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

SCOPING PACKAGE CONTENTS

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.

Public meetings will tentatively be held during the scoping period of April 1st to June 29th, 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.

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...

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), 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.

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.

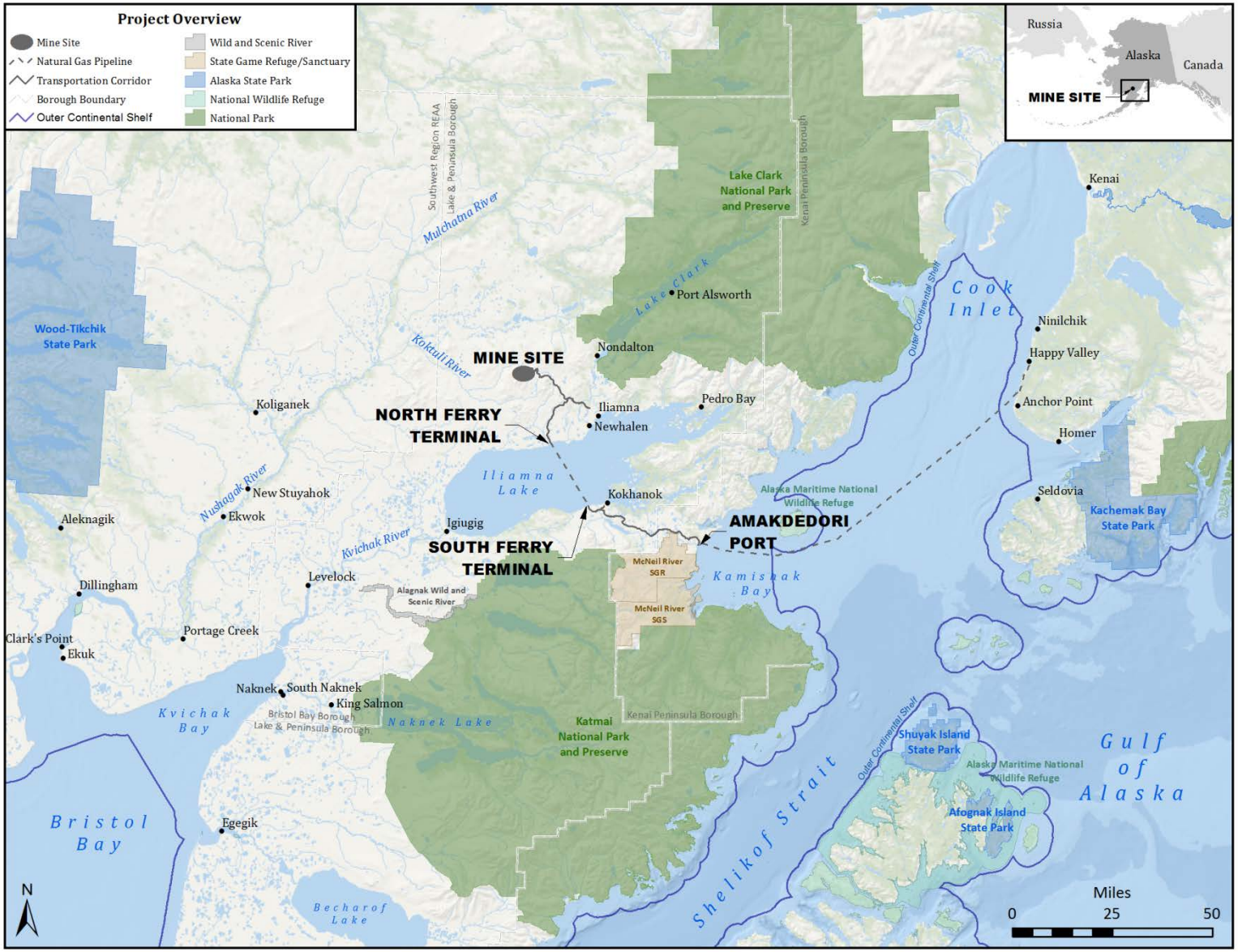


Figure 1. Project Overview

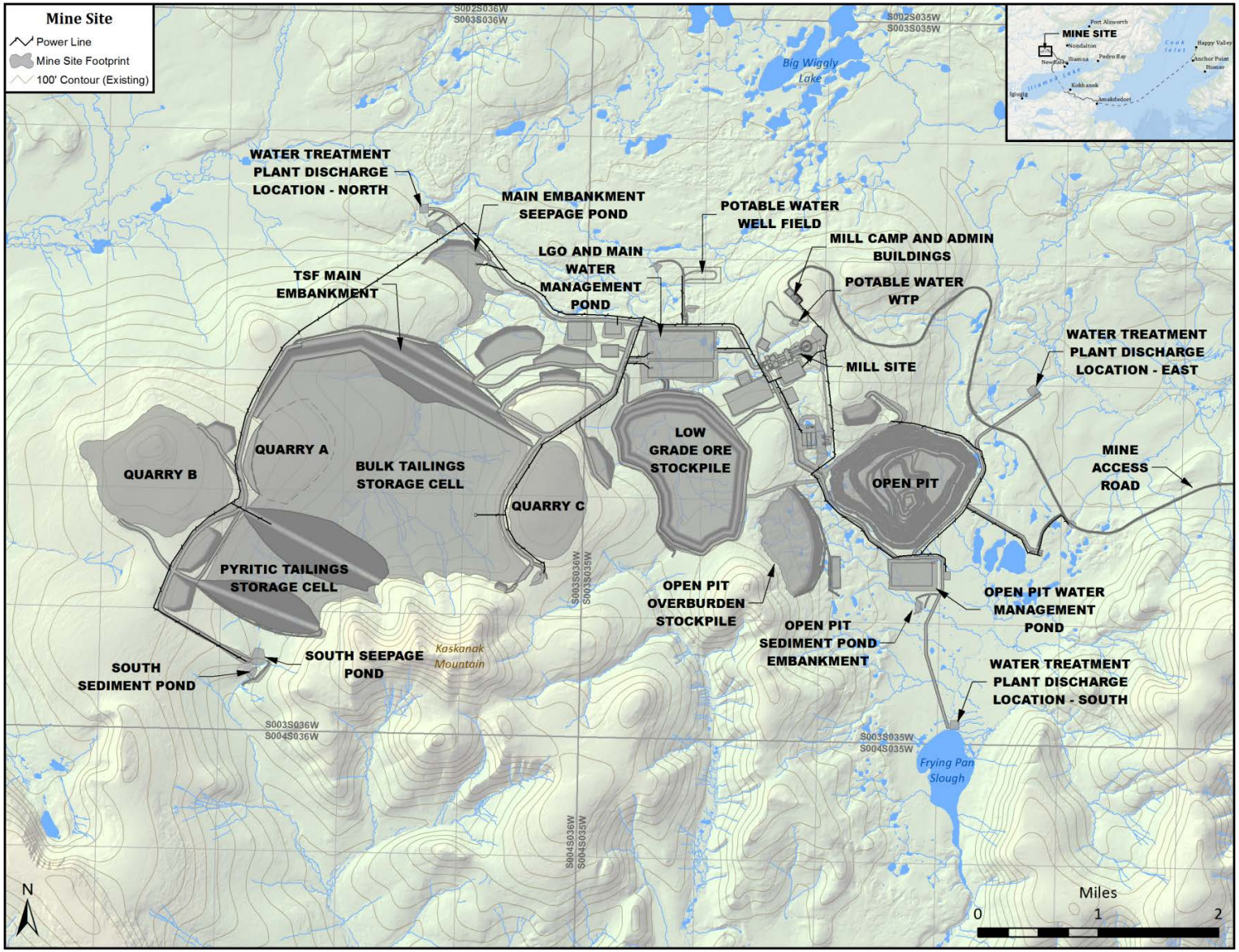


Figure 2. Mine Site and Associated Facilities

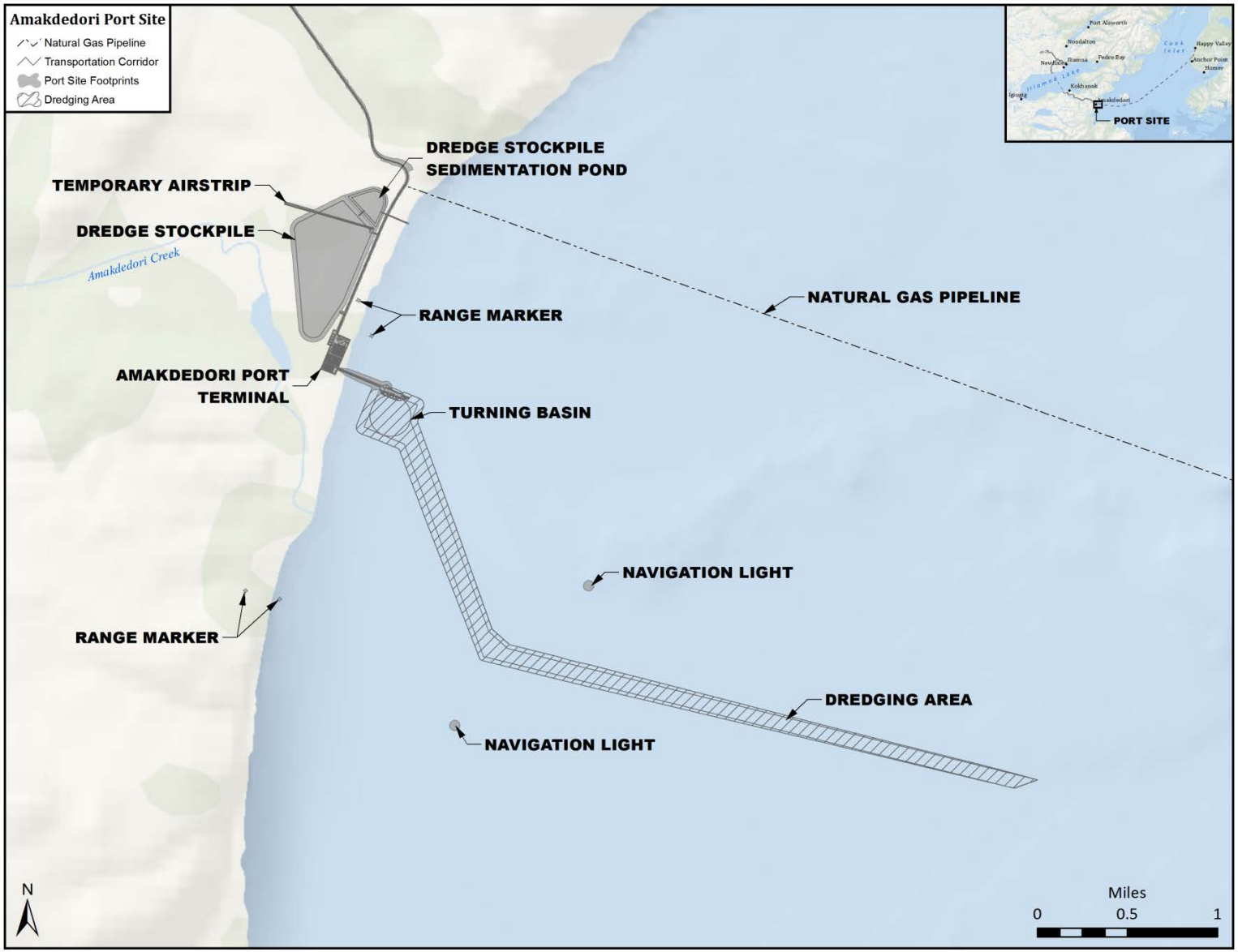


Figure 3. Amakdedori Port Site

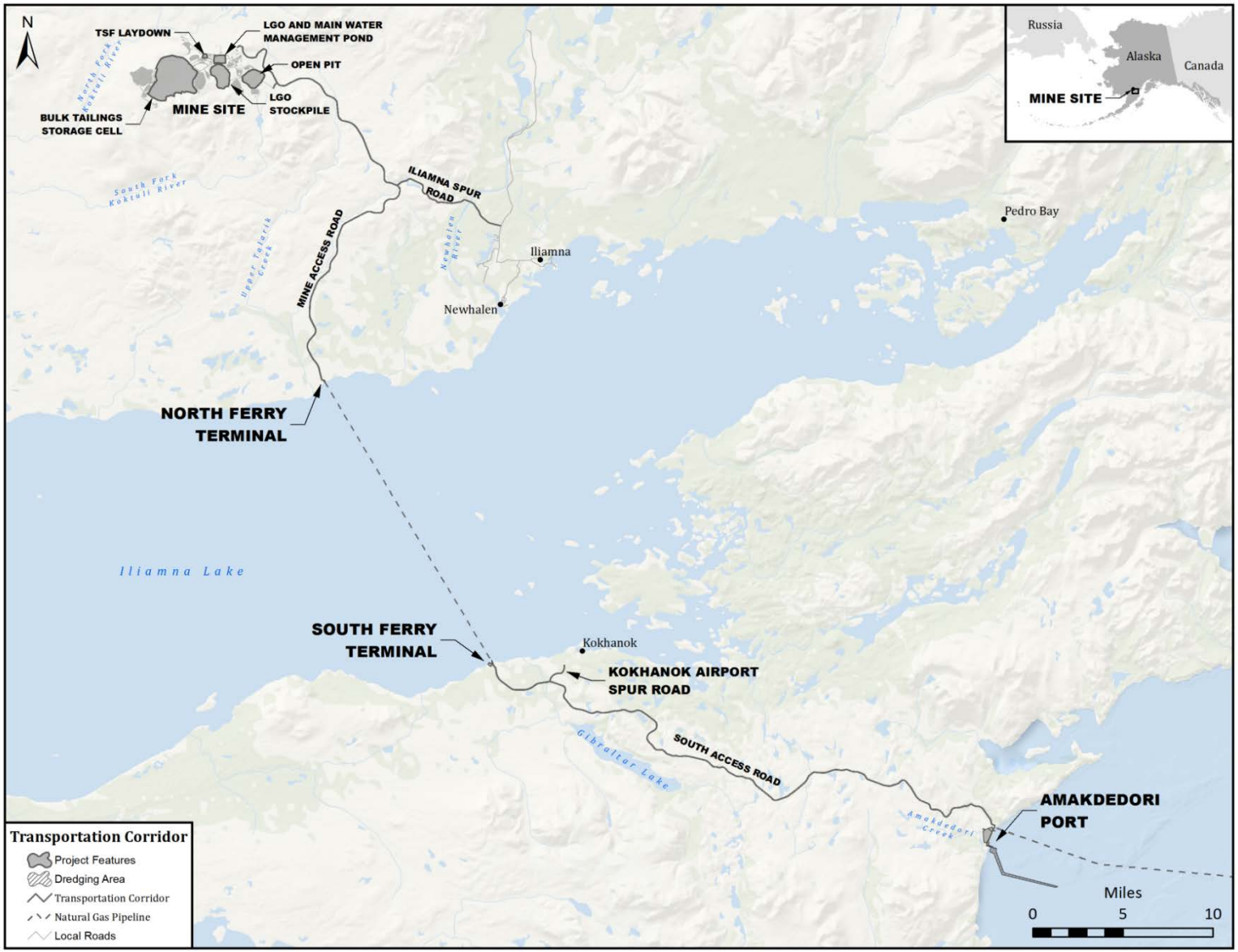


Figure 4. Transportation Corridor

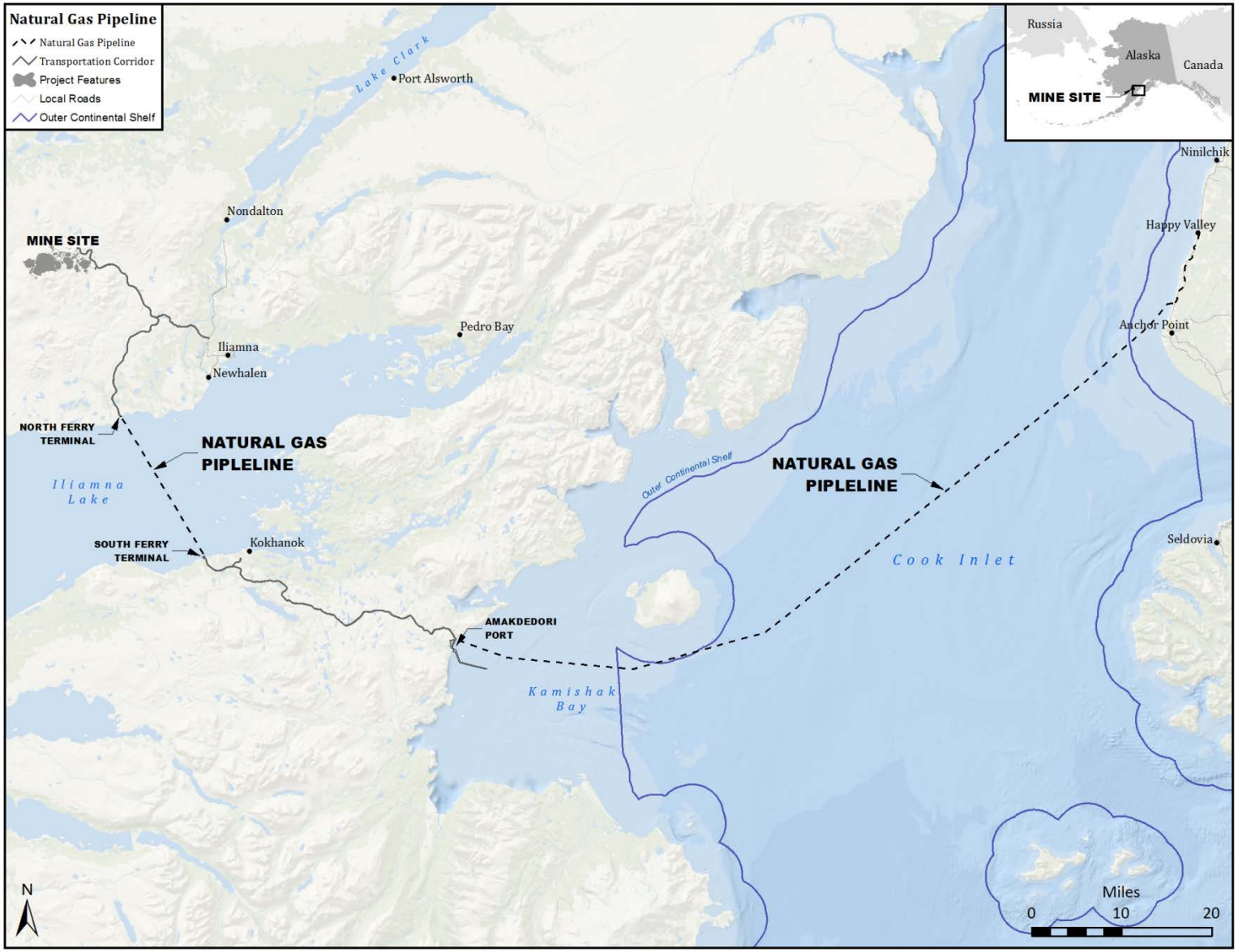


Figure 5. Natural Gas Pipeline

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.

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) 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

- 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.

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.

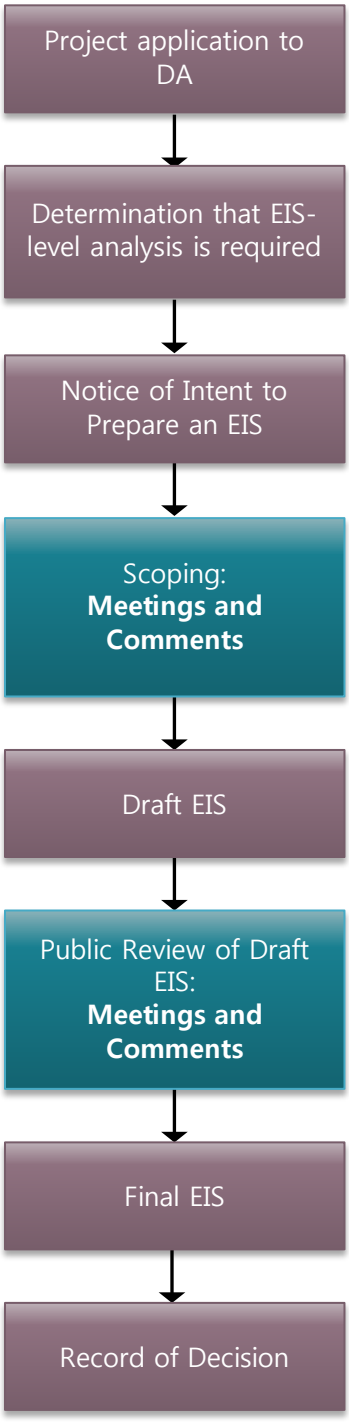
As the USACE prepares to review the submitted permit application, it must conduct a detailed study of:

- 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 anlaysis 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 interdisiplinary 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 3rd 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

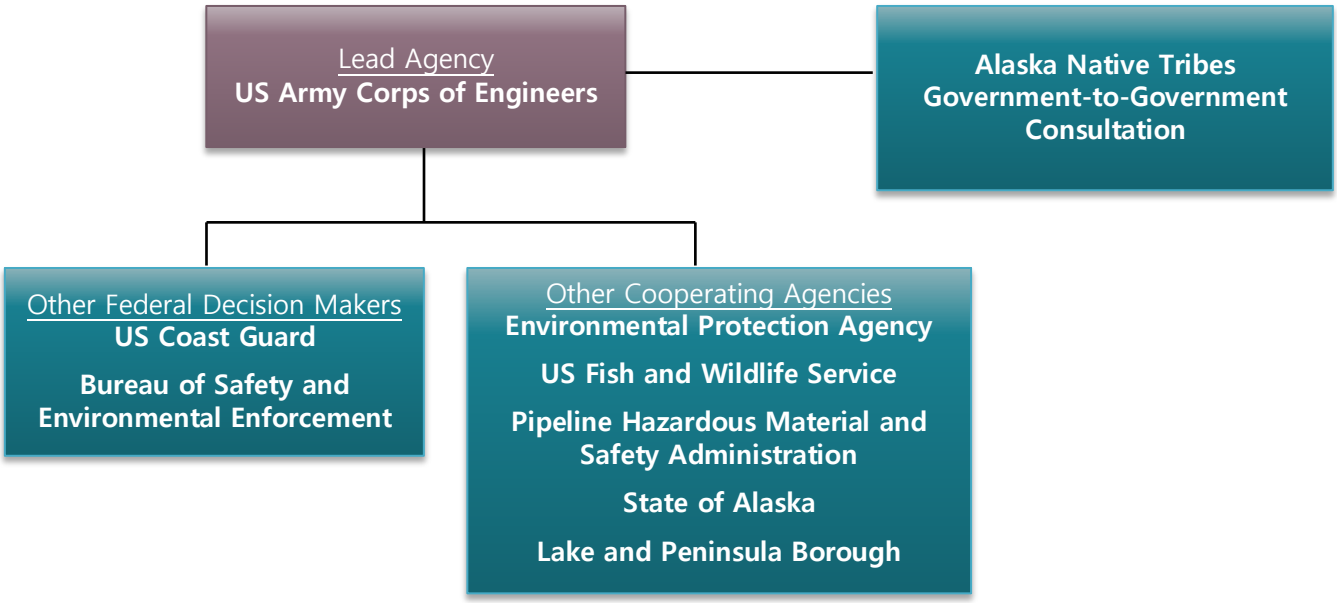
Several cooperating agencies have been invited to provide technical support to the lead agency, the USACE. Cooperating agencies will be actively engaged in scoping and alternatives development and will then be assigned to technical teams based on the specific reasons they were invited to become cooperating 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 entirity 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 Vilage 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

Notice of Intent to Prepare an EIS
March 2018

The USACE released a Notice of Intent to the United States Federal Register in March 2018. This initiated the process to prepare an EIS and began the scoping process.

Scoping: Meetings and Comments
April 2018

The 30 day scoping process kicks off on April 1, 2018. Public meetings will be held at specific locations within the Bristol Bay region, and in Homer and Anchorage in April. Scoping offers a chance for the public to comment on the proposed project and alternatives.

Draft EIS
Estimated Jan. 2019

Determining the alternatives to analyze, and then preparing the Draft EIS will happen immediately following the scoping period. The Draft EIS is anticipated to be released for public review and comment in 2019.

Public Review of Draft EIS: Meetings and Comments
Estimated early 2019

After the Draft EIS is released, the public will have a minimum of 45 days to submit comments. During that time, the USACE will plan public meetings, in the same locations that occurred during scoping, estimated for 2019.

Final EIS
Estimated late 2019

The USACE will assess all public comments submitted on the Draft EIS, and incorporate changes into the Final EIS before release in 2019.

Record of Decision
Estimated early 2020

The Record of Decision will lay out USACE's decision on the application submitted by the Applicant. Three decisions are possible: issue a permit, issue a permit with conditions, or denial of the application. This is estimated to be released in 2020.

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.

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 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.

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 Consiquences 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.
- **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.

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.

Pebble Project EIS Comment Form

You can submit comments using the form on the website (www.PebbleProjectEIS.com), to a court reporter at a public scoping meeting, or in writing (using computers available at a meeting or by mail). We will not be taking public testimony at large meetings in Anchorage, Homer, and Dillingham. If you'd like to mail your comments or submit them at a meeting, please feel free to use this form and attach additional sheets as needed. Write your comments, questions, and suggestions below, then fold this page in thirds so that the mailing address is visible. Remember to affix first-class postage before putting it in the mail, postmarked by the comment deadline of June 29, 2018.

The following questions may help:

- What are your specific concerns about this project and how should they be addressed in the EIS?
- Are there particular fish and wildlife resources, subsistence activities/use areas, or other places that you use and how might they be affected by the project?
- Are there alternative ways of developing any of the components of the Pebble Project that should be considered in preparing the EIS?

Please note that all public comments, including names and addesses of of individuals and organizations, are publically available as part of documenting public involvement in preparing the EIS. The US Army Corps of Engineers intends to place public comments received during scoping on the project website.

From:

Please place first-class postage here.

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

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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.