Proposed IPOP Mine.
Nome, Alaska

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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.
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
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."
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.
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.
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).
"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"
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.
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 transsects and drone based aerial imagery. Data Processing - Collected data was processed through ESRI ArcGIS ArcMap 10.6.1.

Bonanza Channel SAV Dominant Species

<table>
<thead>
<tr>
<th>Bed Type</th>
<th>Dominant Species</th>
<th>AV Surface Area (planimetric feet)</th>
<th>Av m²</th>
<th>Surface Area (acres)</th>
<th>Percentage of Study Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuous</td>
<td>S. pectinatus</td>
<td>16,226,756.7</td>
<td>1507,502.5</td>
<td>37.25</td>
<td>56.85%</td>
</tr>
<tr>
<td>Mudflat</td>
<td>None</td>
<td>2,313,559.5</td>
<td>214,934.9</td>
<td>53.1</td>
<td>8.11%</td>
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<tr>
<td>Patchy</td>
<td>S. pectinatus</td>
<td>7,515,465.3</td>
<td>698,202.8</td>
<td>172.5</td>
<td>26.33%</td>
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<tr>
<td>Patchy</td>
<td>Z. palustris</td>
<td>836,836.5</td>
<td>77,744.0</td>
<td>19.2</td>
<td>2.93%</td>
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<tr>
<td>Patchy</td>
<td>Z. marina</td>
<td>36,176.8</td>
<td>3,360.9</td>
<td>0.8</td>
<td>0.13%</td>
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<tr>
<td>Sparse</td>
<td>S. pectinatus</td>
<td>1,615,492.1</td>
<td>150,082.9</td>
<td>37.1</td>
<td>5.68%</td>
</tr>
<tr>
<td>Study Area</td>
<td>S. pectinatus</td>
<td>28,544,277</td>
<td>2,551,828</td>
<td>655.3</td>
<td>100%</td>
</tr>
</tbody>
</table>
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)
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?

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