



BRISTOL BAY
Regional Seafood Development Association

FOR COMMERCIAL FISHERMEN
BRISTOL BAY



Michael Regan, Administrator
Mail Code 1101A
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

October 2021

Dear Administrator Regan,

As members of Alaska's fishing industry that depend on the health of the Bristol Bay watershed, we write to thank you for your recent decision to seek a voluntary remand of the 2019 decision to withdraw EPA's 2014 Proposed Determination for Bristol Bay and reinstate 404(c) protections. We fully expect the Alaska U.S. District Court will grant EPA's motion to remand the decision back to the agency in the pending lawsuit challenging EPA's decision to withdraw the 404(c) predetermination. For nearly two decades our industry has been under the shadow of the proposed Pebble Mine and we have been fighting to save our jobs and way of life. There has never been a more clear or urgent time for the EPA to finish the job that it started in 2014 and finally protect Bristol Bay's wild salmon. We look to you for your leadership and a thorough, scientifically-sound process that ensures that Bristol Bay's fishermen are able to begin the 2022 fishing season free of the threat of Pebble Mine.


Bristol Bay is an exceptional place and a national treasure that's unmatched in its abundance. Over 66 million sockeye salmon returned to Bristol Bay this summer; more than ever previously recorded. These salmon support Bristol Bay's subsistence culture, a vibrant sport fishing industry, and a thriving commercial fishery that supplies over half the world's wild sockeye salmon, provides over 15,000 American jobs, and generates \$2.2 billion in annual economic activity. Our fishery is a torch-bearer for sustainable resource management, boasting record salmon returns over the past decade, and more than 135 years of sustainable commercial fishing. Bristol Bay's salmon have supported generations of fishing families, and today Bristol Bay's commercial fishing permit holders and crew hail from nearly every U.S. state.

The science unequivocally shows that all of this could be lost if the proposed Pebble Mine is developed in Bristol Bay's headwaters. The EPA's own Bristol Bay watershed assessment concluded that "a large-scale mining operation in Alaska's Bristol Bay would destroy a significant portion of the watershed, a pristine fishery that supports nearly half the world's sockeye salmon and dozens of Alaska Native villages that have relied on fishing for thousands of years." This conclusion was thoroughly backed by robust scientific comments submitted during the Army Corps of Engineers' permitting process. EPA has a clear authority and imperative to act under Section 404(c) of the Clean Water Act.

As fishermen with businesses that are deeply invested in the sustainability of Bristol Bay, as long as the region remains vulnerable to large-scale mining we cannot rest. Every season for over a decade Bristol Bay's fishermen have had to make major investments in their businesses and hire crew under the cloud of uncertainty and risk that the Pebble Mine poses. Simultaneously, Bristol Bay's fishermen have had to invest countless hours fighting to protect our livelihoods. Bristol Bay faces other critical challenges and opportunities all requiring the focus of our fishermen and Bristol Bay leadership. Addressing the impacts of climate change, supporting sustainable economic development, participating in sustainable fishery management and working to improve the quality and value of the salmon harvest all take energy and focus which has been consumed by the threat of the Pebble Mine for far too long.

With EPA's September 9th announcement that it plans to restart the 404(c) process and President Biden's assurances to establish protections for Bristol Bay, we finally have hope that the uncertainty and threat could finally come to an end. As you begin the 404(c) process, we urge you to make sure it remains on track and is informed by those most closely connected to and dependent on Bristol Bay's wild salmon. We ask that the 404(c) process be completed by the time Bristol Bay's fishing fleet heads out on the water next June for the 2022 fishing season. Protecting Bristol Bay's salmon fishery is not only the right thing to do by the people of Bristol Bay, but it's in the best interest of our country to establish certainty and stability for the thousands of Americans who depend on Bristol Bay's salmon. We cannot sustain another fishing season with the Pebble Mine hanging over us and our livelihoods. Therefore, we respectfully ask that your agency move quickly to finalize Clean Water Act protections for Bristol Bay and its wild salmon runs, and in doing so ensure stability and security for Bristol Bay's tribes, fishermen, and businesses, before another fishing season passes us by.

Sincerely,



Andy Wink
Executive Director
Bristol Bay Regional Seafood Development Association



Katherine Carscallen
Executive Director
Commercial Fishermen for Bristol Bay



Katie Enslow
Executive Director
Bristol Bay Reserve Association