



Regional Seafood Development Assoc.

1120 Huffman Road • Anchorage, AK • 99515

June 20, 2010

Lisa P. Jackson, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dennis J. McLerran, Regional Administrator
U.S. Environmental Protection Agency, Region 10
Regional Administrator's Office, RA-140
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Re: Request that EPA initiate proceedings under 404(c) of the Clean Water Act as it pertains to discharges from proposed mining activities in the Bristol Bay area of Alaska.

The Bristol Bay Regional Seafood Development Association is a non-profit association comprised of all 1,865 Bristol Bay driftnet fishermen. These fishermen contribute 1% of their revenues to support the purposes of the Association as defined in Alaska state law. These purposes include adding to fishing infrastructure, improving quality, research and marketing. We currently spend over \$1 million annually on projects in each of these program areas.

The Bristol Bay salmon stocks are healthy. This is primarily due to a healthy environment and to management practices that assure ongoing abundance. Total wholesale value for salmon produced in 2008 (most recent data) was over \$300 million. On average, more than half of the world's sockeye spawn and are harvested in the waters of Bristol Bay. The commercial fishery of Bristol Bay is now in its 127th continuous year and is currently estimated to provide roughly 75% of the area's employment.

Our organization is dedicated to maintaining and improving this time-honored industry – even as salmon runs in other areas are in decline or have died. For the fishery to continue and prosper, the area's water and habitat must also be maintained.

Recent mining proposals threaten these various measures of abundance. Mining developers ask us to wait until permit applications are submitted before deciding on the mine. In our opinion, once permit applications are submitted, discussions will focus on how a mine should be built – not on whether this is the right place, whether existing durable businesses should be put at risk or whether this is the right type of development for local communities, the area's biological health or fishermen.

It appears to us that the 404(c) process offers an opportunity to look at the big picture question before getting to the "how" questions. Before discussing specifics such as how high the dams will be, for example – we should first look at the macro issue of whether mining is safe or appropriate in this particular area.

For these reasons, we ask that you please implement the procedures of section 404(c) of the Clean Water Act. To us they seem tailored to address just these types of questions in Bristol Bay, a truly one-of-a-kind area.

Respectfully,

A handwritten signature in black ink, appearing to read 'Bob Waldrop', with a long horizontal line extending to the right.

Bob Waldrop
Executive Director