



united
TRIBES OF BRISTOL BAY

 BRISTOL BAY NATIVE ASSOCIATION

December 21, 2017

Via email and U.S. Mail to:

Tom Collier
Chief Executive Officer
Pebble Limited Partnership
3201 C Street, Suite 40
Anchorage, AK 99503

Re: Proposed Pebble Mine

Mr. Collier:

We write to reiterate Bristol Bay's opposition to your proposed mine. If built, it will put habitat that is critical to one of the world's greatest remaining sockeye salmon fisheries at risk and is therefore an unacceptable threat to the communities, economy, and way-of-life of the region.

Recent statements by yourself and others associated with the Pebble Limited Partnership (PLP) and Northern Dynasty Minerals (NDM) continue to obfuscate important facts about Bristol Bay, its people, and your potential development plans. As PLP is filing for a Clean Water Act permit on the eve of the Christmas holidays, we take this opportunity to again ask that you be more honest brokers with respect to the mine's development scenarios, potential impacts to the Bristol Bay region, and your relationship with Bay communities and people.

Our organizations collectively represent the interests of fifteen Tribal governments and nine Alaska Native village corporations throughout the Bristol Bay region, as well as the interests of BBNC's 10,300 shareholders of Aleut, Eskimo, and Athabascan heritage with ancestral ties to Bristol Bay and the economic interests and opportunities for the residents of BBEDC's 17 member communities throughout the region. Together, our organizations represent the economic, cultural, and social foundations of Bristol Bay, Alaska, home of the world's most valuable wild salmon fishery.

The proposed Pebble mine entails insurmountable obstacles related to its size, type, and location. These are problems that cannot be engineered or avoided in any meaningful way.

Mine Size

PLP is now stating that it will be pursuing a mine plan that entails a mine footprint of 5.4 square miles. At the same time, when you or other colleagues make presentations to mining investment audiences, you talk about Pebble as presenting a “generational opportunity” with proven reserve numbers that include the full extent of the ore deposit. These presentations also refer to the “new” mine plan as “the first phase” of development. It is clear that it is as much your intent now, as it was previously, to mine the fullest extent of the claims. This includes targeting exploration and development on 12 additional mineral deposits in the claim block area and turning the area into a mining district, as Ronald Thiessen recently alluded to at the Denver Gold Forum in September. In other words, your new mine plan is in reality the first phase of a segmented project, and your statements otherwise only serve to further validate our unyielding opposition to your project.

Mine Location

Ronald Thiessen’s recent presentation about Pebble at the Silver and Gold Forum in San Francisco was notable for many reasons. Foremost amongst these, he referred to the deposit area as “effectively in the middle of nowhere. . . .” You can imagine how our constituents and members reacted to this description. The headwaters of the Nushagak and Kvichak drainages are not the middle of nowhere. It is where the salmon that are so vital to our region’s economic and social fabric, first rear. It is also our home. Given that PLP regularly extols the level of its social engagement, this comment was very revealing. It is comments like these that undercut PLP’s credibility and why the vast majority of people in Bristol Bay do not put any trust in the company’s promises or commitments.

Fiscal Integrity

PLP is touting a new smaller mine plan and offering it to the public as the proving grounds for the project and your companies. PLP further portrays any future phases to the Project as hinging on the success of this first phase, as if there is a possibility that PLP might not seek to pursue any later phases. If there is any truth to this intent, then it should also be true that this first phase of development must be economically viable on its own. Yet PLP has yet to release an economic feasibility study for the project and you have directly told some of us that PLP cannot release such a plan prior to filing a permit application. Let us be clear: there are no legal impediments that preclude PLP from releasing an economic feasibility study now. PLP has spent the past few months advertising a mining footprint without first determining or releasing the economic feasibility of this plan, instead deferring a study of project economics until sometime in 2018 as indicated on NDM’s website. Given this suspect strategy and public pronouncements, it is incumbent upon PLP to prove to Alaskans that this new vision is economically viable without any additional, future development phases.

Resource Independence

PLP’s website and some of the company’s prior project presentations have plugged the project as a means of boosting America’s “resource independence.” The reality is that the market for any raw materials extracted at Pebble is Asia. Ronald Thiessen was explicit about this reality in his Silver and Gold Summit comments. There he told the audience that the mine site was, “close to tidewater which gives us good access to oceans and shipment to Asia.” Touting Pebble as having the potential to assist America’s resource independence is false and disingenuous.

Fishery Co-Existence

Yourselves and John Shively before you have always said that Pebble would co-exist with Bristol Bay's salmon and, if it could not, it should not be built. In PLP's current presentations, the company asserts that Pebble will affect less than 1/10th of 1% of the region's salmon fisheries and habitat. There is no credible scientific support for such a statement and, in fact, it is entirely at odds with the conclusions of the Bristol Bay Watershed Assessment; a document that went through two rounds of peer review and considered more than a million public comments.

PLP's percentage assertion is based on surface area of the total Bristol Bay watersheds that would be directly impacted, ignoring the productivity and importance of specific streams for salmon spawning and rearing habitat. Without question, the Nushagak and Kvichak watersheds where the Pebble ore deposit is located consistently produce over half of Bristol Bay's sockeye salmon. In 2017, those two watersheds produced more than 36 million sockeye salmon. In addition, the Watershed Assessment noted the particular importance of the North Fork Koktuli and the tributaries that Pebble would permanently alter or eliminate for coho and Chinook spawning and rearing habitat. Indeed, EPA found that the impacts to the North Fork Koktuli's coho and Chinook habitat (under a mine scenario smaller than Pebble is putting forth today) will be "unprecedented in the context of the CWA Section 404 regulatory program in Alaska."

Social License

PLP has gone to great lengths to tout PLP's concern for a social license. Yet the company does so without paying mind to the vast majority of Bristol Bay residents who do not and will not support your proposal. Bristol Bay's stakeholders have told PLP for years that our region is not interested in a large-scale mining development in our backyard, at the headwaters of the world's greatest remaining wild sockeye salmon fishery. And yet the company presses on and persists. If PLP believes in operating only where it has local support, it should and would have concluded long ago that Bristol Bay was not the place to build this project.

EPA Bristol Bay Watershed Assessment

Ronald Thiessen also told the Silver and Gold Summit audience that EPA has indicated that a mine with a footprint around the size of the mine that is currently proposed, i.e., with a 5.4 square-mile footprint, would be acceptable. This is patently false. The smallest mine size considered in the Bristol Bay Watershed Assessment had a footprint of 4.1 square miles, a good deal smaller than the mine footprint PLP is currently promoting. The Watershed Assessment concluded that a mine at Pebble with as small as a 4.1 square mile footprint would still present numerous unacceptable adverse impacts to the region and fisheries. And EPA has never sanctioned a mine smaller than 4.1 square miles. There is no fair way to read the Bristol Bay Watershed Assessment otherwise and it is disingenuous for anyone affiliated with Pebble to suggest any differently to any audience.

And perhaps most remarkably, PLP is entering the permitting process with the Proposed Determination in place after insisting for years that the Proposed Determination posed a bar. After thousands of comments from Bristol Bay residents, more than twenty-five thousand comments from Alaskans, and over a million comments from across the United States, all urging EPA not to rescind the Proposed Determination, the company now asserts that it can apply for a permit with the Proposed Determination still in existence.

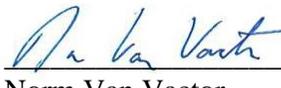
PLP has announced that it intends to file its Clean Water Act permit application with the United States Corps of Engineers on December 22nd, the last business day before Christmas. In other words, you will be filing your permit as everyone else is leaving for the holidays; another classic obfuscation tactic.

Your actions place PLP and NDM historically in line with the worst of the Outsiders who have come to Bristol Bay to exploit the region's resources. We did not let that happen in other contexts and our region will not let it happen to our salmon fisheries and salmon habitat at your hand. Your activities and presentations do a disservice to and show no regard for the people of Bristol Bay. Pebble Mine simply is not welcome in our region.

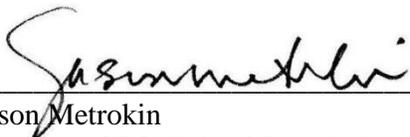
Sincerely,



Alannah Hurley
Executive Director, United Tribes of Bristol Bay
P.O. Box 1252
Dillingham, AK 99576
Phone: (907) 842-1687
Fax: (907) 842-1853



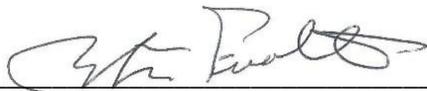
Norm Van Vactor
President/CEO, Bristol Bay Economic Dev't Corp.
PO Box 1464
Dillingham, Alaska 99576
Phone: (907) 842-4370



Jason Metrokin
President/CEO, Bristol Bay Native Corporation
111 West 16th Avenue, Suite 400
Anchorage, AK 99501
Phone: (907) 278-3602
Fax: (907) 276-3924



Ralph Andersen
President & CEO, Bristol Bay Native Association
P.O. Box 310
Dillingham, Alaska 99576
Phone: (907) 842-5257
Fax: (907) 842-5932



Myrtice Evalt
Interim Executive Director, Nunamta Aulukestai
PO Box 735
Dillingham, AK 99576
Phone: (907) 842-4404

Cc:

Philip Pascall, *Chairman & CEO, First Quantum Minerals Ltd.*
Ronald Theissen, *President, CEO & Director, Northern Dynasty Minerals Ltd.*
Members of the Pebble Limited Partnership's Advisory Committee
Honorable Bill Walker, *Governor of Alaska*

Honorable Byron Mallott, *Lt. Governor of Alaska*

Honorable Lisa Murkowski, *U.S. Senate*

Honorable Dan Sullivan, *U.S. Senate*

Honorable Don Young, *U.S. House of Representatives*

Honorable Pete Kelly, *Alaska State Senate President*

Honorable Bryce Edgmon, *Alaska Speaker of the House*

Scott Pruitt, *EPA Administrator*

Todd T. Semonite, *U.S. Army Corps of Engr's, Commanding General & Chief of Engr's Lt. General*

Michael Brooks, *U.S. Army Corps of Engr's Alaska District Commander Col.*