

Northern Norton Sound Fish and Game Advisory Committee

Nome, Alaska

March 29, 2018

William Groom, Geologist II

AkDNR/DMLW, 3700 Airport Way, Fairbanks, Ak. 99709

Dear sir,

The Northern Norton Sound F&G Advisory Committee (NNSAC), a state supported committee with representatives from the communities of the Seward Peninsula coast from Elim to Shishmaref, met March 28 to consider fish and wildlife management. The subject of the Rivers of Gold mining project raised some consternation. The idea of mining in the estuarine waters of Safety Sound/ Bonanza Channel was a red flag to local residents. The promotional video suggests that the mining plan includes the portions of the Lower Bonanza River and a couple miles of Bonanza Channel from the Solomon Entrance to the Bonanza River. We, NNSAC, believe this is a critical habitat which supports important fish species and migratory birds. This fish and wildlife in turn supports human use and is the reason there are a number of subsistence camps on the shores of the channel and river in close proximity of the area proposed for dredging.

We recommend a review of the report:

Nemeth, M., B. Williams, B. Haley, and S. Kinneen. 2006. An ecological comparison of Juvenile salmon from two watersheds in Norton Sound, Alaska: migration, diet, estuarine habitat and fish community assemblage. Final report for the 2003 & 2004. Prepared for the Norton Sound Disaster Relief Fund by LGL Alaska Research Associates, Inc. and the Norton Sound Economic Development Corporation.

This research documents residency of fishes in the estuary, notably chum salmon and contrasts Safety Sound to the Nome River estuary. The small estuaries of most rivers of the Seward Peninsula have a strong out-migration of juvenile salmon during the month of June. Safety Sound had two peaks of out-migration, mid-June and late July. The later migration was composed of significantly larger individuals, indicating they fed and reared in the protected waters. The regulations that create a window for juvenile migration during June were based on the migratory pattern documented on streams like the Nome river. This study documents the importance of creating migratory windows in both June and July.

During the July sampling, other fishes were captured incidentally to salmon. Saffron cod were common with stickle backs and smelt frequently present but less abundant than salmon. Stomach analyses for the chum salmon juveniles found nearly equal amounts of dipteran larvae and small marine invertebrates at the outlet. Dipterans became the predominant food as sampling locations approached the rivers. This mix of marine and fresh invertebrates allows for an easy transition to saltwater minimizing the high mortality typical of the fresh to salt transition.

Safety Sound and Bonanza Channel are important eel grass beds. Migratory water fowl, particularly tundra swan, stage on these water bodies, especially in proximity to the Bonanza River mouth in late July and August until their migration in late September. Literally thousands of swan, ducks and geese are present in late summer. The photography of the promotional video, utilizing a helicopter, left the impression that of an underutilized habitat, but that is a false impression.

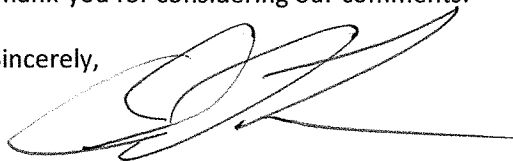
Safety Sound and Bonanza Channel support a great deal of human use in the form of subsistence gathering from mid-July until the ice is a foot thick. The seasonal round starts with salmon fishing in July, August and early September. Bird harvesting occurs in almost the same timeframe. Cod fishing occurs primarily September and October. Seal harvesting utilizes those same dates. One should not forget berry harvesting which primarily occurs during August. The seasonal camps at Solomon, Bonanza Channel and Nook (Safety Sound Entrance) number well over 100. These camps generally consist of a permanent cabin and associated equipment. A few of which are equipped to support winter activities as well as summer and fall. These camps are well developed, and although built of modern material, there is extensive evidence of pre-contact house structures throughout the area. This area supported far more people than Nome historically.

The Department of Fish and Game and area residents have worked hard to help the salmon of the Subdistrict recover from the crash of the 1980s. Severe restrictions on harvest were enacted for a decade or more, habitat projects and salmon planting projects were conducted, and escapement monitoring projects have been funded on these watersheds. To permit a mining project that would interrupt the salmon migration and drive away the migratory birds of such a publicly used area would be jaw-dropping. Few people are aware of the permitting comment period. This is not a path to public participation in the permitting process.

In summary, The NNSAC strongly opposes permitting mining on Bonanza Channel because of the likelihood of environmental disruption of the most accessible wetlands on the Nome Road System. A large-scale dredge operating in the migration path of a recovering salmon stock that has seen significant public and private funding would negate that investment both monetarily and emotionally. The displacement of migratory birds could have far reaching impacts and certainly will have local impact. Allowing a project of dubious and short-term nature on this scale to disrupt centuries of human use and tradition is just poor management of state resources.

Thank-you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'CL', written over a horizontal line.

Charles Lean, chair; Nate Perkins, vice-chair; Brandon Ahmasuk

Cc; Hazel Smith, Boards ADF&G

Jim Menard, Com. Fish. ADF&G