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March 30, 2018

William Groom, Geologist II AKDNR/DMLW
3700 Airport Way
Fairbanks, AK 99709

Re: APMA F20182875 IPOP LLC.

Dear Mr. Groom:

Kawerak, Inc. is the regional non-profit tribal consortium of the Bering Strait Region. Kawerak's Board of Directors is comprised of the Presidents of the 20 tribes of the Bering Strait Region. Kawerak offers numerous programs and services to the 16 communities in the region. Kawerak, Inc. is supportive of economic development that is both responsible and sustainable.

Kawerak, Inc. Opposes APMA F20182875 IPOP LLC. permit application for the following reasons.

- Alaska Statute 16.05.258 – The Subsistence Priority clearly states that subsistence use is first priority above all else including commercial and sport. The IPOP LLC. mining operation is clearly a commercial entity; if they are permitted to operate this will give precedence to commercial users over subsistence users. All aspects of subsistence in the Solomon area, both in river and offshore, will be negatively impacted if this mining outfit is allowed to operate. The area being considered for mining by DNR is home to numerous subsistence users and their camps they have utilized in the area for generations. Camps are for harvesting birds and marine mammals in the spring & fall, harvesting salmon in the summer & fall and harvesting moose and berries, families gather all throughout fall to ice fish for what is locally known as Tomcods or Saffron Cod.
- Alaska Statute 16.05.790 Hunter Harassment Law - It is against state law to intentionally obstruct or hinder another person's lawful hunting, fishing, trapping or viewing of fish and game. Illegal activities include positioning one's self in a location where human presence may alter the behavior of fish or game another person is pursuing. It is also illegal to create a sight, sound, smell, or physical stimulus to alter the behavior of fish and game another person is attempting to take. If this mining operation is allowed they will be in clear violation on all of the above.

- The Flambeau, El Dorado, Bonanza & Solomon Rivers as well as offshore waters is the habitat for numerous seals during the ice free months due to the large amounts of fish returning to spawn. Ringed & Bearded Seals are also known to inhabit this area even during the winter months eating on Saffron Cod, shrimp, clams, flounder and other benthic prey. Two of the four ice associated seals Ringed & Bearded have been placed on the ESA list as Threatened. It is true the listing is due to the predicted lack of sea ice in the future, however, a more immediate threat to Ringed and Bearded Seals livelihood would be possible loss of ability to forage for food. In front of Nome where the other smaller dredges are allowed to operate they disturb seal behavior all summer causing many seals to move out of the area completely. Up and down the coast dredges negatively impact seals and their ability to forage for food. Ex: In 2016 the AU Grabber showed up at the mouth of the Sinuk River. The Sinuk River every summer has hundreds of seals that congregate at the river mouth waiting for salmon. As soon as the AU Grabber showed up all the seals left the area immediately. The AU Grabber mined for a day or so right in the middle of the river mouth blocking off all salmon at the beginning of the run. The AU Grabber only mined for about a day but the seals did not return to the river mouth for 2-3 weeks. If the IPOPOP LLC. mining operation is allowed to operate they will have a greater negative impact because of the size and duration of their operation near the Bonanza Bridge area.
- The Flambeau, El Dorado, Bonanza & Solomon Rivers are all anadromous. The offshore mining outfit being considered is substantially bigger than other vessels in the area. The turbidity caused by this vessel could possibly make it so any/all salmon could not enter any one of the rivers to spawn. The IPOPOP LLC. offshore mining operation will be substantially bigger than most of the offshore dredges that are currently allowed to operate in the Nome area. The permit that IPOPOP LLC. has applied for states the tailings coming off the back of the vessel will be gravity fed, however, according to the video provided on their website the offshore dredge will shoot the tailings into the air and some 80 feet out in a zig zag pattern. The turbidity coming off this vessel's activity will be substantially greater than most. Alaska Department of Fish & Game staff in Nome have commented on how turbidity from even the smaller offshore mining vessels causes salmon to completely avoid the plume in the water and redirect their course until they can migrate around the plume safely. These plumes in the ocean from the tailings from mining vessels can extend for miles & miles completely altering salmon behavior.
- The mouth of Flambeau & El Dorado, Safety Lagoon, Bonanza Channel and the lower portion of the Solomon River are all wetlands and home to thousands upon thousands of migratory birds including Spectacled Eiders which are on the ESA list as Threatened, these birds are reported to nest in the area. Another species of concern are Arctic Terns. For unknown reasons the Arctic Tern population has decreased over the past few years. Arctic Terns are known to frequent the area, nest and forage for food and would be competing directly for food in the same area being considered for mining.

- We have reviewed the IPOP LLC; Rivers of Gold mining video provided on their website and have other concerns. It is our understanding the area being considered for mining is offshore only. However, the owner of this operation in the video they have provided on their website talks about and shows specific areas that are not offshore i.e. up the El Dorado, Flambeau, Bonanza, Solomon rivers and they show specific areas farther north up into Grand Central River, Salmon Lake & Crater Creek. As mentioned most of these rivers are anadromous rivers. The communities of Brevig Mission, Teller & Nome depend on salmon returns, for generations, to fill freezers for the winter. Any mining on any of these rivers will have negative impacts to fish runs & subsistence users.
- The Northern Norton Sound in the past was faced with a chum salmon crash that lasted approximately 30 years. At the beginning of this crash subsistence users were faced with closures. As the chum salmon in Northern Norton Sound slowly started making a comeback subsistence users still had strict bag limits. Presently the chum salmon runs have returned to the rivers meeting or exceeding the escapement goals set forth by ADF&G with the exception of one, the Solomon River. The Solomon River was either closed completely or had very strict bag limits for nearly 40 years. For unknown reasons up until a couple of years ago the Solomon River could not meet escapement goals, trout & grayling continue to struggle in this river as well. Was the chum salmon, trout and grayling crash on the Solomon River due to the old mining that was done up river? This issue has been raised before specifically for Solomon. Will the mining operation that is currently being considered negatively impact the fish runs as well? Will subsistence users have to bear the burden of conservation for another 40 years on the Solomon River if this operation is allowed?

Thanks for your time and consideration as well as the opportunity to provide comments on APMA F20182875. Again Kawerak, Inc. is opposed to the State of Alaska issuing permit for this mine operation. If you have any questions please feel free to contact Brandon Ahmasuk; Kawerak, Inc. Subsistence Resources Program Director @ 907-443-4265, contact email sub.dir@kawerak.org

Sincerely,

KAWERAK, INC.



Melanie Bahnke, President