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Mr. Bob Perciasepe, Acting Administer
Docket #EPA-HQ-ORD-2013-0189
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460
Via email to ORD.Docket@epa.gov

Re: EPA's Revised Assessment of the Bristol Bay Watershed

Sir:

I write to strongly object to the methodology, procedures and protocols with which the EPA has developed an "Assessment of the Bristol Bay Watershed".

I am a professional mining geologist with +40 years of experience and in that time I have never seen a regulatory/permitting agency get so far out front of a potential resource project. EPA's assessment is totally predicated upon a hypothetical mine that in all probability could not be permitted under current environmental law and regulations. EPA's hypothetical mine does not reflect reality and therefore any conclusions re environmental impact predicted from such a flawed model are meaningless. It is particularly noteworthy that a significant number of the EPA appointed peer review members have strongly objected to this practice. That fact alone calls into question the scientific validity of the Assessment.

I would also like to register my extreme disappointed that this "Revised Assessment....." fails to acknowledge, address or incorporate many of the valid and constructive comments and/or recommendations that were provided by industry professionals following review of the 2012 draft Assessment. Such agency action does not inspire confidence in the final document.

EPA's Assessment of the Bristol Bay Watershed is seriously flawed and should be vacated for cause. A new assessment should be deferred until such time as the project proponent has submitted an actual mine plan.

Sincerely,



Paul S. Glavinovich