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**united**  
TRIBES OF BRISTOL BAY

November 30, 2016

***Via email to:***

**Commissioner Andy Mack**  
Alaska Department of Natural Resources  
550 W. 7th. Avenue, Ste 1400  
Anchorage, AK 99501  
[andy.mack@alaska.gov](mailto:andy.mack@alaska.gov)

**Re: Official Comment on Pebble Limited Partnership's Miscellaneous Land Use Permit Renewal Application (APMA A20176118)**

Dear Commissioner Mack:

On behalf of the United Tribes of Bristol Bay (UTBB), thank you for providing public notice and taking public comment on the Pebble Limited Partnership's renewal application for its Miscellaneous Land Use Permit (MLUP) (APMA A20176118). As you know, UTBB has discussed with DNR our continued concerns about the state of remediation efforts at the Pebble Mine site over the past year. While we are appreciative of DNR's willingness to meet with UTBB regarding our concerns, and for DNR's inspection efforts this summer, it was clear to UTBB that many of the issues we identified in our meetings were not going to be addressed through DNR's limited field work plans. As such, our tribes commissioned an independent inspection of the Pebble site following DNR's field inspection to directly examine the state of the company's reclamation efforts.

The full technical report and summary resulting from that inspection is attached as our official comments on Pebble Limited Partnership's MLUP renewal application. The report outlines results of the field work and highlights violations of Pebble's existing permit. In short, our scientists found acidic soils with high metal concentrations, leaking wells, dead vegetation, and improper drill casing closures at inspected drill sites; all causes of concern for safety and water quality in Bristol Bay.

Due to these existing violations and the uncertainty surrounding the Pebble Limited Partnership's future in Bristol Bay, UTBB recommends DNR take necessary steps in the new permit to address the environmental and safety

concerns outlined in the report. UTBB also recommends DNR require financial assurances from the Pebble Limited Partnership so the violations and issues discussed in the report will not be a financial burden to the State and Alaskans. Should DNR choose to renew the Pebble Limited Partnership's MLUP beyond 2016, UTBB requests DNR impose the following requirements on any MLUP issued to the company:

1. DNR should limit the duration of any MLUP to 1 year;
2. DNR should require the Pebble Limited Partnership to provide a reclamation bond to cover the expenses of material removal, site reclamation, and well-site maintenance;
3. DNR should require the Pebble Limited Partnership to complete a more robust monitoring program for all of its well sites;
4. DNR should require the Pebble Limited Partnership to remove all materials unnecessary for ongoing reclamation work; and
5. DNR should make explicit that it will not renew the MLUP after 2017 if the above are not completed.

Please show the leadership Alaskans need and stand up for our people, our land, and our fisheries and hold the Pebble Limited Partnership accountable and stop the blanket renewal of the MLUP at the end of 2016. Alaskans cannot afford to get stuck cleaning up the mess left behind in Bristol Bay.

We look forward to working directly with you and your staff in the future to ensure that the national treasure of Bristol Bay is protected forever.

Quyana,



President, United Tribes of Bristol Bay

cc:

Governor Bill Walker

Lt. Governor Byron Mallot

Deputy Commissioner Ed Fogels

Jack Kerin, DNR Mining Geologist IV

Hollie Chalup, Natural Resource Specialist II, Alaska DNR