

## **APPENDIX A – SCOPING REPORT**



US Army Corps  
of Engineers

# Pebble Project EIS

Scoping Report



August 31, 2018

[www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com)

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## LIST OF ACRONYMS AND ABBREVIATIONS

BSEE	Bureau of Safety and Environmental Enforcement
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
GHG	greenhouse gas
LIDAR	Light Detection and Ranging
NEPA	National Environmental Policy Act
PLP	Pebble Limited Partnership
TSF	Tailings Storage Facility
U.S.C.	United States Code
USACE	U.S. Army Corps of Engineers

## 1.0 INTRODUCTION

This Scoping Report has been developed for the U.S. Army Corps of Engineers (USACE) to share the types of issues that were received during the scoping period from the general public and the cooperating agencies. It documents outreach efforts during the scoping period and summarizes the primary issues of concern and suggested alternatives from the public. The Scoping Report will be used to develop alternatives for the Environmental Impact Statement (EIS) and identifies issues that are important to the public and should be considered in the analysis of the EIS.

## 2.0 PROJECT OVERVIEW AND SCOPING PROCESS

### 2.1 BACKGROUND

The USACE, Alaska District, intends to prepare a Draft EIS to assess the potential social, economic, and environmental impacts associated with the proposed Pebble Project. The EIS will assess potential effects of a range of alternatives.

Pebble Limited Partnership (PLP) is proposing to develop the Pebble copper gold-molybdenum porphyry deposit as an open-pit mine, with associated infrastructure, in southwest Alaska, north of Iliamna Lake. The proposed project would require a natural gas-fired power plant supplied by a natural gas pipeline to the Mine Site, and transportation infrastructure including a road from the Mine Site to a ferry terminal on the north shore of Iliamna Lake, an ice-breaking ferry crossing to a terminal on the south shore of Iliamna Lake, and a road to the proposed Amakdedori Port on Cook Inlet.

### 2.2 NOTICE OF INTENT

An application for a Department of the Army permit was submitted by PLP pursuant to Section 404 of the Clean Water Act (33 United States Code [U.S.C.] 1344) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) on December 22, 2017. The application was deemed complete, and was advertised in a Public Notice, Pacific Operations Area (POA) POA-2017-271, on January 5, 2018. On March 29, 2018, the USACE issued a Notice of Intent in the Federal Register to prepare an EIS for the proposed project. The Notice of Intent is included in Appendix A, and the Public Notice is included in Appendix B.

### 2.3 SCOPING PROCESS

#### 2.3.1 Scoping Process Overview

The scoping period began on April 1, 2018. On March 30, 2018, the USACE issued a press release to announce the opening of the 30-day comment period and to provide information for how to submit comments. On April 6, 2018, their second press release extended the scoping period by 60 days to continue through June 29, 2018. See Appendix B for both press releases.

Scoping is conducted to assist in determining the breadth of analysis, significant issues, and alternatives to be analyzed in depth in the Draft EIS. The Council on Environmental Quality defines scoping as an “early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action” (40 Code of Federal Regulation 1501.7). The scoping process provides an opportunity for people potentially

affected by the project to express their views and concerns and to contribute to the completeness of the EIS.

### **2.3.2 Public Notice, Press Releases, and Other Media**

Prior to the scoping period start, the USACE began organizing public meetings and developing materials related to scoping that were provided to the public.

The project website ([www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com)) went live on March 19, 2018. The website includes information about the project, EIS process, and scoping. The USACE uses the website to disseminate important information to the public, such as the scoping meeting schedule. The website also included a form for the public to submit scoping comments; this online comment form included a map where commenters could mark a point that related to their comment. Comments that have been submitted are available for the public to view. Some individual comments to the website contain multiple documents. Screenshots of the website (dated May 7, 2018) are in Appendix B.

On March 20, 2018, the USACE mailed hardcopies of a Scoping Package to 35 identified Alaska Native Tribal Organizations in the project area. The complete Scoping Package (in Appendix B) was also made available on the project website and includes:

- Information about the scoping process
- A description of the project
- The process for developing alternatives
- A list of resources to be analyzed in the EIS
- Information on the National Environmental Policy Act (NEPA)
- Roles of the various participating organizations
- An EIS schedule and outline
- Information on submitting comments
- A comment form.

To help advertise the scoping period, the USACE began mailing the project's Newsletter #1 on March 29, 2018. The newsletter provided details on the public meeting schedule as well as information on how to submit comments; it was sent to every post office box in 33 communities, and to 140 other organizations and individuals on a mailing list. A total of 3,670 newsletters were mailed. The USACE also ran announcements in the Bristol Bay Times, the Homer News, and the Anchorage Daily News a week prior to relevant meetings. Finally, a flyer was emailed to communities where scoping meetings were scheduled for distribution on April 6, 2018. Newsletter #1, newspaper affidavits, and the flyer can be found in Appendix B.

## **2.4 PUBLIC SCOPING MEETINGS**

Public scoping meetings were held in nine communities, including Anchorage. A total of 914 participants signed in at the public meetings (see Appendix C for sign-in sheets). The primary purpose of the public meetings was to present a project overview, give the public a forum for submitting verbal and electronic comments, and provide an opportunity to talk to the USACE about the EIS and the Department of the Army permit application process. Table 1 shows the meeting locations and the number of people who signed in.

**Table 1: Scoping Meetings**

<b>Date</b>	<b>Community</b>	<b>Location and Time</b>	<b>Number Signed In</b>
April 9, 2018	Naknek	Naknek School, 3:30-7:30 PM	45
April 10, 2018	Kokhanok	Community Hall, 3:30-7:30 PM	68
April 11, 2018	Homer	Homer High School, 5:00-9:00 PM	223
April 12, 2018	Newhalen	Newhalen School, 3:30-7:30 PM	47
April 13, 2018	New Stuyahok	Community Building, 1:00-4:30 PM	65
April 16, 2018	Nondalton	Tribal Center, 3:30-7:30 PM	46
April 17, 2018	Dillingham	Middle School, 5:00-9:00 PM	88
April 18, 2018	Igiugig	Community Building, 3:30-7:30 PM	47
April 19, 2018	Anchorage	Dena'ina Center, 11:00 AM-9:00 PM	285

### 2.4.1 Meeting Description

The format of the public meetings varied depending on the location. A sign-in station with hardcopies of supporting material was set up at all locations. The sign-in sheet was used to update the project mailing list.

In general, a brief introduction by the USACE was given. A 17-minute video describing the project was shown (or was available to be watched), and the public were given multiple ways to comment. Time was allotted for members of the public and media to speak directly with USACE staff, State of Alaska staff, or in some locations, other cooperating agency staff. AECOM (the third party NEPA contractor) staff were also present.

In Naknek, Kokhanok, Newhalen, New Stuyahok, Nondalton, and Igiugig, the USACE provided a microphone (“hot mic”) where participants could speak their comments out loud in front of other meeting attendees. Comments were transcribed by a court reporter, either during the hot mic session or individually after the session. In Homer, Dillingham, and Anchorage, two court reporters were available to take comments one-on-one; therefore, no hot mic was provided.

At all meetings, laptop computers were provided for the public to submit comments electronically to the project website. Paper comment forms were available for handwritten or typed comments, which could be submitted to the USACE at a meeting or mailed later.

### 2.4.2 Meeting Materials Description

The USACE requested that the PLP create a video describing their proposed project and mining process. The resulting 17-minute video gives an introduction to the surrounding environment, project components and footprint, water management and mining process, and reclamation. At some meetings this video was shown after the USACE introduction, and at others it was shown on a repeating loop.

Ten posters prepared by the PLP to describe the project, the mining process, and reclamation were also displayed. The USACE created additional posters describing the NEPA process and how to write effective comments. The Anchorage meeting also included posters on the scoping process, the EIS outline, resources to be discussed in the EIS, and roles of cooperating agencies.



The USACE also provided the Scoping Package, paper comment forms, and a handout from the Bureau of Safety and Environmental Enforcement (BSEE), a cooperating agency. A screenshot of the video, as well as all posters and handouts, are in Appendix D.

### **2.4.3 Additional Agency Involvement**

A kickoff meeting for cooperating agencies was held on June 6, 2018, where the roles of cooperating agencies for this EIS were discussed. Cooperating agencies will have opportunity to provide input throughout the process, including alternatives development, providing technical expertise for analysis, and suggesting mitigation. In addition, the State of Alaska, BSEE, and the Pipeline and Hazardous Materials Safety Administration attended some scoping meetings to answer questions about their role and expertise.

### **2.4.4 Government-to-Government Consultation**

Federal agencies are charged with engaging in regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications pursuant to Executive Order 13175 on Consultation and Coordination with Indian Tribal Governments (November 6, 2000). The USACE Tribal Consultation Policy (2013) states that "Commands will ensure that all Tribes with an interest in a particular activity that has the potential to significantly affect protected tribal resources, tribal rights (including treaty rights) and Indian lands are contacted and their comments taken into consideration". As the lead federal agency for the development of the EIS, USACE is responsible for government-to-government consultation and coordination with federally recognized tribes that may be impacted by the proposed project.

The government-to-government consultation process for the Pebble Project EIS is designed to provide federally recognized tribes in Alaska that may potentially be impacted by the proposed project with opportunities for meaningful participation in the federal permitting process. Tribes and other Alaska Native stakeholders will have several opportunities throughout the environmental review process to participate and provide input. USACE has developed a list of 35 federally recognized tribes that could be potentially impacted by the proposed project. USACE notified and invited these tribes into government-to-government consultation early in the process. The consultation process was coordinated with the NEPA scoping effort to the extent possible. Information learned through tribal consultation will inform the EIS, as appropriate.

An initial letter was sent to the tribes on the list, including basic project information, how tribes may participate in the development of the EIS and an invitation to formal government-to-government consultation. It is expected that not all tribes will request formal consultation, but USACE will continue to offer opportunities to tribes to participate throughout the project review. Informal consultation will consist of the two-way sharing of information through mailings, teleconferences, and regional meetings with tribes during the NEPA process that are held separate from the public meetings.

### **2.4.5 Next Steps in the NEPA Process**

Scoping is the first opportunity for public involvement under the NEPA process. An additional opportunity for public comment will follow the release of the Draft EIS scheduled for early 2019. A Notice of Availability will be published in the Federal Register informing stakeholders and other members of the public that the Draft EIS is available for comment. The Draft EIS comment period will include public meetings in the same communities where scoping meetings were held. The project website will be updated throughout the EIS process.

Public comments shape the NEPA process by identifying project-related questions and issues of concern. Typically questions are in reference to the project, existing environment, extent of temporal and spatial impacts, or potential consequences to the human environment from the proposed action. Substantive questions and issues of concern, which can inform the scope of analysis and alternatives to be considered in the EIS, are grouped by subject matter in this Scoping Report. This information is used in the alternatives development process, the study of the affected environment, and in the process to analyze environmental consequences (or impacts). Documents that are received from the public during the scoping process via the project website, mail, and email are referred to as submissions during analysis. Each submission can contain many coded comments which are then used to inform the scope of the analysis. Submissions without substantive comments that are not specific to a particular issue are considered non-substantive. These comments did not inform our analytical framework during the scoping period, and include comments in support of or in opposition to the applicant's proposed project without providing rationale.

### 3.0 SCOPING COMMENT SUMMARY

This section contains a description of the scoping comment analysis process and a summary of the public scoping comments received. Due to the large number of comments submitted as part of scoping for an EIS, it can be challenging for the EIS preparation team, as well as the general public, to read all the comments and understand all of the issues raised. Standard practice has been to code and enter comments into a database program that captures and summarizes issues and recommendations from scoping comments. However, the EIS team and the general public will continue to have access to comments submitted on the website for reference purposes.

The public comment summary includes the following:

- Description of the scoping comment analysis process (description of the comment database, development of the coding structure, identification and coding of comments, comment summary process).
- A summary of issues identified, categorized by physical environment, biological environment, social environment, or NEPA process.

#### 3.1 SCOPING CONTENT ANALYSIS PROCESS

Public and agency comments submitted by the close of the scoping period were analyzed and categorized using a process called “content analysis.” The analysis process included:

1. Import and organization of all comments/submission content into a comment database.
2. Development of a coding structure to analyze the comments.
3. Review of submissions to assign codes to comments.
4. Preparation of a Scoping Report with analysis results.

The goals of the content analysis process are to:

1. Ensure that every submission (every received set of comments, submitted by any means, is defined as a “submission”) is considered.
2. Identify the concerns raised by commenters.
3. Represent the breadth and depth of the public’s viewpoints and concerns as fairly as possible.
4. Present those concerns in a way that facilitates consideration of comments and conveys the issues raised during scoping.

All comments were treated equally. Emphasis was on the content of a comment, rather than who wrote it or the number of submissions in agreement.

##### 3.1.1 Scoping Comment Database

Names, contact information, and comment text for commenters who submitted comments were entered into an electronic database. Many comments were submitted to the USACE in electronic format through the project website comment form. A large volume of comments were received by the USACE via email and/or postal service. As comments were received, they were made available for the public to view on the project website. Hardcopy comments, including those delivered by postal service or submitted in person at public meetings, were scanned and entered into the database, and also posted to the project website.

The content of the comments was filtered using various database queries and identifying potential form letters (see form letter discussion below). Any submission identified as having the same commenter information and content, regardless of delivery format (e.g., hardcopy letter, email) or date, was counted as one submission.

### **3.1.2 Form Letters**

Form letters are defined as multiple submissions with the same content. Electronic comments were pre-screened in the database, using various queries to identify similar content and thus potential form letters. If consistent content was identified, a form letter record with that content was created in the database and additional submissions with the same content were placed into that form letter category.

### **3.1.3 Coding Structure Development**

Submission content was sorted into categories to represent commenters' concerns and rationale through a coding structure. Codes provide an efficient and accurate grouping of similar comments; coded concerns are referred to as "comments" in this report.

The aim of the coding structure is to identify applicable Pebble Project facilities and components, environmental resources, and planning processes in submissions. An initial coding structure was developed based on expected issues and concerns; this structure was continuously refined as more submissions were received to identify any additional concerns.

### **3.1.4 Comment Identification and Coding**

Submissions were reviewed to identify substantive comments that will be used to formulate the issues and analysis conducted in the EIS process. Individual statements within a submission were identified as a comment(s) and then assigned to categories/topics.

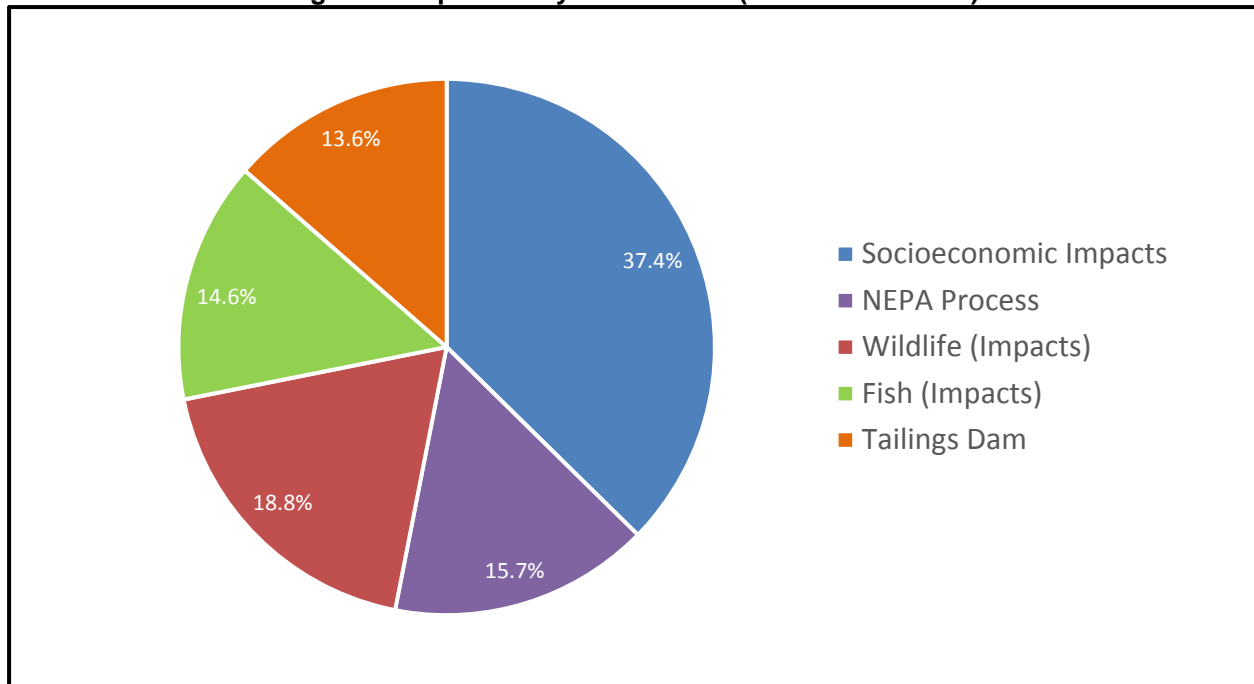
Submissions may contain more than one comment, each coded based on the issue and the specific rationale. This form of analysis allows for specific comments to be captured and then grouped under the umbrella of a general resource issue. The NEPA process considers the substance of issues but does not consider who wrote the comment or the number of similar comments (like votes).

## **3.2 PUBLIC COMMENT SUBMISSION SUMMARY**

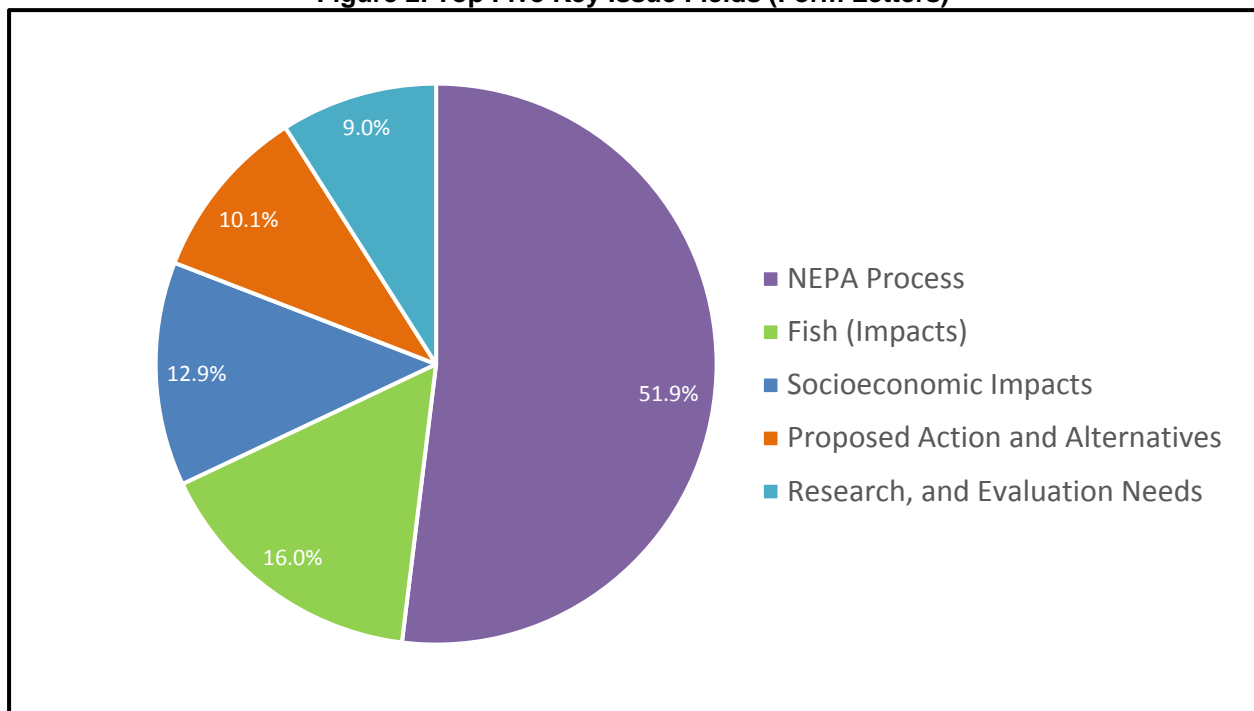
### **3.2.1 Submissions Received**

In total, 174,889 submissions were received through June 29, 2018. A total of 3,653 of these submissions were considered non-form letters. There were several variations of form letters that were received, with a total of 171,236 form letters. The USACE received five petitions with a total of 295,721 signatures that were considered as non-form letter submissions. The validity of these petition signatures has not been verified. Submissions with substantive comments were analyzed for key issues. The top five substantive key issue fields for non-form letters and form letters are shown in Figure 1 and Figure 2.

**Figure 1. Top Five Key Issue Fields (Non-Form Letters)**



**Figure 2. Top Five Key Issue Fields (Form Letters)**



A total of 5,616 substantive comments were received from non-form letter submissions, and 334,351 substantive comments were received from form letters.

### 3.3 COMMENT SUMMARY PROCESS

The intent of this Scoping Report is to provide representative summaries that capture, with a minimum of repetition, major topic areas or concerns expressed during the public scoping period. The topic areas or concerns contained in the summary of public comment will be used to develop the issues, alternatives, and mitigation strategies that will be analyzed in the EIS process. It will also inform the public of issues that were raised from their scoping comments.

In writing this summary, comment analysts reviewed coded comments to understand the overall content of the comment and to identify topic areas or concerns in similar comments from different respondents. Similar comments were summarized into concise narrative statements and organized by the key issues.

Comments are organized in two broad categories below:

- **Resource Topics.** This section provides issues identified in scoping comments organized by resource topic. Resource-specific comments are grouped, such as comments concerning fish and wildlife habitat loss, loss of recreational access, or dust and emissions along the access roads and at the Mine Site. These topics are divided by the physical environment, the biological environment, and the social environment.
- **NEPA Process and Regulatory Compliance.** This section provides a summary of public comments on the NEPA process and alternatives to the proposed project. Topics include the public involvement process, project purpose and need, other laws and regulations, tribal consultation, cooperating agencies, and the no action alternative. Public comment suggestions for proposed action alternatives and mitigation measures are also included.

### 3.4 SUMMARY OF PUBLIC COMMENT –RESOURCE TOPICS

#### 3.4.1 General Resources

A variety of general comments were received indicating that the EIS should analyze the direct, indirect, and cumulative impacts on general resources or the environment in the project area.

#### 3.4.2 Physical Resources

Comments indicated that the EIS should analyze the direct, indirect, and cumulative impacts on specific physical resources, including:

- Air quality
- Climate change
- Geology and seismic activity
- Surface and groundwater hydrology impacts
- Noise impacts
- Spill risks and release
- Hazardous materials stored and transported to and from the mine site
- Natural gas supply and pipeline safety
- Tailings dam

- Water resources – quality and quantity.

### 3.4.2.1 Air Quality

Comments were received on impacts to air quality as a result of project construction and mining operations.

- Comments were received regarding impacts to air quality from construction, fugitive dust emissions, vehicle equipment emissions, and mining activities.
- Concerns were made regarding fugitive dust pollution from the mine and roads, and what chemicals may be used to control dust.
- Impacts to air quality including impacts from transporting ore and materials, or loading and shipping ore and concentrate.
- Impacts from air pollutants emitted during mine operations and contribution to greenhouse gas (GHG) emissions from the power plant.
- Address both air quality and air quality related values (e.g., visibility) in the analysis of potential project impacts.
- Characterize existing conditions to set the context for evaluating project impacts, including regional climate and meteorology, air quality and air quality related values, and identification of sensitive receptors in the vicinity.
- Provide an emissions inventory of criteria pollutants, greenhouse gas emissions, and significant hazardous air pollutant (HAP) emissions for all project components and phases.
- Disclose the air quality regulations and permit requirements that apply to the project.

### 3.4.2.2 Climate Change

Comments were received about the impacts of climate change to the environment and how climate change trends may interact with effects of the proposed project.

- Look at the carbon and GHG additions to the atmosphere from the proposed project.
- Provide a comprehensive emissions inventory of criteria pollutants, GHG emissions, and significant hazardous air pollutant emissions for all project components and phases.
- Create a report and use comparisons to make the units of measure understandable to the public.

### 3.4.2.3 Geology and Seismic Activity

Comments were received regarding impacts to the geology of the project area, including concerns that major faults occur in the proposed project area and may affect project facilities.

- Include detailed information about seismically active areas, geological faults and tectonic activity, and corresponding design features.
- Analyze impacts to bedrock, surface geology, gravel resources, paleontological resources, and landforms from all proposed project components.
- Describe how the proposed project facilities would withstand earthquakes, particularly the tailings storage facility (TSF).
- Analyze impacts from volcanic activity, especially at Amakdedori Port and along the pipeline from the Augustine Island volcano.

### 3.4.2.4 Surface and Groundwater Hydrology

Comments were received on impacts to groundwater systems and aquifers, transportation of groundwater, and how it moves underground. A thorough understanding of the groundwater and surface water hydrology and how they relate to each other should be demonstrated.

- Characterize existing groundwater, surface water, springs, and wetland resources within the area of both the project and alternatives, including groundwater levels, flow direction and gradients.
- Evaluate changes in water volume in the stream areas impacted, as well as changes in the downstream reaches of the watershed resulting from losses of upstream contributions of water. Include seasonal changes to the different stream segments.
- Evaluate flow changes in the impacted stream reaches, both from pit dewatering as well as any proposed in-stream discharge points. Areas of stream incision as a result of flow changes should be identified, as well as losses of connectivity to floodplains and riparian wetlands currently.
- Address earthquake impacts on hydrology characteristics.
- Explain the water balance model of the project. A complete water management plan based on recent data should be provided before impacts can be assessed.
- Develop of conceptual site models to aid in understanding and predictions of changes to water quantity and quality. Include maps, baseline data, underground sources of drinking water, and a detailed water balance model.

### 3.4.2.5 Noise

Comments were received on impacts of noise pollution as a result of project construction and mining operations.

- Discuss noise impacts of blasting in the project area, and describe the blasting methods that would be used.
- Consider noise in the water created by the proposed icebreaker ferry and the impacts to fish, bears, and other wildlife.

### 3.4.2.6 Spill Risks and Releases

Comments were received about the potential for fuel and oil spills or accidental releases from various aspects of the project, including adequate response capacity to clean up spills in various conditions, and potential impacts to natural resources or environment from spills or release.

- Analyze impacts of spills of diesel and natural gas to every resource discussed in the EIS.
- An earthquake could rupture the gas pipeline under the lake when salmon are migrating and impact fish and wildlife.
- Explain who is responsible for spill response on Cook Inlet and Iliamna Lake. Response plans should be developed for all parts of the project.
- The wetlands that surround the mine site would make it difficult to contain contaminated waters if any of the storage or processing sites at the mine or along the transportation corridor were to leak or fail. Therefore, it is essential to ensure that this infrastructure has no possibility of failure during the life of the mine or for decades to centuries after the mine is closed down.



- There is concern about the number of times the ore slurry/concentrate, fuel, and other supplies must be transferred. Each transfer increases the risk of a spill or release.

### 3.4.2.7 Hazardous Materials

Comments were received about the potential for hazardous material storage, spills, and impacts to resources or the environment; in particular, to address chemicals associated with mine process and storage of materials (such as arsenic or acids).

- The revised mine plan calls for no cyanide to be brought in to the region.
- Address impacts of hazardous and solid waste generated from the proposed project. A hazardous and solid waste material handling, storage, management, and disposal plan should be developed and evaluated into the Draft EIS.
- Describe how blasting agents would be transported and managed, and how much would be used.
- During the copper extraction process, an alcohol is added during the flotation along with a collector chemical called potassium amyl xanthate (or the potassium salt of an alkyl dithiocarbonate), which can be toxic.
- The process chemicals described in the permit application appear to be generic descriptions, rather than descriptions of the specific chemicals to be used. A more complete description of the ore processing is needed. A complete list of process chemicals, by manufacturer, as well as the annual amount to be used, is also required.
- List any herbicides, pesticides, or road de-icing compounds.
- The EIS should describe emergency measures that would be implemented should there be a release of hazardous substances and how potential adverse impacts may be mitigated.

### 3.4.2.8 Natural Gas: Pipeline and Gas Supply

Comments were received on the impacts of the proposed project on the supply, demand and cost of natural gas in the proposed project area and Cook Inlet.

- There could be lower costs of fuel in rural Alaska as result of potential new gas supply and spur/distribution systems.
- The supply of available natural gas in Cook Inlet may not be sufficient to provide power to the proposed project.
- Explain if the use of natural gas by PLP would affect existing Alaska Railbelt supply and users.

Comments were received on the design, route, construction, and safety and reliability of the natural gas pipeline crossing Cook Inlet and Iliamna Lake.

- That part of Alaska has exceptionally high tides – routinely greater than 20 feet. Please consider this when analyzing an underwater gas pipeline.
- There are safe and secure methods to construct a pipeline that would cross existing submarine cables. The pipeline owner/operators should enter into a cable crossing agreement to ensure the safety and security of both the fiber cables and the gas pipeline.
- There are not any pipelines in Cook Inlet this long. A commenter noted that in Nikiski, the seabed can change rapidly. This can cause unforeseen problems in maintenance.

While lower Cook Inlet and Kamishak Bay do not have ice or currents to the same extent as the upper Cook Inlet, Lower Cook Inlet is not nearly as protected as the waters of upper Cook Inlet, and Kamishak Bay experiences challenging winter sea conditions.

- At Iliamna Lake, maintenance could be difficult when the lake is frozen.
- The route for this pipeline would be near the base of Augustine Volcano, which is the most active volcano in Cook Inlet and has erupted eight times since 1812.
- Cook Inlet has huge tides, glacial silt, ice flows, and strong currents and is corrosive to almost everything. Explain who will pay for the maintenance and repair of this pipeline.
- The eastern end of the proposed pipeline route runs along a soft, sandy bluff north of Anchor Point. The bluffs are eroding an average of 1.1 feet/year.

### 3.4.2.9 Tailings Dam

Comments were received regarding concern for the stability of the tailings dam, potential for tailings dam failure, and impacts of such a failure.

- Describe how the tailings facility and dams are designed and how they would be operated, closed, and monitored to ensure stability. Describe how the tailings dams would comply with state dam safety criteria.
- Describe the impacts of dam failure and recognize the public concern of the stability of the tailings dam. Specifically, consider the impacts to biological and social environments of a dam failure as a result of an earthquake.
- Look at examples of other tailings dam failures (in Spain, Canada, Australia, and others in the United States).
- Analyze impacts from tailings leaks and leaching, not just failures.
- Tailings dam engineering has improved considerably over the decades. Pebble's tailings dam design will have to be approved to adequately protect the environment before the project would be permitted.
- Analyze impacts from rainfall causing overtopping of the tailings dam. Alaska has a propensity for large storms and with climate change and warming effects, risk for large storms is increased.
- It is recommended that large tailings dams use dynamic rather than pseudostatic analysis for potential dam failure under earthquake loading.
- A risk assessment such as a Failure Modes Effects Analysis should be conducted with results summarized in the EIS.
- The EIS should describe how the tailings dams would comply with state dam safety criteria.

### 3.4.2.10 Water Quality and Quantity

Comments were received concerning a detailed analysis and discussion of the physical and chemical impacts on all water resources.

- Analyze impacts to water quality and quantity from construction, operation, and post-closure.
- Analyze pit water and tailings dam management.

- Identify potential changes to nutrient levels, turbidity, and dissolved oxygen, particularly with respect to seasonal patterns in the downstream reaches.
- Analyze erosion, turbidity, temperature changes.
- Ferry crossing concerns, including changes in shoreline erosion and turbidity, and pollution from the proposed ferry.
- Composition of the (potential) contaminants from all project sources, including blasting.
- Prevailing winds will create water surface waves on the pyritic tailings facility which will allow oxidation of the tailings.
- Risks associated with acid rock drainage from mine project components, including the waste rock facility, leaching, and pathways for acid rock drainage. Acid rock drainage was noted as a potential source of impact on many resources, such as water quality, wetlands, fish, and subsistence food resources.
- Describe how acid rock drainage, tailings, and metals leaching would be tested, monitored, and treated during mining and post-closure.
- Analyze the potential for wastewater to enter streams and rivers.
- Project components should be designed for 500-year events, given predictions for wetter spring and summers in this area.
- The EIS should identify the Alaska Pollutant Discharge Elimination System discharge locations, identify applicable water quality standards, and analyze the likelihood of discharges to meet standards.
- The EIS should identify and describe the location of water sources for hydrostatic testing.
- Characterize the existing groundwater and surface water quality.
- Predict concentrations of contaminants of concern in surface and groundwater that reflect a range in climatic settings and compare to water quality criteria and standards.
- Consideration of downstream impacts and potential for changes in metal speciation and bioavailability.
- To provide reliable predictions of water quality and impacts to surface water and groundwater due to wastewater and mine waste management, the physical and chemical characteristics of the ore, pit walls, waste rock, and tailings should be determined and disclosed in the EIS.
- Evaluation of surface water and groundwater use, including maps and source identification of water supply wells or intakes.

### 3.4.3 Biological Resources

Comments indicated that the EIS should analyze the direct, indirect, and cumulative impacts on specific biological resources, including:

- Vegetation and ecosystems.
- Fish and aquatic resources.
- Wetlands and special aquatic sites.
- Wildlife and non-threatened and endangered species birds and mammals.
- Threatened and endangered species.

### 3.4.3.1 Vegetation and Ecosystems

Comments were received concerning potential for disturbance from project construction and operations, and from invasive species. Comments were also received concerning terrestrial, lake, and marine habitat impacts from project construction and operations.

- Analyze the potential direct, indirect, and cumulative effects of all components and all phases (including reclamation and restoration) of the proposed project on terrestrial, marine, and freshwater ecosystems.
- Analyze impacts to rare and sensitive plants (including removal).
- Address how fugitive dust would affect vegetation within the project area and beyond.
- Address risk for invasive (non-native) species introduction by marine barges and the ferry; include ballast water management.
- Analyze ecosystems as unique in the Bristol Bay area, in the degree to which they remain unaffected by commercial development and other human technologies. Evaluate how the proposed project could alter the biological and human ecosystems and landscape.

### 3.4.3.2 Fish and Aquatic Resources

Comments were received related to potential impacts to fish (King Salmon, Sockeye Salmon, Silver Salmon, Pink Salmon, Chum Salmon, Dolly Varden/Arctic char, Rainbow Trout, and Grayling) populations, abundance, diversity, migratory patterns, contamination, and potential for displacement from project components.

- Address effects of ferry traffic on resident and migrating fish in Iliamna Lake: the potential for the ferry to cause erosion of the lake shoreline and the effect of that on fish; the effect of the ferry on salmon spawning and rearing habitat; the effect of increased noise on salmon productivity; the potential for increased turbidity and its effect on salmon; the potential for ferry traffic to cause wave action that could harm the fry on their way to the ocean; the potential for ferry propellers to entrap fish and cause mortality; and the potential for fish to avoid the area around the ferry and not come back to the area.
- Address effects of gravel pits on stream hydrology and fisheries.
- The USACE should understand that a disruption of habitat could affect the nutrients returned to the ecosystem by the salmon when they return to these watersheds.
- Water withdrawal and capture, storage, treatment and release of wastewater associated with the mine could impair the fish habitat functions of streams, wetlands, and aquatic resources.
- Address the potential for fish to become contaminated from sedimentation, metals, toxins, mining chemicals or fuel spills.
- Evaluate how the proposed project road to Iliamna Lake would impact fish species as road traffic will create dust that may contain copper and other heavy metals that could enter the watershed and affect resident aquatic organisms including salmon.
- Dredging off Amakdedori Beach may affect schooling of salmon and/or Dolly Varden before they run up Chenik Creek, McNeil River and Mikfik Creek.
- Analyze the impact of anthropogenic erosion on fish gills from construction and mining. Anthropogenic turbidity has severe impacts on newly emergent fry. Address the effects of constructing the Amakdedori Port and maintenance dredging would have on Cook Inlet herring spawning habitat in Kamishak Bay.

- The proposed port site has the potential to hinder the recovery of populations that are depressed, such as Tanner, red king, and Dungeness crab species, and to impact crab and weathervane scallop habitats.
- The area that makes up the “headwaters” is full of underwater streams in which small fry/fingerlings swim as they emerge. They sometimes swim into lakes and ponds of the region and often get too big to get out; they are called land-locked salmon.
- The EIS should discuss the species listed and proposed as threatened or endangered under the Endangered Species Act and Essential Fish Habitat within the project area for all components. The EIS should discuss the activities proposed to avoid, minimize, mitigate, and monitor listed and proposed species and Essential Fish Habitat. A biological assessment to evaluate impacts to listed and proposed endangered species and essential fish habitat should be included in the EIS.

Comments were received regarding the impacts of the mine access road crossing streams and anadromous waters, and the impacts of those stream crossings on fish.

- The EIS must include and present all the waters documented in the Alaska Department of Fish and Game Anadromous Waters Catalog at a minimum; however, it should be recognized that the Catalog under-represents waters that actually support anadromous fish on the order of 20 to 40 percent.
- Current plans will impact more than 5 miles of anadromous streams.
- The construction process would build an 80-mile road system with 200 stream crossings impacts that should be analyzed.
- Analyze bridge and culvert impacts to fish, including fish passage and habitat condition change. The proposed 75-mile-long road system would include 222 culverts, 149 of which are not designed for fish passage.
- The proposed road corridor has been designed to minimize impact on wetlands, minimize stream crossings and avoid areas of known for subsistence and recreational use.
- Describe how state protocols regarding fish-bearing streams would be enforced.
- An independent third party needs to verify which streams along the road corridor are fish-bearing. History has shown that PLP and their consultants may have underestimated the number of streams containing fish.

Comments were received regarding the impacts to aquatic resources, including introduction of invasive species.

- Shipping from foreign ports may result in ballast water transporting invasive species such as green crab, which would have a devastating impact on the ecosystem and commercial shellfishery.
- The potential or known effects of a disrupted winter ice regime, lack of ice cover on resident species of fish, birds, and mammals should be investigated. These changes may have contributed to the most recent Kvichak sockeye run decrease. Partial or reduced ice cover may have affected planktonic production, hence food for salmon that may have caused salmon to smolt early.

### **3.4.3.3 Wetlands and Special Aquatic Sites**

Comments were received on filling of wetlands and alternations of wetlands habitat, fragmentation, and loss of wetland habitat as a result of project activities.

- Include delineation of all wetlands that could be affected by the proposed project.

- The estimated mine site would fill 3,190 acres of wetlands and water bodies, nearly three times the maximum set by the Environmental Protection Agency (EPA) for Bristol Bay in 2014.
- Analyze impacts to wetlands dewatering and hydrological changes, pollution to wetlands, impacts on wetlands functions, clearing and removal of wetland vegetation, degrading wetland vegetation from all proposed Pebble project components and during construction, operation, and closure phases.
- Given the extent of streams, wetlands, lakes and ponds both overlying the Pebble deposit and within adjacent watersheds, excavation of a massive mine pit and construction of large tailing impoundments and waste rock piles would result in discharge of dredged or fill material into these waters.
- Quantify impacts to aquatic resources both in terms of the areal or linear extent of impact and by the expected change in the function these resources perform, including fishery support functions, or change in the condition of the resource.
- Consider both direct and secondary effects, as defined by the CWA 404(b)(1) Guidelines.
- Model and consider how losses of stream reaches and adjacent wetlands from dewatering, as well as changes to downstream reaches and adjacent wetlands, may result in physical, chemical, and biological changes which would impact fishery habitat and habitat support.

#### **3.4.3.4 Wildlife and Non-Threatened and Endangered Birds and Mammals**

Comments were received related to potential impacts to wildlife (including terrestrial and marine mammals), and on potential impacts to migratory birds and waterfowl populations; abundance, diversity, migratory patterns and potential for displacement; and attraction of birds to tailing ponds.

- Assess how wildlife can acclimate to construction and operation impacts.
- Analyze how noise levels from construction or large vessel traffic may deter bears from coming to McNeil River Falls, or could affect bear behavior and change or end the use of McNeil River by bears.
- The proposed road and Amakdedori Port could change brown bear migration and result in brown bear mortalities.
- Analyze impacts that habitat fragmentation from Amakdedori Port and the mine access road would have on bear movements.
- Examine how increased contact between bears that use the McNeil River and humans could result in food conditioning of bears or direct bear mortality by humans.
- The proposed ferry could strike marine mammals (seals) in Iliamna Lake, which would congregate in the open water created by the icebreaking ferry. The seals have been considered in the past for Endangered Species Act status.
- Ferries could impact the migration patterns of wildlife.
- The USACE should incorporate traditional knowledge on freshwater seals in Iliamna Lake into the EIS and be aware that there is a Freshwater Seal Commission.
- The transportation of mining materials across Cook Inlet and Iliamna Lake could have potentially negative effects for local marine mammals, particularly underwater noise pollution that impacts marine mammals.

- The Bristol Bay watershed is unique in that it provides habitat for more than 190 birds. Additionally, there are more than 40 species of water birds here and confirmed breeding sites for more than 22 species.
- There are no Bristol Bay Tribal Multi-Species Conservation and Management Plans for Iliamna Lake, the Nushagak River, Nushagak Bay, Kvichak Bay, and Alaska Peninsula. The USACE should mandate these tribal marine multi-species conservation plans be completed before issuing a permit.
- Describe what steps the developers propose to keep tailings ponds/lakes free from pollutants or physically restrict birds from trying to land on them.
- Analyze impacts from noise, blasting, and other human interference to birds.
- Blast control can mitigate noise impacts to birds, like they do with birds at the airport.
- Address effects of the project on birds and migratory waterfowl.
- Kamishak Bay is home to a large seabird nesting colony that would be impacted by disturbance generated from industrial development at Amakdedori Creek.
- Bald eagles nest and feed along the coast and along all of the major salmon spawning rivers in the Bristol Bay and Cook Inlet regions, with a relatively high number of golden eagles also found here.
- Calving grounds for the Mulchatna caribou herd are in the proposed project area and the EIS should include an analysis of the impact of both mine construction and mine operations on caribou calving in the region.
- Exploration activities at the site have caused caribou to avoid the area.

#### **3.4.3.5 Threatened and Endangered Species**

Comments were received on impacts to threatened and endangered species as a result of project construction and operations.

- The proposed port site is designated Critical Habitat for the endangered Cook Inlet beluga whale and the threatened northern sea otter.
- Federally listed threatened northern sea otters and threatened Steller's eiders occur in the waters of Cook Inlet, including Kamishak Bay.

#### **3.4.4 Social Resources**

Comments indicated that the EIS should analyze the direct, indirect, and cumulative impacts on specific social resources, including:

- Socioeconomics
- Subsistence
- Traditional way of life
- Archaeological and cultural resources
- Land ownership, management, and use
- Transportation and navigation
- Recreation
- Environmental justice
- Public health and safety
- Visual resources
- Wilderness characteristics.

### 3.4.4.1 Socioeconomic Impacts

Comments were received regarding the economic impacts to local communities, regional economy, and national economy.

- PLP should give the USACE an independently prepared economic feasibility analysis, which is usually done for other mines like Donlin. Without it, the USACE will be unable to take a hard look at all reasonable alternatives in the draft EIS.
- The Pebble Mine would bring much needed economic opportunity to a region by creating jobs during construction and operation. The Lake and Peninsula Borough has an unemployment rate of 16.6 percent. Presently commercial fishing has a very limited effect on some communities' local economy.
- Residents are moving closer to much larger metropolitan regions to seek opportunities that do not currently exist near their homes in the region. New job opportunities could reduce out-migration, which could help maintain rural schools and allow people in the region to participate in subsistence activities.
- Consider that the project would create a boom and bust economic cycle that would ultimately leave people without jobs.
- The mining company will bring their own workers and not train local people to work at the mine.
- The population would increase during construction and heavily impact local communities.
- Consider the socioeconomic impacts to Bristol Bay's recreational fisheries. More than 37,000 angling trips are taken to Bristol Bay each year, which supports dozens of businesses, and a \$91 million annual economy. The project could also damage the Bristol Bay wild salmon brand because the watershed would no longer be pristine.
- The commercial salmon fishing economy sustains 20,000 jobs; 20,000 jobs will be lost if this mine goes forward.
- Construction and operation of the Amakdedori Port has the potential to conflict with commercial salmon fishing activities in this area. The EIS should also assess potential impacts of marine traffic into and out of the port that may affect access to fishing grounds, impede fishing operations, and jeopardize fishing gear for some species, including pot fishing for Pacific cod, longline fishing for halibut, and non-commercial fishing with pot gear for Tanner crab.
- The EIS should consider that the currently undisturbed proposed port site could be an important herring fishery in the future.
- Consider that the Kennicott Copper Mine was located in the watershed of the Copper River which did not affect the value of the salmon fishery in that region.
- The impact of the use of Iliamna Lake and the proposed transportation corridors/pipelines on sport fishing and the sport fishing-related economy should be evaluated.
- Analyze impacts on the bear viewing industry near the proposed Amakdedori Port.
- Consider that fish taxes are important to the finances of the Bristol Bay Borough.
- Consider that PLP would not pay its fair share of equity to the state. The actual federal and state income royalty or tax on the production would be 3 to 5 percent of that production's value. In comparison to oil, this is inadequate.
- Review social benefits such as education opportunities, and potential reduction in the high cost of living in the region due to transportation improvements.



- PLP should consider using regional Native corporations that are already in the pipeline construction and maintenance industry.
- Examine the economic costs and benefits specific to the state of Alaska including scenarios where no environmental disaster occurs and also the worst disaster happens.
- There were inquiries made in comments if there would be compensation to commercial fishermen if there is a disaster and fish prices go down, similar to what was done with Exxon Valdez.
- The risks to the people and environment would outweigh the short-term benefits.
- Examine the potential impacts to the Homer Electric Association ratepayers.
- The socioeconomic analysis in the EIS should include first order losses from habitat, second order losses, and public perception losses. Existence values have been acknowledged as real and quantifiable and should be used.
- The EIS should use a dynamic net economic benefit approach wherever possible in assessing the socioeconomic impact. One commenter noted that discounting future values can be a highly useful tool for comparing economic benefits over time but that this method may also be misapplied. The USACE should consider that a great deal of work has since been performed on existence values.

#### **3.4.4.2 Subsistence**

Comments were received related to potential impacts to subsistence resources like harvest, sharing, and traditional use areas. Comments were also received on contamination concerns and/or avoidance of subsistence resources.

- The USACE should study the direct, indirect, and cumulative effects of construction, operation, and closure at all stages of the mine and relating infrastructure to all activities relating to fishing, hunting, and other subsistence practices for the Native Village of Tyonek, the Native Village of Port Graham, the Native Village of Seldovia, the Kenaitze Tribe, the Ninilchik Tribe, the Chikaloon Tribe, and all others near in and around the Cook Inlet regions.
- Consider the importance of the salmon fishery to subsistence and the heavy reliance on fish for all users in the area.
- Analyze impacts on subsistence resources including wildlife migration, habitat for growing food, traditional use areas, fisheries, berries and other edible plants, and the cumulative effects from other mining activity. Consider that impacts to any subsistence resource (e.g., fish, wildlife, vegetation) would impact subsistence as well.
- Analyze impacts of potential contaminants entering into the air or water and affecting subsistence resources, including effects on subsistence resources due to potential accidental spills, and bioaccumulation of toxins in subsistence resources, and effects.
- Consider the impacts to the residents along Iliamna Lake who rely on access to small islands for the harvest of bird eggs in the spring.
- We are in fear for our subsistence way of life. Leave our dinner table alone!
- Helicopter traffic during exploration disrupted subsistence activities and this would occur during construction and operations of the mine. Particularly, helicopter traffic impacts spring waterfowl hunting (geese), displaces caribou, and impacts the Koktuli River.

- Many species of fish are used for subsistence harvest, not just salmon.
- Analyze potential beneficial impacts to subsistence as cash income earned from jobs could support subsistence activities. Cash income could be available to fund the boats, motors, fuel, and nets necessary to maintain subsistence activities.
- A sudden influx of noise, people, and heavy equipment over ancestral hunting and fishing lands would have an effect on the intangible resources the sustainable subsistence culture has to offer.
- There could be an influx of workers to construct, run, and remove the mine that would want to have fishing and hunting access to the same resources as the local subsistence communities and will generate user conflict.
- The mine and roads might also facilitate access to previously lightly used areas increasing hunting, fishing berry picking and other pressures.
- Be sure to include Kodiak Island to your analysis, as it has important subsistence areas that could be impacted by the project.
- Over 80 edible and medicinal plants grow and are harvested in the project area including several species of berries, wild peas, wild onions, ferns, cow parsnip, rosehips, and many others.

Comments were received on impacts to important locations for subsistence activity from the project, including:

- The road corridor would go through our winter moose hunting area in the Talarik Creek watershed.
- The Nushagak, Mulchatna, and Kaktuli watersheds are the hunting and fishing areas for people of New Stuyahok.
- The Amakdedori area has been historically used for early subsistence activities, including salmon harvest.
- The mountain behind Nondalton is traditional subsistence area.
- The Frying Pan Lake area is important to Nondalton people and shared with other neighboring people.
- The people in Seldovia have a long tradition of subsistence fishing for herring in Kamishak Bay. The herring also support other animals that we subsist on.

#### **3.4.4.3 Traditional Culture and Way of Life**

Comments were received related to potential cultural impacts and the desire to maintain traditional practices. Includes comments related to traditional land use areas (cultural continuity), and Traditional Ecological Knowledge.

- There are concerns that the mine would be detrimental to the culture, way of life, and history to the people that live in the area, and have been there for centuries.
- Fully disclose the potential impacts of project-related activities on local Alaska Native traditional ways of life. Local culture and environment has already changed from what it was historically, and this may affect the ability to pass values on to future generations.
- Traditional Ecological Knowledge should be studied and incorporated into the Draft EIS. Individual tribal members engage in traditional subsistence activities and have knowledge and experience with their land, wildlife, wetlands, fish, birds, plants, and other resources of the region.

- The profit from the mine and “benefits” are not long term, while preserving Native heritage and leaving a legacy for future generations is a cause that is worthy of consideration.
- The EIS must identify and describe the cultural and spiritual uses of water by the human communities of the region.
- The Amakdedori Port area has been used as a site for a cultural camp, subsistence use areas, and school field trips.
- EIS should look at the long term social impacts, such as trapping and lifestyle change impacts. The project will kill the hearts and souls of the people; our subsistence way of life has more than monetary value.

#### **3.4.4.4 Archeological and Cultural Resources**

Concerns were expressed about impacts to archaeological and cultural resources subject to Section 106 of the National Historic Preservation Act.

- Analyze impacts to cultural resources (historical and pre-historical sites) and direct destruction of cultural resources from all project components.
- The USACE should study and be informed by traditional ecological knowledge.
- The USACE should require appropriate inventory surveys for the broad range of historic property types that may be present within the Area of Potential Effect. The USACE should also clarify in the Draft EIS where it is in the Section 106 review and when the proponent will be carrying out the needed inventory surveys for identification of historic properties that may be affected by the undertaking.
- Determinations of eligibility and effect, and appropriate steps to resolve adverse effects must be informed by the traditional knowledge of Indian tribes who ascribe significance to such properties, as gathered from ethnohistoric data, oral history, and other types of research.
- The project proponent must be sensitive to concerns of the Indian tribes regarding the confidentiality of information they share about properties of religious and cultural significance.
- Review any traditional native or cultural sites within the mine and utility corridors, and provide mitigation for same.
- There are ancestral burial grounds at/near the proposed Amakdedori Port, along the road route on the south side of Iliamna Lake, and on the road route to the south ferry dock.
- Analyze impacts to irreplaceable Native Alaskan rock art sites. This region of Alaska contains several recorded rock art (petroglyph) sites. No doubt more such sites remain to be discovered. Many of the rock art panels are on shorelines and only visible during low tide; thus, it is easy for archaeological surveys to miss these important cultural resources.

#### **3.4.4.5 Land Ownership, Management and Use**

Comments were received about land status (ownership), land management, and land use for the project area.

- The proposed mine site and many project components including the port site and a majority of the transportation corridor are proposed on state-owned lands. Mine

construction, operation, and closure would limit any access to these lands and transportation corridor to private entities only.

- Ensure that activities are consistent with land use plans and goals of all landowners, including the State of Alaska, and Alaska Native corporations.
- The Pebble Mine will be built on state land set aside decades ago in Western Alaska specifically for mining.
- Although the area is classified in the State's area plan as "mineral," a classification is nothing more than recognition of the resource reasonably believed to exist in a particular management unit. The management intent is neutral as to whether mineral development should occur in these units.
- Disclose any impacts to Native Allotments and Native Corporation lands in the project area.
- A pattern of land use change would occur in the region that could be a long-term pattern with additional mining deposits explored for development.
- Analyze the effect of project components on the public use of the surrounding area with regards to trails and waterfront usage.
- Explain the security status of the ferry terminals, the mine access road, and Amakdedori Port, including when and how the public may or may not access or cross project facilities.
- Explain if local Tribal governments have included the mine access road in their Indian Reservation Roads Program that would make it public, versus private roads as stated by PLP.

#### **3.4.4.6 Transportation and Navigation**

Comments were received regarding the impacts to transportation systems, including airports, roads, rivers, and trails as a result of the project.

- Evaluate the potential impacts resulting from navigational challenges, traffic, and user conflicts at Iliamna Lake, Kamishak Bay, and Cook Inlet. The Draft EIS should evaluate how the ferry crossing and vessel traffic could disrupt schedules, local access and local boaters.
- An ice-breaking ferry across Iliamna Lake would create difficulties and hazardous situations for people travelling across the ferry route on snowmachines.
- No depths are recorded on navigation charts for Iliamna Lake. Some rocks on the chart do not exist; others are not where the charts show them to be. Some are not on the charts at all. There are places where the depth goes from 400 feet to 30 feet.
- Consider the impact of travel restrictions from road and ferry and who is benefiting.
- The wind has pushed ice on the north shore of Iliamna Lake in piles as high as 50 feet and could damage the proposed ferry terminal.
- The east winds on Iliamna Lake are strong and generate large waves that would make the proposed ferry unreliable and dangerous; winds can reach 100 mph.
- A disabled ferry could be blown by the wind onto the shoreline such as at Eagle Bluffs.
- The Amakdedori Port location experiences very strong onshore winds that could be hazardous. It is also in an area that could be impacted by a tsunami.
- It will be difficult to maintain the Amakdedori Port dredged channel due to sediment transport in that area.

- The plans for the Amakdedori Port have been changed since the original permit application. The change may reduce maintenance and operation cost, however barge lightering of concentrate to the bulk cargo ships may increase risk and safety in the poor weather conditions Kamishak Bay is famous for.
- The port site may present a variety of fishing hazards to the commercial fishing fleet, including port related marine traffic, the natural gas pipeline landfall, navigational markers, the 2,000-foot earthen causeway, as well as ore loading infrastructure.
- Analyze impacts from increased air traffic during all project phases.
- Concerns were expressed about additional traffic on the Sterling Highway.
- The mine access road would ascend a mountain pass before descending to Iliamna Lake. Has PLP submitted a design and specific route for the road? For perspective on what this road will look like, consider the Pile Bay-Williamsport road where rock slides and falling boulders are a constant threat.

#### **3.4.4.7 Recreation**

Comments were received on impacts to recreation and tourism; recreational hunting and fishing usage near the mine, along river systems, and in transportation/pipeline corridor during construction and operation. This includes comments on disruption of recreational experiences (bear viewing, sport fishing).

- Consider the effects of project components on recreational hunting and existing guided hunting operations (e.g., changes to access, disturbance of wildlife from helicopters or vehicle traffic).
- Concerns about impacts to fish, and how impacts to species could be detrimental to the sport fishing community and businesses.
- The proposed project would bring an influx of the number of people in the Iliamna area that would want to recreate, sport fish and hunt, including mine employees and support industry personnel.
- Displacement of wildlife would impact the experience of people, throughout the proposed project area but would specifically impact the recreationists at McNeil State Game Refuge.
- The mine itself and the proposed tailings dam could not be in a worse location to threaten the trophy rainbow fishing that the many fly-out lodges rely on. The lodges provide long term employment for many in the Iliamna and Lake Clark areas.

#### **3.4.4.8 Environmental Justice**

Comments were received relating to disproportionate, adverse impacts to low income and minority communities as result of the proposed project.

- Identify low income, minority, and Alaska Native communities that may be impacted by the project.
- Analyze impacts related to environmental justice include food security and subsistence resources, health impacts from pollution and exposure to increased industrial activities and noises, increased risk of injury and exposure to hazardous materials, increased exposure to outsiders and the cascading social and psychological problems that brings.
- The economic benefits will not be for the people of the region but the impacts will.
- The environmental justice risk outweighs the benefits.

- Describe efforts that have been or will be taken to meaningfully involve and inform affected communities about project decisions and impacts.
- Concisely explain how environmental justice impacts have been avoided, minimized, and/or mitigated.

#### **3.4.4.9 Public Health**

Comments were received on impacts to local communities' public health and infrastructure as a result of the project (disease, contaminants, lifestyle changes, behavioral health, and physical health), as per EO 12898.

- An analysis of health effects, such as a Health Risk Assessment or Health Impact Assessment, may be needed to determine the direct, indirect, and cumulative impacts to health.
- Analyze public health concerns related to development and infrastructure development in rural communities.
- Discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter, and identify sensitive receptor populations that may be exposed to these emissions.
- The short- and long-term impacts from all stages of the project include increased risks of accidents and injuries, exposure to hazardous materials, negative impacts on food, nutrition, and subsistence, increased potential for infectious diseases, and risks to health and human services from population-stressed infrastructure and services
- It is important for the EIS to consider the social and psychological impacts the stress of this project has already put on people and the communities who live in the project area.
- Evaluate the potential impacts of development on indigenous women, and increased rate of violence as a result.
- Fully discuss the potential that the proposed project could be associated with behavioral health impacts, such as increased use of drugs and alcohol. More disposable income in communities may increase the use of alcohol and drugs.
- An influx of people could bring diseases to an area with minimal healthcare available that may not be able to handle large capacities of patients.
- Potential health impacts to local communities or other project area users should be identified, as well as any strategies employed to communicate risks or actual emergencies.

#### **3.4.4.10 Visual Resources and Aesthetics**

Comments were received on visual impacts that included:

- Consider visual impacts of the mine, roads, and Amakdedori Port to recreation, and secondary industries like flightseeing operators and wildlife viewing guides.
- The project will have permanent and significant impacts on the appearance of the landscape as viewed from key observation points, planes, etc. and will in turn impact use and enjoyment of the area by many.

#### **3.4.4.11 Wilderness Characteristics**

Comments were received related to wilderness characteristics and values.

- This area has wilderness characteristics, and is adjacent to a national park.
- The potential impact on the Kuktuli and Nushagak rivers and tributaries, Upper/Lower Talarik Creeks, the Gibraltar River, the Kvichak River, and other tributaries of Iliamna Lake have an undeniable wilderness quality that could be impacted by the proposed project. Impacts to the Gibraltar, Talarik, and Kuktuli drainages should be considered and, when possible, quantified
- The project would mean the loss of pristine wilderness throughout the area.

### **3.5 SUMMARY OF PUBLIC COMMENT—NEPA PROCESS AND REGULATORY COMPLIANCE**

Comments were received on the NEPA process and need for compliance with regulations including:

- The general NEPA process
- The purpose and need of the proposed project
- The proposed action and project alternatives
- Cumulative effects analysis
- Mitigation measures
- Monitoring and adaptive management
- Bonding and reclamation
- Data and available information
- Research and evaluation needs.

#### **3.5.1 The NEPA and EIS Process**

Comments were received about the overall NEPA and EIS process, the permit application to the USACE, due process, and the scoping meetings. These types of comments generally do not inform preparation of the EIS as to the project purpose and need, resources/level of impacts to be analyzed, or alternatives to the proposed action that should be considered. A summary of the general NEPA process comments includes the following:

- The Pebble Mine application is incomplete. The USACE should suspend its NEPA process/ not release a Draft EIS without more information from PLP. Foundational information for major parts of Pebble's proposal, including the proposed transportation corridor, port or use of Iliamna Lake, are lacking from their application. The data PLP supplied is more than 10 years old and thus is not reliable for analyzing project impacts.
- The Pebble Mine application is not incomplete. The Pebble Mine plan and application has recently been revised to satisfy EPA guidelines.
- There should be opportunities at each public hearing for oral comments in an open public forum. Everyone should have the opportunity to hear the comments of fellow concerned citizens. Open oral comments provide new information and learning opportunities not only for USACE and their contractors, but for all attendees. Please change your scoping format for future meetings to include an opportunity to express concerns through an open oral comment period.
- The limited number of scoping hearings and failure to host scoping hearings in communities within the Nushagak and Kvichak River drainages means that the opinions and voices of local populations have not been accounted for.

- Consider additional scoping meetings in Washington and Oregon.
- Extend the scoping period beyond 30 days. Tribes in Bristol Bay are requesting at least 120 days for this scoping period.
- A 30 day scoping process is sufficient. Few projects have been talked about for as long and with such passion as the Pebble Mine and at this point, no new information about possible adverse effects will come to light.
- Changing the mining plan in the middle of the scoping period means the scoping comment period should be extended and new meetings held.
- The USACE should compare PLP's plans to the EPA's analysis before moving forward with permitting.
- PLP should get a fair permitting process.
- The EIS process is being rushed; the USACE took more time to prepare the Donlin Gold EIS. The USACE cannot take the 'hard look' required by NEPA in this timeframe.
- With the loss of funding, the USACE should reject this application as insufficient, since this is no longer a financially viable project.
- The Pebble Project has changed some of their plans to accommodate concerns of Alaskans. The State of Alaska has a strong track record of regulating responsible mineral development for projects of all sizes and complexities. The Pebble Project will be no exception.
- The USACE evaluation should include the already defined types of authorizations required for a mine like Pebble and the proven scientific and technical information required to support these decisions.
- To manage the high volume of public comments the USACE should consider using software that uses Near-Duplicate Detection.
- The scope of the EIS should include impacts to federally protected units near the project site, including National Parks and National Wildlife Refuge units.

Comments were received that the USACE should initiate formal consultation and coordination with tribal governments. This includes comments on formal consultation and coordination under EO 13175.

Coordination with other agencies is an important part of the NEPA process. Comments were received on how the USACE should seek and promote full- and broad-scope participation by federal and state resource agencies and tribal government entities as cooperating agencies, and undergo comprehensive formal consultation with appropriate entities (for example, consulting with the National Marine Fisheries Service regarding Essential Fish Habitat). Comments were also received on how the USACE should extend cooperating agency invitations to interested tribal governments, as well as local, state, and federal agencies with special expertise and involve cooperating agencies on the full scope of the proposed Pebble Project.

### **3.5.2 Purpose and Need of the Action and USACE Permits**

Comments were received regarding the purpose and need of the action, and the public interest of the project for the purpose of USACE permitting.

- The Pebble EIS should present a clear and concise statement of the underlying purpose and need for the proposed project consistent with the implementing



regulations for NEPA. This statement should be framed broadly enough as to allow for the analysis of a range of reasonable alternatives.

- Explain how an EIS process can proceed without more commitment from financial backers.
- PLP says their project would help with mineral independence but they will export all of the mined minerals.
- The USACE should accept the purpose and need statement contained in the permit application from PLP.
- The Draft EIS should reflect not only the purpose and need of the project proponent, and the USACE, but also the broader public interest and need based on the scoping comments.
- Describe the permit process. Specifically note if there is a time limit for the applicant to act on a permit before it becomes invalid.
- The lack of a feasibility analysis makes the project as planned un-practicable in regards to NEPA requirements.
- Wrong mine, wrong place.

### 3.5.3 Proposed Action and Alternatives

Comments requested more detailed information on the proposed project plans, such as the water management plan, transportation plans, and spill response plans.

- The design and operational plans for the proposed project and alternatives should be evaluated. This should include the water management plans and cover all phases of the project. The EIS should evaluate the adequacy, reliability, effectiveness, and operational uncertainty of the plans.
- Because PLP changed their plans in the middle of the scoping period, the project design is still fluctuating and is not ready for an environmental review.
- The proposed project design and the modern environmental safeguards it incorporates, as well as the significant economic potential it represents for the State of Alaska, should be fairly considered and incorporated into the EIS based solely on the scientific data presented to the USACE in this proposal.

Commenters suggested that a wide range of alternatives should be analyzed for mine pit and tailings locations, types of tailings facilities, tailings dam construction, mine rate and strip ratio, waste rock segregation methods, gold recovery methods, support facility locations, energy sources, pipeline routes, water discharge locations, road alignments, types of water crossings, and ferry routes. Specific alternatives to the proposed project that were suggested include:

- The EIS range of alternatives should include the practicable alternatives developed for the CWA 404(b)(1) Guidelines analysis.
- The USACE must look at a range of alternatives beyond Pebble's mine site and include alternatives for mining copper and gold somewhere other than Bristol Bay.
- The USACE does not need to explore alternatives to Pebble's proposed mine site as being somewhere other than Bristol Bay because it already 100 miles from the bay and should be deemed a reasonable distance.
- Apply a realistic scope to assess mine impacts. The timeframe of analysis is small at 20 years; the applicant's website notes that the mine can operate for 200 years and could have 11 billion tons of ore. The USACE should consider alternatives to permit 50 percent or 100 percent of the current known resources to be mined.

- There should be an alternative that restricts the size of the mine to what the EPA found appropriate in its Watershed Assessment.
- All of the pyritic tailings should be removed and not stored on the land in perpetuity.
- There should be an alternative that includes full treatment of pyritic tailings at the time of mine closure, before or instead of dumping them in the mine pit.
- Tailings would be thickened, possibly to 55 percent solids. Alternatives (slurry, thickened tails, paste tails) need to be analyzed in the EIS.
- The EIS needs to provide an alternative that uses dry stack tailings. Dismissal of such an alternative needs to provide examples of where dry stack is currently used successfully and why this can or cannot be replicated.
- As an alternative to a tailings ponds dam for waste storage, all waste should be trucked to Canada and stored in Canada, since the company is Canadian.
- Measures to reduce contact between mine waste materials and surface water and groundwater should be considered, such as diversions and liners.
- Different covers for the reclaimed tailings area, including “store and release” and impermeable covers, need to be assessed as alternatives in the EIS.
- Consider an alternative where the tailings pond is constructed at a location that will not impair surface waters, block fish passage, or have the potential to contaminate ground or surface waters.
- The EIS needs to include alternatives that provide water storage areas where excess water can be moved out of the TSF and out of the seepage pond in the event of extreme precipitation.
- The EIS should produce an alternative in which all embankments except the internal one are downstream construction.
- Modern pro-active mine design suggestions, including not placing tailings dams where a failure would put sensitive habitat at risk, should be assessed as alternatives in the EIS.
- Consider including a combination of simultaneous open pit and underground mining, a larger open pit mine, or a longer lived open pit mine. It may be possible to mine with open pits for the shallower portions, and mine by underground mining the deeper or eastern portions of the Pebble Deposit.
- The USACE should consider finding an alternative location to take the ore for processing.
- The EIS needs to analyze whether gravity concentration as a recovery method for gold recovery is viable at this deposit. This appears to be a method used in placer deposits.
- The USACE should consider the possibility of having cyanide processing at the mine site and transporting cyanide by truck or pipeline North and West toward the Nushagak Hills where pits would be out of range of the creeks and rivers flowing into the salmon spawning areas.
- An alternative of running mining operations and ore trucks on natural gas or electricity needs to be included in the EIS.
- The EIS should examine an alternative that treats water for discharge to meet the water quality of the natural receiving waters, if they are of higher quality than Alaska most stringent criteria. Studies have shown that where natural waters are very low in copper and cadmium, discharges above those background levels can have potentially toxic effects.

- The EIS needs to include an alternative for water treatment that will result in zero discharge of metals to the watershed.
- In order to contain gases that may contain acid rock drainage from getting into the air in the project area, the USACE should develop an alternative that covers the development with an air tight structure and the fumes should be cleaned before release into the atmosphere.
- The previous plan for a road along the northeastern side of Iliamna Lake, and the new proposed roads and a ferry across Iliamna Lake both put different communities at risk.
- The EIS should consider identifying alternative ferry terminal locations if the proposed sites are found to contain valuable spawning and/or rearing habitats for sockeye salmon.
- The two ferry terminal locations are both at the mouths of blue ribbon trout streams (Upper Talarik Creek and Gibraltar River). Alternative sites closer to populated areas should be considered if possible. The village of Kokhanok airstrip would be an alternative on the south side; a location closer to Newhalen, but away from the mouth of the river is an alternative on the north side.
- The mine access road would follow a branch of Upper Talarik Creek. An alternative that places a dock in Iliamna and uses the proposed Iliamna Spur Road to access the mine needs to be considered in the EIS to reduce potential impacts on Upper Talarik Creek.
- A better alternative is to use the existing road and resources at Pile Bay and Williamsport.
- Running an ore concentrate pipeline around Iliamna Lake to the existing road between Pile Bay and Williamsport is a safer alternative to ferrying ore concentrate across Iliamna Lake in the winter to address concerns about the potential for contamination of surface water in Iliamna Lake.
- Consider having only seasonal (summer) barge transport across Iliamna Lake to avoid impacts to winter transportation options for residents of nearby villages.
- As an alternative to the Iliamna Lake crossing, consider a haul road that would stay north of this lake, then head south from Pedro Bay to the Amakdedori port.
- The road system would cross numerous anadromous streams. It would be best to require bridges at all of these crossings. Oregon and Washington states have been working for many years to bring back their salmon runs. Recreating salmon habitat including headwaters has proven to be extremely hard.
- A port at Diamond Point in Iliamna Bay should be evaluated against the proposed Amakdedori Port.
- Alternative port sites should be evaluated due to the potential ecological impact from the project.
- There is no need to dredge the proposed port to -50 feet; a shallower depth should be evaluated.
- The EIS should assess the whole breadth of dredging activities when determining the possible impacts to aquatic organisms and consider practicable alternatives that would avoid and minimize impacts.
- The range of dredged material management alternatives should include beneficial uses such as beach nourishment or construction material, a disposal site in internal

waters landward of the Kamishak Bay closing line, and an ocean disposal site seaward of the Kamishak Bay closing line.

- The EIS should consider alternative methods for delivering natural gas to the project area, given the risk of natural gas entering the marine environment, the impact it would have on marine resources, and how gas line leaks or ruptures would be contained.
- The EIS should review potential alternative alignments for the pipeline route, such as an alignment north of Augustine Island.
- Include an alternative pipeline route that goes north to connect with the planned natural gas pipeline to support the development and operation of the Donlin Mine.
- Alternative fuel sources should be evaluated in an effort to eliminate the potential long term consequences that a subsea pipeline can have on the environment.
- Alternative energy sources should be examined. Many of the minerals to be mined will go into solar panels, wind turbines, and hydro turbines. The PLP could support the industries they will be supplying by utilizing alternative, renewable energy sources.
- The EIS should consider alternatives to laying the pipeline directly on the seafloor bottom (unburied) and evaluate the effects of an unburied pipeline's impact on crab movements, access to important habitat, and direct mortality.
- The EIS should evaluate practicable alternatives for reducing the amount of natural gas pipeline that is installed in the Sterling Highway right-of-way, which is managed by the Alaska Department of Transportation and Public Facilities.

### 3.5.4 Cumulative Effects Analysis Process

Comments were received on how the cumulative effects analysis should be thorough, well-defined, and complete.

- Describe how the Draft EIS process considers cumulative effects, and identify the geographic scope and timeframe for the cumulative effects analysis.
- The cumulative effects analysis should consider past and current exploration activities conducted at the Pebble project site and current and future exploration activities occurring the watershed region.
- Consider long term and cumulative effects, keeping in mind the potential long duration of the project, potential expansions of the project beyond what is currently proposed for permit review, and the potential that this project may facilitate and encourage a number of other largescale active mining claims in the Bristol Bay watershed by providing transportation and power infrastructure that they can utilize.
- The USACE needs to acknowledge that the current permit application could be the initial phase in a much broader mine development plan. Pebble Limited Partnership has repeatedly said, as recently as September 2017, their project is, "a multi-generational opportunity. Its size and scale will lead to a very, very long life mine." Based on statements such as this, and official records indicating they plan to mine up to 11 billion tons of ore, it is reasonably foreseeable that Pebble intends to expand its mine far beyond what is currently proposed. Reviewing just phase one of the project unlawfully segments environmental review, shortchanges the public interest, and risks untold impacts to the Bristol Bay region's world-class fisheries.
- There are 20 large-scale active mining claims in the Bristol Bay watershed that this project could encourage by providing the transportation and power infrastructure. The

EIS scope should include looking at the impacts of the potential of creating a mining district in the area.

- The EIS needs a cumulative effects analysis on culture.
- Additional large-scale landscape and infrastructure development, facilitated by the initial road, pipeline, and barge and ferry ports is a reasonably foreseeable impact. The EIS should discuss any reasonably foreseeable future public access to the project's infrastructure components and analyze any reasonably foreseeable indirect effects of this action.
- The EIS should include an assessment of the extensive mitigation measures that Pebble has built into the new proposed plan to address environmental and stakeholder concerns.
- The EIS should include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area, including its long term infrastructure.

### 3.5.5 Mitigation Measures

Comments were received related to the need for project mitigation, and suggestions for mitigation measures.

- EIS should identify the type of activities that would require mitigation measures during the construction, operation, and closure phases of this project. Identify whether implementation of each measure is required by the USACE or any other governmental entity and which entity will be responsible for implementing the measure.
- Use scientific data that details what damage is anticipated and determines whether and how such damage can be mitigated, including whether such mitigation is even possible.
- Tribes and the public should be involved in the mitigation planning, and monitoring of the proposed project.
- Review any traditional native or cultural sites within the mine and utility corridors, and provide mitigation for same.
- Consider and recognize the extensive mitigation measures that Pebble has built into the new proposed plan to address environmental and stakeholder concerns.
- The measures suggested by PLP will not work.
- PLP has not given any mitigation plans for sociocultural impacts; sociocultural impacts cannot be mitigated.
- PLP has not provided a plan for compensatory mitigation. The Draft EIS should describe such a plan and reasonable alternatives to it. The USACE should consider mitigation banks, or at a minimum, in-lieu fee programs, not less reliable permittee-responsible mitigation.
- Water takes the path of least resistance, so rainfall will attempt to make its way to the river bodies, but this can be mitigated with runoff ponds and filtrated release.
- Consider bilge water treatment that is capable of more than oil-water separation to protect Iliamna Lake's ecology.
- Require that the tailings pond be lined in such a way as to prevent any interaction between tailings waste and groundwater.

- This EIS should address the timing of ferry traffic across Iliamna Lake with regard to the movement of commercial fishing boats across the lake, both before and after the salmon season, and during salmon spawning.
- The ice-breaker ferry should be constructed and assembled at an alternate location to allow for naval architectural oversight and engineering support.
- Construct the natural gas pipeline in the winter to reduce environmental impacts.
- Suggested mitigation measures for the road corridor include chip sealing, winter maintenance plans, monitoring culverts, plans for vehicle emergency response, clear policy on use of the road by non-mining personnel.
- All culverts should be required to be designed for fish passage at all times, and monitored and corrected to ensure fish passage for the lifespan of the project and closure.
- The culverts should be designed with software that can better predict stress and deflection in heavily-loaded, complex soil structures interaction dependent culvert structures.
- All upland water crossings should be designed for all impacts above the 1.5 times stream width at ordinary high water.
- Take measures to decrease whale strikes by ships.
- Measures should be implemented to minimize the aesthetic impacts as much as is reasonably possible.
- There should be no fly zones, to address caribou hunting impacts.
- Consider measures to reduce or minimize adverse impacts to environmental resources in development of alternatives.

### 3.5.6 Monitoring and Adaptive Management

Comments were received in regards to the need for monitoring plans during operations and after closure of the mine.

- The history of multiple open pit mining sites has shown that the open reservoirs put in place to hold contaminated water and processing liquids have routinely been compromised by leaking and/or by drastic failure of containment levees. While they highlight the measures taken to put these toxins in containment, they fail to address the long term maintenance and mitigation of the toxins to make them inert.
- Explain what oversight and monitoring would be applied to meet minimum detrimental environmental conditions, by whom, and under what authority.
- Explain if there would be a fund for additional environmental monitoring while the project is ongoing.
- Describe how and by whom the tailings dam will be monitored during project operations and then at the end of the mining period.
- The EIS should utilize adaptive management and contingency planning to describe the strategy for responding to unforeseen circumstances at the site. The strategy should include ecological benchmarks or observations that would set follow-up actions into motion. This strategy or plan should be described so that reviewers may comment on its adequacy.

### 3.5.7 Bonding and Reclamation

Comments were received related to reclamation activities, bonding, and setting up an escrow fund for restoration. Comments asked the USACE to explain in the EIS the mechanisms for treatment in perpetuity and post-closure (i.e., plan for permanent water treatment, the entity that would pay post closure costs and secure financing in perpetuity).

- Alaska regulatory requirements require a financial assurance to cover the costs of premature closure of the mine and the costs of post-closure water treatment. Calculating this cost is an essential part of the economic analysis EIS.
- Local communities would be hooked up to the gas line, as well as a maintenance crew watching over the hazardous tailing piles and dams. Describe bonding to cover these costs if something happens to PLP.
- The reclamation bond amount needs to be enough to fix any damage. This needs to be a permanent interest bearing fund that will supply enough funds in perpetuity, to cover unexpected future disasters, not just planned monitoring and reclamation.
- The project should have the ability to self-fund, and/or any third-party financial assurance mechanisms, should be disclosed. Disclosure of the financial assurance amount and mechanism is particularly important for this project given that the proposal includes long term water management and treatment.

### 3.5.8 Data and Available Information

Comments were received that suggested specific, documents, articles, or other information that should be utilized when developing the Draft EIS.

- Review research on fiber optics cable placement on tundra by Rorik Peterson at the University of Alaska Fairbanks. In addition, the USACE should review mapping provided by GCI regarding fiber optic cable placement of the TERRA-Southwest and Kodiak Kenai Fiber Link cable crossings in Cook Inlet and Iliamna Lake that would intersect with the proposed natural gas pipeline.
- Acknowledge how Traditional Ecological Knowledge information may be used and how to ensure that sensitive information is protected and follow a set of protocols for use of this information.
- Regarding impacts to shellfish populations, review the following:
  - Alaska Department of Environmental Conservation: Cook Inlet Subarea Contingency Plan (CISCP) sensitive areas section. Available from [https://dec.alaska.gov/spar/ppr/plans/scp\\_ci/CISCP\\_DSensitive\\_Areas\\_Jan2017.pdf](https://dec.alaska.gov/spar/ppr/plans/scp_ci/CISCP_DSensitive_Areas_Jan2017.pdf).
  - Collapsed or recovering shellfish fisheries in the state of Alaska. Preliminary Report to the Alaska Board of Fisheries. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 1 1J02-06, October 1999.
- Review spills in Cook Inlet. In a study by the Cook Inlet Regional Citizen's Advisory Council, 70 of the 88 were caused by structural or mechanical failures.
- "After leaks, Cook Inlet's aging oil and gas pipelines get an unprecedented review." *Anchorage Daily News*, May 2, 2018.
- Woodson, Ross D. 1990. Offshore Pipeline Failures. University of California, Berkeley, Department of Civil Engineering, Hydraulic and Coastal Engineering.

- Alaska Department of Fish and Game, Division of Commercial Fisheries news release: 2018 Bristol Bay Sockeye Salmon Forecast.
- *The Economic Importance of the Bristol Bay Salmon Industry*. Prepared for the Bristol Bay Regional Seafood Development Association by Gunnar Knapp Mouhcine Guettabi Scott Goldsmith. April 2013.
- There is a recent text book edited by Dr. Carol Anne Woody that should be a resource for the EIS.
- *Review of Pebble Limited Partnership's Environmental Baseline Document, Geochemical Characterization*. Available from <http://pebblescience.org/pebble-ebd-critiques.html>.
- *Critique of Pebble Limited Seismic Hazard Assessment*. Available from <http://pebblescience.org/pebble-ebd-critiques.html>.
- Regarding salmon and fish habitat, review the following:
- Limpinsel, D. E., Eagleton, M. P., and Hanson, J. L., 2017. *Impacts to Essential Fish Habitat from Non-Fishing Activities in Alaska*. EFH 5 Year Review: 2010 through 2015. U.S. Dep. Commer., NOAA Tech.
- Review certified fish habitat areas found here: <https://extra.sf.adfg.state.ak.us/>
- Ching, Jason S., Curry J. Cunningham, and Thomas P Quinn. *Iliamna Lake Spawning Ground Habitat Assessment and Data Access*. Final Report to the Bristol Bay Regional Seafood Development Association, December 2014. School of Aquatic and Fishery Sciences University of Washington.
- Brennan and Daniel E. Schindler and Diego P. Fernandez, 2017. *Using strontium in otoliths to determine the natal origin and habitat use of sockeye salmon in the Nushagak River*. University of Washington, School of Aquatic and Fishery Sciences, University of Utah, Department of Geology and Geophysics.
- Hauser, William J. 2007. Potential Impacts of the Proposed Pebble Mine on Fish Habitat and Fishery Resources of Bristol Bay. Fish Talk Consulting.
- Pebble Project Freshwater, Marine Fish and Instream Flow Technical Working Groups: Development of Study Objectives and Agency Recommendations.
- Bristol Bay Fish Facts. Prepared for United Fishermen of Alaska Salmon Habitat Information Program, for Pebble Mine EIS Scoping—2018. See also Additional Anadromous Cataloged Waterbodies (attached to public comment submitted by United Fishermen of Alaska).
- In incorporating potential human health effects of the proposal and environmental impacts, apply the four components of the precautionary principle, as described in Kriebel et al., 2001: *Environmental Health Perspectives*. Available from <https://www.ncbi.nlm.nih.gov/pubmed/11673114>.
- Sharma, R. P., & Kumar, A. 2013. *Case histories of earthen dam failures*. International Conference on Case Histories in Geotechnical Engineering, 8, 6. Available from <https://scholarsmine.mst.edu/cgi/viewcontent.cgi?article=3092&context=icchgq>.
- It has been reported that PLP has Light Detection and Ranging (LIDAR) data that covers the project area. LIDAR should provide a good indication of surface faulting. The LIDAR data could be very helpful in addressing the question of whether the Lake Clark fault may extend farther to the southwest.
- “Suncor investigating after more than 100 birds die at new oilsands mine”. *Financial Post*, September 19, 2017.



- Bristol Bay Tribal Multi-Species Conservation and Management Plans. Currently there are none for Iliamna, Nushagak River, Nushagak Bay, Kvichak Bay, and Peninsula, but they should be incorporated into the EIS when complete.
- Cederholm, C. J., D. H. Johnson, R. E. Bilby, L.G. Dominguez, A. M. Garrett, W. H. Graeber, E. L. Greda, M. D. Kunze, B.G. Marcot, J. F. Palmisano, R. W. Plotnikoff, W. G. Percy, C. A. Simenstad, and P. C. Trotter. 2000. "Pacific Salmon and Wildlife: Ecological Contexts, Relationships, and Implications for Management." Special Edition Technical Report, Prepared for D. H. Johnson and T. A. O'Neil (Managing directors), Wildlife-Habitat Relationships in Oregon and Washington. Washington Department of Fish and Wildlife, Olympia, Washington.
- *Where Water is Gold: Life and Livelihood in Alaska's Bristol Bay*. By Carl Johnson, with a foreword by Sandra Day O'Connor. Copyright 2016 by Braided River and the Mountaineers Foundation.
- *From the Hinterlands to Tidewater: A Grassroots Pictorial 1885-1965*. By John B. Branson, 1998. The National Park Service, Lake Clark National Park and Preserve.
- Kokhanok portion of the Katmai Project Jukebox program. Judy Nelson/Shirley Nielsen. <http://jukebox.uaf.edu/Katmai/Kokhanok/html/main.html>
- H W McCurdy. 1966. Marine History of the Pacific Northwest. Pg 344. <http://alaskashipwreck.com/shipwrecks-by-area/south-central-alaska-shipwrecks/south-central-alaska-wrecks/>
- Bristol Bay Seasonal Subsistence Gathering Cycle. (Attached to comment submitted by Curyung Tribal Council).

### 3.5.9 Research and Evaluation Needs

Comments were received regarding the lack of baseline research, monitoring, and evaluation needs, or data gaps for the project.

- The USACE should suspend its NEPA process until the PLP presents sufficient environmental baseline and economic data about its proposal so as to reasonably inform the NEPA process.
- No new baseline documents or data were submitted with PLP's application to the USACE in December 2017. The only publicly available baseline documents compiled by PLP are now more than a decade old, with data collected from 2004 to 2008. Those baseline studies failed to include newly proposed project components such as the transportation corridor, Iliamna Lake, and the proposed port site.
- Study the Montana mining industry (e.g., Berkeley Mine) and how often that state has experienced a negative environmental pollution outcome from a mine which was not cleaned up properly.
- There is a lack of baseline studies on newly added mine components for an informed permit process, such as wastewater discharges to Frying Pan Lake.
- An ecotoxicology assessment needs to be conducted for the pit lake, and it needs to be conducted when the pit first rebounds to its full level, and where pit lake stratification turns over and pit lake water mixes.
- Predictive modeling be used, based on a site-specific conceptual model that describes the system boundaries, spatial and temporal scales, hydraulic and chemical characteristics, and the mathematical relationships used to describe processes. The water quality model, in particular, should be capable of predicting both whole water and dissolved fractions of metals/metalloids.

- Baseline data for the proposed Amakdedori Port and Kamishak Bay may be lacking in terms of what is known about water currents, shifting sands/silts and ice and how these physical conditions may affect trenching. The mud at Amakdedori Bay provides an important ecological function and habitat.
- No baseline data exists for the proposed port and use of Iliamna Lake, or the 83-mile transportation corridor making it impossible to analyze the potential impacts these activities would have on sensitive salmon habitat, tributaries, and adjacent wetlands.
- There are no relevant studies of Iliamna Lake. Frissell and Shaftel's spawning data are more than 7 years old.
- The Alaska Department of Fish and Game lacks assessment tools for the shellfish that live in Cook Inlet. Current baseline studies for these species do not exist. In light of the possible increase in sediment deposition rate resulting from dredging in the area of the Pebble Project, the USACE should require a shellfish population baseline assessment and impact statement regarding the dredging project prior to any dredging work beginning in Amakdedori Bay.
- An extensive and thorough baseline study on bear populations including numbers, movement, diet, and feeding areas should be done.
- More studies are needed to understand freshwater seals and all other animals in the Iliamna Lake area.
- There needs to be more baseline data on all species in the Bristol Bay river mouths and estuaries and the species in the Amakdedori Port area of Kamishak Bay.
- Require appropriate inventory survey for the broad range of historic property types that may be present in the Area of Potential Effect, including archeological sites/districts, properties of cultural and religious significance to Tribes, cultural landscapes, standing structures, and Historic Districts.
- Stream courses should be accurately documented using best available technology. The application relies largely on National Hydrography Dataset which is outdated and overlooks important tributary habitat.
- Evaluate all streams crossed by the road corridor for fish presence (including documentation of species, life stages, and abundance).
- Quantify salmon populations in the North Fork Kaktuli, South Fork Kaktuli, Upper Talarik Creek, and their tributaries, as well as all stream crossings in the transportation corridor, with at least five years of data.
- The effects of ice breaking on winter lake ecology are not known; study is required to determine the width of the ice-free corridor and the impacts of changes in light, current, and lake surface albedo on spring melt date, phyto- and zooplankton bloom timing, and lake food webs.

### 3.5.10 Non-Substantive Comment

Submissions without substantive comment that are not specific to a particular issue or do not inform the analysis conducted in the EIS are considered non-substantive. These include comments in support of, or in opposition to, the applicant's proposed project.

## **APPENDIX A – NOTICE OF INTENT**

Individuals are required to self-report any arrests, charges or convictions that would keep the individual from obtaining or maintaining a favorable suitability or fitness determination. Programs impacted are referenced within the 42 U.S. Code § 13041 and include impacted individuals such as employees, DoD contractors, providers, adults residing in a family child care home, volunteers, and others with regular reoccurring contact with children.

*Affected Public:* Individuals or Households.

*Annual Burden Hours:* 1,250.

*Number of Respondents:* 5,000.

*Responses per Respondent:* 1.

*Annual Responses:* 5,000.

*Average Burden per Response:* 15 minutes.

*Frequency:* On occasion.

Respondents are DoD contractors, family child care providers, family child care adult family members residing in the home, and specified volunteers who provide child care services for children under age 18. This form will be initiated by DoD staff and will be maintained in the initiating DoD offices and/or appropriate Human Resources or Security Offices.

Dated: March 23, 2018.

**Aaron T. Siegel,**

*Alternate OSD Federal Register Liaison Officer, Department of Defense.*

[FR Doc. 2018-06284 Filed 3-28-18; 8:45 am]

**BILLING CODE 5001-06-P**

## DEPARTMENT OF DEFENSE

### Department of the Army, Corps of Engineers

#### Intent To Prepare an Environmental Impact Statement (EIS) for the Pebble Project

**AGENCY:** U.S. Army Corps of Engineers, Department of Defense.

**ACTION:** Notice of intent.

**SUMMARY:** The Alaska District, U.S. Army Corps of Engineers (the Corps) intends to prepare a Draft Environmental Impact Statement (DEIS) to assess the potential social, economic, and environmental impacts associated with the proposed Pebble open pit mine in wetlands, streams and Ocean near Cook Inlet. The EIS will assess potential effects of a range of alternatives.

**DATES:** Public scoping meetings are tentatively scheduled in Anchorage, Homer, Dillingham, King Salmon (Naknek), Iliamna (Newhalen), Nondalton, and Kokhanok (Iguigig) will occur in mid-April 2018. Information

about these meetings and meeting dates will be published locally, posted at <http://www.pebbleprojecteis.com>, and available by contacting the Corps.

**ADDRESSES:** U.S. Army Corps of Engineers, P.O. Box 6898, Joint Base Elmendorf Richardson, AK 99506-0898.

**FOR FURTHER INFORMATION CONTACT:** Questions about the proposed action and the Draft EIS should be referred to: Mr. Shane McCoy, Regulatory Division, telephone: (907) 753-2715 at <http://www.pebbleprojecteis.com> or by mail to the above address. To be added to the project mailing list and for additional information, please visit the following website: <http://www.pebbleprojecteis.com>.

**SUPPLEMENTARY INFORMATION:** An application for a Department of the Army permit was submitted by the Pebble Limited Partnership pursuant Section 404 of the Clean Water Act (33 U.S.C. 1344) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) on December 22, 2017, and was advertised in a Public Notice, POA-2017-271, on January 5, 2018. The public notice is available on Alaska District's public website at: [http://www.poa.usace.army.mil/Portals/34/docs/regulatory/publicnotices/2018/POA-2017-271%20Pebble\\_PN.pdf?ver=2018-01-05-153755-640](http://www.poa.usace.army.mil/Portals/34/docs/regulatory/publicnotices/2018/POA-2017-271%20Pebble_PN.pdf?ver=2018-01-05-153755-640).

**1. Description of the Proposed Project.** Pebble Limited Partnership (PLP) is proposing to develop the Pebble copper-gold-molybdenum porphyry deposit as an open-pit mine, with associated infrastructure, in southwest Alaska, north of Lake Iliamna. The proposed project would require approximately four years to construct, with a projected mine life of approximately 20 years. Major project components include excavation of an open pit, that ultimately would be approximately 6,500 feet long by 5,500 feet wide, with depths between 1,330 and 1,750 feet; a tailings impoundment with 1.1 billion tons storage volume; a low grade ore stockpile with the capacity to store up to 330 million tons; an open pit overburden stockpile; a mill facility processing approximately 160,000 tons of ore per day; a natural gas-fired power plant with a total connected load of 230 mega-watt (MW), supplied by a 188-mile, 10 to 12-inch diameter, natural gas pipeline across Cook Inlet and Iliamna Lake to the Mine Site; and transportation infrastructure including a 30-mile road from the Mine Site to a ferry terminal on the north shore of Iliamna Lake, an 18-mile crossing with an ice-breaking ferry to a terminal on the south shore of Iliamna Lake, and a 35-mile road to the proposed

Amakdedori Port on Cook Inlet. The proposed mine and related facilities would have a total footprint of approximately 5.9 square miles.

The pipeline route would originate on the Kenai Peninsula, connecting to the existing gas pipeline infrastructure near Happy Valley. A metering station would be constructed at the off-take point and the pipeline would then follow south along the Sterling Highway for 9 miles to a gas-fired compressor station north of Anchor Point. The compressor station would feed a 94-mile subsea pipeline from the east shore of Cook Inlet to Amakdedori Port on the west shore. A second gas-fired compressor station would be located at the port site. The pipeline route would then follow a 30-mile mine access road to the south shore of Iliamna Lake, where the pipeline would enter Iliamna Lake for approximately 18 miles. The pipeline would come ashore at on the north shore of the lake, where it would follow the mine access road to the Mine Site.

**2. Alternatives.** A range of alternatives of the proposed action will be identified, and those found to be reasonable and practicable will be fully evaluated in the DEIS, including: the no action alternative, the applicant's proposed alternative, alternative mine locations and mine plans, alternative mining methods and processes, alternatives that may result in avoidance and minimization of impacts, and mitigation measures not in the proposed action. However, this list is not exclusive and additional alternatives may be considered for inclusion.

**3. Scoping Process and Public Involvement.** The scoping period will extend from April 1, 2018, through April 30, 2018. Scoping is conducted to assist in determining the scope of analysis, significant issues and alternatives to be analyzed in depth in the DEIS. Comments should be as specific as possible. Additional public involvement will be sought through the implementation of the public involvement plan and the agency coordination team.

**4. Significant Issues.** Numerous issues will be analyzed in depth in the DEIS related to the effects of the proposed Pebble mine and associated infrastructure construction, operation, and closure. These issues will include, but will not be limited to, the following: wetlands, water quality, air quality, hazardous materials, fish and wildlife, vegetation, cultural resources, food production, land use, needs and welfare of the people (socioeconomics including commercial fishing and tourism), recreation, general environmental

concerns, historic properties, navigation, and safety.

5. *Additional Review and Consultation.* Additional review and consultation which will be incorporated into the preparation of the DEIS will include, but are not necessarily limited to coordination under Section 401 of the Clean Water Act, Essential Fish Habitat coordination; consultation under Section 7 of the Endangered Species Act; and consultation under the National Historic Preservation Act

**Shelia Newman,**

*Deputy Chief, Regional Regulatory Division, U.S. Army Corps of Engineers, Alaska District.*

[FR Doc. 2018-06369 Filed 3-28-18; 8:45 am]

**BILLING CODE 3720-58-P**

## DEPARTMENT OF EDUCATION

[Docket No.: ED-2018-ICCD-0030]

### Agency Information Collection Activities; Comment Request; Expanding Opportunity Through Quality Charter Schools Program: Technical Assistance To Support Monitoring, Evaluation, Data Collection, and Dissemination of Best Practices

**AGENCY:** Office of Innovation and Improvement (OII), Department of Education (ED).

**ACTION:** Notice.

**SUMMARY:** In accordance with the Paperwork Reduction Act of 1995, ED is proposing an extension of an existing information collection.

**DATES:** Interested persons are invited to submit comments on or before May 29, 2018.

**ADDRESSES:** To access and review all the documents related to the information collection listed in this notice, please use <http://www.regulations.gov> by searching the Docket ID number ED-2018-ICCD-0030. Comments submitted in response to this notice should be submitted electronically through the Federal eRulemaking Portal at <http://www.regulations.gov> by selecting the Docket ID number or via postal mail, commercial delivery, or hand delivery. Please note that comments submitted by fax or email and those submitted after the comment period will not be accepted. Written requests for information or comments submitted by postal mail or delivery should be addressed to the Director of the Information Collection Clearance Division, U.S. Department of Education, 400 Maryland Avenue SW, LBJ, Room 216-44, Washington, DC 20202-4537.

**FOR FURTHER INFORMATION CONTACT:** For specific questions related to collection activities, please contact Patricia Kilby-Robb, 202-260-2225.

**SUPPLEMENTARY INFORMATION:** The Department of Education (ED), in accordance with the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3506(c)(2)(A)), provides the general public and Federal agencies with an opportunity to comment on proposed, revised, and continuing collections of information. This helps the Department assess the impact of its information collection requirements and minimize the public's reporting burden. It also helps the public understand the Department's information collection requirements and provide the requested data in the desired format. ED is soliciting comments on the proposed information collection request (ICR) that is described below. The Department of Education is especially interested in public comment addressing the following issues: (1) Is this collection necessary to the proper functions of the Department; (2) will this information be processed and used in a timely manner; (3) is the estimate of burden accurate; (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology. Please note that written comments received in response to this notice will be considered public records.

*Title of Collection:* Expanding Opportunity through Quality Charter Schools Program: Technical Assistance to Support Monitoring, Evaluation, Data Collection, and Dissemination of Best Practices.

*OMB Control Number:* 1855-0016.

*Type of Review:* An extension of an existing information collection.

*Respondents/Affected Public:* State, Local, and Tribal Governments.

*Total Estimated Number of Annual Responses:* 102.

*Total Estimated Number of Annual Burden Hours:* 136.

*Abstract:* This request is for an extension of OMB approval to collect data for the Expanding Opportunity through Quality Charter Schools Program: Technical Assistance to Support Monitoring, Evaluation, Data Collection, and Dissemination of Best Practices formerly titled Charter Schools Program (CSP) Grant Awards Database. This current data collection is being coordinated with the EDFacts Initiative to reduce respondent burden and fully utilize data submitted by States and

available to the U.S. Department of Education (ED). Specifically, under the current data collection, ED collects CSP grant award information from grantees (State agencies, charter management organizations, and some schools) to create a new database of current CSP-funded charter schools. Together, these data allow ED to monitor CSP grant performance and analyze data related to accountability for academic purposes, financial integrity, and program effectiveness.

Dated: March 23, 2018.

**Tomakie Washington,**

*Acting Director, Information Collection Clearance Division, Office of the Chief Privacy Officer, Office of Management.*

[FR Doc. 2018-06244 Filed 3-28-18; 8:45 am]

**BILLING CODE 4000-01-P**

## FEDERAL COMMUNICATIONS COMMISSION

[OMB 3060-0819]

### Information Collection Being Reviewed by the Federal Communications Commission

**AGENCY:** Federal Communications Commission.

**ACTION:** Notice and request for comments.

**SUMMARY:** As part of its continuing effort to reduce paperwork burdens, and as required by the Paperwork Reduction Act (PRA) of 1995, the Federal Communications Commission (FCC or the Commission) invites the general public and other Federal agencies to take this opportunity to comment on the following information collection. Comments are requested concerning: whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility; the accuracy of the Commission's burden estimate; ways to enhance the quality, utility, and clarity of the information collected; ways to minimize the burden of the collection of information on the respondents, including the use of automated collection techniques or other forms of information technology; and ways to further reduce the information collection burden on small business concerns with fewer than 25 employees. The FCC may not conduct or sponsor a collection of information unless it displays a currently valid control number. No person shall be subject to any penalty for failing to comply with a collection of information subject to the

## **APPENDIX B – PUBLIC NOTICES**



US Army Corps  
of Engineers  
Alaska District

Regulatory Division (1145)  
CEPOA-RD  
Post Office Box 6898  
JBER, Alaska 99506-0898

# Public Notice of Application for Permit

**PUBLIC NOTICE DATE:** January 5, 2018  
**REFERENCE NUMBER:** POA-2017-271  
**WATERWAY:** Multiple

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An application has been received in this office from Pebble Limited Partnership (applicant) to discharge fill material into and perform work within waters of the United States. The project site is located in Southwest Alaska near Iliamna Lake, primarily within the Lake and Peninsula Borough with a portion of the supporting infrastructure in the Kenai Peninsula Borough. The project consists of four primary project elements: a mine site, a port at Amakdedori, transportation corridor, and natural gas pipeline. The submitted application is available on the Corps website at [www.poa.usace.army.mil/Missions/Regulatory/Permitting-Section-Homepage/Department of the Army Permit Application POA-2017-271](http://www.poa.usace.army.mil/Missions/Regulatory/Permitting-Section-Homepage/Department%20of%20the%20Army%20Permit%20Application%20POA-2017-271) submitted by Pebble Limited Partnership.

The Corps has determined and notified the applicant that an environmental impact statement level of analysis will be required for the review of the Department of the Army Permit application. As such, the Corps will conduct public scoping after publishing a Notice of Intent to develop an EIS in the federal register. The Notice of Intent will include a list of public scoping locations. Times and dates for these locations will subsequently be advertised via Corps Public Notice and website as well as local media outlets.

Please contact Sheila Newman, Regulatory Division Program Manager at (907) 753-2712, toll free from within Alaska at (800) 478-2712, by fax at (907) 753-5567, or by email at [poaspecialprojects@usace.army.mil](mailto:poaspecialprojects@usace.army.mil) if further information is desired concerning this notice.

District Engineer  
U.S. Army, Corps of Engineers



# NEWS RELEASE

**U.S. ARMY CORPS OF ENGINEERS**

**BUILDING STRONG.**

For Immediate Release:  
March 30, 2018  
Release No. 18-006

Contact:  
John Budnik, 907-753-2615  
John.P.Budnik@usace.army.mil

## **Scoping for Department of the Army Permit Application 2017-271-Pebble Limited Partnership, Environmental Impact Statement**

JOINT BASE ELMENDORF-RICHARDSON – The U.S. Army Corps of Engineers – Alaska District requests public input regarding the scope of the environmental impact statement level of analysis for Department of the Army permit application POA-2017-271 submitted by Pebble Limited Partnership.

The Pebble Project has been in the public eye for many years and there have been multiple public input and comment opportunities from other agencies. This public body of information has helped to inform the Corps' preliminary scope for the environmental impact analysis.

The Corps is now asking the public for any additional information to help inform the scope of analysis as it specifically relates to the Pebble Limited Partnership's submitted permit application to include potentially affected resources, alternative options, analytical methodology, and potential mitigation measures.

Since Jan.5, the permit application has been publically available on the Alaska District's website. On Jan.12, the application was mailed via CD to 35 federally recognized Alaska Native Tribes alongside invitations for government-to-government consultation throughout the entire evaluation process including the EIS. The Corps maintains the application as well as additional scoping information at [www.pebbleprojecteis.com](http://www.pebbleprojecteis.com).

Scoping input can be submitted by mail to:

U.S. Army Corps of Engineers, Alaska District  
Program Manager, Regulatory Division  
ATTN: DA Permit Application 2017-271, Pebble Limited Partnership  
P.O. Box 6898  
Joint Base Elmendorf-Richardson, Alaska, 99506-0898

Beginning April 1, scoping input can be entered directly into the project website at [www.pebbleprojecteis.com](http://www.pebbleprojecteis.com).

Also, scoping input can be submitted in person at public meetings via directly into the provided computers, handing in written comments, or speaking to a court reporter.



Please note that public scoping meetings are not public hearings. The Corps has chosen to arrange meetings to provide the public with an easy forum to provide input. All information received will become part of the public record upon receipt.

Meeting locations and times are indicated below. A video explaining major project components will be available for viewing. The Corps will have representatives available to answer questions regarding the Department of the Army permit application review process. Individuals may come in at any time during open hours and to provide scoping input. A Yupik translator will be available at the meetings.

**Naknek**

Monday, April 9  
Naknek School  
3:30 PM – 7:30 PM

**Kokhanok**

Tuesday, April 10  
Tribal Hall  
3:30 PM – 7:30 PM

**Homer**

Wednesday, April 11  
Homer High School,  
5:00 PM – 9:00 PM

**Newhalen**

Thursday, April 12  
Newhalen School  
3:30 PM – 7:30 PM

**New Stuyahok**

Friday, April 13  
Community Building  
1:00 PM to 4:30 PM

**Nondalton**

Monday, April 16  
Tribal Center  
3:30 PM – 7:30 PM

**Dillingham**

Tuesday, April 17  
Dillingham Middle  
School  
5:00 PM – 9:00 PM

**Igiugig**

Wednesday, April 18  
Community Building  
3:30 PM – 7:30 PM

**Anchorage**

Thursday, April 19  
Dena'ina Center  
11:00 AM – 9:00 PM

For more information regarding the evaluation of DA Permit application POA-2017-271 please visit <https://www.pebbleprojecteis.com>.

To learn more about the Corps' Regulatory Division and its program, visit <http://www.poa.usace.army.mil/Missions/Regulatory/>.

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# NEWS RELEASE

**U.S. ARMY CORPS OF ENGINEERS**

**BUILDING STRONG.**

For Immediate Release:  
April 6, 2018  
Release No. 18-007

Contact:  
John Budnik, 907-753-2615  
Public.affairs3@usace.army.mil

**Corps extends public scoping period for Department of Army permit application 2017-271  
Pebble Limited Partnership, Environmental Impact Statement**

JOINT BASE ELMENDORF-RICHARDSON – The U.S. Army Corps of Engineers – Alaska District has allotted more time for the public scoping period for the environmental impact statement level of analysis for Department of Army permit application 2017-271 submitted by Pebble Limited Partnership.

An additional 60 days has been added to the original 30-day public scoping period that began on April 1. Therefore, interested parties that would like to provide scoping input have until June 29 to submit.

The Corps is asking the public for any additional information to help inform the scope of analysis as it specifically relates to the Pebble Limited Partnership's submitted permit application to include potentially affected resources, alternative options, analytical methodology, and potential mitigation measures. The permit application is available on the project website at [www.pebbleprojecteis.com](http://www.pebbleprojecteis.com).

Scoping input can be submitted by mail to:

U.S. Army Corps of Engineers, Alaska District  
Program Manager, Regulatory Division  
ATTN: DA Permit Application 2017-271, Pebble Limited Partnership  
P.O. Box 6898  
Joint Base Elmendorf-Richardson, Alaska 99506-0898

Scoping input can be entered directly into the project website at [www.pebbleprojecteis.com](http://www.pebbleprojecteis.com).

Also, scoping input can be submitted in person at public meetings via directly into the provided computers, handing in written comments, or speaking to a court reporter. Please note that public scoping meetings are not public hearings. The Corps has chosen to arrange meetings to provide the public with an easy forum to provide input. All information received will become part of the public record upon receipt.

For more information regarding the evaluation of DA Permit application POA-2017-271 please visit <https://www.pebbleprojecteis.com>.

To learn more about the Corps' Regulatory Division and its program, visit <http://www.poa.usace.army.mil/Missions/Regulatory/>.

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**U.S. ARMY CORPS OF ENGINEERS – ALASKA DISTRICT**

P.O. Box 6898, Joint Base Elmendorf-Richardson, AK 99506-0898

<http://www.poa.usace.army.mil> ♦ <http://www.facebook.com/AlaskaCorps>  
<http://www.flickr.com/AlaskaCorps> ♦ <http://www.youtube.com/AlaskaCorps>  
<http://www.twitter.com/AlaskaCorps>



## Welcome

The U.S. Army Corps of Engineers invites you to participate in the Pebble Project Environmental Impact Statement (EIS) process. Pebble Limited Partnership proposes to develop the Pebble copper-gold-molybdenum porphyry deposit (Pebble Deposit) as an open-pit mine, with associated infrastructure, in southwest Alaska, approximately 17 miles west/northwest of the villages of Iliamna, Newhalen, and Nondalton. A 188-mile [natural gas pipeline](#) from the Kenai Peninsula across Cook Inlet to the [Mine Site](#) is proposed as the energy source for the mine. The [Transportation Corridor](#) includes an 18-mile crossing of Lake Iliamna and an [Amakdedori Port](#) facility on the western shore of Cook Inlet.

The proposed mine requires many federal and state permits. The EIS provides the basis for the U.S. Army Corps of Engineers and other federal agencies to evaluate federal permit applications.

Your input can make a real difference in understanding:

- Issues and concerns that should be addressed in the EIS.
- The way in which land and resources might be affected by the project.
- Ideas on alternatives and ways to minimize impacts.

We hope this website will answer your questions and make it easy for you to participate. Please add your name to our [mailing list](#) if you would like to be mailed our newsletters. If you have any questions that are not answered on the website, please [contact us](#).

This site is being continually updated. Check back often for updates.

What's New?
<b>Monday, April 30, 2018</b> Scoping meeting transcripts now available
<b>Thursday, April 19, 2018</b> Applicant Video Available
<b>Friday, April 6, 2018</b> USACE extends scoping public comment period by 60 days
<b>Sunday, April 1, 2018</b> Submit your Scoping Comments
<b>Wednesday, March 28, 2018</b> Newsletter #1 Available
<b>Friday, March 23, 2018</b> Scoping Package is available



## Project Overview

Pebble Limited Partnership (Applicant) has applied for permits to develop the Pebble copper-gold-molybdenum porphyry deposit (Pebble Deposit) as an open-pit mine, with associated infrastructure. The Pebble Deposit is located under rolling, permafrost-free terrain in the Iliamna region of southwest Alaska, approximately 200 miles southwest of Anchorage and 60 miles west of Cook Inlet. The closest communities are the villages of Iliamna, Newhalen, and Nondaton, each approximately 17 miles from the Pebble Deposit. In addition to the Mine Site, the project would have three other major components: Transportation Corridor, Amakdedori Port, and Natural Gas Pipeline.

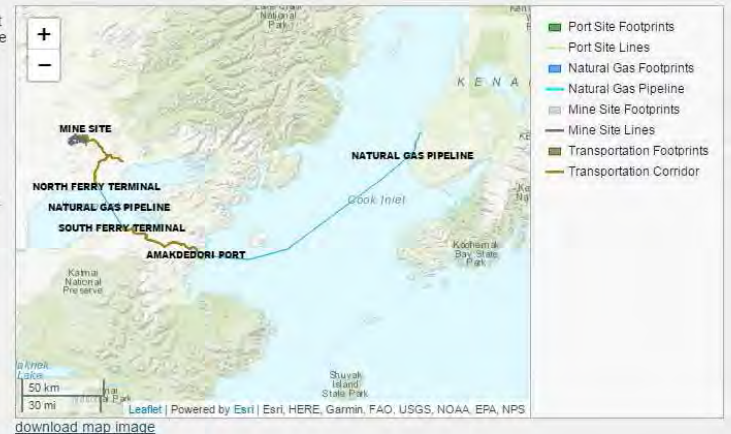
The Pebble Deposit lies within a 417-square-mile claim block held by subsidiaries of the applicant and by a subsidiary of the applicant's parent company, Northern Dynasty. Neither the applicant nor Northern Dynasty currently owns surface rights associated with these mineral claims. All lands within the claim block are owned by the State of Alaska. Rights to develop on State of Alaska land may be acquired when necessary locations for mine development have been determined and permits awarded. The Transportation Corridor crosses both state land and land patented under the Alaska Native Claims Settlement Act.

The proposed project would have a mine life of approximately 20 years. During that time, there would be:

- a total of 1.2 billion tons of material mined over the life of the project;
- mining rate up to 90 million tons per year;
- milling rate up to 58 million tons per year;
- annual copper-gold concentrate production of 600,000 tons; and
- annual molybdenum concentrate production of 15,000 tons.

The project would have an operating schedule of two 12-hour shifts per day for 365 days per year, and employ approximately 2,000 personnel for construction and 850 for operations.

A more detailed project description from the the applicant to the U.S. Army Corps of Engineers can be found [here](#).



## Documents

To download a document, click on its title below. Before you download a file, please be aware of your connection speed and note the size of the file you want. Some files are very large and may take a long time to download, depending on the speed of your internet connection.

For example, at a minimal dial-up modem speed of 56 Kbps, a 2 MB document will take about 5 minutes to download; a 25 MB file will take about an hour. With a high speed connection of 10 Mbps, files of both these example sizes would download in less than 30 seconds.

⚠ Documents not produced by the U.S. Army Corps of Engineers may not be in compliance with the Americans with Disabilities Act Section 508, and documents that are produced by the U.S. Army Corps of Engineers may not be fully compliant. Please contact us if you require assistance and we will try to accommodate your needs. This may include providing the information to you in an alternative format.

[Background Documents](#) | [Scoping Documents](#) | [EIS Documents](#) | [Newsletters](#) | [Project Library](#)

### Permit Application Documents

	Title ^	Date
Download ↓	Department of the Army Permit Application	12/01/2017
Download ↓	Department of the Army Permit Application ORM Upload Consolidated Rapanos	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A1	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A2	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A3	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A4	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A5	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A6	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A6, MX1-16 mine xs	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment A6, MX1-16 mine xs_Optimized	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment C	12/01/2017
Download ↓	Department of the Army Permit Application, Attachment D	12/01/2017

### Federal Register Notices

	Title ^	Date
Download ↓	Federal Register Notice of Intent	03/30/2018

## EIS Schedule

The flow chart on this page shows the steps and expected time schedule of the Environmental Impact Statement (EIS) process. If you have questions about the schedule that are not answered here, please contact us.

### What is an Environmental Impact Statement?

An EIS is a decision making process that allows for a full review of public concerns about a proposed project, such as the Pebble Mine Project. A federal agency prepares an EIS so that decision-makers have a complete picture of the benefits and potential environmental risks before approving a project.

Just as important, the EIS provides opportunities for tribes, local communities, and the general public to voice your concerns and to understand the potential effects of the proposed project.

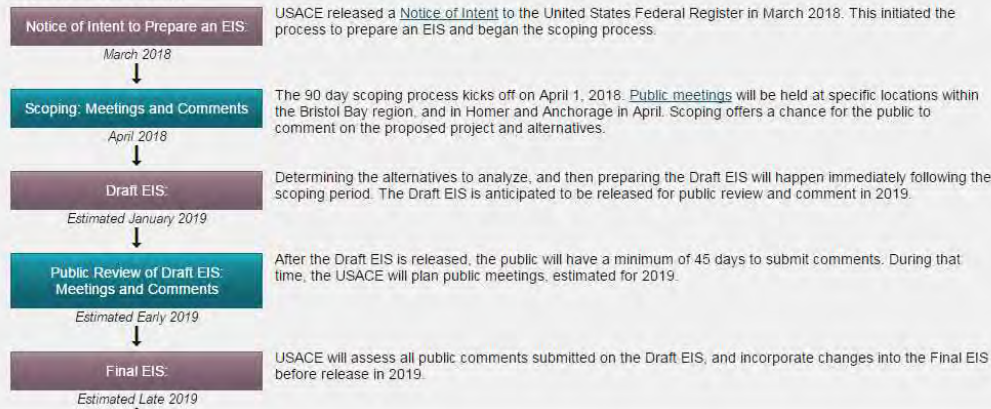
The National Environmental Policy Act (NEPA) requires agencies to prepare an EIS when an action may affect the quality of the physical and human environment. The process begins when someone applies for a federal permit for any activity that can affect the environment, including land, air, water, animals, and communities.

Congress enacted NEPA to ensure that federal agencies take a careful look at a proposed activity, including:

- **The ideas and concerns of the public**, as stated during scoping meetings and in review comments on the Draft EIS.
- **A range of alternatives**, including the no action alternative.
- **A thorough scientific study** of current conditions and potential effects.

Preparation of the Pebble Project Environmental Impact Statement (EIS) level of analysis began in December 2017, when the Army Corps of Engineers (USACE) received a permit application from the Pebble Limited Partnership (Applicant). The EIS process will take several months to complete a Draft EIS for public review, with a Final EIS expected within 24 months. The estimated schedule for the EIS is below

#### Steps in the EIS Process



## Scoping Meeting Schedule

The U.S. Army Corps of Engineers hosted public meetings in nine communities to give a presentation on USACE's role in permitting for the Project and the Environmental Impact Statement (EIS) process. The purpose was to inform communities about the EIS and gather comments from the public about concerns. Full transcripts are located [here](#). You can view all comments as they are submitted [here](#).

Community	Date & Time	Location
Naknek	Monday, April 9, 2018 3:30 PM - 7:30 PM	Naknek School
Kokhanok	Tuesday, April 10, 2018 3:30 PM - 7:30 PM	Community Hall
Homer	Wednesday, April 11, 2018 5:00 PM - 9:00 PM	Homer High School
Newhalen	Thursday, April 12, 2018 3:30 PM - 7:30 PM	Newhalen School
New Stuyahok	Friday, April 13, 2018 1:00 PM - 4:30 PM	Community Building
Nondalton	Monday, April 16, 2018 3:30 PM - 7:30 PM	Tribal Center
Dillingham	Tuesday, April 17, 2018 5:00 PM - 9:00 PM	Middle School
Igiugig	Wednesday, April 18, 2018 3:30 PM - 7:30 PM	Community Building
Anchorage	Thursday, April 19, 2018 11:00 AM - 9:00 PM	Dena'ina Center

Providing ample opportunities for the public to submit scoping comments on the Pebble Project EIS is of utmost importance to the USACE. Public comments during this scoping phase will be accepted during the scoping period, scheduled to run from April 1, 2018 to June 29, 2018.

[Submit your comment](#)

There will be an additional public comment period in January 2019 when the Draft EIS is released.



## External Resources

This site provides external links as a convenience to our users. The appearance of external links on this site does not constitute endorsement by USACE of the external sites/documents or the information, products or services contained therein.

[Council of Environmental Quality: Citizen's Guide to NEPA](#)

[Alaska Department of Natural Resources: Permitting Large Mine Projects in Alaska](#)

[Alaska Department of Natural Resources: Pebble Project](#)





## Public Comments

[View Submitted Comments](#) | [Submit New Comment](#)

### Submit new comment

Public participation is an important part of developing an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA). Submitting substantive and concise comments during the scoping period is an important role the public plays in the NEPA process, and can influence the scope of analysis for the EIS. Comments will be accepted through June 29, 2018.

Comments on the project are not counted as votes; they are used to determine the appropriate scope of issues analyzed and contents of the EIS, and to ensure that the impacts are adequately disclosed before the USACE makes a final decision on the proposed project. Avoid simply agreeing or disagreeing with the proposed project. It is more important to identify specific relevant issues, alternatives, mitigation measures/conditions of permitting, and analytic tools so they can be used to inform the EIS analysis. The more clear, concise, and relevant your comments are, the more effective they will be in shaping the development of the EIS.

#### General recommendations:

- Become familiar with the proposed project — review the [Project Overview](#) and [Project Description](#).
- Keep your comments focused and as specific as possible on the proposed project under consideration. What you think the EIS analysis needs to address and why?
- Be specific. For example, if you are concerned about wildlife, focus on a particular problem or issue, such as a species that you feel should be analyzed, instead of making a broad statement such as "I am concerned about the impacts to wildlife".
- Support your statements with explanations, facts, and references, as appropriate.
- Make suggestions, including resources that should be analyzed, new data or analytic tools that should be used, and substantially different alternatives that should be evaluated in the EIS.

I understand and accept that it is the practice of the U.S. Army Corps of Engineers to make all comments public at any time, including names and addresses of individuals.

Name

Organization optional

Email

Mailing Address

Mailing Address Line 2 optional

City

State

Zip Code

Comment 1

Category



## Contact Us

### Lead Agency

U.S. Army Corps of Engineers  
<http://www.poa.usace.army.mil>

Shane McCoy, Project Manager  
P. (907) 753-2712

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**DEPARTMENT OF THE ARMY PERMIT APPLICATION POA-2017-271, SCOPING  
PACKAGE**

**SCOPING PACKAGE CONTENTS**

1. Public Scoping for the Pebble Project EIS
2. Pebble Limited Partnership (Applicant) Project Description
3. How Alternatives will be Developed
4. What Resources will be Analyzed in the EIS?
5. What is NEPA?
6. Roles and Responsibilities
7. EIS Schedule
8. EIS Outline
9. How to Comment
10. Pebble Project Comment Form
11. Frequently Asked Questions

# Public Scoping for the Pebble Project EIS

The US Army Corps of Engineers (USACE) is preparing an Environmental Impact Statement (EIS) to analyze the impacts of issuing permits for an open pit, copper-gold-molybdenum porphyry deposit, with associated infrastructure, as proposed by the Pebble Limited Partnership. The EIS scoping period begins April 1, 2018 and ends June 29, 2018.

At the beginning of developing an EIS, USACE reaches out through scoping to involve members of the public. The scoping period provides opportunities for people who could be affected by the proposed action to express their views and concerns, and to offer suggestions on the scope of analysis. Public input may include ideas for alternatives to the proposed action that could have lesser environmental impacts.

The EIS will identify potential impacts on the physical, biological, and social environment from all phases of the proposed project, including construction, mine operation, closure, and post-closure. The EIS will also look at mitigation methods—ways in which potential negative impacts could be avoided or lessened.

During the scoping period, USACE will work with the public to identify issues and concerns to thoroughly analyze the potential effects of the proposed project. USACE will use the scientific literature, alongside traditional knowledge and observations provided by the public.

We welcome your comments and information on the resources that are important to you. For example, many communities will be concerned about potential impacts to fish, subsistence resources, and traditional land uses during project construction, operations, and closure.

Public meetings will tentatively be held during the scoping period of April 1<sup>st</sup> to June 29<sup>th</sup>, 2018, in the following communities:

- Anchorage\*
- Dillingham\*
- Homer\*
- Igiugig
- Kokhanok
- Naknek
- Newhalen
- New Stuyahok
- Nondalton

\* To avoid long wait times, an open public testimony format will not be used.

Please check our website for the current meeting schedule.

## To Participate...

Providing ample opportunities for the public to submit scoping comments on the Pebble Project EIS is of utmost importance to the USACE. A good way to get involved is to come to a scoping meeting and give your comment orally to a dedicated court reporter, or electronically submit using one of a number of dedicated laptop computers. You can also bring written comments to a meeting, use the comment form on the project website ([www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com)), or send them to:

Program Manager, Regulatory Division  
US Army Corps of Engineers  
PO Box 6898  
Joint Base Elmendorf Richardson,  
AK 99506 0898

Let us know what aspects of the proposed project are important to you!

Scoping comments can be submitted through June 29, 2018.

\*Comments received/postmarked after June 29 will be considered, but may not be included in the scoping report. Comments will be reviewed and incorporated into the Draft EIS.



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## PEBBLE PROJECT DESCRIPTION

Pebble Limited Partnership (PLP), proposes to develop the Pebble copper-gold-molybdenum porphyry deposit (Pebble Deposit) as an open-pit mine, with associated infrastructure, in southwest Alaska. The Pebble Deposit is located approximately 200 miles southwest of Anchorage and 60 miles west of Cook Inlet. The closest communities are the villages of Iliamna, Newhalen, and Nondalton, each approximately 17 miles from the Pebble Deposit, and Kokhanok, which is located 3 miles to the northeast of the proposed road from the port site to the south ferry terminal on Lake Iliamna (see Figure 1).

## PEBBLE PROJECT COMPONENTS

The Pebble Project as proposed consists of four facility and operations components:

### **Mine Site and Associated Facilities** (see Figure 2)

- **Open pit mine**, developed in stages, with each stage expanding the area and deepening the previous stage. Final dimensions of the open pit would be approximately 6,500 feet long and 5,500 feet wide, with depths between 1,330 and 1,750 feet.
- **Mine site mineral processing facilities** include a crushing plant, coarse ore stockpile, grinding plant, froth flotation circuits to produce concentrates, and concentrate filters to remove moisture before shipment.
- **Copper-gold concentrate** would be loaded into covered bulk shipping containers and transported by truck to the Amakdedori Port. **Molybdenum concentrate** would be bagged and containerized before shipping to Amakdedori Port.
- **Tailings Storage Facility** located within the North Fork Koktuli watershed:
  - 1.1 billion tons storage volume.
  - separate cells for bulk and pyritic (lined) tailings.
  - four embankments: main (600 feet high), south (350 feet high), and east (60 feet high) perimeter embankments and an internal embankment (420 feet high) separating the bulk and pyritic tailings cells.
- **Low Grade Ore Stockpile** up to 330 million tons of mineralized material, segregated by relative value, and PAG waste rock, placed on an engineered liner to control seepage losses through the stockpile.
- **Waste rock** – Non-potentially acid generating (NPAG) waste rock would be used to construct various mine site structures, including the TSF embankments and mine site roads. PAG waste rock would be stored within the LGO stockpile until mine closure, and then back-hauled into the open pit.
- **Overburden Stockpile** segregated to the southwest of the open pit, and surrounded by a berm of non-mineralized rock to contain the material and increase stability.
- **Water Supply, Management and Treatment** consists of five components:
  - potable water well field and treatment plant.
  - two water management ponds (open pit and LGO/main).
  - sediment ponds.
  - three seepage ponds (south, west, and main embankment).
  - two water treatment plant/three discharge locations (north, south and east).

- **Personnel camps** include a main construction camp to accommodate 1,700 workers, later refurbished for 850 rooms for operations.
- **Power generation** capacity and distribution infrastructure: 230 megawatt delivery capacity fired by natural gas and a 69-kilovolt distribution system.

#### **Amakdedori Port Site** (See Figure 3)

- **Ore carrier vessels** up to 40,000 dead weight tons and 700 feet in length, up to **25 Handysize ships will be required annually** to transport concentrate.
- Up to **30 marine line-haul barge loads of supplies and consumables** will be required annually. **Two ice-breaking tug boats** will be used to support marine facility operations.
- **2000 foot earthen access causeway** extending out to a marine jetty located in 15 feet of natural water depth.
- **Access channel and turning basin**, dredged to 50 foot depth.
- **Shore-based facilities** to receive and store containers and fuel, two, 2-MW natural gas power generators with an emergency diesel generator, a natural gas compressor station, maintenance facilities, employee accommodations, and offices.
- **Fuel storage** consisting of four 1.25 million gallon tanks inside a lined and bermed area

#### **Transportation Corridor** (see Figure 3)

##### Road System Connecting Amakdedori Port to the Mine Site

- **Private, double-lane road extending 30 miles south from the Mine Site to North ferry terminal** on the north shore of Iliamna Lake.
- **Private, double-lane road extending 35 miles southeast from the South Ferry Terminal to the Amakdedori Port** on Cook Inlet.
- **Eight bridges**, six of which would be single-span, two-lane bridges that range in length from approximately 90 to 170 feet. There would be one large (550 feet) multi-span, two-lane bridge across the Newhalen River and one large (455 feet) multi-span, two-lane bridge across the Gibraltar River.
- Daily transportation of concentrate, fuel, reagents and consumables would require **up to 35 truck round trips per day for each leg of the road**, including three loads of fuel per day.
- **Village surface road connections** from the Transportation Corridor to Iliamna, Newhalen, and Kokhanok.

##### Ferry Service and Terminals on Lake Iliamna

- **18 mile ferry crossing of Lake Iliamna.**
- **All-season icebreaking ferry** with 12 crew members.
- **Inbound supplies from the Amakdedori Port to the Mine Site and outbound copper-gold and molybdenum concentrates, backhauled waste, and empty containers.**
- **Average of one round trip ferry per day.**
- **Two ferry terminals** with 40 foot rock/aggregate causeway, container handling and storage facilities, office and maintenance buildings, and local power supply.

**Natural Gas Pipeline System** (see Figure 1)

- **188 mile 10-12 inch diameter natural gas pipeline**, buried 3 feet deep onshore, in five segments:
  - starts on the eastern shore of Cook Inlet at Happy Valley near Anchor Point along the Sterling Highway.
  - 94 mile subsea pipeline crosses Cook Inlet to the Amakdedori Port Site.
  - 35 mile buried pipeline adjacent to the road from port site to south ferry terminal.
  - 18 mile pipeline across Lake Iliamna.
  - 30 mile buried pipeline adjacent to the road from north ferry terminal to Mine Site.
- **Two gas fired compression stations**, one on the eastern end at Anchor Point, and one at the Amakdedori Port.
- **Buried fiber optic cable** adjacent to pipeline.

**PROJECT CONSTRUCTION**

- **The project would take approximately four years to construct**, on four main project components – Mine Site, Amakdedori Port, Transportation Corridor, and Pipeline.
- **Transportation infrastructure to access the site is the first step**, along with Pre-production Phase environmental protection systems and temporary facilities that support construction crews (camps at port site, mine site, ferry terminals).
- **Initial access to the mine site within one year**, followed by earthworks, plant facilities, tailings storage embankments, stockpile foundations/liners, and water treatment facilities.
- **Natural gas line installation** will occur during the second and third construction years.
- **Completion of Pre-production Open Pit, power plant and processing facilities** in year 4.
- **Construction employment** estimated at 2,000 workers.

**PROJECT OPERATIONS**

- **Project operating life of 20 years, three mining phases** – pre-production, production and stockpile reclaim.
- **Conventional open pit mine** – drill, blast, truck and shovel operation.
- **Blasting events** – once to twice a day.
- **Tailings Storage Facility water management** – Control, collection, and recovery of tailings water for recycling or treatment prior to discharge; seepage collection system below impoundment structures; freeboard to contain inflow design flood.
- **Total material mined** – 1.2 billion tons over the life of the project.
- **Mining rate** up to 90 million tons per year, **milling rate** up to 58 million tons per year.
- **Annual concentrate production** – 600,000 tons copper gold, 15,000 tons molybdenum.
- **Operations employment** estimated at 850 workers, two shifts per day, 365 days/year.

## PROJECT CLOSURE

- **Reclamation and closure jurisdiction** – Alaska Department of Natural Resources Division of Mining, Land, and Water, and Alaska Department of Environmental Conservation.
- **Design for Closure** – early consideration of requirements for Closure and post-Closure site management.
- **Segregation of the bulk and pyritic tailings storage cells** to facilitate Tailings Storage Facility closure.
- **Potentially Acid Generating waste rock** backhauled to mine pit for subaqueous storage.
- **Comprehensive water management plan** that strategically discharges surplus treated water to downgradient streams in a manner that reduces the effect of flow changes on stream flow and fish habitat.
- **Removal of mill and other infrastructure** not required for closure and reclamation.
- **Reclamation of disturbed areas** through grading, use of top soil as need and revegetated.
- **Road system retained** as needed for post-Closure activities and monitoring.
- **Pit lake water quality will be monitored;** water will be treated and discharged before levels approach elevation where groundwater flows outward from the open pit.

For more details, see Attachment D Project Description, Department of Army Application for Permit (POA-2017-271) on [www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com).



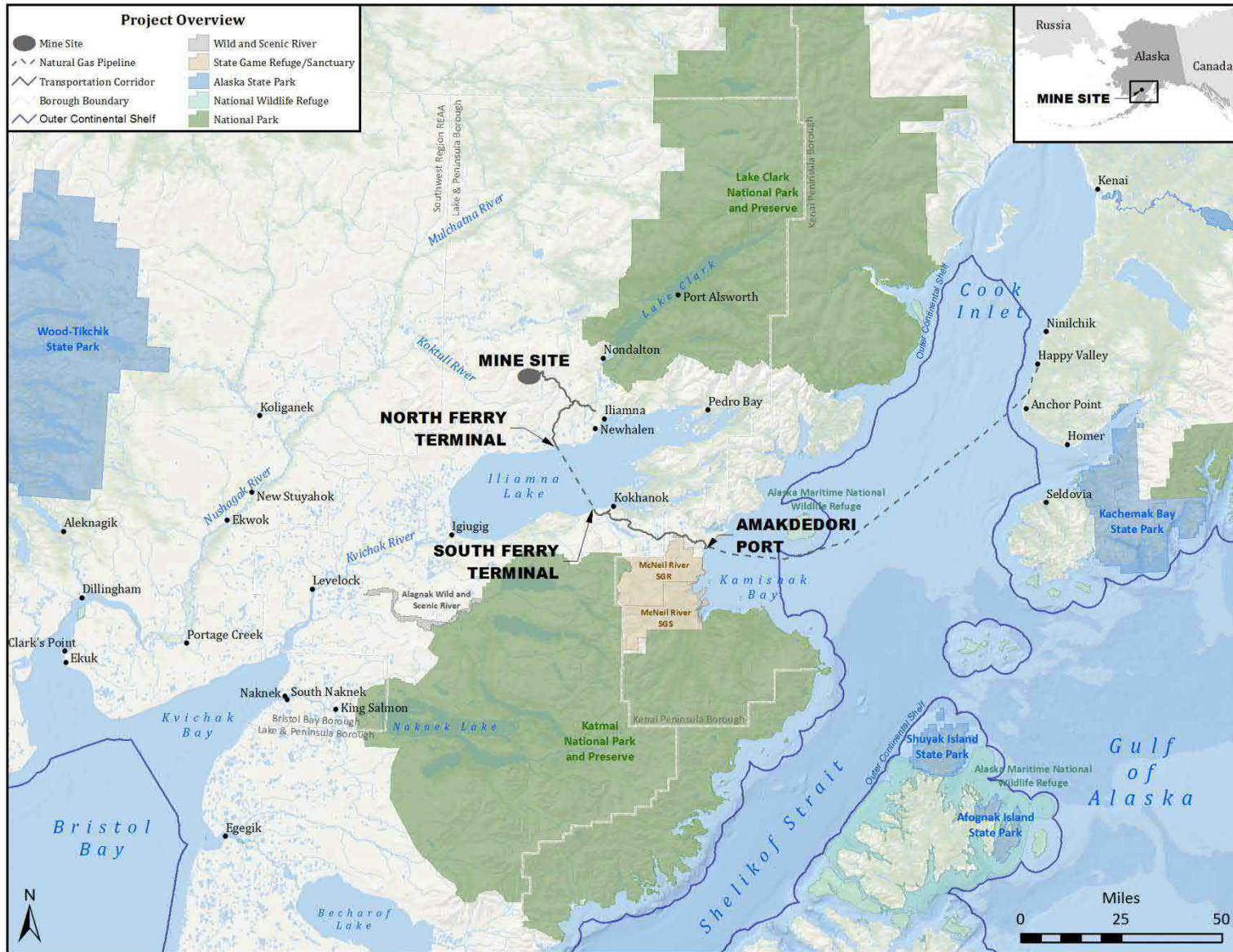


Figure 1. Project Overview

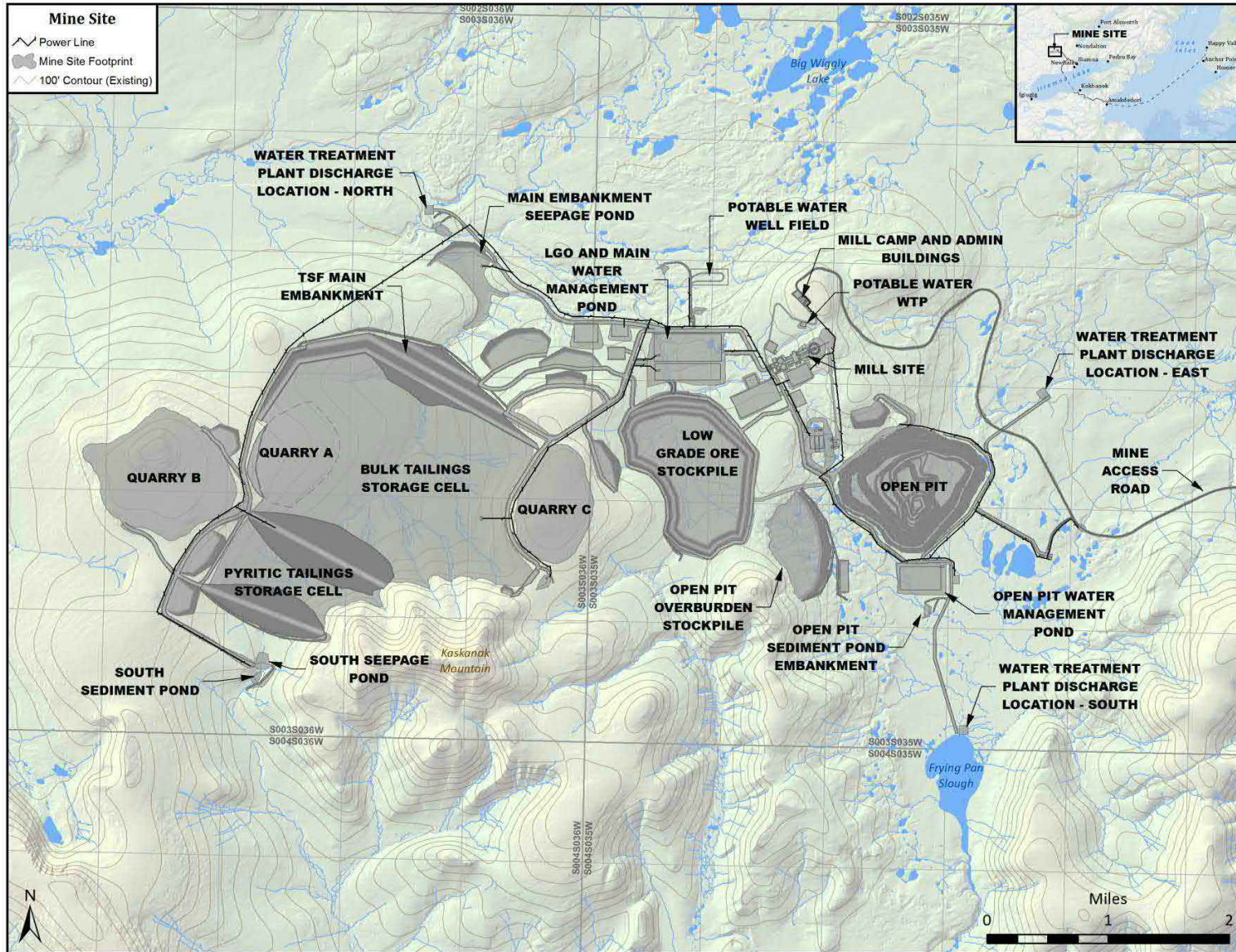


Figure 2. Mine Site and Associated Facilities

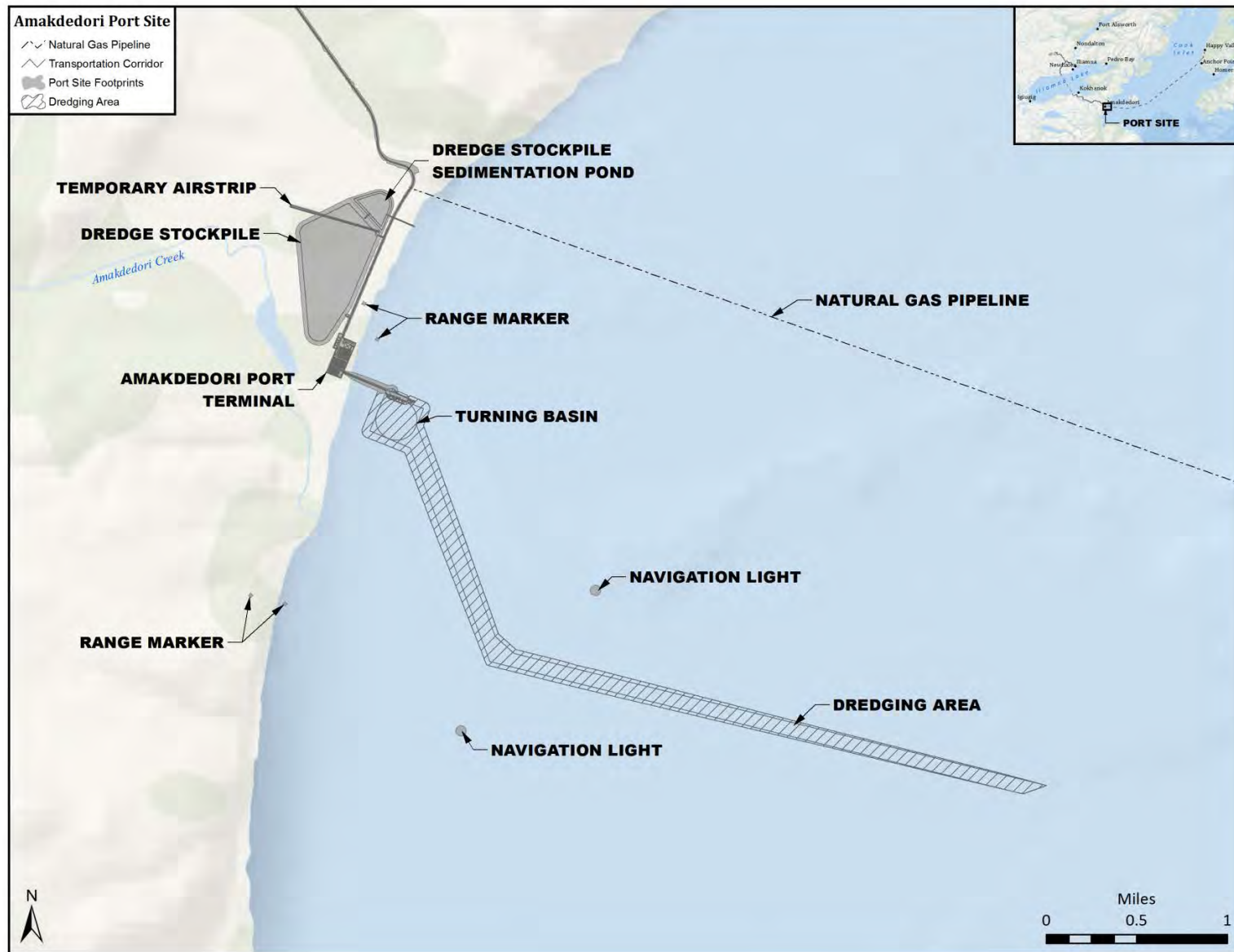


Figure 3. Amakdedori Port Site

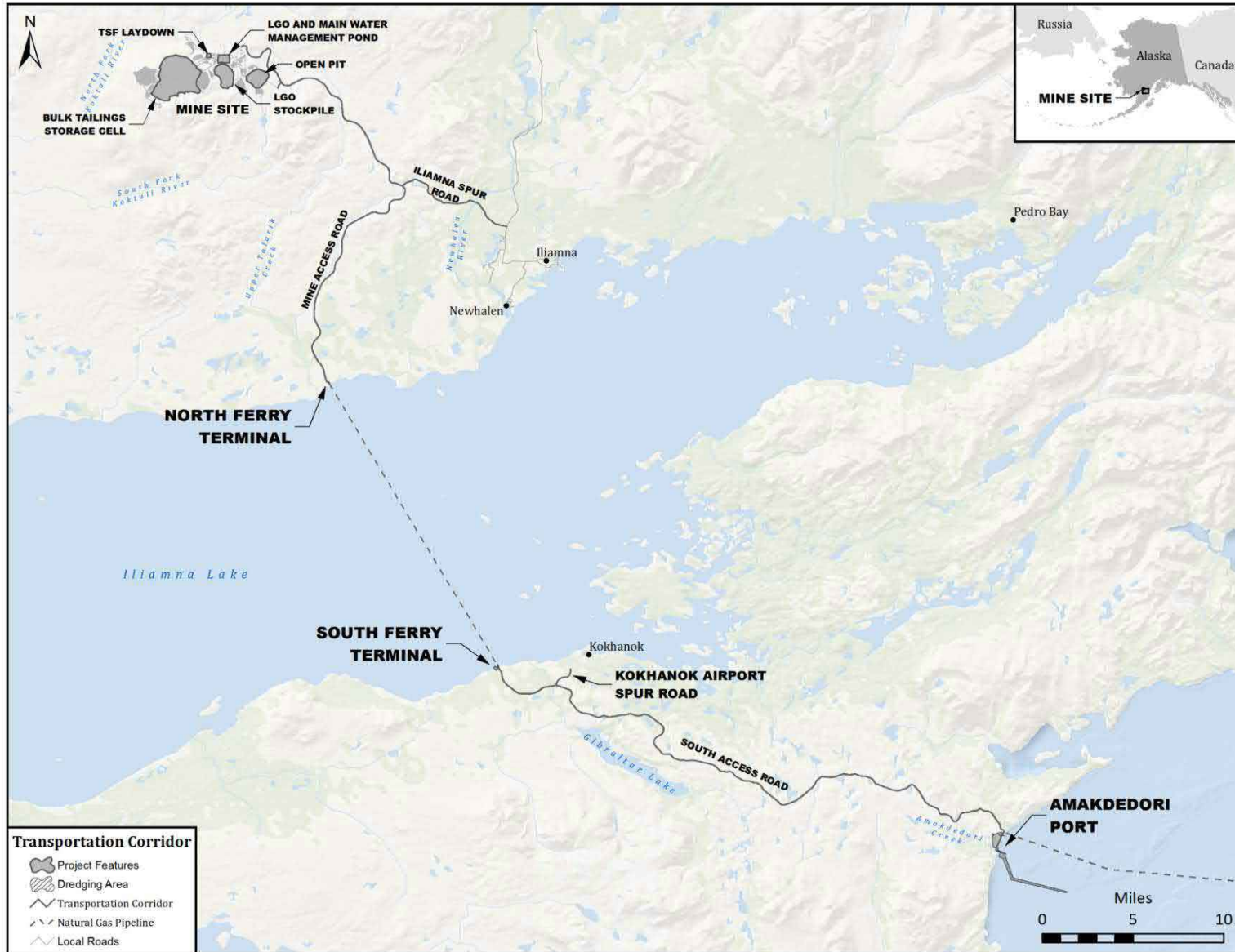


Figure 4. Transportation Corridor

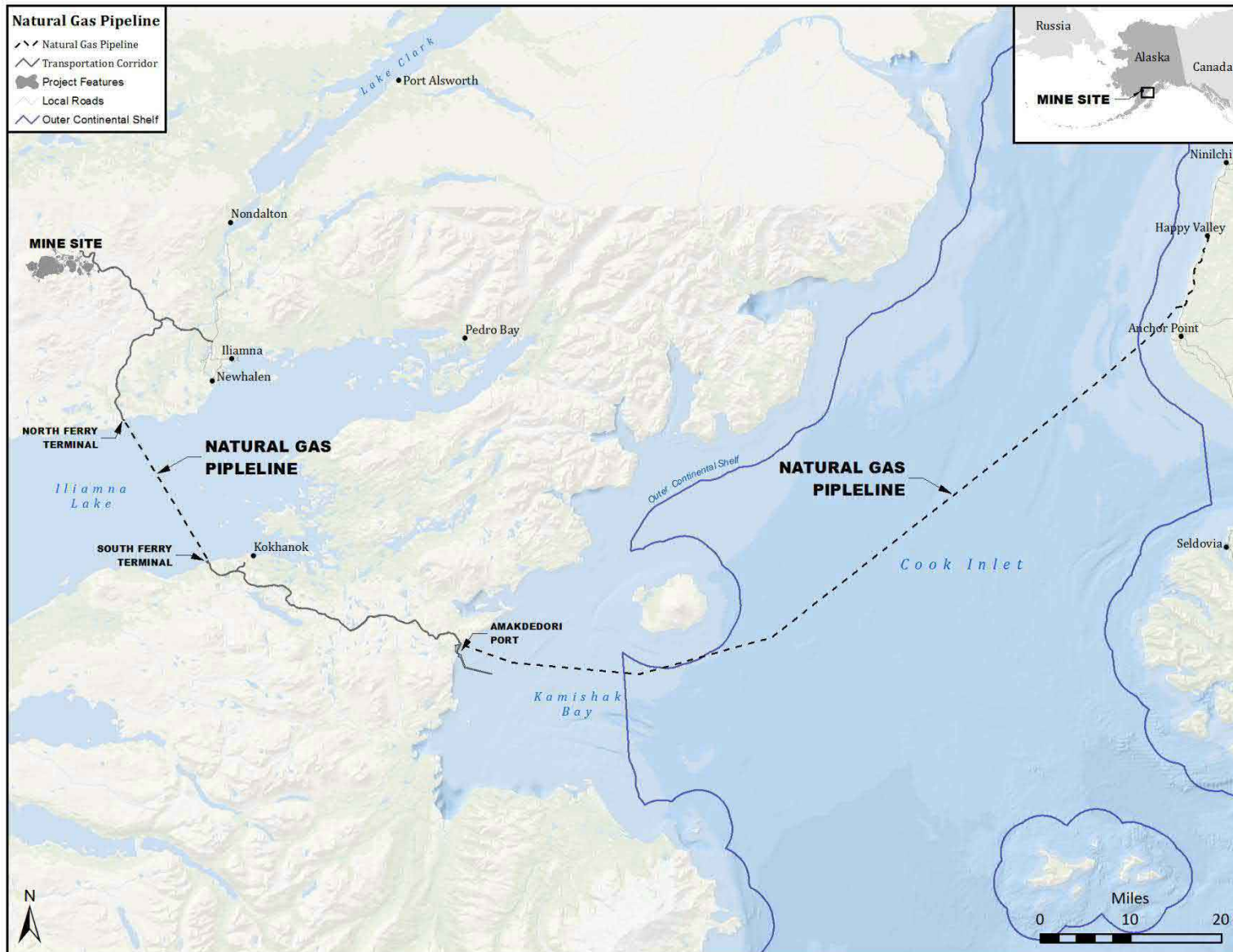


Figure 5. Natural Gas Pipeline

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## How Alternatives will be Developed for the Pebble Project Environmental Impact Statement (EIS)

1. Identify need to which the United States Army Corps of Engineers (USACE) – Alaska District is responding and identify the overall project purpose. State the applicant's objectives for the project.
2. Compile a range of alternatives to be considered that meet the overall project purpose with consideration of the applicant's objectives. The alternatives compilation will include the no action alternative, any alternatives considered by the applicant, and alternatives suggested during the scoping process.
3. Determine whether identified alternatives are reasonable in accordance with the National Environmental Policy Act.
  - a. Reasonable is based on the consideration of the overall project purpose including stated objectives as well as technology, economics, and common sense.
  - b. Determine whether an alternative meets the overall project purpose inclusive of objectives.
    - i. Alternatives that do not meet the overall project purpose will be eliminated at this stage.
    - ii. Alternatives that meet the overall purpose will move forward.
  - c. Alternatives that meet the overall project purpose will be reviewed to determine whether the alternative was available to the applicant during project planning (past 10 years).
    - i. Alternatives identified as reasonable but were not available to the applicant will be removed at this time.
    - ii. Alternatives that were available will move forward.
  - d. Alternatives will be reviewed for technical feasibility (can these alternatives be accomplished using existing technology and equipment?).
    - i. Alternatives determined to not be technically feasible will be removed at this stage.
    - ii. Alternatives determined to be technically feasible will move forward.
  - e. Alternatives will be reviewed for economic feasibility.
    - i. Any alternative claimed to not be economically feasible by the applicant will require an economic analysis to support statement.
    - ii. An alternative proven to not be economically feasible will be removed at this time.
    - iii. Alternatives determined to be economically feasible will move forward.
  - f. Alternatives will be reviewed using common sense.
    - i. Alternatives that increase adverse environmental impacts will be removed at this time.
    - ii. Alternatives will also be reviewed for logistical feasibility. Alternatives that are not logistically feasible will be removed at this time.

*Identified REASONABLE ALTERNATIVES with significantly LESSER impacts will be evaluated in the EIS along with the NO ACTION alternative and the applicant's PROPOSED alternative.*

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## How Alternatives are Screened for Practicability

Due to the USACE specific authorities, alternatives must also be screened for practicability. The practicability determination is described below. Ultimately, the USACE must identify the **least environmentally damaging practicable alternative (LEDPA)** in the Record of Decision prior to making a decision under Section 404 of the Clean Water Act.

1. From the identified reasonable alternatives, further identify practicable alternatives in accordance with Clean Water Act Section 404(b)(1) of the Clean Water Act (the Guidelines). The Guidelines state practicable means the project is available and capable of being done after taking into consideration **cost, existing technology** and/or **logistics** in light of the overall project purpose including the applicant's objectives. Logistics and existing technology have at this point been screened in our determination of reasonable alternatives and are included below only for completeness and explanatory purposes. *An alternative needs to fail only one practicability factor to be determined not practicable.*
  - a. Costs – Cost is analyzed in the context of the overall scope/cost of the project and whether it is unreasonably expensive. This determination is typically made in relation to comparable costs for similar actions in the region or analogous markets. Cost is to be based on an objective, industry-neutral inquiry that does not consider an individual applicant's financial standing. The data used for any cost must be current with respect to the time of the alternatives analysis. Because one alternative costs more than another does not mean that the more expensive alternative is impracticable. It is important to note that in the context of this definition, cost does not include economics.
  - b. Existing Technology – The alternatives examined should consider the limitations of existing technology yet incorporate the most efficient/least-impacting construction methods currently available.
  - c. Logistics – The alternatives evaluated may incorporate an examination of various logistics associated with the project (e.g., placement of facilities within a specified distance to major thoroughfares, utilization of existing storage or staging areas, and/or safety concerns that cannot be overcome).
  - d. Availability – The Guidelines state that if an alternative is otherwise practicable, an area not presently owned by the applicant that could reasonably be obtained, utilized, expanded, or managed in order to fulfill the overall purpose of the proposed activity can still be considered a practicable alternative. In other words, the fact that an applicant does not own an alternative parcel, does not preclude that parcel from being considered as a practicable alternative. This factor is normally a consideration as a logistics and possibly cost limitation.
  - e. Two tests are specified in the Guidelines for alternatives when the basic purpose of a project does not require siting within special aquatic sites such as wetlands. The basic purpose of this project is mining. The type of mining proposed (transitional metal-copper, gold, molybdenum) does not require siting within special aquatic sites. Therefore:
    - i. It is presumed that alternatives that do not affect special aquatic sites such as wetlands are available

- ii. It is presumed that alternatives in sites that are not special aquatic sites will have a LESSER ADVERSE impact on the aquatic ecosystem

*Once an otherwise practicable alternative has been identified, the applicant (Pebble Limited Partnership) will be required to clearly demonstrate to the USACE that both of these presumptions have been rebutted or the alternative will be considered in the determination of the LEDPA.*

**\*\*All practicable alternatives are also reasonable alternatives.**

2. The final step in developing alternatives is to construct detailed descriptions for the reasonable alternatives that have been retained and carried forward for evaluation in the EIS.

### **How the Public Can Provide Useful Guidance on Alternatives that should be Considered in the EIS**

The purpose of scoping is to determine the alternatives that should be considered in the analysis and determine the extent and nature of issues by which each alternative should be evaluated.

Scoping is an important opportunity for all citizens to provide specific suggestions for alternatives that should be considered in preparing the EIS, and issues that should be addressed in that process. The following guidelines may be useful in submitting comments during the scoping period (*examples shown in italics*):

1. Keep in mind the reasonable alternative screening criteria described above – any suggestions should fulfill the overall project purpose in consideration of the applicant's objectives with a focus on reducing potential adverse environmental impacts.
2. You can suggest alternatives specific to components for developing the mine (*mining methods, water treatment, tailings management*), the port site, the transportation corridor and modes (*rail*), and the natural gas pipeline.
3. You can suggest changes in location of project components (*road, port site, mine components*).
4. You can suggest potential mitigation measures and conditions of development that may reduce environmental impacts.
5. Be as specific as possible and provide the reason for making your suggestions (*construction of a rail connection may eliminate truck traffic and reduce dust levels*).

The USACE will make the results of the scoping process publically available by publishing the Scoping Report on the project website ([pebbleprojecteis.com](http://pebbleprojecteis.com)) and will also communicate information for newsletters.

### **How Alternatives will be evaluated in this EIS**

Once reasonable alternatives have been identified for evaluation as above, the USACE will evaluate each alternative in relation to the following:

- Conservation
- Economics
- Aesthetics



- General environmental concerns
- Wetlands
- Historic properties (inclusive of sacred sites or areas of community and/or spiritual significance)
- Fish and wildlife values (inclusive of endangered species, marine mammals, fisheries and wildlife)
- Flood hazards
- Floodplain values
- Land use (inclusive of transportation corridors)
- Navigation
- Shore erosion and accretion
- Recreation
- Water supply and conservation
- Water quality
- Energy needs
- Safety
- Food and fiber production (this would include subsistence activities)
- Mineral needs
- Considerations of property ownership
- The needs and welfare of the people

In the EIS, we will develop a framework to analyze each of these issues with emphasis on issues that rise to the highest level of importance.

During scoping, we are also asking you to help us determine which of these factors are of highest concern to you, to provide information of specific concern regarding any factor listed, and to identify any other specific issues that are not listed. As with your comments related to alternatives, please be as specific as possible when identifying other issues or expanding on issues identified above. This will help us develop the analytical framework moving forward.

For alternatives identified as practicable, the USACE will ultimately make the following determinations:

- 1) Whether the alternative is the least environmentally damaging practicable alternative,
- 2) Whether the LEDPA will cause or contribute to the violation of applicable state or federal laws, such as water quality standards or the Endangered Species Act,
- 3) Whether the LEDPA will result in significant degradation of waters of the United States
- 4) Whether the LEDPA includes appropriate and practicable steps have been taken to minimize the adverse impacts of the project on wetlands and other waters.

# What Resources will be Analyzed in the EIS?

Using the analysis in the Environmental Impact Statement (EIS), The U.S. Army Corps of Engineers (USACE) will evaluate the environmental and related social and economic effects of the proposed project. The analysis will include direct and indirect impacts, cumulative effects, and potential spill and tailings dam failure scenarios. Comments received during the scoping period will likely result in additional resources to be considered in the analysis.

Social Environment	Physical Environment	Biological Environment
<ul style="list-style-type: none"> <li>○ Cultural Resources</li> <li>○ Historic Properties</li> <li>○ Land use and management</li> <li>○ Subsistence</li> <li>○ Transportation and Navigation</li> <li>○ Aesthetics</li> <li>○ Recreational and Commercial Fisheries</li> <li>○ Recreation</li> <li>○ Needs and Welfare of the People</li> <li>○ Environmental Justice</li> <li>○ Health and Safety</li> </ul>	<ul style="list-style-type: none"> <li>○ Geohazards</li> <li>○ Geology</li> <li>○ Soils</li> <li>○ Surface Water Hydrology including flood plains and flood hazards</li> <li>○ Groundwater Hydrology</li> <li>○ Water Quality</li> <li>○ Noise</li> <li>○ Air Quality</li> <li>○ Climate Change</li> </ul>	<ul style="list-style-type: none"> <li>○ Wetlands/Special Aquatic Sites</li> <li>○ Vegetation</li> <li>○ Birds</li> <li>○ Terrestrial Wildlife</li> <li>○ Fisheries and Aquatic Resources</li> <li>○ Marine Wildlife</li> <li>○ Threatened and Endangered Species</li> </ul>

**Direct impacts** occur through direct interaction of an activity with an environmental, social, or economic component.  
*For example: pollutant discharge from a source could directly result in lowered water quality.*

**Indirect impacts** on the environment are not a direct result of the project, but often a result of a complex impact pathway.  
*For example: pollutants in the air from a source could land on vegetation, indirectly causing acidic soils.*

**Cumulative impacts** occur when the incremental impact of the project is combined with the effects of other past, present and reasonably foreseeable future projects.  
*For example: wetland fill from one project, combined with the wetland fill from a separate project.*



# What is NEPA?

The national commitment to the environment was formalized through the passage of the National Environmental Policy Act (NEPA) of 1969. NEPA's goal is to help the federal government make decisions with full understanding of the potential environmental consequences associated with federal projects or authorizations. A thorough understanding of consequences allows us to identify potential actions that can be taken to protect, restore, or enhance the environment.

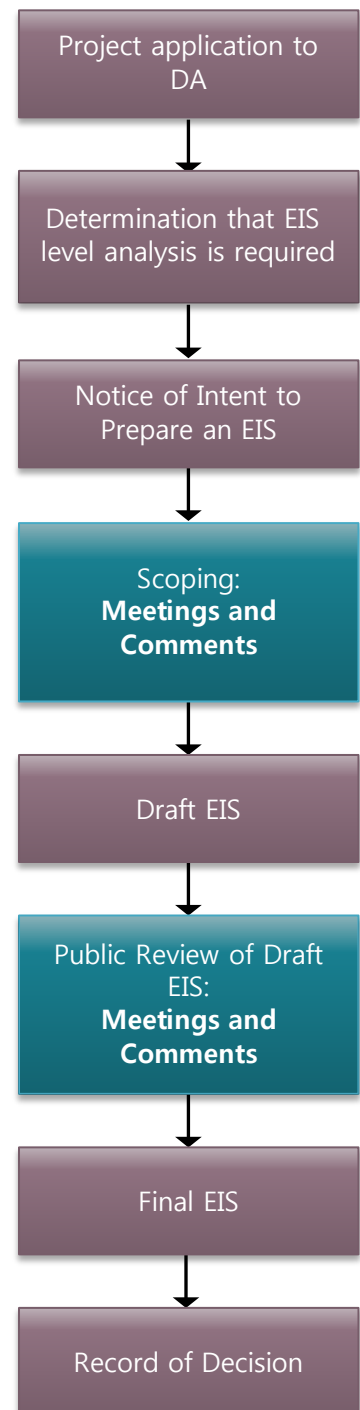
As the USACE prepares to review the submitted permit application, it must conduct a detailed study of:

- how the project will be built,
- the consequences of the project (good or bad) on the environment and for communities,
- alternative ways to develop the project that still meet the project's purpose and needs while better protecting people and the environment, and
- measures that can be taken to avoid or lessen any harmful impacts of the project.

## Transparency

Before a decision is made and throughout its analysis, the federal government must ask citizens to voice concerns and suggest alternatives to ensure decisions on federal actions are well informed.

### Steps in the EIS Process



# Roles and Responsibilities

When the Pebble Limited Partnership (Applicant) submitted an application on December 22, 2017, the US Army Corps of Engineers, Alaska District (USACE) was compelled to begin processing the permit application in accordance with 33 CFR 320. The USACE determined that review of the application would require an environmental impact statement (EIS) level of analysis in compliance with the National Environmental Policy Act. The USACE is the lead federal agency for developing the EIS

## Role of the Corps

The USACE, as the lead agency, is responsible for reviewing the permit application submitted by the applicant, and analyzing the potential environmental impacts from the proposed project. As lead agency, the USACE is responsible for identifying, inviting, and assigning roles to cooperating agencies including agencies that also have permitting decisions to make for the proposed project. The USACE will lead the effort to take a hard look at reasonable and practicable alternatives and evaluate the impacts of the proposed project utilizing an interdisciplinary team. At the completion of the environmental impact analysis, the USACE, will issue a Record of Decision related to USACE's authorities under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act.

## Role of the 3<sup>rd</sup> Party Contractor

AECOM (a consulting firm) has been hired to provide the interdisciplinary team that will develop a fact-based independent analysis of the Pebble Project as proposed and evaluate identified reasonable alternatives. AECOM will work solely under the direction of the USACE and will be the primary developers of the EIS. AECOM will also provide support to the USACE for scoping and public involvement, development of alternatives to the proposed action, assessment of potential impacts, developing the Draft and Final EIS, and distribution. The AECOM team is made up of specialists and scientists in the biological environment, the physical environment, and the social environment.

## Role of the Applicant

As the applicant is required to provide information to the USACE related to their proposed project. This includes:

- description of the proposed project,
- background material, completed research, and site information,
- data for the development of maps and figures, and
- other information that may be identified as necessary during preparation of the EIS.

The applicant will not be involved in the development of the EIS beyond this limited scope.

## Role of Cooperating Agencies

Several cooperating agencies have been invited to provide technical support to the lead agency, the USACE. Cooperating agencies will be actively engaged in scoping and alternatives development and will then be assigned to technical teams based on the specific reasons they were invited to become cooperating agencies. Although cooperating agencies are involved in preparation and writing of certain portions of the EIS and cooperators may use the EIS for their own decisions, the USACE has final authority on the EIS content.

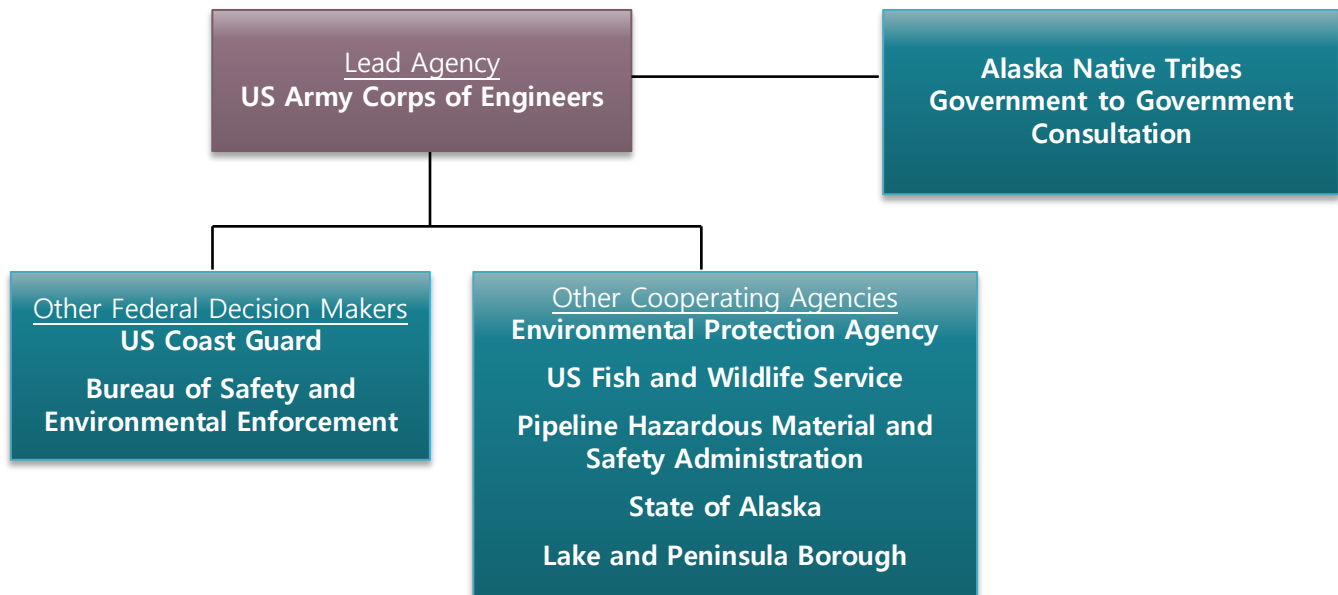


## Role of Alaska Native Tribes

The USACE has invited 35 federally recognized Alaska Native Tribes to consult throughout the entirety of the federal decision making process, including the development of the environmental impact statement. Federally recognized Alaska Native Tribes that the USACE has extended government-to-government consultation invitations to are:

- Aleknagik Traditional Council
- Chignik Bay Tribal Council
- Chignik Lagoon Village Council
- Chignik Lake Traditional Council
- Clarks Point Village Council
- Curyung Tribal Council
- Egegik Village Council
- Ekuk Village Council
- Ekwok Village Council
- Igiugig Village Council
- Iliamna Village Council
- Ivanof Bay Tribal Council
- King Salmon Tribal Council
- Kokhanok Village Council
- Levelock Village Council
- Manokotak Village Council
- Naknek Village Council
- Nanwalek IRA Council
- Native Tribe of Kanatak
- Native Village of Perryville
- New Koliganek Village Council
- New Stuyahok Traditional Council
- Newhalen Tribal Council
- Ninilchik Traditional Council
- Nondalton Tribal Council
- Pedro Bay Village Council
- Pilot Point Tribal Council
- Port Graham Tribal Council
- Port Heiden Village Council
- Portage Creek Village Council
- Seldovia Village Tribal Council
- South Naknek Village Council
- Traditional Council of Togiak
- Twin Hills Village Council
- Ugashik Traditional Council

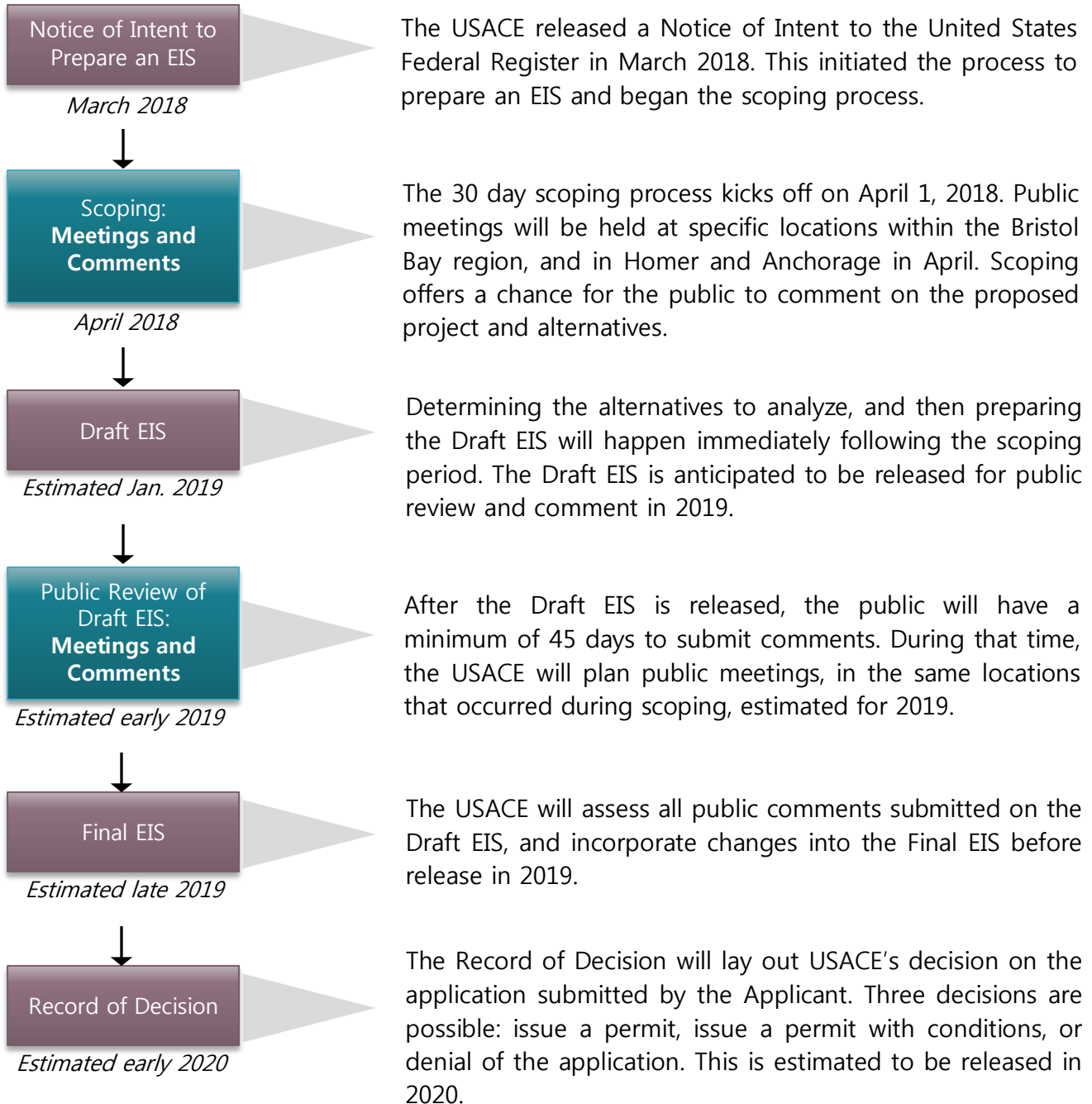
### Lead and Cooperating Agencies



# EIS Schedule

Preparation of the Pebble Project Environmental Impact Statement (EIS) level of analysis began in December 2017, when the US Army Corps of Engineers (USACE) received a permit application from the Pebble Limited Partnership (Applicant). The EIS process will take several months to complete a Draft EIS for public review, with a Final EIS expected within 24 months. The estimated schedule for the EIS is below.

## Steps in the EIS Process



# EIS Outline

## How the Draft and Final EIS will be Organized

The Environmental Impact Statement (EIS) will analyze the potential impacts to the biological, physical, and social environments. The EIS will be organized into chapters to address the specific requirements in the National Environmental Policy Act (NEPA). By understanding the layout of the document ahead of time, readers can more easily find the specific sections they may be interested in reviewing and providing comments.

**Executive Summary** – Provides overview of the Draft and Final EIS, summarizes draft findings of potential impacts, and serves as a guide for where to find details.

**Chapter 1. Purpose and Need** – Describes the purpose of the proposed project to inform the range of alternatives analyzed in the EIS.

**Chapter 2. Alternatives** – Describes alternatives to be analyzed, including a No Action Alternative, the Proposed Action (as designed by the Pebble Limited Partnership), and reasonable and practicable alternatives to address issues raised during scoping and the EIS process, such as, but not limited to, tailings and mine water management, alternate pipeline routes, surface access to the mine site and vehicle traffic levels, and port/ferry facilities, location, and traffic levels.

The purpose and need of a project is essential in establishing a basis for developing the range of reasonable alternatives required in an EIS and identifying and selecting a preferred alternative.

**Chapter 3. Affected Environment** – Describes the baseline conditions of key resource topics in the proposed project environment (such as fish and wildlife, water quality, economics, food production, commercial fishing, and recreation).

**Chapter 4. Environmental Consequences of Action** – Analyzes the potential direct, indirect, and cumulative impacts, as well as potential mitigation measures relevant to each of the resources from the proposed action and each alternative.

**Chapter 5. List of Preparers** – Presents the list of contributors to the preparation of the EIS, including their affiliation, project role, educational background, and years of experience. Cooperating agency roles and responsibilities are also described in Chapter 5.

**Chapter 6. List of Agencies, Organizations, and Persons to Whom Copies of the Statement Have Been Sent** – Describes the distribution of the Draft and Final EIS documents for informational purposes and to identify public locations where the document is available.

**Chapter 7. References** – Presents the references used in preparing the EIS.

**Chapter 8. Appendices** – Presents the in-depth analyses, comments/response to comments, coordination, consultations, mailing lists and other information used in the analysis of the applicant's project.



# How to Comment

Public participation is an important part of developing an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA). Submitting substantive and concise comments during the scoping period is an important role the public plays in the NEPA process, and can influence the scope of analysis for the EIS.

## General recommendations

- **Become familiar with the proposed project** — Review the project or agency website, read the project description, monitor local newspapers, and attend public meetings. The website for the Pebble Project EIS is [www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com).
- **Learn about the steps in the NEPA process** and opportunities for submitting to the U.S. Army Corps of Engineers (USACE). Public comment periods are during scoping, and at the draft EIS.
- **Keep your comments focused and as specific as possible** on the proposed project under consideration, what you think the EIS analysis needs to address and why.
- **Submit your comments within the timeframes announced** to ensure that your concerns are considered and addressed during the drafting of the EIS; the Scoping Comment period is from April 1 through April 30.

Comments on the project are not counted as votes; they are used to determine the appropriate scope of issues analyzed and contents of the EIS and to ensure that the impacts are adequately disclosed before the USACE makes a final decision on the permit application. Avoid simply agreeing or disagreeing with the proposed project. It is more important to identify specific relevant issues, alternatives, mitigation measures/conditions of permitting, and analytic tools so they can be used to inform the EIS analysis. The more clear, concise, and relevant your comments are, the more effective they will be in shaping the development of the EIS. For a citizen's guide to NEPA, visit [https://ceq.doe.gov/get-involved/citizens\\_guide\\_to\\_nepa.html](https://ceq.doe.gov/get-involved/citizens_guide_to_nepa.html).

## Tips for Writing Effective Comments

- **Be specific.** For example, if you are concerned about wildlife, focus on a particular problem or issue, such as a species that you feel should be analyzed, instead of making a broad statement such as "I am concerned about the impacts to wildlife."
- **Support your statements** with explanations, facts, and references, as appropriate.
- **Make suggestions,** including resources that should be analyzed, new data or analytic tools that should be used, and substantially different alternatives that should be evaluated in the EIS.









*fold here*



*fold here*

**Program Manager  
US Army Corps of Engineers Regulatory Division  
P.O. Box 6898  
Joint Base Elmendorf Richardson, AK 99506-0898**

Please place  
first-class  
postage here.

**From:**

# Frequently Asked Questions

## *What is the U.S. Army Corps of Engineers' relationship with the applicant?*

The U.S. Army Corps of Engineers (USACE) has no relationship with the applicant and is neither for or against the project. The USACE has a responsibility to review the applicant's proposed project with the same objectivity as it would any permit application and make a permit decision under the USACE statutory authorities.

## *Is the Pebble Project already approved and going to be built?*

No.

## *What is the USACE's role in reviewing this project?*

The applicant has applied for authorization under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. It is the USACE's responsibility to evaluate their application and ultimately make permit decisions (approval or denial) under the USACE's Clean Water Act and Rivers and Harbors authorities.

## *Why is the USACE conducting an EIS for this project?*

The National Environmental Policy Act (NEPA) mandates an EIS-level of analysis should be conducted for review of any potential federal authorizations that could "significantly affect the quality of the human environment." The USACE has reviewed the permit application and has determined that the proposed project could "significantly affect the quality of the human environment."

## *Are any other federal decisions required based on the applicant's submittal of the permit application?*

Two additional federal agencies have federal decision making authority: the U.S. Department of the Interior Bureau of Safety and Environmental Enforcement, and the U.S. Coast Guard.

## *Will the USACE seriously consider the No Action Alternative and what factors might lead to its selection?*

The USACE cannot be pre-decisional, therefore, the process will be required to analyze and consider the No Action Alternative. In the context of USACE's evaluation, the No Action Alternative constitutes an action that would not include the discharge of fill material into waters of the United States.

## *What is the role of cooperating agencies that do not have federal decisions to make?*

The role of cooperators invited due to specific expertise is to support the lead agency in developing the environmental analysis and providing technical assistance at the request of the lead agency.



### *What is the role of federally recognized Alaska Native Tribes in the EIS process?*

Thirty five federally recognized Alaska Native Tribes have been asked to consult directly with the USACE as lead agency throughout the entire decision making process to include the development of the environmental impact statement.

### *When and how will my comments be considered in preparing the EIS?*

Public comments can be submitted at any time during the preparation of an EIS. Formal requests for comment occur during two important phases of an EIS:

- ▶ During the Scoping Period, the public is asked to comment on the issues and potential impacts that should be addressed in the EIS. The public is also asked to suggest alternatives to the proposed action that should be considered for evaluation in the EIS.
- ▶ Once the Draft EIS is released for public review and comment, the public is given the opportunity to submit comments in written form via the project website and orally at public meetings on the Draft EIS.
- ▶ All comments submitted will be put into the record, analyzed, and considered in determining the scope and potential impacts within the EIS and in making changes to the Draft EIS during the preparation of the Final EIS.
- ▶ The USACE is required to prepare responses to comments submitted on the Draft EIS; comments submitted and response will be included in the Final EIS.



# Pebble Project EIS

NEWSLETTER 1 | April 2018 | [www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com)



## Scoping Notice

The U.S. Army Corps of Engineers (USACE) Alaska District is conducting an Environmental Impact Statement (EIS) level of analysis to evaluate Department of the Army permit application POA-2017-271 submitted by Pebble Limited Partnership (PLP). PLP's application states the purpose of discharges of dredged and/or fill material into jurisdictional waters of the United States is for the purpose of developing a copper-gold-molybdenum porphyry deposit as an open-pit mine, with associated infrastructure, in southwest Alaska. The EIS scoping period begins April 1 and ends April 30, 2018.

The scoping period provides opportunities for any person interested in the proposed project to share information that can help shape the scope of analysis of the EIS. This may include ideas for alternatives to the applicant's proposed action as identified in the permit application (publicly available at [pebbleprojecteis.com](http://pebbleprojecteis.com)) that could have lesser environmental impacts and identifying areas and/or issues of particular concern.



## SCOPING PROCESS BEGINS

### About PLP's Permit Application

PLP is proposing to develop the Pebble Deposit which is located under rolling, permafrost-free terrain in the Iliamna region of southwest Alaska, approximately 200 miles southwest of Anchorage and 60 miles west of Cook Inlet. The closest communities are the villages of Iliamna, Newhalen, and Nondalton, each approximately 17 miles from the Pebble Deposit. Portions of the proposed project lie within the Lake and Peninsula and Kenai Peninsula boroughs. Development of the Pebble Deposit would require federal permits from the USACE, The United States Coast Guard, and the Bureau of Safety and Environmental Enforcement for various aspects of the major project components. These three federal agencies are required to comply with the National Environmental Policy Act and thus will be using the EIS to inform their respective federal decisions. The major project components are briefly described here followed by an overview of the EIS process.

### Major Project Components

**Mine Site.** The fully developed Mine Site would include the open pit mine, a tailings storage facility, a low grade ore stockpile, overburden stockpiles, material sites, water management ponds, milling and processing facilities, and supporting infrastructure such as a power plant, water treatment plants, camp facilities, and fuel and material storage facilities.

**Transportation Corridor.** The Transportation Corridor would connect the Mine Site to the Amakdedori Port on the west side of Cook Inlet. It has three main components:

1. A private, double-lane road extending 30 miles south from the Mine Site to a ferry terminal on the north shore of Iliamna Lake.
2. An ice-breaking ferry to transport materials, equipment, and ore concentrates 18 miles across Iliamna Lake between ferry terminals on the north and south shores of the lake.
3. A private, double-lane road extending 35 miles southeast from the South Ferry Terminal near the community of Kokhanok, to the Amakdedori Port on the west side of Cook Inlet.

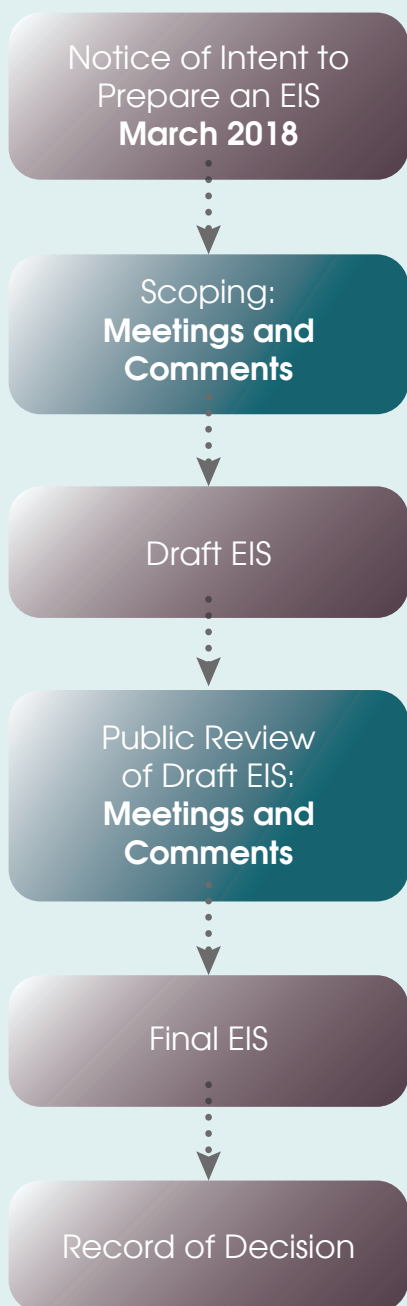
**Amakdedori Port.** The Amakdedori Port would be located near Amakdedori Creek on the western shore of Cook Inlet, approximately 190 miles southwest of Anchorage and approximately 95 miles southwest of Homer. It would include shore-based and marine facilities for the shipment of ore concentrates, freight, and fuel for the project. A 1300-foot earthen causeway with a 700-foot wharf would connect the port site with the docking facility. A 50-foot deep turning basin would be dredged adjacent to the docking facility, along with a 50-foot deep access channel. Other facilities would include fuel storage and transfer facilities, power generation and distribution facilities, maintenance facilities, employee accommodations, and offices.

**Natural Gas Pipeline.** Natural gas, sourced from the existing natural gas supply infrastructure for the Cook Inlet area, would supply power generation for the Pebble Project, and would require the construction of a 188-mile pipe. The gas pipeline alignment would connect to

existing infrastructure near Happy Valley on the Kenai Peninsula and travel south, paralleling the Sterling Highway for 9 miles to a compressor station near Anchor Point. From the compressor station, the pipeline would head southwest across Cook Inlet for 60 miles, before turning west for 35 miles to

a landfall at the Amakdedori Port. A second compressor station and offtake point would be located at the port site. The pipeline would then follow the transportation corridor from the port to the mine site, including crossing Iliamna Lake on the lakebed.

## ABOUT THE EIS



**We  
Are  
Here**

The USACE is serving as the lead federal agency for this EIS. The Bureau of Safety and Environment Enforcement and the United States Coast Guard have federal decision-making authority over portions of the applicant's proposed project and will serve as cooperating agencies. The U.S. Fish and Wildlife Service, Advisory Council on Historic Preservation, the State of Alaska (multiple divisions), the Lake and Peninsula Borough, the Pipeline and Hazardous Materials and Safety Administration, and the U.S. Environmental Protection Agency will serve as cooperating agencies to provide technical assistance for specifically identified special expertise. Thirty-five federally recognized tribal governments have been invited to participate directly through government-to-government consultation.

The EIS will identify potential impacts and potential benefits of the proposed project and reasonable alternatives on the physical, biological, and social environment from all phases of the project, including construction, operations, and post-closure. The EIS will also look at mitigation methods—ways in which potential negative impacts could be lessened. The USACE will use available scientific literature and subsequent data collected, alongside traditional knowledge and observations provided by the public.

We welcome your comments and information on the resources that are important to you. For example, many communities will be concerned about potential impacts to subsistence resources and land uses during project construction, operations, and closure. The EIS will address long-term cumulative effects, consider a reasonable range of alternatives, and analyze a range of practical mitigation and monitoring measures for protecting public health, water quality, wildlife, and subsistence resources.





## Participate!

All interested parties are invited to participate in the EIS process. The goals of the public scoping process are to:

- Gather comments and suggestions from interested parties to help determine issues and concerns that are relevant to the analysis of potential impacts
- Help define a reasonable range of alternatives to evaluate in the EIS
- Capture information that will lead to the development of good mitigation and monitoring measures

## Public Scoping Meetings

USACE has chosen to conduct scoping in multiple ways including scoping meetings in addition to our newsletters, website, and other communication methods. The scoping schedule includes meetings across the project area, as well as in Anchorage and Homer. The public meeting schedule is listed below.

COMMUNITY	DATE AND TIME	LOCATION
Naknek	April 9, 2018, 3:30 pm	Naknek School
Kokhanok	April 10, 2018, 3:30 pm	Tribal Hall
Homer*	April 11, 2018, 5:30 pm	High School
Newhalen	April 12, 2018, 3:30 pm	Newhalen School
Nondalton	April 16, 2018, 3:30 pm	Tribal Center
Dillingham*	April 17, 2018, 5:00 pm	Middle School
Iguigig	April 18, 2018, 3:30 pm	Community Building
Anchorage*	April 19, 2018, 5:00 pm	Dena'ina Center

*\*To avoid long wait times, a hot mic format will not be used.*

## TO PARTICIPATE...

Providing ample opportunities for the public to submit scoping comments on the Pebble Project EIS is of utmost importance to the USACE. Come to scoping meetings and share your thoughts regarding project impacts and benefits and ideas for alternatives. Give your comment orally to a dedicated court reporter, or electronically submit using one of a number of dedicated laptop computers. You can also bring written comments to a meeting, use the comment form on the project website ([www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com)), or send them to:

Program Manager, Regulatory Division  
 US Army Corps of Engineers  
 PO Box 6898  
 Joint Base Elmendorf Richardson,  
 AK 99506-0898

### Let us know what aspects of the proposed project are important to you!

Written scoping comments can be submitted through April 30, 2018.  
 Comments received/postmarked after April 30 will be considered, but may not be included in the scoping report.  
 Comments will be reviewed and incorporated into the Draft EIS, as appropriate



Program Manager  
 Regulatory Division  
 US Army Corps of Engineers  
 PO Box 6898  
 Joint Base Elmendorf Richardson AK 99506-0898



# ANCHORAGE DAILY NEWS

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Placement 0300  
Position 0301

STATE OF ALASKA  
THIRD JUDICIAL DISTRICT

Joleesa Stepetin

being first duly sworn on oath deposes and says that he/she is a representative of the Anchorage Daily News, a daily newspaper. That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on

April 08, 2018, April 09, 2018

and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.

Signed Joleesa Stepetin  
Joleesa Stepetin

Subscribed and sworn to before me  
this 9th day of April, 2018

Britney Thompson  
Notary Public in and for  
The State of Alaska.  
Third Division  
Anchorage, Alaska

MY COMMISSION EXPIRES

2/23/2019

### Pebble Project EIS

#### Pebble Project EIS – Notice of Public Meetings

The Alaska District, U.S. Army Corps of Engineers (USACE) invites the public to attend public scoping meetings for the Environmental Impact Statement (EIS) analysis for the proposed Pebble Project, which would be located 17 miles west/northwest of the villages of Iliamna, Newhalen, and Nondalton, Alaska.

The EIS will analyze potential impacts from the proposed mine that would produce copper, gold, and molybdenum from the Pebble porphyry deposit. The proposed project also includes a 188-mile natural gas pipeline from the Kenai Peninsula across Cook Inlet to the Mine Site, an Amakdedori Port facility on the western shore of Cook Inlet, and an 83 mile transportation corridor that includes an 18-mile ferry crossing of Lake Iliamna.

These meetings are an opportunity for members of the public to provide comments and suggestions to help determine important issues and help define a reasonable range of alternatives to evaluate in the EIS. Please note that public scoping meetings are not public hearings. Scoping input can be submitted in person at public meetings via directly into the provided computers, handing in written comments, or speaking to a court reporter.

To learn more about scoping and the EIS, please visit the web site: [www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com).

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Public comments may be submitted from April 1, 2018 through June 29, 2018 in person at one of the meetings, online at [www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com), or mailed to Pebble EIS Project Manager, Regulatory Division, U.S. Army Corps of Engineers, P.O. Box 6898, Joint Base Elmendorf Richardson, AK 99506-0898.

Notary Public  
BRITNEY L. THOMPSON  
State of Alaska  
My Commission Expires Feb 23, 2019

# ANCHORAGE DAILY NEWS

## AFFIDAVIT OF PUBLICATION

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Position 0301

STATE OF ALASKA  
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Joleesa Stepetin

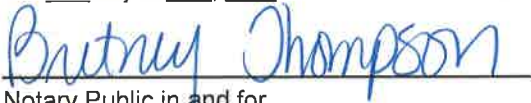
being first duly sworn on oath deposes and says that he/she is a representative of the Anchorage Daily News, a daily newspaper. That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on

April 15, 2018, April 16, 2018

and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.

Signed   
Joleesa Stepetin

Subscribed and sworn to before me  
this 16th day of April, 2018

  
Notary Public in and for  
The State of Alaska.  
Third Division  
Anchorage, Alaska

MY COMMISSION EXPIRES

2/23/2019

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Notary Public  
BRITNEY L. THOMPSON  
State of Alaska  
My Commission Expires Feb 23, 2019

AFFID

Notice of Public Meetings

**Affidavit of Publication**

STATE OF ALASKA }  
COUNTY OF KENAI } SS

Denise Reece, being duly sworn, says:

That she is Principal Clerk of the Homer News, a daily newspaper of general circulation, printed and published in Homer, Kenai County, Alaska; that the publication, of which is attached hereto, was published in the said newspaper on the following dates:

April 05, 2018, April 12, 2018

That said newspaper was regularly issued and circulated on those dates.

SIGNED:

Denise Reece

Principal Clerk

Subscribed to and sworn to me this 12th day of April 2018.

Mary Von Beaudion

Mary Von Beaudion, Notary Public, Kenai County, Alaska

My commission expires: August 29, 2020

00001218 13002507

Jessica Evans  
AECOM  
700 G. Street, Suite 500  
ANCHORAGE, AK 99501



**Pebble Project EIS**



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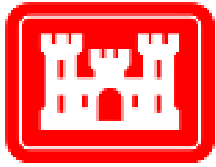
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**In Anchorage, the USACE will be available beginning at 11:00am to take your comment**

Public comments may be submitted from April 1, 2018 through April 30, 2018 in person at one of the meetings, online at [www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com), or mailed to Pebble EIS Project Manager, Regulator Division, U.S. Army Corps of Engineers, P.O. Box 6898, Joint Base Elmendorf Richardson, AK 99506-0898



# US Army Corps of Engineers

Invites You to Attend Public Scoping  
for the

## Pebble Project EIS

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Public comments may be submitted from April 1, 2018 through April 30, 2018 in person at one of the meetings, online at [www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com), or mailed to Pebble EIS Program Manager, Regulatory Division, U.S. Army Corps of Engineers, P.O. Box 6898, Joint Base Elmendorf Richardson, AK 99506-0898

*Please note that public scoping meetings are not public hearings. Scoping input can be submitted in person at public meetings via directly into the provided computers, handing in written comments, or speaking to a court reporter*

## **APPENDIX C – MEETING SIGN-IN SHEETS**



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# Pebble Project Environmental Impact Statement

Public Scoping Meeting

Naknek – April 9, 2018

PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
✓ 1. Maureen Knutsen	self/ <del>husband</del>	maureen.knutsen@gmail.com
✓ 2. HENRY F. FISCHER JR	Self employed	N/A
- 3. William REGAN	RETIRED	regans@bristolbay.com
✓ 4. Dorothy M Larson	BBNC	dorzlarson@gci.net mmahmimi@gmail.com
- 5. Marilyn A Hansen	housewife	
✓ 6. Paul Hansen Sr	subsistence fisherman	pauljhansen@gmail.com
✓ 7. Sharon Thompson	resident	steelbirdproductions@gmail.com
✓ 8. Abe Williams	PIP/self	abew907@gmail.com
✓ 9. Richard Russell	formerly ADFG but now just for myself	_____
- 10. Peter Andrew	BBNC	pandrew@bbnc.net



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
11. <del>Henry</del>		
✓ 12. Ted Shangin		
✓ 13. JOE Chythlook	BBNC	JChythlook@bbnc.net
✓ 14. <del>Stillsing</del>	BBNC	Naknek
✓ 15. Daniel J. O'Hara	Bristol Bay Port Major	
✓ 16. Everett Thompson	Bristol Bay Fisherman <sup>local</sup>	SalmonandSouk@gmail.com
✓ 17. Dylan Mancuso	Bristol Bay Fisherman	maxdylan@gmail.com
✓ 18. Melissa Mancuso	BB resident	millelissa@gmail.com
✓ 19. Lindsay Layland	BB resident	
✓ 20. Russell Phelps	BBNC	rphelps@bbnc.net



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	
21. George Wilson Jr	BBFA/personal	georgewilsonj@gmail.com	
22. Russell Nelson	BBNC	russell2542k@yahoo.com	
23. John Christensen	Native Village of Port Heiden	johnivan2@gmail.com	
24. Jodie Hagobay	Naknek	jodiestdeas10t@aol.com	NO
25. Cody Larson	D. Mayhan	Cody@Larson@gmail.com	
26. MegAnna Schlais	Naknek	meganna.rose@live.com	NO
27. Pete Caruso	KS/Naknek	PJCaruso@hotmail.com	NO
28. CarolAnn Hester	Naknek Set Gillnet Fisher	carolann.1961@hotmail.com	
29. Beth Hill		behill80@gmail.com	NO
30. Anna Hoover	Egegik Difter	anna_laura@msn.com	

↳ Peter Andrews





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	
31. Eddie Clark	Egegik Settler	flyingeddieak@gmail.com	
32. DALE PETERS	NO MINE! NO WAY!! NAKNEK SETNETTER LOCAL BUSINESS OWNER	dmpeters@bristolbay.com	NO
33. Veronica Wood	Naknek Resident	alaskamommy13@gmail.com	NO
34. Eseta Sherman	Small Business	sherman@bristdbay.com	No
35. Joshua Gumlikpak	Aushagak Drifter	jgumlickpak@gmail.com	
36. Paul Hansen Jr	Fisherman Drifter		NO
37. Rose Chr Hansen	Naknek Resident	Box 414 King Salmon AK 99603	No
38. Annette CARUSO	Naknek resident	annettewilsoncaruso@gmail.com	com
39. Josey Wood	Resident		yes
40.			



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
41. William Weatherly		wwwby73@gmail.com
42. Kate Conley	Lake & Peninsula Borough	kate.conley@lakeandpen.com
43. John <del>Wise</del> Wise		swatrans@yahoo.com
44. BECKY SAVO	resident BBB	beckys109@gmail.com
45.		
46.		
47.		
48.		
49.		
50.		



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
51. <i>Wesley Foster</i>		<i>mary7654@ME.COM</i>
52.		
53.		
54.		
55.		
56.		
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<b>PLEASE PRINT Name</b>	<b>Affiliation (if any)</b>	<b>E-Mail or Address</b>
61.		
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
1. Gerald Andrew		gerald-andrew@line.com
2. David McAlister		DMcalister@alaska.com
3. chukwak Pari Chukwak		
4. Joe Chytkolok		JChytkolok@bbcc.wa
5. John Nelson Jr	self	jaydoloshian@hotmail.com
6. Sheila M. Hobson		sheilambobson82@gmail.com
7. Jim Tilly	self	tilly358@yahoo.com
8. Michelle Ravenman	Lake & Penn Borough Assembly	popevanny@gmail.com
9. Steve Nowitzak		
10. Joe Hyde		mjohyde@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
11. Agnes Mike		none
12. Marlene Tilly		marl3ak@yahoo.com
13. Rick <del>ter</del> Marsha Dickert		
14. Matt Mita <del>Richard</del>		
15. Kimberly Wilkins		
16. NATHAN HILL	LAKE+PENINSULA BOROUGH	manager@lakeandpen.com
17. Trefim Wassilke		
18. Marlene Eknaty		
19. Diedre Hill	B.B.N.C. / land owner	diedrehill33@gmail.com
20. Mollie Gatzke		



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
21. Viola Paul		Levelock
22. Greg Andrew Jr.		Levelock
23. Sergei Chukwaj	Levelock Village	S chukerak@yahoo.com
24. Lutz Zaackar		Kokhanok
25. Gustie Tallakpalet	Levelock AK	
26. Gilbert Andrew	Kokhanok AK	
27. Laura Evan-Andrew	Kokhanok, AK	
28. Nicell Newyaka Jr.	Kokhanok AK	
29. Avery Lill	KDLG	avery@kdlg.org
30. Cynthia Olympic-Andrew	Kokhanok	Kokhanok

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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
31. Alesia Newyak	Kokhanok	
32. Matt Nelson	Kokhanok	
33. Fran Andrew	Kokhanok	
34. Jimmy Ekuty	Kokhanok	
35. Natalia Wassillio	Kokhanok	
36. Marisa Hobson	Kokhanok	
37. Isaiak Mike	Kokhanok	
38. Joseph Zackay	Kokhanok	
39. John Chukwak	Levelock	
40. Martha Kernak	Kokhanok	

4

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4





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
41. <i>Aline Cobb</i>	<i>Kolchanok</i>	
42. <i>John F. Gust</i>	<i>Kokhanok</i>	
43. <i>Gregory Wassillie</i>	<i>Kokhanok</i>	
44. <i>Samuel Madrid</i>	<i>Kokhanok</i>	
45. <i>Ami Hester (Hester)</i>	<i>Kokhanok</i>	
46. <i>Joe A Paine</i>	<i>KOKHANOK</i>	
47. <i>Alexander Talletkpaletk</i>		
48. <i>Jay Woods</i>	<i>Kolchanok</i>	
49. <i>Raymond Apokobak</i>	<i>hevelok</i>	
50. <i>Nicholas Chocknok</i>	<i>Kokhanok</i>	

✓

~~XXXX~~

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Testify? -

PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
51. Brittany Bush		
52. Evangaline Chemere		
53. Sonia Delkittie		sonia.delkittie22.sd@gmail.com
54. <del>Megan Hoff</del>		
55. SAMARA chomok	Kokhanok	
56. Helen chomok	Kokhanok	
57. Cara Pellegrino	Kokhanok	
58. Shelby Gallo	Kokhanok	
59. Jordan Pufka	Kokhanok	jordanpufka@gmail.com
60. Charlene Roehr	Kokhanok	

✓

BE



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Test.ity?

PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	
61. Marlene Nielsen		kipp470-558@hotmail.com	✓
62. Sharolyn Chocknok		schocknok@yahoo.com	✓
63. Tootsie Roehl	wounded in	tootsier93@gmail.com	✓
64. Roy Andrew		roy.701@yahoo.com	✓
65. Kathy Wassilie			
66. Nancy Wassilie			
67. Jesse Davis		jessejkdavis@gmail.com	
68. Laney Moses		lanymsk@gmail.com	
69.			
70.			



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
1. DAN BOONE	<del>None</del> NONE	dlboone42@gmail.com
2. JACK POLSTER	"	—
3. Eileen Sheridan	Cook Inlet Keepers	ak25grandparents@yahoo.com
4. GARY Sheridan	"	"
5. Wilma Williams	None	wilma.s.williams@gmail.com
6. Royce Page	None	roycepage@yahoo.com
7. JACK ALLARDECE	None	@
8. JOHN WHITTIER	None	Box 134 HOMER AK 99603
9. Amanda Kelly	None	Box 2919 Homer
10. Janet Fink	None	B 64957 Da Mar keep Homer



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
11. Sera Baxter		sera-baxter@yahoo.com
12. John Allardice		jr24@sonic.net
13. MICHELLE MITAUD		AKSHOME BURDER@GMAIL.COM
14. Chris Perry		Fishyarns@yahoo.com
15. Milli MARTIN		millimom39@gmail.com
16. BRYAN ZAK		Bry2d@AOL.com
17. SHIRLEY EVANS		toshirley2@gmail.com
18. Georgeanna Heavenley		glheaverley@gmail.com
19. Shlomo Gherman		shlomagherman@gmail.com
20. Jim Chespe		s.lurb@alaska.net



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
21. Benn Levine	none	bennlevine@sci.net
22. Lindsay Layland	NA	
23. Emilie Springer	USAF	esspringer@alaska.edu
24. Martha Crow	fisherwoman	marthecrow33@hotmail.com
25. Charles Cramp frn	farmer-none	Charlesone@Horizonsatellite.com
26. Barbara Reilly		barbarareilly131@gmail.com
27. Larry Shove	None	
28. Milti Lundgren	Fisherman	lundgren.milti@gmail.com
29. Mike Lundgren	Fisherman	mikelundgren234@gmail.com
30. Clyde Boyer	Interested Alaskan to save our fishery	clyde.t.boyerjr@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
31. JOFFE MIDDLETON		JOFFE MIDDLETON 48 @ G.mall.com
32. Dennis Andrews		31851 Echo Lake Rd Soldotna AK 99669
33. Shelley Gill	EyeoftheWhale.org	whaledetective@yahoo.com
34. Michael Yourkowski		michael.yourkowski@gmail.com
35. Dore Lewis	Salmon Lover	davelyn@gci.net
36. George Matz		gcmatz41@gmail.com
37. Joim McCall	BSEE	—
38. MATT HAKALA		
39. Loretta Brown	Salmon State	loretta@salmonstate.org
40. Jessie Nelson	Cook Inlet Aquaculture Lower Inlet Seiner	nukapointfish@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
41. BEAVER NELSON	Cook Inlet seiner	Nwka point 43 @ gmail.com
42. BRIAN CAMERON	Sports fisherman	brance@alaska.net
43. Janette Latimer	Nurse	latimer@xyz.net
44. LISA KREBS	Aristol Bay fisherman	lckrebs@gmail.com
45. Ricin CARON	TENDER OWNER in B.B.	ERICINACARON@gmail.com
46. George Smallwood	Keeper	P.O. Box 3371 <sup>Smallwood</sup> <del>198</del> gmail.com. Homer, AK 99603-3371
47. Marika Carey		marikacarey@hotmail.com
48. Shine Carey		Shinecarey03@gmail.com
49. Kyle Schneider	Sport fisherman/Educator	Kyle L Schneider@gnail.com
50. Donna Adarhold	self	donnaGrace99@gmail.com





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
51. Charlie Franz		kachemakcharlie@gmail.com
52. Claire Neaton	comfish	claire.neaton@gmail.com
53. Jim Plymire	BEARLOVE FISHERIES LLC	BEARLOVE907@YAHOO.COM
54. Jinky Handy		jhandy.ak@gmail.com
55. Malcolm Milne	North Pacific Fisheries Assoc.	npfahomer@gmail.com
56. Revelle Russell	North Pac Fisheries Assoc NCPFA	aktedpole@mac.com
57. Jennifer Hakala	NPFA	jennymak30@gmail.com
58. GARY AULT		grobault@hotmail.com
59. Andrew Sereginev		Andy.su21@gmail.com
60. Jaime Gable		namastayinn@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
61. Jon James Sharp	human	jonjsharp@gmail.com
62. Chessie Sharp		chernutsharp@gmail.com
63. Laura McIndoe		lmcindoe2@gmail.com
64. MARK MASSIARI		markmassiar@yahoo.com
65. Reba Temple	fisherman	reba.maetemple@gmail.com
66. RON KEFFER	CAN	annronkeffer@gmail.com
67. Carolyn Maalozw	teacher/salmon advocate	daveilyn@gci.net
68. STEVE BAIRD		SJB@IRD@MTC.COM
69. Jane Miles		janeflyfish@gmail.com
70. Catie Bursch	fisherman	tcbursch@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
71. Wendy Wayne		2435 Paradise Pl Homer AK 99603 lewistownmontana@yahoo.com
72. Lolita Brache		lolitagrace@gmail.com
73. Tess Dally		tessdally@gmail.com
74. Charles Lindsay	VCIDA	PO Box 15428 Fritz Creek AK 99603 chucklindsay@gmail.com
75. Renie Cannava		reniedro@ci.net
76. Peter Cannava		" "
77. Joey Kraszeski		kraszkeski@gmail.com
78. Solstice Kraszeski		teensyfish@gmail.com
79. LOGAN SANDER		logansander@gmail.com
80. Barb Buzzelli Ault		inletcharters@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
81. PAT & Lyle Bellamy		Path@horizonsatellite.com
82. Cheryl Rykaczewski	MARICULTURE OYSTER FARMER - ASSN.	907r.ski@gmail.com
83. MCKIBBEN JACKINSKY	HOMER NEWS/ FREELANCE WRITER	mckibben.jackinsky@gmail.com
84. Sharon Brooks	resident	homerhohe@gmail.com
85. Laura Luttrell		lauraluttrell@gmail.com
86. ROB LUND	RESIDENT	summersong@alaska.net
87. Karen Murdock	resident	marshall@xyz.net
88. Thomas McDonough	resident	fttj'm@yahoo.com
89. <sup>Dr. Wesley</sup> Sharon Henny	resident	s <sup>s</sup> sharwes@alaska.net
90. LuAnne M. Nelson	resident	lanelson54@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
91. Brandon Hill	Cook Inlet/keeper	brandon@inletkeeper.org
92. Tim Scheffelho	Private-Healthcare	DRTIMSCHEFFEL@Gmail.com
93. Stu Schmutzler	Private	alpine.stu@gmail.com
94. Amanda Candell		Amanda224@yahoo.com
95. Sean Campbell		clearprose@gmail.com
96. Kathryn Carssow	private	kcarssow@LIVE.com
97. MAKO HAGGERTY	self	mako@xyz.net
98. Amy Christensen	self	justamyc@gmail.com
99. Shevawn Miller	self	sbm3456@gmail.com
100. Amy Woodruff	self	amy.woodruff89@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
101. BRENDA DOLMA	Alaskan (self)	dolma@ptialaska.net
102. DRUE SMITH	ALASKAN	druesmith@yahoo.com
103. Em Knudtsen	"	epknudtsen@gmail.com
104. Patricia Cue	Conservation Kachemak Bay Society	paveccos@alaska.net
105. DINAGHERMAN	ALASKAN	<del>gfe</del> howcanyou8@gmail.com
106. Tim Steinberg	Alaskan	tim@visualadventures.net tim@visualad
107. Laurie Daniel	Alaskan	lauriedanielinc@hotmail.com
108. Katie Dawson	Alaskan	rag15smith@gmail.com
109. Tammy Carmichael	Alaskan / tourism	ak_brownbear@hotmail
110. David Schauble	Alaskan	shaggyccs@yahoo.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
111. Philip Brudie	local fisherman	PO BOX 111 Homer, AK 99603
112. Joe Szymberky	Local fisherman	Box 15322 Fritz AK. 99603
113. Diane Szymberky	business owner	Diane.szymberky@gmail.com
114. Roberta Kightant	Kachemak Bay <sup>society</sup> Conservation	Roberto.archibald@gmail.com
115. Ernest Suoja	Local	
116. Bill Wiebe	Local	
117. Leon Smith		Kachemakian@gmail.com
118. Trisha J. Davis	Superfund Site Survivor	deadfallmtn@gmail.com
119. Mark Munro	Fisherman Bear View Air Taxi	Box 1971 Homer 99603 / Stella1n@gmail.com
120. Matthew Martushev	Commercial fisherman	mnm-rb@yahoo.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
121. NATALIA MULLAWA		NATALIA MULLAWA @GMAIL.COM
122. John Mink		JOHN MINK PDX @GMAIL.COM
123. SARAH ROBERTSON	HOMER BIRTH & WELLNESS CENTER	sarahskib3@gmail.com.
124. GLENN CALDWELL		gcalaska @gmail.com
125. Jeff Dean		jndeana@jeffreyhdean.com
126. Skywalker Payne		skywalker@skywalkerpayne.com
127. Daniel Layland	COOK INLET RESIDENT 35yr Bristol Bay Summer	P.O Box 531 HOMER AK 99603
128. DAVE BACHZACH		goseebears@gmail.com reiddouglasa@gmail.com reiddouglasa@
129. Doug Reid		reiddouglasa@
130. Deborah Smith	Cook Inlet Keeper Supporter	ton@xyz.net





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
131. Lynn Temple		lynn.temple@hotmail.com
132. MARY FRISCHE		frollopx@gmail.com
133. KARA CLEMENS		Kbclemens@hotmail.com
134. Andrea VanDinther	Bear Guide	a.vandinther@gmail.com
135. Sofia Lobay		S.anouk.lobay@gmail.com
136. Isabella Lobay		893 Lupine Ct. Homer, AK 99603
137. Hudson Lobay		893 Lupine Ct, Homer, AK 99603
138. Joe Loboy		893 Lupine Ct. Homer AK
139. Jeanne Parcer	teacher	866 Linda Ct Homer AK
140. Russell Miller		3437 1/2 Bluegrass St Anchorage AK



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
141. ALISON OTTARA		ALASKASELKIE@GMAIL.COM
142. Miranda Weiss	Citizen voter mother	miranda.weiss@gmail.com <del>sheppardfries@gmail.com</del>
143. GREGORY FRIES	VOTER / CITIZEN	kickbatkool@icloud.com
144. Morgan Edminster	Fisherman / voter / citizen	edmmor11@gmail.com
145. EDWIN O. KILCHER	COMMERCIAL BARGE & BUSINESS	OTTOKILCHER@GMAIL.COM
146. Charlotte Adamson	Farmer	charlottadamson@gmail.com
147. Francie Roberts	Citizen	francie.roberts@gmail.com
148. LACEY VELSKO	COMMERCIAL FISH	VELSKOLACEY@GMAIL.COM
149. Penelope Haas	ADF&G / commercial fishing	
150. Todd Gustafson		ToddGustafson@Yahoo.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
151. Mark Schollenberger		msberger@horizonsatellite.com
152. RICHARD HARNESS	SEASIDE ADVENTURE	SEASIDEADVENTURE@EARTHLINK.NET
153. TORREY SHORT	Wildland Firefighter	torreyshort@gmail.com <del>torrey</del>
154. ELAINE BURGESS		eburgess214@gmail.com
155. Dorla Harness	citizen	dorlaharness@gmail.com
156. Cynthia Morelli	fish eater	cmorelli@alaska.net
157. Lynn Takeoka Spence		ltakeokaspence@gmail.com
158. SHERYL BAECHLER	HOMER Citizen Landowner Bristol Bay	baechler@gci.net
159. Tim Whip		tim_whip@yahoo.com
160. JACK CUSHING	HOMER CITIZEN	jackcushing@gci.net



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
161. Susan Cushing	Homer Resident	cushinghouse@gmail.com
162. Lisa Wood Bell	Homer Resident	spiralwedge@gmail.com
163. Shannon McBride-Morin	Kachemak Bay Wilderness Homer Lodge.	shannon@AlaskaWilderness Lodge.com
164. Lars	Homer Resident	
165. Ben	Homer Resident	
166. Maggie Goedeke	Homer Resident	maggie - kay 89@yahoo.com
167. Robert Johnson	Alaska resident, fisheries biologist, tribal employee	robert@ninilchiktribe.gov
168. Monica Zappa	Ninilenik, AK Set netter	monica zappa 1@gmail.com
169. Peter Andrew	DBYC	pandrew@bbnc.net
170. Rika Mouw	resident	rikamouw@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
171. JENIFER DICKSON	Homer	<del>BT</del> jeninlalaland@yahoo.com
172. Sherri Burt	Seldovia	sherriburt@yahoo.com
173. PEGGY PAVER	Homer	peggypaver@gmail.com
174. Aaron Ford	Homer	krommeweg@gmail.com
175. Nicole Arevalo	myself	genehackmanwho@yahoo.com
176. JUDY GONSALVES	BRISTOL BAY FISHERMAN HOMER RESIDENT	judydan86@gmail.com
177. Charlie Christoffersen	Kenai	
178. Zenovia Prokopiof-Tallekpalek	Levelok	zenoviat@gmail.com
179. Jordan Jackinsky		medicine4light@gmail.com
180. Brad Thornburgh	Homer	BTThornburgh@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
181. Betty Siegel	-	Siegelbetty@gmail.com
182. Daniel Del Missiev		ddelmissiev@hotmail.com
183. Stephanie Zuniga	-	steffyzuniga@hotmail.com
184. Wes Schacht	Homeroid	P.O. BOX 15243 Fritz Ct. AK 99603
185. Jodi Andrews		tjandrews815@gmail.com
186. Christine Kulcheski		clakland@yahoo.com
187. Mikee Flora	Bristol Bay Fisherman	MikeeFlora@yahoo.com
188. Taylor Andrade	Homer Resident employed in Tourism.	tay.t.andrade@gmail.com
189. Kyla Dammann		Kyla.adelle@gmail.com
190. Anne Wieland	-	agpacsa@yahoo.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
191. <i>JOB MOORE</i>	AK RESIDENT 48 yrs.	moorefishak@gmail.com
192. Mercedes Becker	AK resident 21 yrs	mercedesak1@gmail.com
193. Karen Northrop	AK resident 21 yrs	kknorthrop@gmail.com
194. Ruby High	AK resident 66yr	rubyha@alaska.net
195. Carrie Oats	AK resident 19yrs.	oatscarrie@gmail.com
196. Cal Loomer	AK Resident	ca.loomer@gmail.com
197. PETE BECK	AK RESIDENT	INTHEROAD@GMAIL.COM
198. TRISH BOYER	AK RESIDENT	mts@gci.net
199. Michael Mosley	AK Resident	mmosley.ak@gmail
200. TIM OSMAR	AK Resident	MONICAZAPPA1@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
201. Beverly Cronen		
202. Louis Dupree		
203. Amanda Miotke		amandaakhomes@gmail.com
204. Diedre Hill	B.B.N.C.	dhill@bbnc.net
205. Karen Schmidt		shastate@gmail.com
206. Kim McNett	Kachumak Bay Conservation Society	kmmcnett@gmail.com
207. NANCY HILLSTRAND	PIONEER ALASKAN FISHERIES INC	bear@alaska.net
208. Jeffrey Lee		skiridge@gmail.com
209. Joey Allred		hilltopallreds@gmail.com
210. Karianna Derr	Homer	Kariannahalley@gmail.com





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
211. Timothy Gervais	fisherman	megtingervais
212. Ruby	}	}
213. Margaret		
214. Meghan		
215. Eileen Mullen	fisherwoman	eileenmullen907@gmail.com
216. Martin Reuner		h95mr@mua.ca
217. Sue Manger		S_manger@yahoo.com
218. WAYNE ADERHOLD	_____	aderhold@xyz.net
219. Anders Gustafson	Bristol Bay Heritage Land Trust Homer Land Use Guide	anders@renewak.org
220. Leah Evans	Homer	leahcloud@yahoo.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
221. Mary Edminster	Homer	mmedminster@gmail.com
222. Scott Bartlett	Homer	scottbartlett@gmail.com
223. Aimee Sulczynski		aimstevan@gmail.com
224.		
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<b>PLEASE PRINT Name</b>	<b>Affiliation (if any)</b>	<b>E-Mail or Address</b>
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<b>PLEASE PRINT Name</b>	<b>Affiliation (if any)</b>	<b>E-Mail or Address</b>
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
1. Raymond Wassile			YES ✓
2. Tasha Hobson	Student		NO.
3. Wyatt Wassilie			NO
4. Lem Batchelder		Lem Batch@yahoo.com	NO
5. Greg Anelou	self	greganelon@yahoo.com	YES ✓
6. Mente Anelou	INL		yes ✓
7. Ethel ADCOY Ethel ADCOY	ILI	eadcoy@gmail.com	
8. James R. Linnon Ts.			NO
9. VERA Kolyaha	Pedro Bay	vj.kolyaha@gmail.com	NO
10. Wade	Student		NO



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
11. BEN FOSS	Pedro Bay	b.foss@pedrobay.com	OK ✓
12. Avery Lill	KDLG	avery@kdlg.org	NO
13. Keith Jensen	Pedro Bay	darthlice@yahoo.com	y ✓
14. KARA JENSEN	PEDRO BAY TRIBE	Shavelasurfer@gmail.com	YES ✓
15. Wynn Knighton	Pedro Bay	Knighton907@gmail.com	Yes
16. Molly Dischner	WTBB		Yes
17. Traci Nickoli In Newhalen	none	-	no
18. Terry Wassilko	Newhalen Tribal Council		no
19. Samantha Herrick	Pedro Bay	Samantha.foss99@live.com	Yes
20. Mike Clark	Iliamna	clarks4him@protonmail.com	no



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
21. LARRY J. HILL			NO
22. RANDY ALVAREZ			NO
23. Heather Mase <del>Heather Mase</del>			no
24. Manuel Anfon			NO
25. Kim Williams			
26. Anelon Charity Anelon			
27. Alex Wasiluk			yes ✓
28. Lisa Reimers			yes ✓
29. Alex Wasiluk			yes ✓
30. Lauree Anelon			yes ✓



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
31. Nathan Kibbide	—	nate.kibbide@gmail	—
32. Maxine Wassilhe			—
33. Lydia Olympic	—	ohlydia533@gmail.com	NO
34. Joe Chythlook	BBNC		yes ✓
35. Russell Nelson	Resident of BB	russell@dlgsd.org	Yes ✓
36. Norman von Uster	Bristol Bay Economic Dev. Corp	norm@bhec.com	Yes ✓
37. Margie Olympic	Newhalen	molympic907@gmail.com	? ✓
38. Agnes Rynkowsky	Newhalen	aj772@yahoo.com	? ✓
39. Chip Embretson	Iliamna	chipcos@msn.com	? ✓
40. Harvey Anderson	Iliamna NATIVE		—





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
41. Bill Cornell		Newhalen, AK	No
42. Joanne Wassilke		Newhalentribal@yahoo.com	NO
43. Annie Wassilke		Newhalen	no
44. Cathleen Gust		mybabyangel@hotmail.com	No
45. Sheera Ishmoor		sishmoor@yahoo.com	NO
46. Sarah Armstrong		Sararmstrong@lpsd.com	<del>NO</del> - No.
47. Tim Anka!		ti-anka.	? ✓
48.			
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New Stuyahok – April 13, 2018

Father Alexie

YES ✓

PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
1. John Hanson Sr. (Wally)	NSTC	N/A mail out	YES ✓
2. Wassilie Guston	New Stuyahok Traditional Council	wjust2015@yahoo.com	YES!! ✓
3. Blunka Stephan Blunka		new Stuyahok, AK 99636 Box 17	NO
4. Randal A Hastings	community member	P.O. Box 61 New Stuyahok AK 99636	YES ✓
5. Won hola Adrian Wontola	community member	P.O. Box 55 New Stuyahok AK 99636	NO? ✓ decha
6. Timothy Oyaluk	"	" P.O. Box 77 "	yes ✓
7. Mike Oyaluk	"	P.O. Box 12 New Stuyahok AK 99636	No
8. John Hanson Jr	"	Box 95 New Stuyahok, AK 99636	NO
9. Kim Wilkams			yes ✓
10. Tatianna Oyaluk		Box 73 New Stuyahok, AK 99636	<del>NO</del>



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
11. Gustie Kusma		PO Box 82 New Stuyahok, AK 99636	
12. Moxie Andrew Jr.		mandrewjr@hotmail.com	YES ✓
13. Matriona Gust		P.O. Box 168 New Stuyahok, AK. 99636	YES ✓
14. MaryAnn Gust		P.O. Box 72 New Stuyahok, AK 99636 gustmaryann@yahoo.com	Yes ✓
15. Evan Kusma Sr.		P.O. Box 82 New Stuyahok, AK. 99636	NO ??
16. DENNIS ANDREUZ		New Stuyahok.	Yes ✓
17. Bobbie Larson		Box 5028 Kotzebue AK 99576	yes ✓
18. Thomas Tilden		tildenthomas@outlook.com	yes ✓
19. Tatianna Gumllickpuk		Box 26 New Stuyahok, AK 99636	NO
20. CHAULIE Gumllickpuk		" " "	NO



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
21. Myrtice Ewert	Nunamta Aulukes tai	myrtice.ewert@yahoo	JR
22. Joe Clythlock	BOW		—
23. Gusty S Blund Sr		P.O. Box 52	No
24. Wass Neketa Sr.			No
25. Mary Wankala		P.O. Box 77 Church Road New Stuyahok, AK 99636	NO
26. Andrew Wyagon		P.O. Box 93 New Stuyahok, AK, 99636	NO
27. Peter Christopher Sr.	Stuyahok (td)	P.O. Box 85 New Stuyahok, AK 99636	Yes ✓
28. Lucas Barr	pupil	"	Yes ✓
29. Maie Paul	BRASC	mpaul@brasc.net	Yes ✓
30. Alannah Harley	UTBB	ahurley@utbb.org	Yes ✓



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
31. Lindsay Layland	NTSB	llayland@ntsb.org	Yes - after review else
32. Frances A. Nelson	New Koliganek Village Council	P.O. Box 5043 Koliganek AK 99576	Yes ✓
33. Junk McBrown Jen Tell	New Koliganek Village Council	P.O. Box 5043 Koliganek AK 99576	Yes ✓
34. MaryAnn Wassilie	New Stuyahok		? decline
35. Michael Frost			No
36. Matrona Andrews			Yes ✓
37. Iven Womhda		PO BOX 51 New Stuyahok, ALASKA 99636	Yes ✓
38. Natalia Christopher	New Stuyahok	P.O. Box 115 New Stuyahok AK	NO
39. Natalia Ogaluk	New Stuyahok	P.O. BOX 73 New Stuyahok AK	NO
40. Glen Olympic			maybe ✓



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
41. Natalia Wassilliey		P.O. Box 37 New Stuyahok	Yes ✓
42. Blunta Wassilliey Sr			Yes decline
43. Bjorn Olson	<del>BB + BB</del>	fatbikebjorn@gmail	No
44. Wassilie Andrews		wassilieandrews@hotmail	Yes ✓
45. Harvey Demantle		hdemantle@yahoo.com	NO
46. SERGIEVALUK			NO
47. Annie Chukat		Bx 124 KNW AIC 99636	NO
48. Ivan Flunka			NO
49. Thomas Woodman		P.O. Box 164 New Stuyahok, AK	? ? ✓
50. L. Alexis Astende			NO Yes ✓



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
51. <i>Vina P. Gust</i>			<i>NO</i>
52. <i>James ACOYAK</i>			<i>NO</i>
53. <i>miki yuzaluk</i>		<i>new Stuyahok</i>	<i>NO</i>
54. <i>Phillip Pavella</i>		<i>New Stuyahok, P.O. 45</i>	<i>NO</i>
55. <i>Michael P. Gumbel</i>			<i>NO</i>
56. <i>Gustie Hanson Sr</i>		<i>Po Box 35 New Stuyahok AK 99636</i>	<i>NO</i>
57. <i>Peter Oyaluk</i>		<i>Box 73 New Stuyahok AK 99636</i>	<i>NO</i>
58. <i>Demtri Gust</i>		<i>demtri.gust@yahoo.com</i>	<i>NO</i>
59. <i>John Wonhola</i>		<i>John.Wonhola@gmail.com</i>	<i>No</i>
60. <i>Wassilie Blunke</i>		<i>blunke - 08@hotmail.com</i>	<i>NO</i>



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New Stuyahok 13  
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
51. 61 Nancy Waskey		P.O. Box 13 New Stuyahok, AK 99636	no
52. 62 Delores Larson		PO Box 5018 Koliganek, AK 99576	yes ✓
53. 63 Tim Pavella			NO
54. 64 Faith Andrew		fandrew@blnc.net	YES ✓
55. 65 Mary Olympic		PO Box 132 New Stuyahok, AK 99636	NO
56. 66			
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
1. Luther E. Hobson, Jr.	R	<del>_____</del>	Yes- <del>decline</del> <sup>decline</sup>
2. Charlotte Balende			YES-later ✓
3. Christina Salmon	Lake & Penn <del>the</del> Borough Assembly		no
4. Jackie G Hobson		TPCRPR@hotmail.com	yes ✓
5. John B. Branson			yes ✓
6. Michelle Ravenmoon	Lake & Penn + Borough Assembly		<del>yes</del> Decline ✓
7. Tim Vogel			yes ✓
8. DARCELLE BAILLIE	Lake & Penn		yes ✓
9. Hobson SR, Paul Hobson SR			yes ✓
10. June Tracey		<del>_____</del>	yes ✓



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
11. Ventura Samaniego	Kijik Corp.	ventura@kijikcorp.com	? ✓
12. Billy Trefon Jr	Nondalton Tribal Council	billytrefonjr@yahoo.com	yes ✓
13. Timothy Hobson	None Nondalton	Timwithobson15@gmail	yes ✓
14. Alexie George Alex	" "		YES ✓
15. Marjila Natalia Marttila	Nondalton Tribal	—	? ✓
16. Elizabeth A. Ralute	" "	geniz	? ✓
17. Virginia Delkittie	Nondalton		no
18. Mavin Trefon	NONDALTON		Yes ✓
19. Clara Trefon	Nondalton	ctrefon@blnc.net	<del>yes</del> NO
20. Coors Weeding	Nondalton		? ✓

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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
21. Clarence Delkittie	Tribe		yes ✓
22. Bora Olson	UTBB	fatbikebor@gmail	NO
23. Alannah Hurley	UTBB	ahurley@utbb.org	—
24. Wesley James Furlong	NARF	wfurlong@narf.org	no —
25. Molly Dischner	UTBB	mldischer@utbb.org	no —
26. EVANOFF Will Evansoff	Tribal Council Nondalton		YES ✓
27. Kristy Te Fries	Tribal Council	c-bailuta@cyberod.com	<del>YES</del> NO
28. Sarah O'Neal	UN	sarahlovisoneal@gmail.com	Yes ✓
29. Briana Delkittie	Nondalton Tribal Council		NO
30. nenita Wilson		wilsonnenita@yahoo.com	NO



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
31. Michelle Wilson	Nondalton Tribal Council	ntcsecretary@yahoo.com	no
32. Sunflower Delkittie	Nondalton Tribal Council	ntcttp@yahoo.com	NO
33. Darlene Moran	NND T. Member		No
34. Randy Kakawuk	Nondalton Tribal Council	midiaapty@gmail.com	yes ✓
35. Fawn Silas	_____	fawnsilas@gmail.com	? decline
36. Teresa Richteroff	P.O. Box 13 .. ..	↓	? decline
37. Illeah Aaberg	PO Box 43	illeahaaberg@yahoo.com	NO
38. Chris Crookhan	Po. Box 43	Chris.Crookhan@yahoo	NO
39. ROB KAKARUK	PO BOX 116		NO
40. Harry Karshakoff	PO Box 35 <sup>Kluik</sup>		yes ✓



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
41. Kim Williams	BBNC		yes ✓
42. Idon Washington			NO
43. Eric Talley			NO
44. Myrtice Evalt	Nunamta Akkelkestai		yes written ✓
45. <sup>Noden</sup> MARK	Self	Mnodenak@gmail	see ✓
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
51. <i>Alannah Hurley</i>	<i>Jup'ik</i>		<i>yes plz ✓</i>
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
1. Marie Paul	BBNC	mpaul@bbnc.net
2. Bertha Pavian-Lockuk	UTBB	blockuk@swrsd.org
3. Ishnook Miyuki Ishnook		lilmuskrot@yahoo.com
4. William P Johnson		WILMART1938@hotmail.com
5. Helen Aderman	BBNA Marine Mammals	haderman@bbna.com
6. Wassiliisia Bennis	BBNA -CAO	dbennis@bbna.com
7. Wassiliisia Bennis	self	jdd@hughes.net
8. DAVE BOWKER	-	Box 241 DLG 99576
9. Patricia Treydte	self	Box 398 DLG 99576
10. Everette Anderson	BBNC	eanderson@bbnc.net



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
11. KARL HILL		kar/hill907@yahoo.com
12. Sam Eveslage		
13. Tom Eveslage		
14. Deborah McLean		d/mclean@alaska.edu
15. Katherine Carscallen		Katherinecarscallen@gmail.com
16. Jimmy Coopschick		Coopschickjimmy@gmail.com
17. Susie Jenkins-Brito		sjenkins85@yahoo.com
18. Courtenay Carthy		courtenayecurym@tribe.com
19. Violet King		courtenayCarthy@gmail.com
20. Tod Larson		manager@dillingham.ak.us





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
21. Deven hisac		drlisac@hotmail.com
22. Elaine Phillips		elphillips@bbahe.org
23. Stephen Boyd		guide@olympen.com
24. Myra Olsen		Box 74, Egegik, AK. 99579
25. David Wetter		
26. Morgan Allen		
27. Christopher Manes	BBNA	cmanes@bbna.com
28. Shannon Clouse		sdlclouse@gmail.com
29. Kaitlin Clouse		
30. Kaitlin Clouse		



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
31. Avery Lill	KDLG	avery@kdlg.org
32. Betty Gardner	CPVC	ditterhabe@yahoo.com
33. Annalee Carty		HJSavo@gmail.com
34. Charlene Savo		
35. Arney Wassily SR.	CLACK'S Pt, Tribal.	None,
36. Larnee Angerstein		
37. C O V A H G A S C H	N	
38. N O S H		
39. Andy Aderman		gulo4gulo@yahoo.com
40. Alisha Fikson		afikson@bbahc.org



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
41. Bruce Flutsik	Aleknagik Traditional Council	aleknag:kttribalclerk@hotmail.com
42. Jean Barrett	City of DLG	publicworks@dillinghamak.us
43. Hailey Carty		
44. Lara Collis		<del>lcollis@dlg.ak</del> Collis.lara@gmail.com
45. Nicole Krause		baby.krause@yahoo.com
46. Susanna Henry	U.S. Fish & Wildlife Service	Susanna_Henry@fws.gov
47. Malcolm Wright		MMWRIGHT88@HUGHES.NET
48. Bernina Venua		bernina.venua@gmail.com
49. Cory Howard		CoryHoward780@gmail.com
50. Steve Wassily Steve W... Steve W...		



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
51. <i>Renton Woods</i>		
52. <i>ANDREA HURLEY</i>		<i>[Signature]</i>
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
131. Cate Gomez		Cate.gomez@dcdak.org
132. ROBERT HIMSCHERT		HIMSCHERTROBERT@GMAIL.COM
133. Tony Johnson		None
134. Gayla Hoeseth		gaylahoeseth@gmail.com
135. Terry D. Mann		tdmann75@gmail.com
136. Valencia Mann		valencia.mann@dcdak.org
137. Thomas Tilden		tildenthomas@outlook.com
138. Dan Dunaway	me	dunawaydmb@hotmail.com
139. Gary Cline	Self	cline.bristolbay@gmail.com
140. Thomas Woods	Self	twoods115@gmail.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
251. Mark Nøden		mnodenak@gmail.com
252.		
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
371. Ethel J. Nelson		jnelson@nushtel.net
372. George L. Nelson		
373.		
374.		
375.		
376.		
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
481. Kim Williams	BBNC Curyung Tribe	williams@nushtel.net
482. Cody Larson		C.Larson@Alaska.edu
483. Diane Wetter		ekukalaska@yahoo.com
484. Jackie Nelson		bondd1@gmail.com
485. Chanice Johnson		cjohnson@bbak.org
486. Norman Von Vactor	Bristol Bay <sup>Electric</sup> Power Corp	norm@hbedc.com
487. Mike Davis	UAF	MEDAVIS@ALASKA.EDU
488. Ingrid Andrew	interested	.woodriver@outlook.com
489. Wassillie Tilden	BB	UncleWass23@gmail.com
490. Moses L Kritz III	BB	MKritz351@gmail.com





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
491. Sharon Clark	self none	sharonclark3225@yahoo.com
492. MARK LISAC	Self	mjlisac@hotmail.com
493. Alannah Hurley	UTBB	
494. Glen Szymoniak	school Dist	gszymoniak@gmail.com
495. Izzy Ross	Self	isabelle@kd19.org
496. Susan Flensburg	self	sflensburg6@gmail.com
497. Frederick Angasan III	Self	tangan_3@hotmail.com
498. Greyg Maxmiller	Self	gregorymaxmiller@yahoo.com
499. Richard Alto	self	
500. Page O'Connell	self	tpoconnell@icloud.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
501. Hannah Hendrickson		hannahmh@hotmail.com
502. Rebekah Fonkert		dillinghamdaisy@gmail.com
503. Holly Wyszocki		hwyszocki@bbakc.org
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
1. Betsy Hostetter		betsyhoss@hotmail.com	NO
2. Andy Smith		asmith.pta@gmail.com	NO
3. Nick Smith			NP
4. Alannah Amy	JTB		NO
5. Christina Salmon		Christina Salmon	yes ✓
6. Keilansalmon			yes ✓
7. Karl Hill	IVC	karthill907@yahoo.com	yes ✓
8. Glen R. Alsworth Sr	LPB	grasjr@hotmail.com	NO
9. Everett Anderson		eanderson@bbnc.net	NO
10. Renae Zacker		rzackarta@yahoo.com	Yes ✓



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
11. Lindsay Layknd	VTBB		yes - at end (after everyone else)
12. RANDY ALVAREZ		PO Box 4012 FGUIGIG AK 99613	yes ✓
13. Dannitak Salmon	Na	Na	yes ✓
14. JOHN ALVAREZ			yes ✓
15. Audra Gooden		a gooden a gooden joedogcole@yahoo.com	yes ✓
16. Michelle Rowenmoon	<del>Alaska</del> ☺		yes ✓
17. Charlie Gifford		gbtrout@yahoo.com	no
18. Walt Gooden			no
19. John Chukwak			yes ✓
20. Gerson Zacker			No



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
21. Jeff Bringhurst	Self	jeffbringhurst22@gmail.com	Y ✓
22. Olga Zackar		Bx 4034 Iguigig 99613	NO
23. Anna Verkino	Self		No.
24. Avery Nelson			
25. Tanya Salmon	Self	salmon_tanya@yahoo.com	yes ✓
26. Jern Gooden			✓
27. Annie Wilson			yes ✓
28. Julie Salmon	self	juliasalmon57@hotmail.com	yes ✓
29. Alicia Zackar	Self	alicia_zackar17@me.com	maybe ✓
30. Olivia Sinyon	self		NO



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
31. Alice Zackar	self		no
32. Dallia Andrew	self		no
33. Ruth Sinyon	self		no
34. Sharolynn Zackar	self		no
35. Yako Nicholi	Self		NO
36. Sandra Alvarez	self	sjalvarez@aol.com	yes ✓
37. Denise Chythlook	Self	chythlook@gmail.com	yes ✓
38. DENNIS Andrew son	self	NativeDennis13@ykh.com	? ✓
39. Sherry Nelson	self	sdnelson29@yahoo.com	yes ✓
40. AlexAnna Salmon	self	alexannasalmon@gmail.com	Yes ✓





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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
41. Lydia Olympic	—	<del>ohlydia@</del> ohlydia533@gmail.com	Yes ✓
42. Daniela	Self	nelsonwida2901@gmail.com	Yes ✓
43. Tatiana Zocher	Self	zocher24@gmail.com	NO
44. Terek Anelom	own	anelomterek@hotmail.com	NO
45. Sheryl Wassillie	own	swassillie@gmail.com	Yes ✓
46. Steve Routh			NO
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address	Are you planning to comment?
51. Myrtice Evalt	Nunamta Aulukestai	myrticenaden@yahoo	yes ✓
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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
1. Mischen Ellanna	BBNC	mellanna@bbnc.net
2. Kim M. Wardell		
3. Charles McKee c/o P.O.# 243053	self	c/o P.O.# 243053 Anch, AK 99524-3053
4. Taryn Kiekow Heimer	NRDC	tkiekowheimer@nrdc.org
5. Rick DeKittie Sr.	Nanvotot Tribe	
6. Kerry Adler	self	akgeowiz@alaska.net
7. Kim Williams	BBNC / Copper Tribe	williams@nushtel.net
8. Joseph James	Pan-American Invest mts	jias@hushmail.com
9. Joe Bogs		
10. Dana Stewart	DES.IT	dana.stewart@yahoo.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
11. Mark McLoughlin		m.samuel.mcloughlin@gmail.com
12. RAINBOW AZURE	Turtle Mtn Chippewa & Yakama Yakama Tribe	rainbowandvee@aol.com
13. Jill Burke	Bloomberg <del>BNA</del>	jillburke907@gmail.com
14. Sue Bawn	-	suebee1@gci.net
15. Adrienne Christensen	Pedro Bay	achristensen@pedrobaycorp.com
16. RAYN AABERG	PEDRO BAY	raaberg@pedrobaycorp.com
17. Nelli Williams		nwilliams@tu.org
18. Daniel J. Michels	Crystal Creek Lodge King Salmon	dan@crystalcreeklodge.com
19. Chris Bruns	None	
20. Jenny Weis		jweis@tu.org



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
21. Tim Sohn	Journalist	tsohn@gmail.com
22. Ron Benkert	ADFG	RONALD.BENKERT@ALASKA.60V
23. Doug Griffin	Southwest Alaska Municipal Conference - (SWAMC)	dgriffin@swamc.org
24. Ryan Astalos		ryanasto1@gmail
25. MEUSSA Thayne	Alaska	akmt1@live.com
26. Gerald Protzman		3627 E 5 <sup>th</sup> 65 <sup>th</sup> Anch AK 99507
27. Howard J. Grey		h_j_grey@hotmail.com
28. Don Perrin		
29. Mariah Oxford	Pebble Watch	moxford@bbnc.net
30. MARC LESTER	ANCH. DAILY NEWS	mlestr@adn.com



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PLEASE PRINT Name	Affiliation (if any)	E-Mail or Address
31. Anna Kowl		
32. Marilyn Houser	None	lostinspxre@matnet.com
33. Emily Fehrenbacher	Salmon State	emily@salmonstate.org
34. Eric Booton	Trout Unlimited	ebooton@tu.org
35. <u>Brooke</u> Merrell	NPS	brooke-merrell@nps.gov
36. Jim POSEY	P.A. LLC	_____
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40. Beth Venge	KTNV-TV	_____



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41. Elwood Brehmer	ASOC	
42. Mary Romero	_____	_____
43. Jeremy Grant	_____	_____
44. Alex DeMar BANS	Anchorage Daily News	
45. Jennifer Worah-el	Alaska Miners ASSOC.	
46. Terry L Sevy	Alaskan	_____
47. Nicole O'Hara	ABC/Fox Alaska	_____
48. MARWANNA HALL	RDC	mhall@akrvc.org
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63. Gayla Toese	Dillingham	
64. Myrinda Ewalt	Digo	
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67. Lance Powell	—	LW POWELL @ JUNO.COM
68. John Homan	—	John @ rosehulme.com
69. Sherry Dugan	—	smd@alaska.net
70. Carrie Cecil	—	carrie.cecil90@gmail.com.



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100. Julian & Jean		jbooks@yahoo.com



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118. Luey Terry	Eskimo	
119. BILL JASO		
120. Susan Hooker		Chesapeake Ave Anchorage



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131. Ronda Pokupec		bbsalmon4life@gmail.com
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135. Rachelle Griffiths	student - UAA Environmental Engineering	—
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150. Ann James	Born & raised Alaskan	no



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# Pebble Project Environmental Impact Statement

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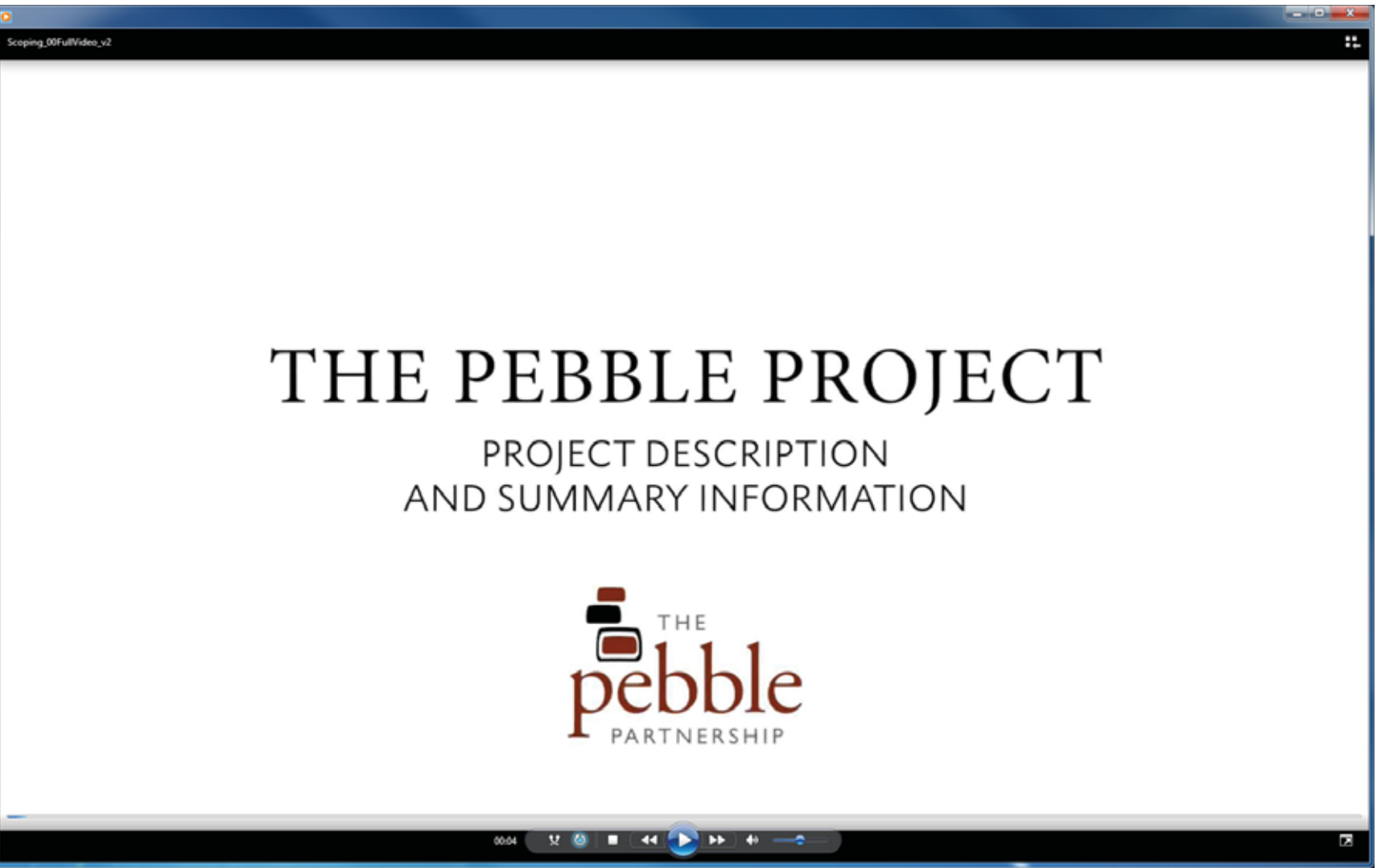
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## **APPENDIX D – MEETING MATERIALS**



# THE PEBBLE PROJECT

PROJECT DESCRIPTION  
AND SUMMARY INFORMATION



# THE PEBBLE PROJECT

① OVERVIEW

Pebble Limited Partnership (PLP) is proposing to develop the Pebble copper-gold-molybdenum porphyry deposit (Pebble Deposit) in southwest Alaska as an open-pit mine, with associated infrastructure.

## PROJECT DESCRIPTION DETAILS



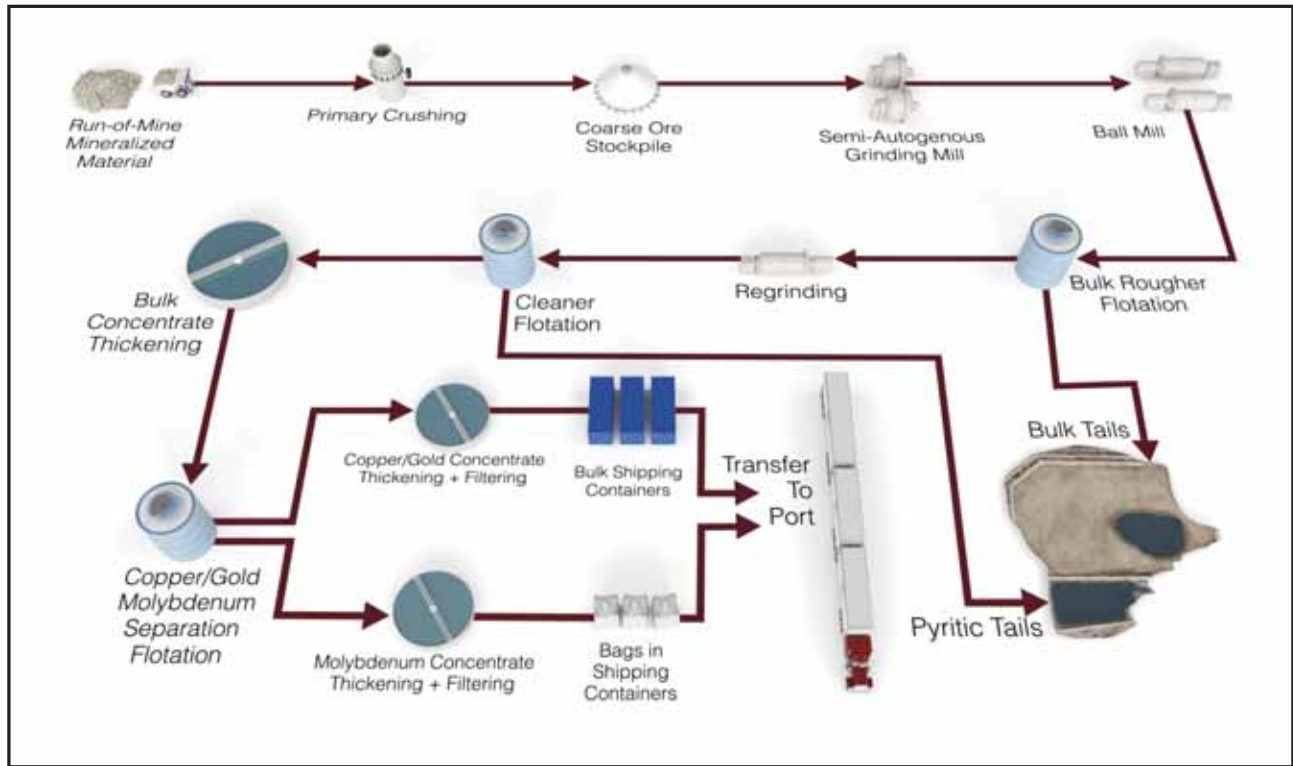
## SUMMARY INFORMATION

- Located on state of Alaska land
- Project operating life of 20 years
- Employment of 2,000 people for construction and 850 for operation
- Gas pipeline from Anchor Point and gas-fired power plant at site
- Road and lake ferry to Cook Inlet
- Segregated storage of bulk and pyritic tailings



The Project will mine approximately 1.1 billion tons of mineralized material throughout the 20-year mine life.

## AN OVERVIEW OF MINERAL PROCESSING



OPEN PIT MINING



DRILLING & BLASTING



HEAVY EQUIPMENT



GRINDING MILL

## SUMMARY INFORMATION

- Mining rate up to 90 million tons per year
- Milling rate up to 58 million tons per year
- Annual copper/gold concentrate production of 600,000 tons
- Annual molybdenum concentrate production of 15,000 tons

# TAILINGS STORAGE

Pebble Limited Partnership (PLP) conducted a multiyear, multidisciplinary evaluation to select a Tailings Storage Facility (TSF) location that meets all engineering and environmental goals. It will store ground-up material after minerals have been extracted.

## TAILINGS STORAGE FACILITY

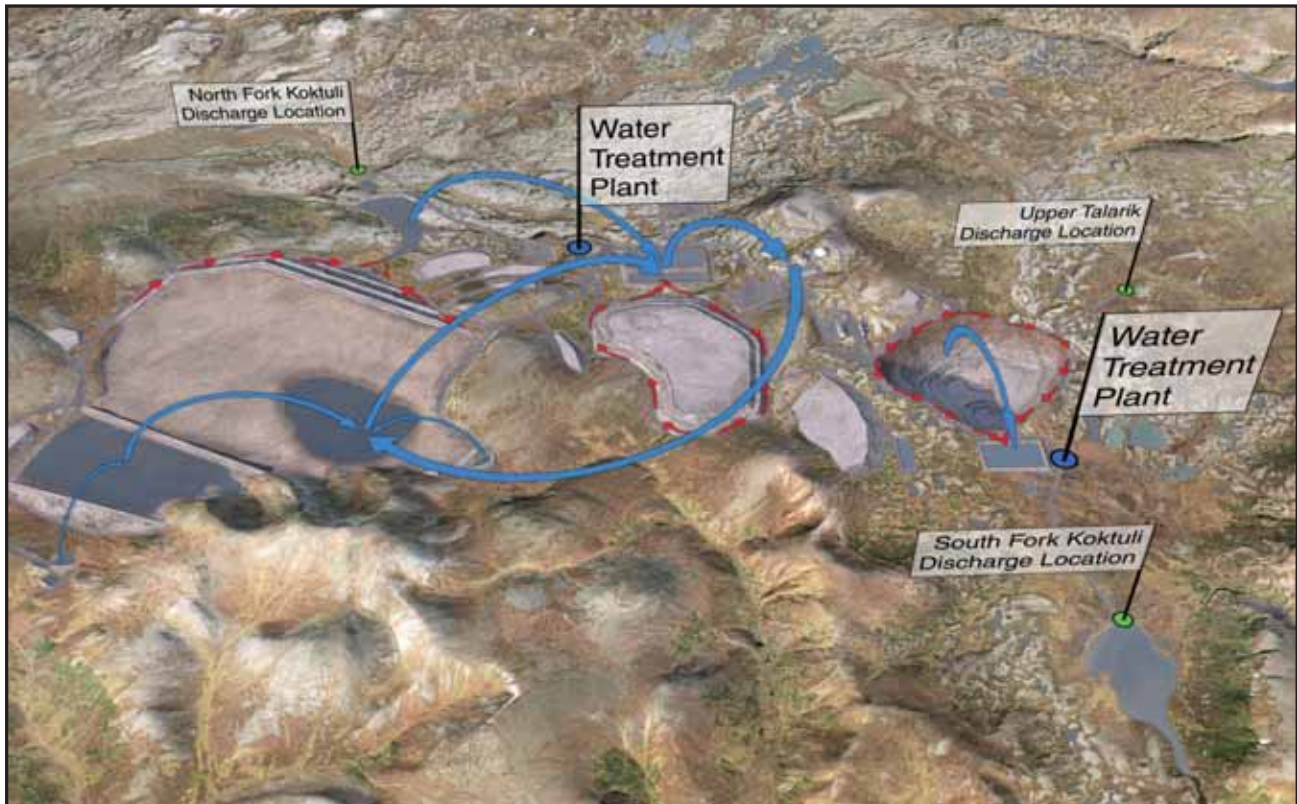


## SUMMARY INFORMATION

- Designed to meet Alaska Dam Safety Program standards
- Separate cells for bulk and pyritic tailings
- Minimize water storage in bulk tailings to keep water away from embankment
- Fully-lined cell for pyritic tailings with water cover
- Rock-filled embankments (600' high at main embankment)
- Seepage collection facilities for all embankments

Pebble Limited Partnership (PLP) has designed the water management plan to minimize the volume of water diverted from natural flows and to treat and condition all water to meet quality standards before discharge.

## MONITORING AND TREATMENT



## SUMMARY INFORMATION

- All water is tracked and managed from rainfall to discharge
- One water treatment plant for pit-related water
- One water treatment plant for tailings, stockpile, and process contact water
- All water treated and conditioned to meet quality standards before release
- Discharge locations in each of three drainages
- No mixing zones will be required
- Discharge managed based on downstream habitat needs

An 83-mile transportation corridor runs from the mine site to a port site on Cook Inlet. The route was selected to minimize impact on wetlands, minimize stream crossings, and avoid area of known subsistence and recreational use.

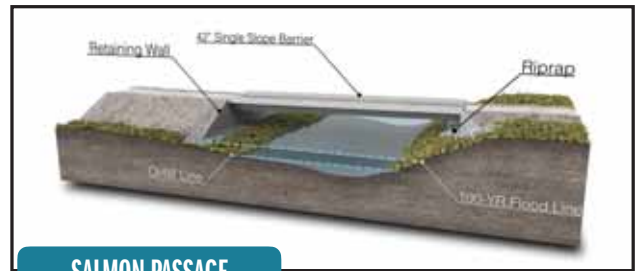
## NORTH & SOUTH ROAD SEGMENTS



TRANSPORT BY TRUCK



CONCENTRATE CONTAINERS



SALMON PASSAGE



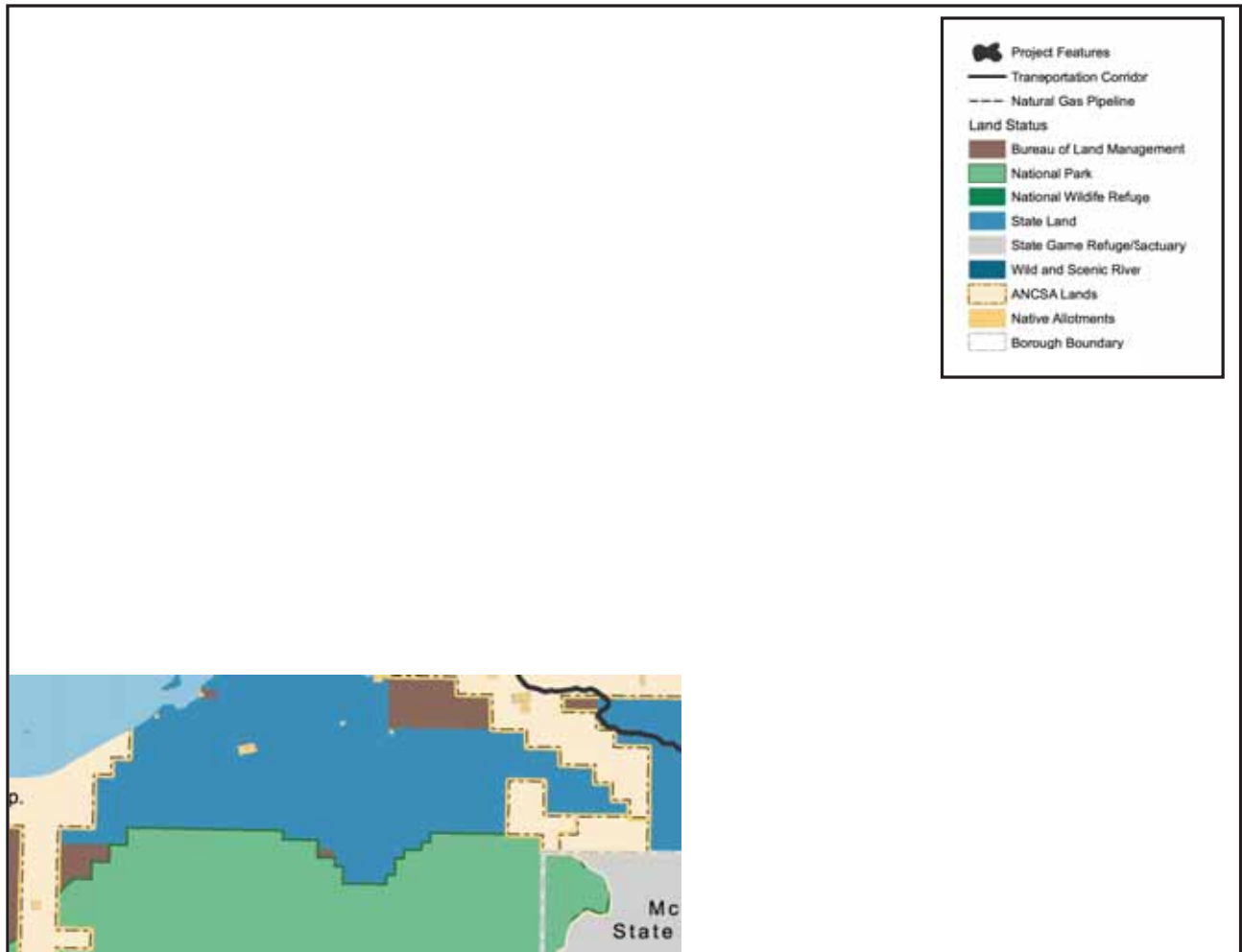
## SUMMARY INFORMATION

- Personnel flown to Iliamna Airport and driven to mine site
- 30-mile (north segment) and 35-mile (south segment) private roads
- Spur roads connecting to the villages of Iliamna, Newhalen, and Kokhanok
- Stream crossings designed to state of Alaska standards
- Up to 35 round trips by truck each day (one by ferry)
- Concentrate hauled in bulk containers with locking lids
- Fuel hauled in 6350-gallon sealed tank containers

# LAND STATUS

The mine site — including the pit, tailings storage, and all primary facilities — is located on state of Alaska land. The transportation corridor includes state of Alaska and ANCSA land.

## MINE SITE & CORRIDOR LAND OWNERSHIP



## SUMMARY INFORMATION

- Access Road = 65% state of Alaska + 35% Alaska Peninsula Corporation
- Iliamna Airport Spur = 55% state of Alaska + 45% Iliamna Natives Limited
- Iliamna Lake Crossing = 100% state of Alaska
- Kokhanok Airport Spur = 100% Alaska Peninsula Corporation

# FERRY & TERMINALS

A custom-built ice breaking ferry will transit Iliamna Lake year round, carrying inbound supplies from the Amakdedori Port to the mine site and returning with copper-gold and molybdenum concentrates.

## ILIAMNA LAKE CROSSING



## SUMMARY INFORMATION

- The one-way ferry trip across Iliamna Lake is about 18 miles
- An average of one round trip per day will be required
- Vessel is designed to operate year-round, in all ice conditions
- Symmetrical forward and aft with two ice-breaking bows
- 12 crew members may be accommodated on the ferry

# AMAKDEDORI PORT

Incoming supplies such as equipment, reagents, and fuel will be barged to the Amakdedori Port and then transported by truck to the mine site.

## DESIGN & OPERATIONS



## SUMMARY INFORMATION

- 50-foot deep channel dredged to provide access for Handysize bulk carriers
- Mineral concentrate will be direct-loaded from the containers onto the vessels
- Equipment and supplies delivered by barge
- Shore-based facilities will receive and store containers and fuel
- Up to 25 concentrate shipments annually
- Up to 30 marine barge loads annually

The power plant will be sized to meet the anticipated load of 230 megawatts using high-efficiency turbine or reciprocating engine generators operating in a combined-cycle configuration.

## NATURAL GAS PIPELINE + POWER PLANT



## SUMMARY INFORMATION

- Pipeline will connect to existing gas supply infrastructure near Happy Valley
- Buried pipe will transport gas to a compressor station near Anchor Point
- 94-mile subsea pipeline across Cook Inlet will come ashore near port site, follow road to site, and cross the bed of Iliamna Lake
- Gross flow rate of 50 million standard cubic feet per day
- 10" pipeline on land, 12" pipeline for water crossings
- Emergency backup power provided by diesel generators



# CLOSURE & RECLAMATION

Pebble Limited Partnership (PLP) is committed to conducting all mining operations, including reclamation and closure, in accordance with all local, state, and federal regulations.

## PEBBLE: DESIGNED FOR CLOSURE

**RECLAMATION**

**AFTER...**

**5 YEARS**  
Most buildings removed  
Terrain resculpted  
Native plants resown

**20 YEARS**  
Vegetation well-established in reclaimed areas  
Pit continues to fill with water

**30 YEARS**  
Pit lake has formed  
Water is pumped from pit for treatment and discharge



## SUMMARY INFORMATION

- Removal of mill and other facilities not used after closure
- Hauling of PAG waste rock into the open pit for under water storage
- Recontouring and placement of overburden for revegetation
- Plan and infrastructure for long term water management and treatment
- Financial assurance for closure and long term site management is required before construction

# How to Comment

## Tips for Writing Effective Comments

Public participation is an important part of developing an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA). Submitting substantive and concise comments during the scoping period is an important role the public plays in the NEPA process, and can influence the scope of analysis for the EIS.

- **Become familiar with the proposed project** — Review the project or agency website, read the project description, monitor local newspapers, and attend public meetings.
- **Learn about the steps in the NEPA process** and opportunities for submitting comments.
- **Keep your comments focused on the proposed project** and the needs to address a particular concern. **Be as specific as possible** on the link between the EIS analysis and the concern.
- **Submit your comments early** so your concerns are included in the Scoping Comments. **Be included** to ensure that your comments are included in the drafting of the EIS; see page 29.
- **Be specific.** For example, if you are concerned about wildlife, focus on a particular problem you feel should be analyzed, instead of a general statement such as "I am concerned about the impacts on wildlife."
- **Make suggestions.** If you have suggestions for tools to be analyzed, new data to be collected, or analytic tools that should be used to evaluate different alternatives, include them in your comments.

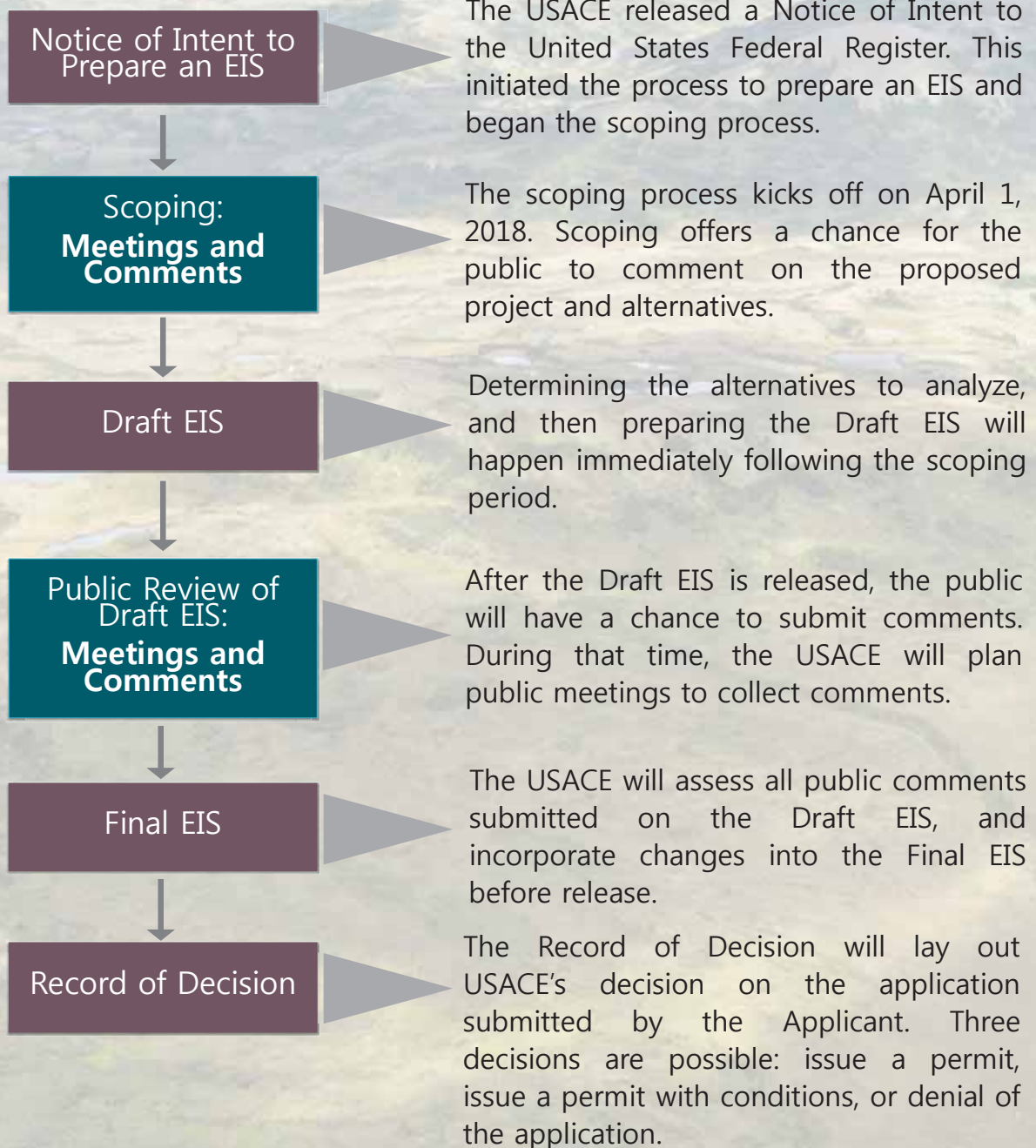
Comments on the project that are specific to the appropriate scope of analysis and the impacts are adequately addressed in the proposed project. It is more effective if you suggest mitigation measures/controls to inform the EIS analysis. The more effective they are, the more likely they will be used to determine the scope of the EIS and to ensure that the project meets the requirements or disagreeing with the project. Relevant issues, alternatives, and tools so they can be used to inform the EIS. Relevant your comments are, the more likely they will be used in the EIS.

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# The National Environmental Policy Act

Preparation of the Pebble Project Environmental Impact Statement (EIS) level of analysis began when the US Army Corps of Engineers (USACE) received a permit application from the Pebble Limited Partnership. The EIS process will take several months to complete a Draft EIS for public review, and several months to incorporate public comments into the draft to develop the Final EIS.

## Steps in the EIS Process



## How the Draft and Final EIS will be Organized

The Environmental Impact Statement (EIS) will analyze the potential impacts to the biological, physical, and social environments. By understanding the layout of the document ahead of time, readers can more easily find the specific sections they may be interested in reviewing and commenting on.

**Executive Summary** – Provides overview of the Draft and Final EIS, summarizes draft findings of potential impacts, and serves as a guide for where to find details.

**Chapter 1. Purpose and Need** – Describes the purpose of the proposed project to inform the range of alternatives analyzed in the EIS.

**Chapter 2. Alternatives** – Describes alternatives to be analyzed, including a No Action Alternative, the Proposed Action (as designed by the Pebble Limited Partnership), and reasonable and practicable alternatives to address issues raised during scoping and the EIS process, such as, but not limited to, tailings and mine water management, alternate pipeline routes, surface access to the mine site and vehicle traffic levels, and port/ferry facilities, location, and traffic levels.

The purpose and need of a project is essential in establishing a basis for developing the range of reasonable alternatives required in an EIS and identifying and selecting a preferred alternative.

**Chapter 3. Affected Environment** – Describes the baseline conditions of key resource topics in the proposed project environment (such as fish and wildlife, water quality, economics, food production, commercial fishing, and recreation).

**Chapter 4. Environmental Consequences of Action** – Analyzes the potential direct, indirect, and cumulative impacts, as well as potential mitigation measures relevant to each of the resources from the proposed action and each alternative.

**Chapter 5. List of Preparers** – Presents the list of contributors to the preparation of the EIS, including their affiliation, project role, educational background, and years of experience. Cooperating agency roles and responsibilities are also described in Chapter 5.

**Chapter 6. List of Agencies, Organizations, and Persons to Whom copies of the Statement Have Been Sent** – Describes the distribution of the Draft and Final EIS documents for informational purposes and to identify public locations where the document is available.

**Chapter 7. References** – Presents the references used in preparing the EIS.

**Chapter 8. Appendices** – Presents the in-depth analyses, comments/response to comments, coordination, consultations, mailing lists and other information used in the analysis of the applicant's project.

# What Resources will be Analyzed in the EIS?

Using the analysis in the Environmental Impact Statement (EIS), The U.S. Army Corps of Engineers (USACE) will evaluate the environmental and related social and economic effects of the proposed project. The analysis will include direct and indirect impacts, cumulative effects, and potential spill and tailings dam failure scenarios. Comments received during the scoping period will likely result in additional resources to be considered in the analysis.

## Social Environment

- Cultural Resources
- Historic Properties
- Land use and management
- Subsistence
- Transportation and Navigation
- Aesthetics
- Recreational and Commercial Fisheries
- Recreation
- Needs and Welfare of the People
- Environmental Justice
- Health and Safety

## Physical Environment

- Geohazards
- Geology
- Soils
- Surface Water Hydrology including flood plains and flood hazards
- Groundwater Hydrology
- Water Quality
- Noise
- Air Quality
- Climate Change

## Biological Environment

- Wetlands/Special Aquatic Sites
- Vegetation
- Birds
- Terrestrial Wildlife
- Fisheries and Aquatic Resources
- Marine Wildlife
- Threatened and Endangered Species

**Direct impacts** occur through direct interaction of an activity with an environmental, social, or economic component.

*For example: pollutant discharge from a source could directly result in lowered water quality.*

**Indirect impacts** on the environment are not a direct result of the project, but often a result of a complex impact pathway.

*For example: pollutants in the air from a source could land on vegetation, indirectly causing acidic soils.*

**Cumulative impacts** occur when the incremental impact of the project is combined with the effects of other past, present and reasonably foreseeable future projects.

*For example: wetland fill from one project, combined with the wetland fill from a separate project.*

# Roles and Responsibilities

When the Pebble Limited Partnership (Applicant) submitted an application on December 22, 2017, the US Army Corps of Engineers, Alaska District (USACE) was compelled to begin processing the permit application in accordance with 33 CFR 320. The USACE determined that review of the application would require an environmental impact statement (EIS) level of analysis in compliance with the National Environmental Policy Act. The USACE is the lead federal agency for developing the EIS.

## Role of the Corps

The USACE, as the lead agency, is responsible for reviewing the permit application submitted by the applicant, and analyzing the potential environmental impacts from the proposed project. The USACE will lead the effort to take a hard look at reasonable and practicable alternatives and evaluate the impacts of the proposed project utilizing an interdisciplinary team. At the completion of the environmental impact analysis, the USACE, will issue a Record of Decision related to USACE's authorities under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act.

## Role of the 3<sup>rd</sup> Party Contractor

AECOM (a consulting firm) has been hired to provide an interdisciplinary team to develop a fact-based independent analysis of the Pebble Project as proposed and evaluate identified reasonable alternatives. AECOM will work solely under the direction of the USACE and will be the primary developers of the EIS. AECOM will also provide support to the USACE for scoping and public involvement, development of alternatives to the proposed action, assessment of potential impacts, and distribution. The AECOM team is made up of specialists and scientists in the biological environment, the physical environment, and the social environment.

## Role of Alaska Native Tribes

The USACE has invited 35 federally recognized Alaska Native Tribes to consult throughout the entirety of the federal decision making process, including the development of the environmental impact statement. Federally recognized Alaska Native Tribes that the USACE has extended government-to-government consultation invitations to are:

- Aleknagik Traditional Council
- Chignik Bay Tribal Council
- Chignik Lagoon Village Council
- Chignik Lake Traditional Council
- Clarks Point Village Council
- Curyung Tribal Council
- Egegik Village Council
- Ekuk Village Council
- Ekwok Village Council
- Igiugig Village Council
- Iliamna Village Council
- Ivanof Bay Tribal Council
- King Salmon Tribal Council
- Kokhanok Village Council
- Levelock Village Council
- Manokotak Village Council
- Naknek Village Council
- Nanwalek IRA Council
- Native Tribe of Kanatak
- Native Village of Perryville
- New Koliganek Village Council
- New Stuyahok Traditional Council
- Newhalen Tribal Council
- Ninilchik Traditional Council
- Nondalton Tribal Council
- Pedro Bay Village Council
- Pilot Point Tribal Council
- Port Graham Tribal Council
- Port Heiden Village Council
- Portage Creek Village Council
- Seldovia Village Tribal Council
- South Naknek Village Council
- Traditional Council of Togiak
- Twin Hills Village Council
- Ugashik Traditional Council

## Role of the Applicant

As the applicant is required to provide information to the USACE related to their proposed project. This includes:

- description of the proposed project,
- background material, completed research, and site information,
- data for the development of maps and figures, and
- other information that may be identified as necessary during preparation of the EIS.

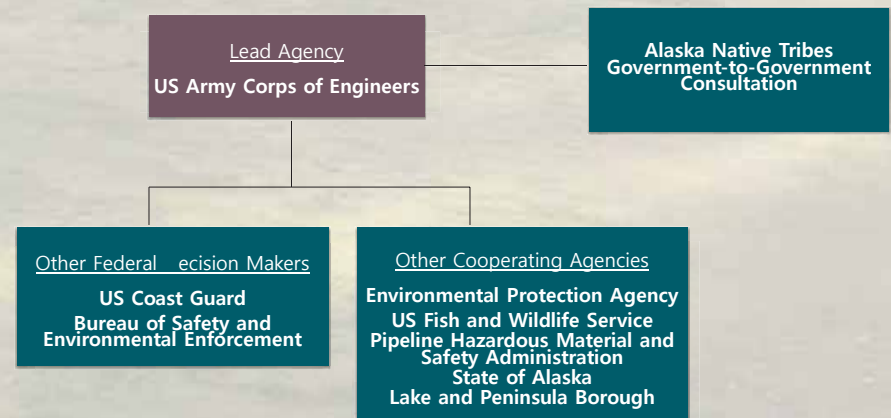
The applicant will not be involved in the development of the EIS beyond this limited scope.

## Role of Cooperating Agencies

Several cooperating agencies have been invited to provide technical support to the lead agency, the USACE.

Cooperating agencies will be actively engaged in scoping and alternatives development and will then be assigned to technical teams based on the specific reasons they were invited to become cooperating agencies. Although cooperating agencies are involved in preparation and writing of certain portions of the EIS and cooperators may use the EIS for their own decisions, the USACE has final authority on the EIS content.

## Lead and Cooperating Agencies



# Public Scoping for the Pebble Project EIS

The US Army Corps of Engineers (USACE) is preparing an Environmental Impact Statement (EIS) to analyze the impacts of issuing permits for an open pit, copper-gold-molybdenum porphyry deposit, with associated infrastructure, as proposed by the Pebble Limited Partnership. The EIS scoping period begins April 1, 2018 and ends June 29, 2018.

At the beginning of developing an EIS, USACE reaches out through scoping to involve members of the public. The scoping period provides opportunities for people who could be affected by the proposed action that could have lesser environmental impacts.

In addition to Anchorage, Public meetings were held in April in the following communities:

- Naknek
- Kokhanok
- Homer
- Newhalen
- New Stuyahok
- Nondalton
- Dillingham
- Igiugig

The EIS will identify potential impacts on the physical, biological, and social environment from all phases of the proposed project, including construction, mine operation, closure, and post-closure. The EIS will also look at mitigation methods—ways in which potential negative impacts could be avoided or lessened.

During the scoping period, USACE will work with the public to identify issues and concerns to thoroughly analyze the potential effects of the proposed project. USACE will use the scientific literature, alongside traditional knowledge and observations provided by the public.

We welcome your comments and information on the resources that are important to you. For example, many communities will be concerned about potential impacts to fish, subsistence resources, and traditional land uses during project construction, operations, and closure.

## To Participate...

Let us know what aspects of the proposed project are important to you!

Providing ample opportunities for the public to submit scoping comments on the Pebble Project EIS is of utmost importance to the USACE. A good way to get involved is to give your comment orally to a dedicated court reporter, or electronically submit using one of the dedicated laptop computers. You can also submit hand-written comments, use the comment form on the project website ([www.PebbleProjectEIS.com](http://www.PebbleProjectEIS.com)), or send them to:

Program Manager, Regulatory Division  
US Army Corps of Engineers  
PO Box 6898  
Joint Base Elmendorf Richardson,  
AK 99506-0898

Scoping comments can be submitted through June 29, 2018.

\*Comments received/postmarked after June 29 will be considered, but may not be included in the scoping report. Comments will be reviewed and incorporated into the Draft EIS.





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**Program Manager  
US Army Corps of Engineers  
Regulatory Division  
P.O Box 6898  
Joint Base Elmendorf Richardson, AK  
99506-0898**

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**From:**

# FACT SHEET



## **Pebble Limited Partnership Project Proposed Natural Gas Pipeline**

### **Background**

The Bureau of Safety and Environmental Enforcement (BSEE) is a cooperating agency on the Environmental Impact Statement that the United States Army Corps of Engineers, Alaska District, is preparing for the Pebble Limited Partnership project.

The Pebble Limited Partnership is proposing to develop the Pebble copper-gold-molybdenum porphyry deposit as an open-pit mine, with associated infrastructure, in southwest Alaska. The proposed project infrastructure will include an approximately 230-megawatt power plant that will be fueled using natural gas. Natural gas would be supplied to the site using a roughly 190-mile pipeline that would connect to the project site from a tie-in on the Kenai Peninsula near Happy Valley.

While BSEE has no regulatory oversight of onshore mining, our role will include a Pipeline Right-of-Way grant approval process for the proposed pipeline crossing federal waters of the Outer Continental Shelf in Cook Inlet.

### **Proposed Pipeline**

The gas pipeline alignment, as currently proposed, would start near Happy Valley on the Kenai Peninsula and travel south paralleling the Sterling Highway for approximately 9 miles to a compressor station. From the compressor station, the pipeline heads southwest across Cook Inlet for 60 miles, before turning west for 35 miles to a landfall at the proposed Pebble port site near the mouth of Amakdedori Creek. A second compressor station and offtake point is located at the port site. The pipeline then follows the proposed road alignment from the port to the mine site, including crossing Iliamna Lake on the lake bed for approximately 18 miles. BSEE's jurisdiction for the proposed pipeline will likely only cover 63 miles, the portion that crosses federal waters of Cook Inlet.

The pipeline, as currently proposed, would be constructed of steel and designed to have a gross flow rate of 50 million standard cubic feet of natural gas per day. The onshore portions of the pipeline would be 10-inch diameter, while the offshore portion would be constructed using heavy wall 12-inch diameter pipe with negative buoyancy. All appropriate federal regulations would be followed in the design, construction, and operation of the pipeline.

### **Right-of-Way Decision Process**

Pipeline right-of-way requirements for permitting are detailed in the 30 Federal Code of Regulations Part 250—Oil And Gas And Sulphur Operations In The Outer Continental Shelf Subpart J—Pipelines and Pipeline Rights-of-Way.

Applications for permits must be submitted to the BSEE Regional Supervisor and will include detailed information about the right of way, including consideration of effects from water currents, storm or ice scouring, soft bottoms, mudslides, earthquakes, permafrost, and other relevant environmental factors.

While the pipeline in this case will ultimately be regulated by the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, BSEE's interest is to have the requisite level of information that enables a well-informed right-of-way decision process, with the knowledge that environmental and safety factors have been considered and addressed.

### Pebble Project Proposed Natural Gas Pipeline

