

May 15, 2024

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To the Nome Common Council:

CITY OF NOME  
CLERKS DEPARTMENT

The agenda item of the May 14 meeting regarding the gold dredging of Bonanza Channel deserves more attention. This operation is ill-advised and will have adverse effects in our community. The recent reversal of the federal permit rejection smacks of cronyism. For roughly two years, the permit was denied after a lengthy review by the public, USFWS, NMFS, and EPA, not to mention the Alaska Corps of Engineers (COE). The findings were focused on the Clean Waters Act and the lasting damage forecast on the Submerged Aquatic Vegetation (SAV). This SAV is the foundation of the fish and wildlife resources of the Safety Sound/Bonanza Channel. Any local resident would know the importance of this area to those who harvest those resources. Solomon Native Corporation has commented on that subject. Kawerak, NSHC, Bering Straits Native Corp. and NSEDC have all weighed in as well. Several individuals from the birding community have commented too. There is a widespread lack of recognition of just how important the area is to tourism in Nome. Using a survey of tourism from ten years ago, birders spent about \$1500 per individual for a four day stay in Nome, not including air fare. Two-year-old data from birder observation lists estimated about 500 birders per year. This back-of-the-envelope math would render about \$750,000 per year. This sort of tourism is expanding, as is the much less lucrative tour ship activity. The difference is, the individuals spend far more and many return several times, up to ten times! The main attraction to visit Nome is this lagoon system. Both the Teller Road and the Kougarok Road are secondary attractions. To put this in bird terms, this is the goose that lays golden eggs for Nome and IPOP would essentially kill the goose!

The COE blew off the other agency concerns of altering the ecology of the lagoon in their reversal. They considered the SAV to be eradicated annually and to grow back from seed annually, contrary to the other agency's cautionary statements. The situation is much more like a lawn that comes back from sod annually. Sod takes years to be established. Another statement alluded to the bottom structure to be in a dynamic state of change. This is not true. When you fly over Safety Sound one can observe craters underwater NE of the bridge. Those are the result of jettisoned bombs during WWII. Its been 80 years and they are still visible. The pits are revegetated, but the rims are too shallow and are barren still. The reclamation plan is critical to the outcome of this project.

This project is going to try to contain silt with a curtain around the operation. They will launch and dredge their way from south to north across the channel. This would require a curtain across the channel, thus blocking fish and human movement of this navigable, anadromous waterway. That is contrary to both DNR and ADF&G regulation/statutes.

Why does the harbor dredge have stricter operational requirements than this experimental mine? The harbor dredge is forbidden to work during the outmigration of juvenile salmon. The harbor must provide for free movement of both juvenile and adult fish, breaches in the causeways. The dredge cannot work on the point of Belmont Point due to the inability of the cutter head to digest the clay

hard pan. The IPOP dredge is essentially the same as the harbor dredge. The Snake River and Bonanza Channel are anadromous waterways the rules should be the same. The hard pan at Belmont Point is the gold bearing false bedrock that still is producing gold on Submarine Bench. IPOP has the wrong tool for the job.

IPOP is supposed to demonstrate the project is economically feasible. They have been unable to conduct a core drilling sampling program despite being permitted. They have maybe 13 core samples which were evaluated in-house to serve as measures of values they could reach. Their evaluation of the cores was flawed and yet they have not been required to show reliable sampling to prove up this project. Instead, the COE gives them 5 years to see what they can do! "Nome is a remote small community with similar resources elsewhere. Affected users could just use those other resources and places." That is unacceptable! If they cannot manage to conduct a sampling program, why would they be expected to manage a full-scale mining operation? What kind of business would use investor money to prospect for gold while they sold the project as an operating mine?

The City of Nome will be affected by this project despite it being outside City limits. The widespread concern of residents has been expressed in years-worth of testimony. Hunting, fishing, tourism and local day trippers are all in opposition to this project. The City needs to compare the costs and benefits of the project to the community and act accordingly.

Thank you for your attention.

A handwritten signature in blue ink that reads "Charlie Lean". The signature is fluid and cursive, with "Charlie" on the top line and "Lean" on the bottom line.