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RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

July 1, 2019

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Submitted via: <https://pebbleprojecteis.com>

To Whom It May Concern:

The Resource Development Council for Alaska, Inc. is writing to comment on the U.S. Army Corps of Engineers' (USACE) Draft Environmental Impact Statement (DEIS) for the Pebble Project.

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC is writing in support of Alternative 1, the applicant's proposed project, as well as due process and the rule of law. Alaska utilizes a well-established permitting and review process, with multiple opportunities for public input, and review by local, state, and federal agencies. RDC believes the permitting process is the best place to make decisions about the merits of development projects in Alaska.

Further, it is the mission of RDC to encourage the responsible development of Alaska's natural resources, and to encourage new exploration and projects.

Alaska has enjoyed the benefits of mining for well over 100 years, with the last several decades seeing new innovations and advancements for protecting the environment. Alaska has stringent regulations to protect its lands and waters. As the Alaskan economy is dependent on natural resource development, including mining, it is vital to have predictable and efficient federal and state permitting processes that are based on sound science.

Alternative 1 is the newly-proposed mine plan for the Pebble Project where the footprint of the facilities has been reduced to minimize the impact to areas of known subsistence use, waterbodies, wildlife, and areas of cultural significance.

The DEIS is an early step in a very long process, which will also include multiple and ongoing opportunities for public input.

The DEIS demonstrates the project can be done in a safe way

RDC believes that every project, no matter the size or location, should have an opportunity to be reviewed under existing legal processes. If the process determines a project as designed cannot protect the environment and other resources, it will not advance. The process will not permit one industry or resource to advance at the expense of another. This DEIS demonstrates the project can be done without harm to other resources.

- The DEIS validates that the proposed project will not harm fish and water resources in the area.
- The DEIS notes the project will not reduce returning adult salmon to the Kvichak and Nushagak river systems and predicts no long-term change to the health of the Bristol Bay or Cook Inlet fisheries.
- The DEIS states that a catastrophic failure of the tailings facility is extremely unlikely and there would be no population impacts for fish from the tailings release scenarios evaluated.
- There will be no downstream impacts from the pit in post closure per the DEIS.
- The DEIS notes negligible impact to flows in the Upper Talarik Creek (UTC) during operations and no impacts to flows in the UTC after closure.
- The project will use two water treatment plants to ensure water discharge meets Alaska's criteria for water prior to discharge and will use a sophisticated water management plan that will strategically discharge water in all three nearby streams to benefit fish habitat.

Modern mining techniques are constantly improving and technology will only advance, and best management practices will be applied. Alaska has a good environmental track record with mining that coexists with fish and wildlife resources.

Project proponents have studied the environment to design a plan that best coexists with the surrounding elements. These studies have placed significant emphasis on analyzing the fish and water resources in and around the proposed project. These studies must be fairly evaluated and considered via the EIS review process.

Stakeholder input has been incorporated

Project proponents have greatly reduced the projected footprint of the proposed mine and have mitigated potential impacts in a way that will allow the mine to be responsibly developed. For example, there will be no major mine facilities in the Upper Talarik/Kvichak River drainage.

Further, the project has committed to no use of cyanide for gold recovery and has reduced the impact to wetlands to reduce impacts to fish.

The project has partnerships with local stakeholders

Although the project deposit is located on state land specifically designated for mineral exploration, the proponents have developed and maintained partnerships with local stakeholders, including:

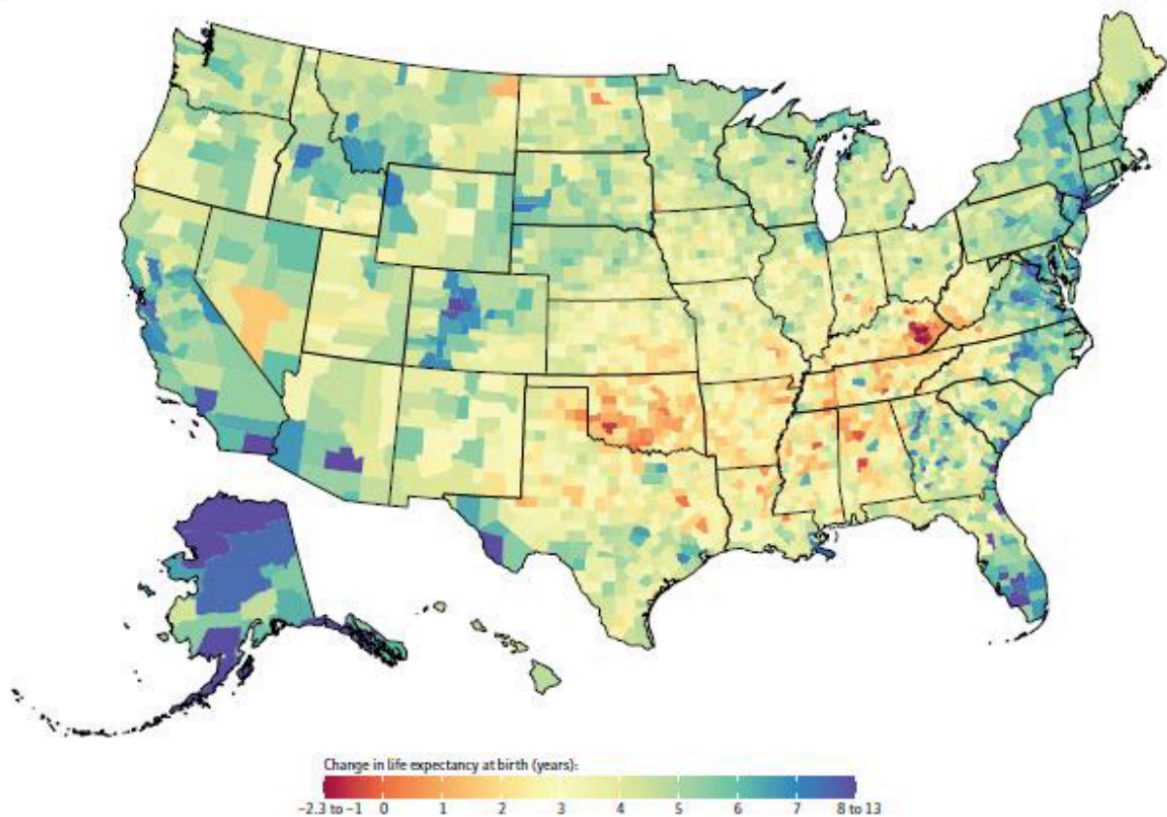
- A land access agreement with the Alaska Peninsula Corporation;
- Long-term business partnerships with other village corporations;
- Locals will continue to have a critical voice in the project and a seat at the table about local issues of concern, and regular briefings; and
- Land access agreement with Iliamna Natives Limited.

Economic impacts will benefit the region, Alaska, and the Nation

The project will create much needed job opportunities which will likely lead to reduced out-migration, helping to maintain rural schools and culture, including traditional ways of life. It is in a region of Alaska where few other economic opportunities exist. In addition to jobs and economic benefits, the project is expected to provide an estimated \$1 billion to the State over 20 years.

The project is expected to employ up to 2,000 people during the construction phase, and 850 people full time and all year during the 20 years of operations.

In rural areas such as the North Slope and Northwest Arctic Borough, industry jobs have helped generate a stable economy. Jobs enable self-sufficiency and provide a means to support a family. This is a major, personal direct benefit of resource development in Alaska and a new project like this will be no exception.



Compared with the national average, counties in central Colorado, Alaska, and along both coasts experienced larger increases in life expectancy between 1980

and 2014, while some southern counties in states stretching from Oklahoma to West Virginia saw little, if any, improvement over this same period.

An article in the Journal of the American Medical Association (published in May 2018) revealed the most dramatic increase in average life expectancy of Americans between 1980 and 2014 occurred in the North Slope and the Northwest Arctic boroughs, which saw an eight to 13-year increase in life expectancy at birth. The researchers' discussion indicated socioeconomic, behavioral and healthcare factors combined to explain 82 percent of the contributing elements in the change of life expectancy.

In 1977, North Slope oil production came on line and in 1990 the Red Dog Mine within the Northwest Arctic Borough began production. Both natural resource development activities generated a year-round, sustainable economy in their respective regions, providing jobs to local residents and sharply improving a

broad array of public services and much better access to quality health care in local communities. Oil and mineral production generated revenues, which funded education, construction of modern schools, healthcare programs and clinics, clean drinking water, wastewater treatment, and good-paying jobs, transforming both rural and urban Alaska. These socioeconomic factors and the expansion of life spans in the region should be acknowledged.

The DEIS highlights that project development could help the Lake and Peninsula Borough through revenue going to the borough and help maintain population numbers to avoid school closures.

The deposit would provide a much-needed commodity used in green technology

The resources from this project would likely be used for the growing worldwide demand for the products and technology related to renewables and the green economy. The mineral deposit at Pebble could be a vital resource for increasing Alaska, and America's, technology and energy resources

America's foreign mineral dependence has increased significantly in recent years. In 2018, the U.S. imported at least 50 percent of its supply of 48 mineral commodities, including 100 percent of 18 of them. U.S. mineral security is an emerging major issue as domestic vulnerabilities to foreign supply restrictions have become a rising threat to our economy, competitiveness, and national security.

With the growing worldwide consumption and dependence upon technical products (including electric vehicles) powered by critical minerals such as copper, the expanding demand for renewable energy technologies, and the development of projects with strategic national significance, the Pebble deposit has the potential to reduce our dependence on foreign suppliers and generate hundreds of millions of dollars in annual economic activity for Alaska, as well as significant revenues for state and local governments.

Conclusion

RDC has long supported both responsible development and due process. We urge the USACE to adopt Alternative 1 as its Preferred Alternative. Further, RDC applauds the USACE for its objective and transparent process in evaluating the proposed project.

Thank you for the opportunity to comment on this important project.

Sincerely,



Marleanna Hall
Executive Director