



March 5, 2019

Shane McCoy
U.S. Army Corps of Engineers – Alaska District
Anchorage Field Office, Regulatory Division (1145) CEPOA-RD
1600 A Street, Suite 110
Anchorage, AK 99501-5146

Dear Mr. McCoy:

The Pacific Seafood Processors Association (PSPA) requests that the review and comment period for the Draft Environmental Impact Statement (EIS) for the Pebble Project be extended to at least 180 days.

PSPA is a nonprofit trade association representing nine seafood processing companies operating in Alaska. Bristol Bay’s healthy and abundant salmon fisheries are a top priority for our members, who, along with our harvesting partners and hundreds of support sector businesses, consistently bring in more than 200 million pounds of salmon annually. This fishery has existed for more than 130 years, and today supports more than 12,000 jobs in harvesting, processing, and other direct activities that deliver healthy, sustainable sockeye to consumers in the U.S. and around the world.

As explained in our June 29, 2018 comment letter on the Pebble Project EIS scoping process, PSPA has great concerns about the information gaps and unresolved questions surrounding the project and its impacts on salmon habitat. We are particularly concerned about direct and indirect impacts that could affect salmon habitat and productivity, as all aspects of this salmon fishery – from spawning and out-migration to consumer buying decisions – are directly dependent on the health and sustainability of this fishery. The mining activities proposed by Pebble Limited Partnership (PLP) could lead to significant, permanent changes to the habitat upon which sockeye depend, leading to potentially permanent harm to Alaska’s sockeye fishery.

Given these high stakes, we find that the 1,400+ pages (not including appendices and accompanying documents) of the Draft EIS warrant careful, comprehensive analysis so that we can comment most effectively on the data and analyses it contains, assess any unresolved questions, engage analytical expertise, and provide the most informed input. Considering PLP took more than a decade of planning to submit its application for a Department of Army permit,

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the process of reviewing it should not be rushed. We find that 90 days is insufficient for allowing us and other stakeholders to provide meaningful and relevant comments, which have been and should be the Corps' priority in reviewing EIS documents.

The public deserves to be given reasonable time to comment, both verbally and in writing, on the proposed Pebble Project. Our goal is to promote a full, inclusive, and transparent analyses of the Draft EIS, so that all potential impacts and alternatives can be properly analyzed. Additional time and outreach will help advance that goal.

Thank you for considering our request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Glenn Reed', enclosed in a thin black rectangular border.

Glenn Reed
President

cc: Honorable Lisa Murkowski, Senator for Alaska
Honorable Dan Sullivan, Senator for Alaska
Honorable Don Young, Congressman for Alaska
Honorable R.D. James, Assistant Secretary of the Army for Civil Works
Col. Phillip Borders, U.S. Army Corps of Engineers