific Northwest*

**Alex Wall**
Director of Consulting, Discover-e Legal, LLC.
*Chapter Director, E2 Pacific Northwest*

**Chris Dennett**
Systems & Analytics Manager - Account Management, Regence.
*Chapter Director, E2 Pacific Northwest*

**Nicole Lederer**
Co-Founder, E2

---