
DEPARTMENT OF THE ARMY PERMIT APPLICATION POA-2017-271

DRAFT EIS INFORMATION PACKAGE

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Draft EIS for the Pebble Project

The US Army Corps of Engineers (USACE) prepared a Draft Environmental Impact Statement (EIS) to analyze the impacts of issuing permits for the discharge of dredge and/or fill material into aquatic resources and actions that may affect the nations navigable waters that would facilitate the development of an open pit, copper-gold-molybdenum porphyry deposit, with associated infrastructure, as proposed by the Pebble Limited Partnership. The comment period for the Draft EIS begins March 1, 2019 and ends May 30, 2019.

At the release of the Draft EIS, USACE reaches out through public hearings to involve members of the public. The comment period provides opportunities for people who could be affected by the proposed project to offer suggestions on the draft analysis. Public input may result in modifications to the proposed alternative or other action alternatives that could have less environmental impact or suggestions to further avoid or minimize potential impacts.

The Draft EIS identifies 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 Draft EIS also looks at mitigation methods—ways in which potential negative impacts could be avoided or minimized.

During the comment period, USACE will work with the public to address issues and concerns raised 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.

Public hearings will tentatively be held from March 25th to April 16th, 2019, in the following communities:

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

Please check our website for the current meeting schedule.

Participants testifying at the public hearings should anticipate having a time limit of three minutes

To Participate...

Providing ample opportunities for the public to submit comments on the Pebble Project Draft EIS is of utmost importance to the USACE. A good way to get involved is to come to a public hearing 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 hearing, use the comment form on the project website (www.PebbleProjectEIS.com), email them (drafteis@comments.pebbleprojecteis.com) or send them to:

Program Manager, Regulatory Division

US Army Corps of Engineers
645 G St.
Suite 100-921
Anchorage, AK 99501

Let us know what aspects of the proposed project are important to you! comments will be reviewed and incorporated into the Final EIS.

Public comments can be submitted through May 30, 2019.

*Comments received/postmarked after May 30 will be considered, but may not be included in the comment analysis report.



Draft EIS Public Hearings

The US Army Corps of Engineers will be soliciting public comments on the Draft Environmental Impact Statement (EIS) in multiple ways including public hearings, written comments, website, email, and other communication methods. The schedule includes public hearings in the project area, as well as in Anchorage and Homer. A separate dedicated court reporter and laptop computers will also be provided at public hearings for those who don't want to wait to testify, or for those who wish to submit comments in private.

The schedule may change on short notice due to weather or other community events. Please check our website for the current meeting schedule.

Community	Date and Time	Location
Naknek	March 25, 2019, 3:30-7:00pm	Naknek School
Kokhanok	March 26, 2019, 3:30-7:00pm	Bingo Hall
Newhalen	March 27, 2019, 3:30-7:00pm	Newhalen School
Iguigig	March 28, 2019 3:30-7:00pm	Iguigig School
New Stuyahok	March 29, 2019, 1:00-5:00pm	Community Building
Nondalton	April 8, 2019, 3:30-7:00pm	Tribal Center
Dillingham*	April 9, 2019, 4:00-9:00pm	Elementary School
Homer*	April 11, 2019, 4:30-9:00pm	Homer High School
Anchorage*	April 16, 12:00-8:00pm	Dena'ina Center (600 W 7 th Ave)

**Participants testifying during the public hearings should anticipate having a time limit in order to accomodate all who may want to testify in public.*

To Participate...

You can come to a public hearing and give your comment orally in public or privately to a dedicated court reporter. You can also submit your comment electronically using one of a number of dedicated laptop computers, bring written comments to a hearing, email them (drafteis@comments.pebbleprojecteis.com) or send them to:

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HOW ALTERNATIVES WERE DEVELOPED

The purpose of evaluating alternatives to the proposed action

- ▶ The National Environmental Policy Act (NEPA) requires an objective evaluation of reasonable alternatives to a proposed action that accomplish the stated purpose and need.
- ▶ The primary intent is to evaluate ways to avoid or reduce environmental risk.
- ▶ Alternatives evaluated should be reasonable in terms of cost, logistics, technology, and social, environmental, and regulatory factors.

How alternatives were developed for the Pebble Project Draft Environmental Impact Statement (EIS)

- ▶ Developed the project purpose and need statement.
- ▶ Developed screening criteria organized around three screening tests:
 - 1) does it meet the purpose and need;
 - 2) is it reasonable and practicable in light of the overall project purpose; and
 - 3) does it provide an environmental benefit compared to the proposed action.
- ▶ Compiled a range of “options” (i.e., variations of components of the proposed project) which were identified to address concerns suggested during the scoping process, were previously evaluated by the Pebble Limited Partnership when developing the proposed project design, or suggested by the public and cooperating agencies.
- ▶ Applied the screening criteria to the options to determine reasonable and practicable options that avoid or reduce environmental risks for detailed analysis in the Draft EIS.
- ▶ Organized the component options that met the screening criteria into viable action alternatives for detailed analysis in the Draft EIS (an action alternative consists of a complete, functioning project that includes power generation and fuel supply, a port, transportation corridor, and mine site facilities).

Alternatives Carried Forward for Evaluation in the Draft EIS

- ▶ **No Action Alternative**
 - Federal agencies with decision-making authorities on the project would not issue permits to construct and operate the project under their respective authorities; PLP would retain the ability to apply for continued mineral exploration activities under the State of Alaska’s authorization process, as well as conduct any activity that would not require federal authorization. Although no resource development would occur, permitted resource exploration activities currently associated with the project may continue.

▶ **Alternative 1 – Applicant’s Proposed Alternative**

- Includes the proposed mine site at Pebble; a transportation corridor with a mine access road, a port access road, and a ferry crossing of Iliamna Lake; a port at Amakdedori; and a natural gas pipeline from the Kenai Peninsula that crosses the Cook Inlet to the port, then follows the transportation corridor to the mine site. Variants for Alternative 1 are the Summer-Only Ferry Operations, Kokhanok East Ferry Terminal, and Pile Supported Dock (at Amakdedori port).

▶ **Alternative 2 –North Road and Ferry with Downstream Dams**

- Reduces the overall length of access roads and uses alternate methods for construction of the bulk tailings storage facility. The access route includes a road alignment from the mine site along the northern shore of Iliamna Lake to Eagle Bay; a ferry from Eagle Bay to Pile Bay; and a road alignment to a port at Diamond Point. Variants for Alternative 2 are the Summer-Only Ferry Operations and Pile-Supported Dock (at Diamond Point port).

▶ **Alternative 3 –North Road Only**

- Provides an alternative transportation corridor and natural gas pipeline route, and would eliminate the need for ferry transportation across Iliamna Lake. The access route includes a north road alignment from the mine site to a port at Diamond Point on Cook Inlet. The variant for Alternative 3 is the Concentrate Pipeline.

Decisions Made in the Final EIS

The USACE will ultimately make the following determinations:

- ▶ Whether the proposed project is the least environmentally damaging practicable alternative (LEDPA) and is not contrary to the public’s interest.
- ▶ 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.
- ▶ Whether the LEDPA will result in significant degradation of waters of the United States.
- ▶ Whether the LEDPA includes appropriate and practicable steps to minimize the adverse impacts of the project on wetlands and other waters.
- ▶ Consideration of the relative extent of the public and private need for the proposal and the public interest.

Project Component/Facilities	Alternative 1 – Applicant's Proposed Alternative (Includes 3 Variants)	Alternative 2 – North Road and Ferry with Downstream Dams (Includes 2 Variants)	Alternative 3 – North Road Only (Includes 1 Variant)
Mine Site Component			
Mine Site	Alternative 1 <ul style="list-style-type: none"> Total Footprint: 8,086 acres Bulk TSF Main Embankment: Unlined; Centerline Construction Bulk TSF Footprint: 2,796 acres Summer-Only Ferry Operations Variant <ul style="list-style-type: none"> Total Footprint: 8,124 	Alternative 2 <ul style="list-style-type: none"> Total Footprint: 8,241 acres Bulk TSF Main Embankment: Unlined; Downstream Construction Bulk TSF Footprint: 2,958 acres Summer-Only Ferry Operations Variant <ul style="list-style-type: none"> Total Footprint: 8,279 acres 	Alternative 3 <ul style="list-style-type: none"> Total Footprint: 8,086 acres (same as Alternative 1) Concentrate Pipeline Variant <ul style="list-style-type: none"> Total Footprint: 8,087 acres
Transportation Component			
Transportation Corridor Traffic	Alternative 1 <ul style="list-style-type: none"> Trucks: Up to 39 round trips per day Ferry: One round trip per day on average Summer-Only Ferry Operations Variant <ul style="list-style-type: none"> Trucks: Up to 78 round-trip truck moves per day on each side of the ferry Ferry: Larger ferry making two round trips per day on average; or two ferries making one round trip each per day 	Alternative 2 <ul style="list-style-type: none"> Same as Alternative 1 Summer-Only Ferry Operations Variant <ul style="list-style-type: none"> Trucks: Up to 78 round-trip truck moves per day on each side of the ferry Ferry: Larger ferry making two round trips per day on average; or two ferries making one round trip each per day 	Alternative 3 <ul style="list-style-type: none"> Trucks: Same as Alternative 1 No Ferry Concentrate Pipeline Variant <ul style="list-style-type: none"> Trucks: Up to 18 round trips per day No Ferry
Access Road Lengths and Sizes	Alternative 1 <ul style="list-style-type: none"> Total Road Length/Footprint: 78 miles/ 892 acres Kokhanok East Variant <ul style="list-style-type: none"> Total Road Length/Footprint: 72 miles/ 833 acres 	Alternative 2 <ul style="list-style-type: none"> Total Road Length/Footprint: 53 miles/ 715 acres 	Alternative 3 <ul style="list-style-type: none"> Total Road Length/Footprint: 82 miles/ 1,036 acres Concentrate Pipeline Variant <ul style="list-style-type: none"> Same length as Alternative 3; total road footprint would increase
Material Sites	Alternative 1 <ul style="list-style-type: none"> Total Material Sites: 18; Footprint: 241 acres Kokhanok East Variant <ul style="list-style-type: none"> Total Material Sites: 18; Footprint: 349 acres 	Alternative 2 <ul style="list-style-type: none"> Total Material Sites: 16; Footprint: 422 acres 	Alternative 3 <ul style="list-style-type: none"> Total Material Sites: 26; Footprint: 717 acres

Project Component/Facilities	Alternative 1 – Applicant's Proposed Alternative (Includes 3 Variants)	Alternative 2 – North Road and Ferry with Downstream Dams (Includes 2 Variants)	Alternative 3 – North Road Only (Includes 1 Variant)
Water Body Crossing Infrastructure	Alternative 1 <ul style="list-style-type: none"> Bridges: 9 Culverts: 86 (41 fish passage) Kokhanok East Variant <ul style="list-style-type: none"> Bridges: 7 Culverts: 78 culverts (33 fish passage) 	Alternative 2 <ul style="list-style-type: none"> Bridges: 7 Culverts: 39 (18 fish passage) 	Alternative 3 <ul style="list-style-type: none"> Bridges: 17 Culverts: 105 (37 fish passage)
Ferry Crossing Length	Alternative 1 <ul style="list-style-type: none"> 18 miles Kokhanok East Variant <ul style="list-style-type: none"> 27 miles 	Alternative 2 <ul style="list-style-type: none"> 29 miles 	Alternative 3 Not applicable – No ferry
North Ferry Terminal Location and Size	Alternative 1 <ul style="list-style-type: none"> Location: Southwest of Newhalen Total Footprint: 4 acres 	Alternative 2 <ul style="list-style-type: none"> Location: Eagle Bay Total Footprint: 7 acres	Alternative 3 Not applicable – No ferry
South Ferry Terminal Location and Size	Alternative 1 <ul style="list-style-type: none"> Location: West of Kokhanok Total Footprint: 23 acres Kokhanok East Variant <ul style="list-style-type: none"> Location: East of Kokhanok. Total Footprint: 15 acres 	Alternative 2 <ul style="list-style-type: none"> Location: Pile Bay Total Footprint: 18 acres 	Alternative 3 Not applicable – No ferry
Port Component			
Port Location and Size	Alternative 1 <ul style="list-style-type: none"> Location: Amakdedori Dock Design: Earthen causeway and jetty Dredging: None Total Footprint: 30 acres Summer-Only Ferry Operations Variant <ul style="list-style-type: none"> Total Footprint: 58 acres Pile-Supported Dock Variant <ul style="list-style-type: none"> Dock Design: Pile-supported dock Total Footprint: 19 acres 	Alternative 2 <ul style="list-style-type: none"> Location: Diamond Point Dock Design: Earthen causeway and jetty Dredging: Yes Total Footprint: 112 acres Summer-Only Ferry Operations Variant No changes at the port site Pile-Supported Dock Variant <ul style="list-style-type: none"> Dock Design: Pile-supported dock Total Footprint: 101 acres 	Alternative 3 Same as Alternative 2 Concentrate Pipeline Variant <ul style="list-style-type: none"> Water Treatment Plant: No change in total footprint.

Project Component/Facilities	Alternative 1 – Applicant's Proposed Alternative (Includes 3 Variants)	Alternative 2 – North Road and Ferry with Downstream Dams (Includes 2 Variants)	Alternative 3 – North Road Only (Includes 1 Variant)
Lightering Location and Navigational Buoys	Alternative 1 <ul style="list-style-type: none"> Primary Lightering Location: 12 miles offshore east of Amakdedori port Alternate Lightering Location: ~18 miles east-northeast of Amakdedori port between Augustine Island and the mainland Navigational Buoys: Two lighted buoys located on the reefs framing the entrance to Amakdedori port (~1.5 miles east) 	Alternative 2 <ul style="list-style-type: none"> Primary Lightering Location: Iniskin Bay Alternate Lightering Location: Same as Alternative 1. Navigational Buoys: None 	Alternative 3 Same as Alternative 2
Natural Gas Pipeline			
Pipeline Alignment and Length	Alternative 1 <ul style="list-style-type: none"> Total Footprint: 40 acres Total Length: 187 miles <ul style="list-style-type: none"> Kenai Peninsula Tie-in: less than 1 mile Cook Inlet Crossing: 104 miles Amakdedori port to South ferry terminal: 36 miles Iliamna Lake Crossing: 19 miles North ferry terminal to Mine Site: 27 miles Kokhanok East Variant Total Length: 185 miles	Alternative 2 <ul style="list-style-type: none"> Total Footprint: 856 acres Total Length: 164 miles <ul style="list-style-type: none"> Kenai Peninsula Tie-in: less than 1 mile Cook Inlet Crossing: 75 miles Ursus Cove to Diamond Point Port: 9 miles Diamond Point port to Mine Site: 80 miles 	Alternative 3 <ul style="list-style-type: none"> Total Footprint: 97 acres Total Length: 165 miles <ul style="list-style-type: none"> Kenai Peninsula Tie-in: less than 1 mile Cook Inlet Crossing: 75 miles Ursus Cove to Diamond Point Port: 9 miles Diamond Point port to Mine Site: 81 miles

Project Component/Facilities	Alternative 1 – Applicant's Proposed Alternative (Includes 3 Variants)	Alternative 2 – North Road and Ferry with Downstream Dams (Includes 2 Variants)	Alternative 3 – North Road Only (Includes 1 Variant)
Total Permanent Footprint			
Total Permanent Footprint	<p>Alternative 1</p> <ul style="list-style-type: none"> • 9,317 acres <p>Kokhanok East Variant</p> <ul style="list-style-type: none"> • 9,395 acres <p>Summer-Only Ferry Operations Variant</p> <ul style="list-style-type: none"> • 9,343 acres <p>Pile-Supported Dock Variant</p> <ul style="list-style-type: none"> • 9,265 acres 	<p>Alternative 2</p> <ul style="list-style-type: none"> • 10,341 acres <p>Summer-Only Operations Variant</p> <ul style="list-style-type: none"> • 10,408 acres <p>Pile-Supported Dock Variant</p> <ul style="list-style-type: none"> • 10,330 acres 	<p>Alternative 3</p> <ul style="list-style-type: none"> • 10,047 acres <p>Concentrate Pipeline Variant</p> <ul style="list-style-type: none"> • 10,048 acres

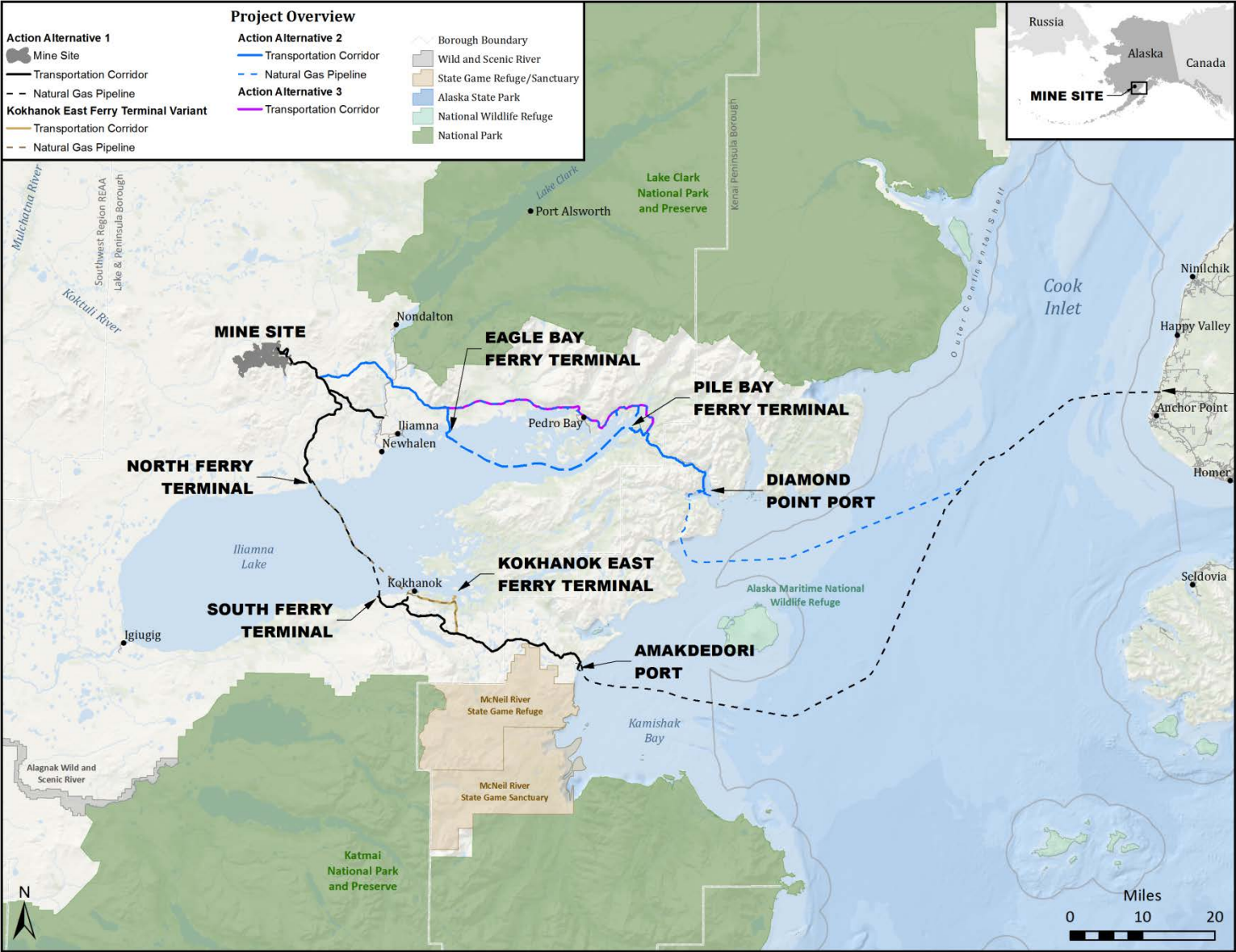


Figure 1. Project Overview

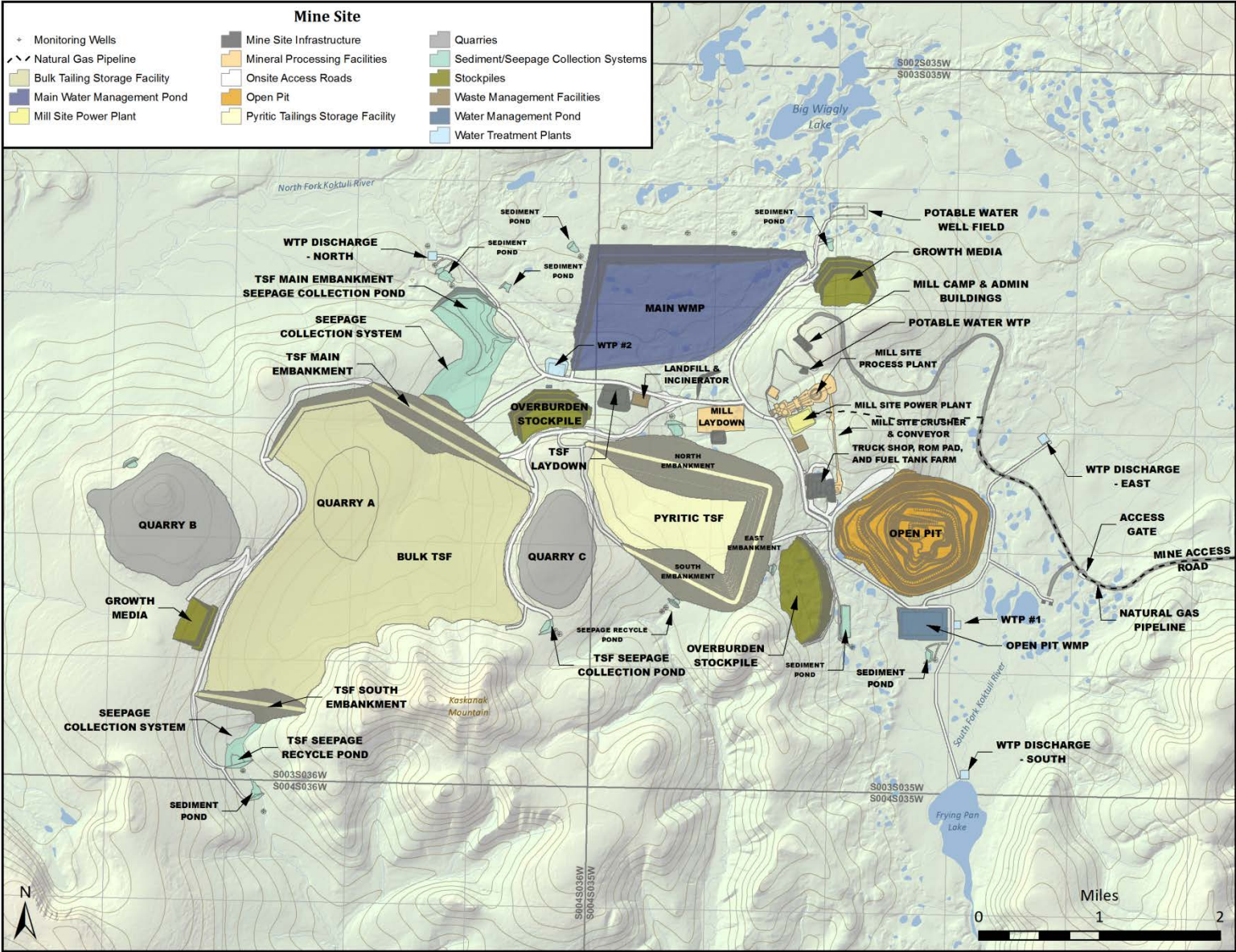


Figure 2. Alternative 1 Mine Site Layout

What Resources are Analyzed in the Draft EIS?

Using the analysis in the Environmental Impact Statement (EIS), The U.S. Army Corps of Engineers (USACE) is evaluating 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 for some resources. The resources below are analyzed in the Draft EIS.

Social Environment	Physical Environment	Biological Environment
<ul style="list-style-type: none">○ Land use and management○ Needs and Welfare of the People (Socioeconomics)○ Environmental Justice○ Recreation○ Recreational and Commercial Fisheries○ Cultural Resources○ Historic Properties○ Subsistence○ Health and Safety○ Aesthetics○ Transportation and Navigation○ Food and Fiber	<ul style="list-style-type: none">○ Geology○ Soils○ Geohazards○ Surface Water Hydrology, including flood plains and flood hazards○ Groundwater Hydrology○ Water and Sediment Quality○ Noise○ Air Quality, including greenhouse gas emissions	<ul style="list-style-type: none">○ Wetlands and Other Waters/Special Aquatic Sites○ Wildlife Values, including birds, terrestrial and marine mammals, birds, and frogs○ Fish Values○ Threatened and Endangered Species○ Vegetation

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 US Army Corps of Engineers (USACE) reviews the submitted permit application, it must analyze and disclose:

- how the project will be built, operated, and closed/reclaimed as applicable,
- 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.

This will be done by developing an Environmental Impact Statement (EIS).

Transparency

Before a decision is made and throughout its analysis, the federal government must ask citizens to voice concerns, suggest alternatives, and comment on draft analyses 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 325. 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 USACE

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 is leading the effort to take a hard look at reasonable and practicable alternatives and evaluate the impacts of the proposed project using 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 of 1899.

Role of the 3rd Party Contractor

AECOM (a consulting firm) has been hired to provide the interdisciplinary team that is developing a fact-based independent analysis of the Pebble Project as proposed and evaluate identified reasonable alternatives. AECOM works solely under the direction of the USACE and are the primary developers of the EIS for USACE review and approval. AECOM is also providing support to the USACE for scoping, public hearings and other 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, physical, and social environments, along with public involvement practitioners.

Role of the Applicant

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 is not 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 include representatives of federal, state, local and tribal governments. They have been actively engaged in scoping and alternatives development and were 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.

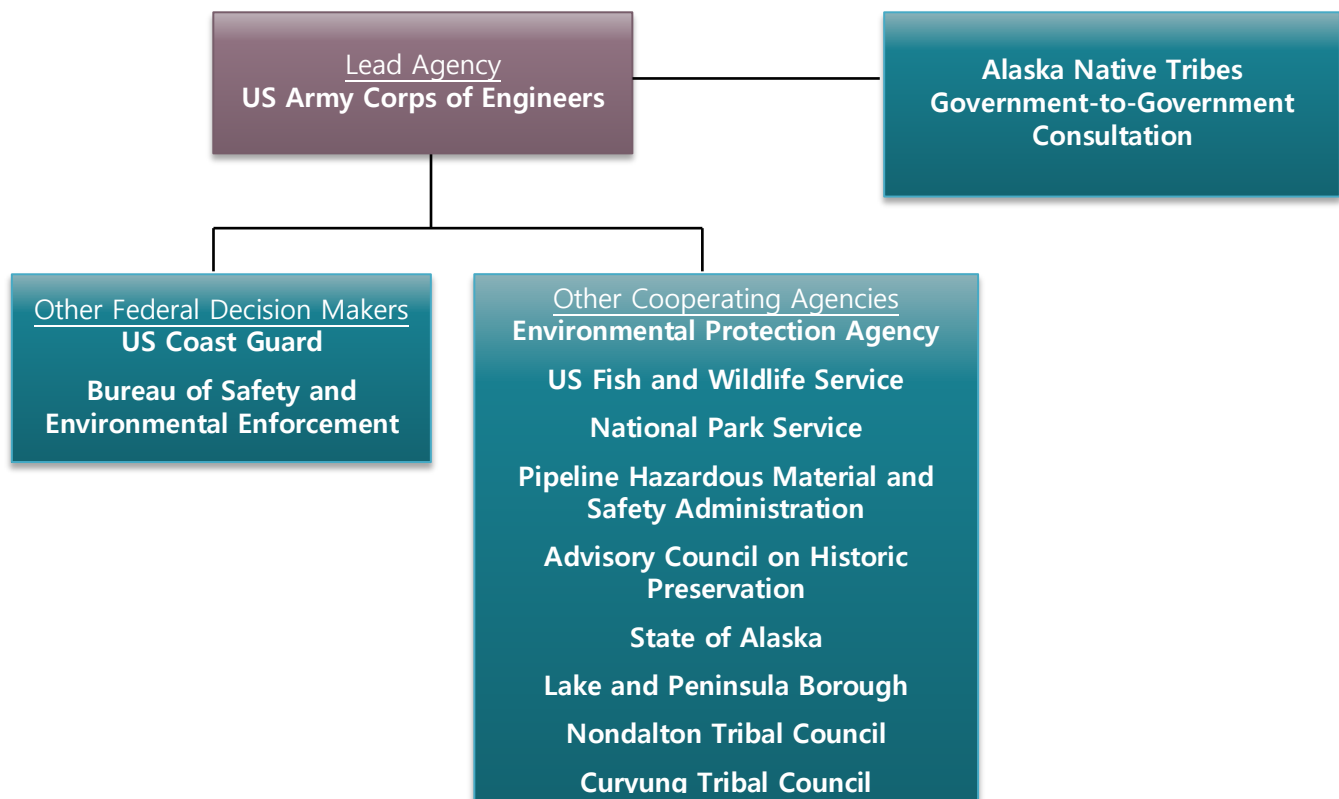


Role of Alaska Native Tribes

The USACE has invited 38 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
- Kenaitze Indian Tribe
- 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
- Native Village of Tyonek
- 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
- Village of Salamatof

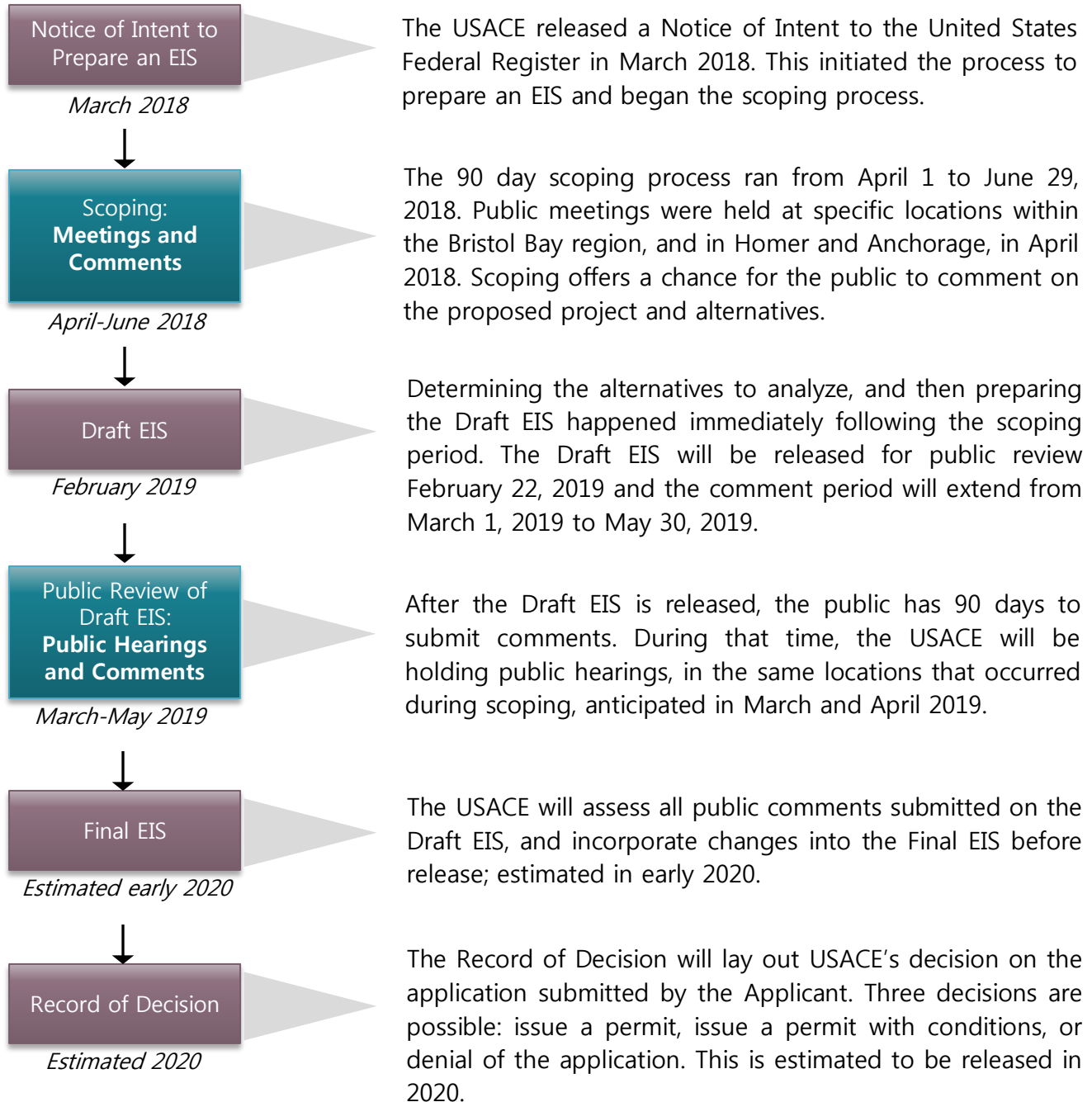
Lead and Cooperating Agencies



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 took a year to complete the Draft EIS for public review, with a Final EIS expected in 2020. The estimated schedule for the EIS is below.

Steps in the EIS Process



EIS Outline

How the Draft EIS is Organized

The Draft Environmental Impact Statement (EIS) analyzes the potential impacts to the biological, physical, and social environments. The Draft EIS is 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 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 Draft EIS.

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

Chapter 2. Alternatives – Describes the alternatives considered and analyzed, including a No Action Alternative, the Proposed Action (as designed by the Pebble Limited Partnership), and two reasonable and practicable alternatives to address issues raised during scoping and the EIS process.

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

Chapter 4. Environmental Consequences of Action – Analyzes the potential direct, indirect, and cumulative impacts of the resources discussed in Chapter 3.

Chapter 5. Mitigation – Describes avoidance and minimization measures incorporated as a component of a proposed project or as a measure being considered in the course of the NEPA review to support agency decision making processes, and summarizes impact avoidance, minimization, and a conceptual compensatory mitigation plan.

Chapter 6. Consultation and Coordination – Summarizes the consultation and coordination between federal/state/local agencies, federally-recognized tribal governments, as well as the public involvement opportunities for the EIS, through preparation of the Draft EIS.

Chapters 7 and 8 – A list of contributors to the preparation of the EIS along with cooperating agency roles and responsibilities are described in Chapter 7. Chapter 8 has a list of agencies, organizations, and persons to whom the Draft EIS was sent.

Chapter 9. References – Presents the references used in preparing the EIS.

Appendices – Presents the in-depth analyses, comments/response to comments, 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 public comment period is an important role the public plays in the NEPA process, and can influence the EIS analysis and contents.

General recommendations

- **Become familiar with the proposed project** — Review the project website, read the Draft EIS, monitor local newspapers, and attend public hearings. The website for the Pebble Project EIS is www.PebbleProjectEIS.com.
- **Learn about the steps in the NEPA process** and opportunities for submitting comments to the U.S. Army Corps of Engineers (USACE). Public comment periods are during scoping, and at the release of the Draft EIS.
- **Keep your comments focused and as specific as possible** on the EIS analysis of the proposed alternatives, potential impacts, and proposed mitigation measures.
- **Submit your comments within the time frames announced** to ensure that your concerns are considered and addressed during the development of the EIS; the Draft EIS comment period is from March 1 through May 30, 2019. Comments will be placed on the project website as we receive them.

Comments on the project are not counted as votes; comments will be used to ensure that the potential impacts are adequately disclosed and will be used to inform the determination of the overall public's interest for 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 contributing to and informing changes in the Final EIS and helping the agency decision makers with their permit decisions. For a citizen's guide to NEPA, visit https://ceq.doe.gov/get-involved/citizens_guide_to_nepa.html.

Tips for Writing Effective Comments

- **Substantive** comments will be considered by the USACE and can contribute to changes in the Final EIS, such as factual corrections and modifications to the alternatives, analyses, and mitigation. Comments that are solution oriented and provide specific examples are more effective than those that simply oppose the proposed project.
- In drafting comments on the Draft EIS, try to focus on the **purpose and need** of the proposed action, the **proposed alternatives**, the assessment of the **environmental impacts** of those alternatives, and **mitigation** to further avoid or minimize impacts.



Pebble Project EIS Comment Form

You can submit comments using the form on the website (www.PebbleProjectEIS.com), by email (drafteis@comments.pebbleprojecteis.com), to a court reporter at a public hearing, or in writing (using computers available at a hearing or by mail). During the public hearings, you will be given limited time to give your comment to allow others to speak. If you'd like to mail your comments or submit them at a hearing, 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 place first-class postage before putting it in the mail, postmarked by the comment deadline of May 30, 2019. Please note that all public comments, including names and addresses of individuals and organizations, are publically available as part of documenting public involvement in preparing the Draft EIS. The US Army Corps of Engineers intends to place all public comments received during the Draft EIS comment period on the project website.

The following questions may help you write your comment:

- Have your specific concerns about this project been addressed in the Draft environmental Impact Statement (EIS), and if not, why or how?
- Are there factual corrections or modifications that need to be made with regard to the alternatives, affected environment, impact analyses, and mitigation measures?
- Are there substantially alternate ways of developing any of the components of the Pebble Project that have not been considered in preparing the Draft EIS?
- Is there missing or new information that might changes the analyses or conclusions in the Draft EIS?

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From:

Please place
first-class
postage here.

Program Manager
US Army Corps of Engineers
645 G St.
Suite 100-921
Anchorage, AK 99501

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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 nor 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 Environmental Impact Statement (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 EIS must analyze and the USACE must consider the No Action Alternative. In the context of USACE's evaluation, the No Action Alternative would not issue a permit authorizing the discharge of fill material into waters of the United States.

Did the USACE consider a range of alternatives to the applicant's proposed action in preparing the Draft EIS?

The USACE evaluated over 100 potential alternative options. The range of alternative options were suggested by agencies, tribes and the public during the scoping process, and include those evaluated by the applicant when developing their proposed project. The No Action Alternative, the proposed action, and two action alternatives are analyzed in detail in the Draft EIS. Additionally, several small options (variants) in the design of the action alternatives are analyzed in detail.



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

The role of cooperators is to support the lead agency in developing the environmental analysis and providing technical assistance at the request of the lead agency. Cooperating agencies were invited by the USACE to participate because of their jurisdiction and special expertise. The information and analyses contained in the Draft EIS may be used to inform decisions required under state and local regulations.

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 during the government-to-government process.

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 was asked to comment on the issues and potential impacts that should be addressed in the Draft EIS. The public was also asked to suggest alternatives to the proposed action that should be considered for evaluation in the Draft EIS. The scoping period for this project was conducted in April through June, 2018.
- ▶ 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, email, mail, and orally at public hearings on the Draft EIS. The public comment period is March 1 through May 30, 2019.
- ▶ All comments submitted will be put into the record, analyzed, and considered in making changes to the Draft EIS during the preparation of the Final EIS.
- ▶ The USACE will prepare responses to comments submitted on the Draft EIS; comment responses will be included in the Final EIS.

How can I see comments that have been submitted during the public review of the Draft EIS?

There are two ways to see or hear the comments being submitted on the Draft EIS:

- ▶ Attend public hearings on the Draft EIS – you can listen to oral public comments during the hearings.
- ▶ Visit the project website – comments submitted through oral testimony, via the project website, and by email or in writing will be placed on the project website soon after submission.



SCOPING SUMMARY

INTRODUCTION

Scoping is the first opportunity for public participation in the preparation of an Environmental Impact Statement (EIS), and is conducted to assist in determining the breadth of analysis, significant issues, and alternatives to be analyzed. The National Environmental Policy Act (NEPA) requires scoping, which is described in 40 Code of Federal Regulations 1501.7 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, the process shall be termed scoping...” The scoping process provides an opportunity for the public to express their views and concerns, and to contribute to the completeness of the scope of analysis of the EIS. The scoping period for the Pebble Project EIS began on April 1, 2018, and continued through June 29, 2018. The US Army Corps of Engineers (USACE) provided several mechanisms for submitting scoping comments, including public scoping meetings, talking to a court reporter, and submitting comments through the website, by email, and in writing.

Public scoping meetings were held in nine communities, including Anchorage. A total of 914 participants signed in at the public meetings. 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

Date	Community	Location and Time	Number Signed In
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

SCOPING COMMENT SUMMARY

After all scoping comments were received, they were coded and entered into a database program that captures and summarizes issues and recommendations. The EIS team and the general public will continue to have access to scoping comments on the website (www.PebbleProjectEIS).

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 and recommendations. The top five substantive key issue fields for non-form letters and form letters are shown in Figure 1 and Figure 2. A total of 5,616 substantive comments were received from non-form letter submissions, and 334,351 substantive comments were received from form letters.

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

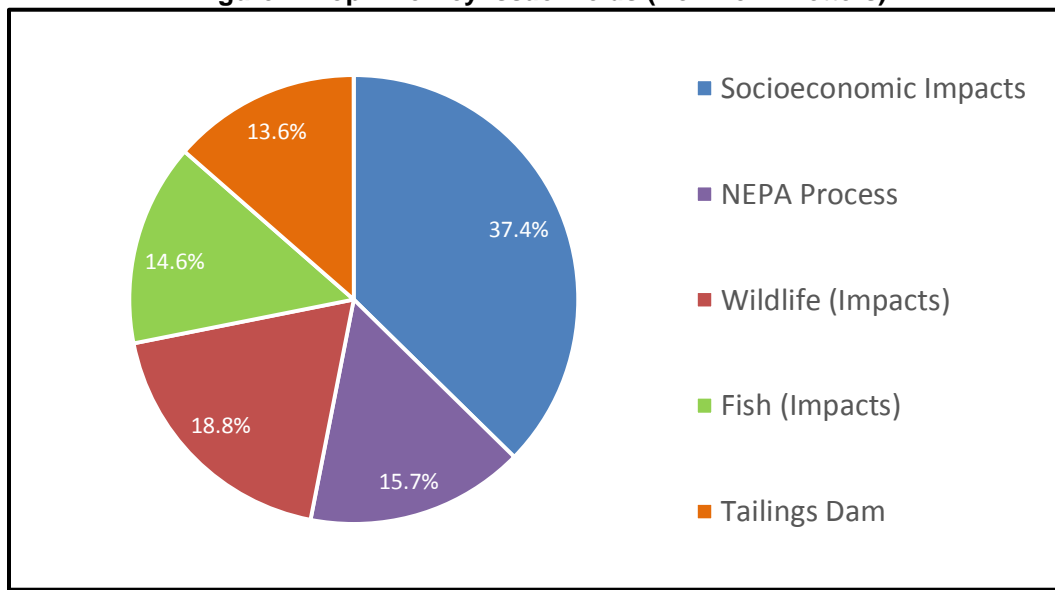


Figure 2. Top Five Key Issue Fields (Form Letters)

