

6/28/13

Office of Environmental Information (OEI) Docket (Mail Code: 28221T)

Docket # EPA-HQ-ORD-2013-0189

U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

To whom it may concern:

I am a geologist with over 17 years of experience in both open-pit and underground mining, and as an Alaskan I have followed the EPA's Bristol Bay Watershed Assessment process with much interest since its inception.

I am severely disappointed by the EPA's continued failure to address significant flaws in the assessment and I also have significant concerns about the possibility that this flawed document may be used to preempt the rigorous and science based permitting processes that allow us to responsibly develop our resources here in Alaska.

The latest draft of the assessment completely ignores the direction that the EPA was given by the 2012 Peer Review Panel and continues to rely on a hypothetical mine scenario that could not be permitted under existing local, state, and federal laws.

The mine scenario used in the assessment is technically flawed and lacks sufficient detail for even the most basic scientific risk assessments. The scenario fails to come close to the standard of information that any project would be required to meet in a permit application. At a minimum this would normally include detailed plans for mine designs, mining rates, process flow sheets, recoveries, concentrate and tails composition, water management, water balances, waste rock characterization, and construction and operating plans for waste rock and tailings storage facilities. It would also include detailed information on the avoidance, minimization and mitigation plans that ensure that any project will have the least amount of impact to its surrounding environment.

Unfortunately, the current draft of the assessment relies on generic assumptions about mining activities to make broad, sweeping statements about potential impacts in the regions and thus remains fatally flawed and without scientific merit. This is a classic case of garbage in, garbage out.

In order to ensure equal protection and due process for the potential developers of resources in the Bristol Bay watershed, I would urge the EPA to halt work on the assessment until such time that permits are filed and a specific plan of operations can be evaluated. Failure to do so will have significant negative impact on natural resource development, not only in the Bristol Bay Region, but throughout Alaska.

Thank you for your consideration,



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