

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 4.14 - Soils

Agency	Comment No.	Section	Relevant Text/Subject	Comment	Response
ADF&G (habitat)	1	4.14.2.4	Chapter does not address environmental consequences of erosion and resultant stream sedimentation from trenching through thaw unstable ice-rich slopes.	Project should identify all areas of permafrost along the proposed natural gas pipeline in the EIS particularly any thaw unstable slopes that will need to be trenched. This is necessary due to likelihood of erosion and subsequent stream sedimentation once permafrost is trenched. Environmental consequences should be described, and mitigation measures should also be identified to monitor and stabilize these post-construction.	<p>Respectfully disagree with this comment, and no changes have been made. Information is provided in provided in Section 3.14, Soils, Chapter 3, Affected Environment; and in Technical Appendix K3.14. Isolated permafrost patches do not need to be identified. Permafrost in this area is uncommon, similar to distribution in Anchorage or on the Kenai Peninsula.</p> <p>Most of the road alignment is on bedrock and high ground, and would be unlikely to encounter permafrost. There is no evidence of widespread permafrost on the route.</p> <p>Standard engineering practices would be used to deal with permafrost, should it be encountered at all. Isolated masses of permafrost are unlikely to result in impacts; practices would be expected to be detailed at a later permitting phase to avoid, minimize, or reduce impacts.</p>
ADF&G (habitat)	2	4.14.2.5	Chapter does not address environmental consequences from erosion and subsequent stream sedimentation from overland flows intercepting the pipeline ditch.	Chapter should address environmental consequences of erosion from surface waters intercepting the pipeline ditch and describe how the ditch will be stabilized and monitored for erosion.	<p>Respectfully disagree with this comment, and no changes have been made. The pipeline ditch is a short-term feature that exists only during pipeline construction, and for only short lengths of time. Standard engineering practices will be employed during construction. Such practices do not need to be described in detail, and would be expected to be detailed at a later permitting phase to avoid, minimize, or reduce impacts.</p>