



NOAA
FISHERIES

Proposed IPOP Mine. Nome, Alaska

Seanbob Kelly & Stefanie Coxe
Habitat Conservation Division
11/12/20

What is the IPOP Project?

As proposed, the gold mine would be located in Bonanza Channel/Safety Sound estuary near Solomon, Alaska approximately 25 miles east of Nome Alaska.

If developed,

- The IPOP Mine would be the largest suction cutterhead dredge mine in Alaskan History.
- Producing nearly 1 million Cubic Yards of dredged material per year.



NOAA
FISHERIES

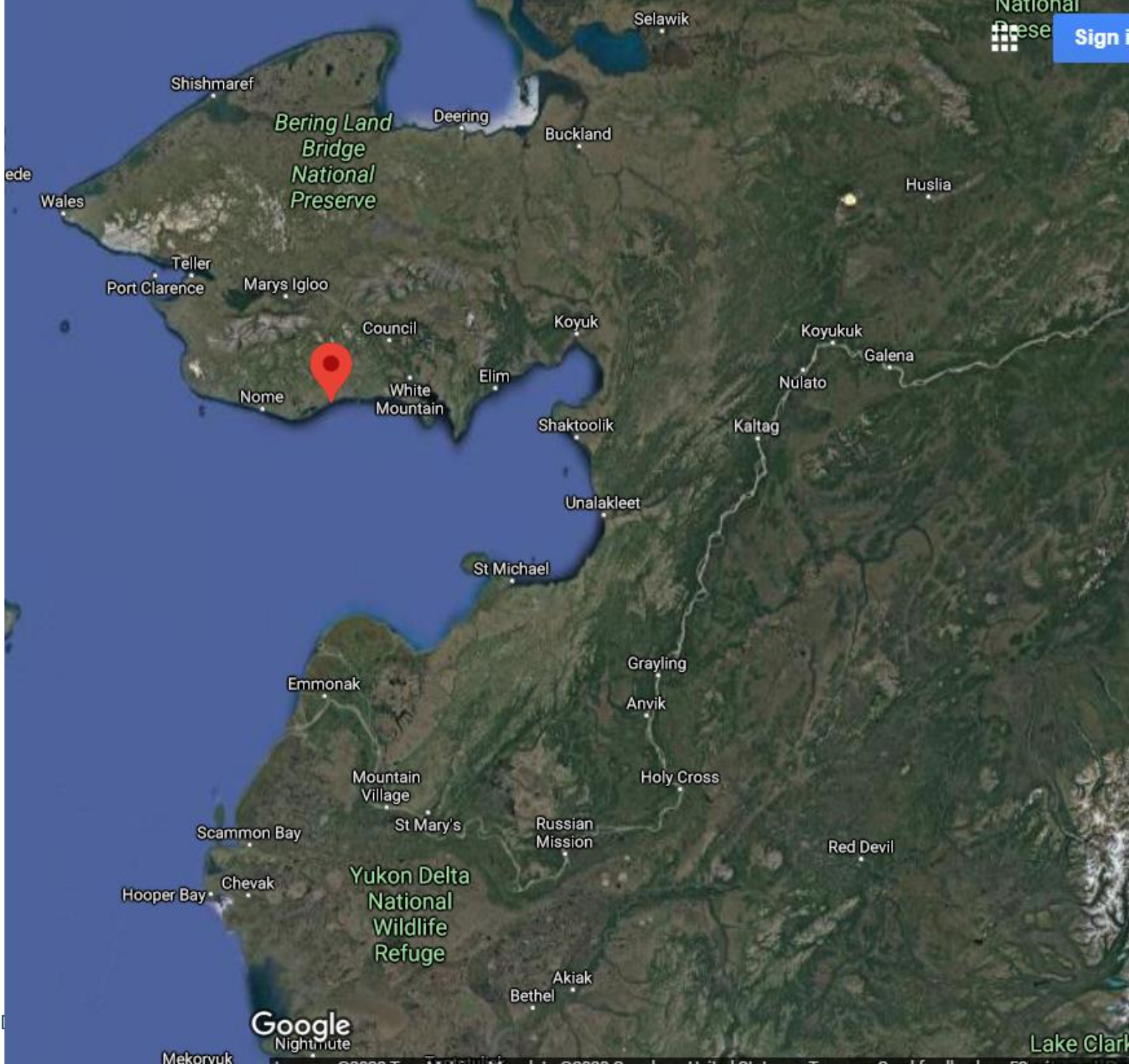




Image Landsat / Copernicus
Image IBCAO

Google Earth



Uncertainties about the Mine's Size and Lifetime

- The IPOP 2020 Narrative and Plan of Operations for the Bonanza Channel Placer Project did not meet the requirements for an Essential Fish Habitat Assessment.
- The project lifetime would be 5 or 10 years, conflicting statements.
- The USACE Public Notice provides details for 14 claims but request authorization to dredge 32 claims.



Timeline for the Proposed Mine

- March 2018- IPOP applies for first exploration permit (APMA 2875).
- April 2018- NMFS received a Draft EFH Assessment that did not meet content requirements.
- May 2018- USACE withdrew the permit application because it was incomplete.
- September 2018- NMFS sends Memo to USACE about small scale core sampling / exploration, i.e., General Permit Agency Coordination (GPAC).



“HCD has determined that the proposed action may adversely affect EFH. Adverse effects would be minimal and temporary” NMFS, September 24, 2018



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

September 24, 2018

Essential Fish Habitat

The Fishery Management Plan for Pering Sea/Aleutian Islands King and Tanner Crabs (BSAI Crab FMP) identifies EFH for Norton Sound red king crab (*Paralithodes camtschaticus*) in marine waters near the proposed project site. This EFH does not overlap with the project as currently proposed, however HCD recommends that USACE considers the importance of this fishery when analyzing effects of the anticipated future large scale project.

Additionally, EFH for all five species of Pacific salmon (*Oncorhynchus* spp.) are identified in the FMP for the Salmon Fisheries in the EEZ off Alaska. Saffron cod (*Eleginus gracilis*) EFH is not designated in the project area, but anecdotal accounts of saffron cod presence were mentioned several times during early agency scoping.

EFH Requirements

- Conducting work in dynamic estuarine waters, as opposed to directly within wetlands or marine habitat;
- Limiting dredged material to a 10-foot diameter and 5-foot depth area; and
- Adhering to stipulations set forth in Alaska Department of Fish and Game Fish Habitat Permit FH-18-III-0167

As stated previously, after considering the EFH information provided during early coordination and within the GPAC, HCD does not require a separate EFH Assessment for the project as currently proposed. However, HCD would like to be informed of any findings from the exploration program that have relevance to the following—

- Results from environmental baseline studies, including bathymetric, eelgrass, and water quality information.

“HCD has determined that the proposed action may adversely affect EFH. Adverse effects would be minimal and temporary because they would be localized to the area and time... considering the EFH information provided ... HCD does not require a separate EFH Assessment for the project as currently proposed... NMFS HCD understands that IPOP, LLC is only proposing to conduct exploration activities and environmental baseline data collection at this time ... Should the proposed action change significantly, HCD wishes to be informed of any such changes in order to reassess our response”

- Minimizing the number of drill sites to accomplish the project,



NOAA
FISHERIES

Continued Contact in 2019

- March 2019- IPOP submits an Individual Permit Application with USACE.
- April 2019- USACE sends letter to IPOP saying their application for permit is incomplete.
- April 2019- IPOP Appeals.
- May 2019- Corps responds the IPOP appeal:

"Neither special conditions associated with granted permits nor granted Nationwide Permits in themselves, are considered appealable actions, pursuant to 33 CFR Section 331.4."



NOAA
FISHERIES

State Exploratory Permits, 2019

- August 2019- Alaska Department of Natural Resource issue permit for exploratory core sampling.
- September 2019- NMFS sends memo to USACE:

“NMFS maintains its September 24, 2018 determination; an EFH Assessment is not necessary at this time.” NMFS September 23, 2019



2019 -2020 Progress To Core Drilling

- November 2019- IPOP submits a letter Titled: *Completion and Amendment of March 20, 2019 Individual Permit Application*
- February 2020- The USACE sends a letter to IPOP reminding them about the EFH and ESA process if the project *shifts* from Exploration to Mining.





UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668
September 23, 2019

Colonel Phillip J. Borders
U.S. Army Corps of Engineers
P.O. Box 6898
JBER, Alaska, 99506-0898

Re: POA-2018-00123 Bonanza Channel/Safety Sound

Dear Colonel Borders:

The National Marine Fisheries Service (NMFS) Habitat Conservation Division (HCD) has received the U.S. Army Corps of Engineers' (USACE) General Permit Agency Coordination (GPAC) for the re-verification process of the Individual Permit issued under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. On September 24, 2018, NMFS submitted formal comments on the original GPAC for IPOP, LLC exploration program consisting of GeoProbe drilling and environmental baseline studies in several mining claims

"NMFS concurs with the USACE determination that the described activity may adversely affect EFH in the project area... adverse effects would be minimal and temporary because of the small scale of the activities and they would be limited to Safety Sound... NMFS maintains its September 24, 2018 determination; an EFH Assessment is not necessary at this time."

Fisheries in the EEZ Off Alaska (Salmon FMP). NMFS does not define EFH for Dolly Varden or humpback whitefish.

NMFS notes the project described in this revised GPAC would occur during salmon spawning migrations to the local anadromous waters and not during ice covered months as previously required. Moreover, two new proposed boreholes would be drilled within 0.5 miles of the mouth to the salmon bearing Solomon River. Both of these new actions do not comply with our initial EFH Conservation Recommendations in our 2018 letter. Therefore, NMFS concurs with the USACE determination that the described activity may adversely affect EFH in the project area.

However, the adverse effects would be minimal and temporary because of the small scale of the activities and they would be limited to Safety Sound, thus limiting the impact footprint. Further, NMFS recognizes Alaska Department of Fish and Game's Fish Habitat permits FH19-III-0145 and FH19-III-0166 authorize these changes within the State of Alaska's Title 16 Permit process.

ALASKA REGION - <http://alaskafisheries.noaa.gov>



NOAA
FISHERIES

Project Escalates Summer 2020

- End of February 2020- USACE issues permit for 175 cores samples.
- May 2020- IPOP petitions to increase the number of core samples to 235.
- May 15 2020- IPOP informs USACE they intend to start full-scale mining in *two weeks*.
- June 2020- NMFS submits informal early coordination comments describing EFH Assessment requirements and IPOP's data gaps and inconsistencies.



Petition to Begin Mining June 1, 2020

- June & October 2020- NMFS informed the Council about the proposed mine.
- September 2020- NMFS sends formal memo to USACE

“We [NMFS] are concerned that this proposed Federal action to permit these mining activities has the potential for significant environmental impacts, and therefore request that USACE consider preparing an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA).





UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

September 14, 2020

Colonel Damon Delarosa
U.S. Army Corps of Engineers
P.O. Box 6898
JBER, Alaska, 99506-0898

Re: Public Notice of Application for Permit POA-2018-00123, Bonanza Channel/Safety Sound

Dear Colonel Delarosa:

The National Marine Fisheries Service (NMFS) has reviewed IPOP's application to the U.S. Army Corps of Engineers (USACE) to produce gold from their mining claims in the Bonanza Channel/Safety Sound area near Nome, Alaska. IPOP plans to discharge 4,973,992 cubic yards of material into 172.7 acres of waters of the U.S. to construct and maintain an access channel, dredge disposal areas, mining channel, and a mine camp and staging area. Equipment to be used

"Draft EFH Assessment is not complete or accurate in its description of the project, analysis of impacts, or identification of EFH and federally managed species impacted. To initiate EFH consultation for these actions, we request a revised EFH Assessment... request that USACE consider preparing an Environmental Impact Statement"

project, analysis of impacts, or identification of EFH and federally managed species impacted. To initiate EFH consultation for these actions, we request a revised EFH Assessment that meets the requirements in Federal regulations (50 CFR 600.920(e)).

Further, we are concerned that this proposed Federal action to permit these mining activities has the potential for significant environmental impacts, and therefore request that USACE consider preparing an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA).

As part of early coordination, we are providing comments to assist USACE and the applicant in preparing an EFH Assessment.



NOAA
FISHERIES

Summary

- NMFS sent 3 formal letters in three years.
- Each letter NMFS provided included EFH Conservation Recommendations and guidance for analyzing impacts to EFH, species lists, need for citations, and highlighting IPOP data gaps.
- NMFS provided similar comments in meetings with IPOP representative and other State and Federal Agencies.
- NMFS has not received a completed EFH Assessment.



NOAA
FISHERIES

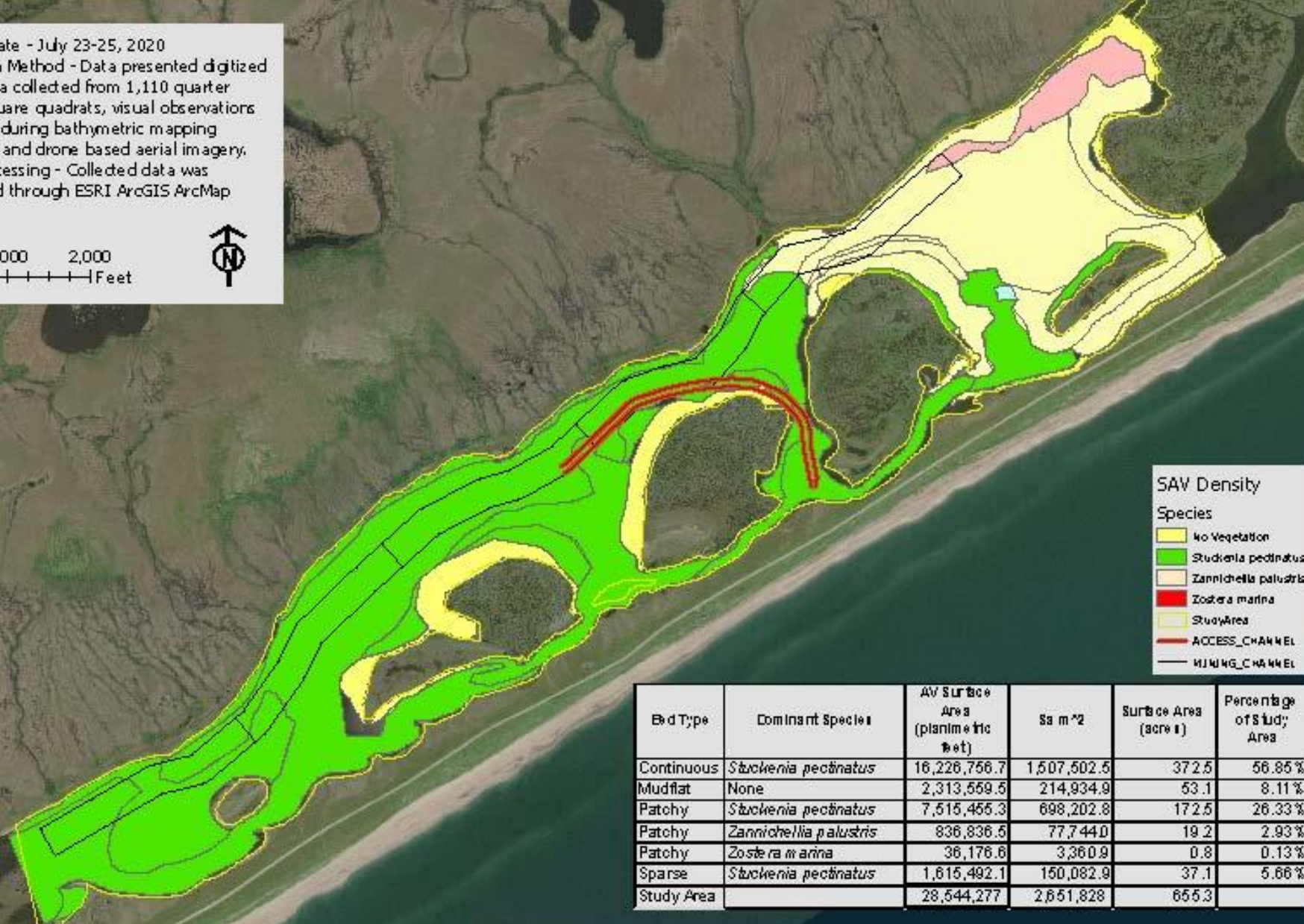
IPOP Conducted Surveys July 2020

- Agency comments from ADFG, FWS, and EPA
- Several Agency met during spring and summer 2020
- IPOP conducted SAV surveys of the area, one small patch of eel grass. Mostly *stuckenia sp.* And *zannichellia palustris*



Survey Date - July 23-25, 2020
 Collection Method - Data presented digitized using data collected from 1,110 quarter meter square quadrats, visual observations collected during bathymetric mapping transects and drone based aerial imagery.
 Data Processing - Collected data was processed through ESRI ArcGIS ArcMap 10.6.1.

0 500 1,000 2,000
 Feet



SAV Density

Species

- No Vegetation
- Stuckenia pectinatus*
- Zannichellia palustris*
- Zostera marina*
- Study Area
- ACCESS_CHANNELS
- MINING_CHANNELS

Bed Type	Dominant Species	AV Surface Area (planimetric Net)	Ss m ²	Surface Area (acres)	Percentage of Study Area
Continuous	<i>Stuckenia pectinatus</i>	16,226,756.7	1,507,502.5	372.5	56.85%
Mudflat	None	2,313,559.5	214,934.9	53.1	8.11%
Patchy	<i>Stuckenia pectinatus</i>	7,515,455.3	698,202.8	172.5	26.33%
Patchy	<i>Zannichellia palustris</i>	836,836.5	77,744.0	19.2	2.93%
Patchy	<i>Zostera marina</i>	36,176.6	3,360.9	0.8	0.13%
Sparse	<i>Stuckenia pectinatus</i>	1,615,492.1	150,082.9	37.1	5.66%
Study Area		28,544,277	2,651,828	655.3	

Bonanza Channel SAV Dominant Species

IPOP Conducted Demo Aug. 2020

- IPOP conducted test mining & silt curtain efficacy test at five locations
- Dubious data and results: Cutter head smaller (10in vs. 35in), project footprint will be much larger (10 acres)





FISHERIES

Current Status

- Currently the USACE is considering NEPA requirements for the permit, EA or EIS
- NMFS Habitat Conservation Division is in the Early Coordination stage of the EFH Consultation
- NMFS just received response to our latest comment letter 11/10/20



Next Steps

- Waiting for USACE decision on NEPA requirements.
- Continue early coordination with USACE until we receive a completed EFH Assessment.
- If the Council wishes to comment on this action NMFS is willing to coordinate.



Questions?

seanbob.kelly@noaa.gov

907-271-5195

stefanie.coxe@noaa.gov

570-436-3030

Special thanks to LT Lydia Ames



NOAA
FISHERIES