

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Appendix K3.18 - Water and Sediment Quality

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
ADEC	1	Section K3.18.1.1, Page K3.18-1	Paragraph two in this section discusses EPA water quality standards for mercury and selenium.	Updated input from Water Division: The EPA has issued aquatic life recommendations (in 2001 and 2016) that require adoption by states in a timely manner. ADEC is currently making revisions to their 2008 Toxics Manual for aquatic life and human health criteria. These actions are currently scheduled to be completed by the end of 2019. Any regulatory impact on the Pebble Project would depend on the timing of a permit application.	Noted. Revisions to water quality criteria would be applied as adopted by ADEC.
ADEC	2	Section K3.18.2.1, Page 3.18-6	Paragraph two on this page discusses rock sample testing and included geochemical tests including ABA without explaining what ABA is.	The first two sentences from paragraph five could be inserted after the mention of ABA in the second paragraph and would provide a clearer explanation.	Text adjusted as recommended. Acid-Base Accounting (ABA) is defined at the beginning of Section K3.18.2.1.