

**Pebble Project EIS  
Consolidated State Agency Comments**

**Submitted 11/21/18**

No.	Department/Division/Section	Document Name	Section/Fig./Table	Page #	Comment/Issue	Recommendation/Action
1	DNR/DGGS/Energy Resources	Chapter 4: Environmental Consequences	Table 4.1-1	12	The cell containing the description of Cook Inlet Oil and Gas Lease Sales includes inaccurate and/or misleading information. The text does not distinguish between state managed and federally managed areas. By mentioning BOEM, the text could suggest that the federally managed OCS area south of Kalgin Island is included in the volume estimates. This is not the case. AOGA's estimates come from the U.S. Geological Survey. In 2011 the U.S. Geological Survey assessed the undiscovered, but technically recoverable oil and gas resources in the Cook Inlet basin, including state waters. Their assessment did not include the federally managed OCS. If the OCS were included, the estimated volumes of undiscovered resources would likely be at least slightly larger. The numbers cited are mean volumes of oil and gas.	Cite the correct source for the estimated volumes of undiscovered, but technically recoverable oil and gas in Cook Basin and state that the estimated mean volumes do not include the federally managed OCS.
2	DNR/DOG/SPC	Sec 4.1_IntroEC_reviewdraft _2018.10.16	Table 4.1-1	4.1-11	re Donlin Gold description: "The proposed mine would have a total footprint of approximately 16,300 acres. Includes a 312-mile long pipeline to carry natural gas from Cook Inlet to the mine site. "	The proposed pipeline is estimated to be approximately 315 miles long. Suggest updating the description.

3	DNR/DOG/SPC	Sec 4.1_IntroEC_reviewdraft _2018.10.16	Table 4.1-1	4.1-12	re: "Drift River Oil Pipeline Transportation Project"	This project has been approved/constructed and oil is now flowing through the previously-gas CIGGS-A pipeline; gas is now flowing through the related, new 7-mile Tyonek pipeline. Drift River facilities still exist but the new supply routes are operating; recommend updating this row of the table.
4	DNR/DOG/SPC	Figure_02_27_Alt1_Ama kdedori Port...		Fig 2-27	there is a typo in the document name - "Alterantive"	suggest fixing typo
5	DNR/DOG/SPC	10_10_2018_Updated_P rojectDescription	6.1	72	Language reads, "If no longer required, the pipeline will be pigged and cleaned before being abandoned in place. "	Change language to match text in Ch1 alternatives, "If no longer required, the pipeline would be pigged and cleaned and either abandoned in place or removed, subject to regulatory review and approval at the decommissioning stage of the project. "
6	DNR/DOG/SPC	10_10_2018_Updated_P rojectDescription	Table 7-1	77	language reads, "Natural gas pipeline between the mine and port and in state waters" of "Pipeline Right-of-Way permit"	suggest changing "permit" to "lease"; change to "on State lands and in State waters" - this lease will also apply to lands on the Kenai Peninsula also authorized by ADOT&PF
7	ADEC Commissioner's Office	Pebble Project Description	2.1.3	15	The abbreviations SFK, UTC and NFK are used in this section.	Please spell out abbreviations the first time they appear in a section. The document should be user friendly to decision makers and the public who are not well acquainted with the details of the project.
8	ADEC Commissioner's Office	Pebble Project Description	3.2.3	28	The abbreviations NPAG, non-ML, PAG, ML and TSF are used in this section.	Please spell out abbreviations the first time they appear in a section. The document should be user friendly to decision makers and the public who are not well acquainted with the details of the project.

9	ADEC Commissioner's Office	Pebble Project Description	3.4.6	41	The abbreviation IDF is used in this section.	Please spell out abbreviations the first time they appear in a section. The document should be user friendly to decision makers and the public who are not well acquainted with the details of the project.
10	ADEC Commissioner's Office	Pebble Project Description	3.5.7	43	The is no mention of cell phone tower or cell phone service in the area.	Please describe the availability of cell phone service in the area of the Amakdedori Port and any plans or lack of plans for providing cell service in the project area.
11	ADEC Commissioner's Office	Pebble Project Description	3.5.8	43	The discussion of laboratories does not include any details on the potential for toxic air emissions from laboratory operations.	Please describe any operations in the laboratories that could result in toxic emissions, such as mercury. If the mine operations will not have toxic emissions, that should be pointed out because other large mine projects have included those emissions.
12	ADEC Commissioner's Office	Pebble Project Description	4.1	53	Sentence two in this section notes that <i>"The ultimate Project design will incorporate a detailed analysis of water collection and management, including quantity and quality estimates, water treatment options, water management facility design, and strategic discharge of treated water."</i>	It is not clear how the impact of the project can be determined if the details will not be provided until a later date. If more detailed information exists it should at least be referenced here.
13	ADEC Commissioner's Office	Pebble Project Description	4.1.1	53	This section discusses the Pebble Water Balance Model but only provides a general description.	It is not clear how the impact of the project can be determined if the details will not be provided until a later date. If more detailed information exists it should at least be referenced here.

14	ADEC Commissioner's Office	Pebble Project Description	4.1.2.1	55	Bullet four in this section discusses the open pit dewatering system. It is not clear how the volume of dewatering is being determined or how it would be addressed in the water management modules.	It is not clear how the impact of the project or the design of the water treatment system can be determined without an idea of the volumes involved. Please provide additional details or a citation to other documents that contain the requested information.
15	ADEC Commissioner's Office	Pebble Project Description	4.1.2.2	56	The title of this section is " <i>Water Treatment</i> ", but it does not provide any details on water treatment, just the waters that would be treated.	Please provide details of the potential pollutants and how the water treatment system would address them or a citation to other documents that contain the requested information. Section 4.1.3.2 contains much of this information.
16	ADEC Commissioner's Office	Pebble Project Description	4.1.3.1	57	Bullet five on this page notes that " <i>Although the mine site will have a water surplus, the water volume available to discharge will be less than the pre-mine flows within the mine footprint as some water will be consumed in the tailings voids and some will be lost to evaporation and other minor uses.</i> "	It is questionable how this conclusion can be made without detailed modeling or information. Please provide additional details or a citation to other documents that contain the requested information.
17	ADEC Commissioner's Office	Pebble Project Description	5.1.1	66	Paragraph two in this section notes that " <i>Temporary diesel generators will be used for power supply.</i> " It is not clear what is meant by the word temporary, since the construction phase will take at least three years before natural gas could be used to generate power.	Please provide details on how many years these diesel generators would be in operation.

18	ADEC Commissioner's Office	Pebble Project Description	5.2.3	68	This section discusses " <i>Wet Commissioning</i> " of equipment and pipelines to test that fluid systems perform to their design intent. It is not clear if hydrotest waters will contain antifreeze or other additives that would be required during sub-freezing temperatures.	Please provide details on any additives that could be request for wet commissioning so that the department can understand whether discharges of these hydrotest waters would require an Alaska Pollutant Discharge Elimination System (APDES) permit.
19	ADEC Commissioner's Office	Pebble Project Description	5.4.3.2	70	This section discusses helicopter protocols but does not provide any details on the volume of flights per day.	Please provide additional details in this section so that the reader can understand potential noise impacts.
20	ADEC Commissioner's Office	Pebble Project Description	6	71	Paragraph three in this closure and reclamation section discusses the jurisdiction of ADNDR and ADEC, but does not discuss the need for an Integrated Waste Management Permit or any of the financial responsibility requirements.	Please provide additional details so the reader can understand the different regulatory authorities involved.
21	ADEC Commissioner's Office	Pebble Project Description	6.2	73	This section discusses post-closure management of the pit lake, but does not address long-term water management that will be required.	Please provide additional details so that the reader can understand the long-term impacts in the area.
22	ADEC Commissioner's Office	Pebble Project Description	7	74	In this section the federal agencies are all noted with abbreviations	Please spell ou the names of the federal agencies.The document should be user friendly to decision makers and the public who are not well acquainted with the details of the project.
23	ADEC Commissioner's Office	Pebble Project Description	7	76	The listing for ADEC permits does not include the 401 certification of the Corp of Engineers 404 permit.	Please add the ADEC 401 certification to this list. The Corp 404 permit is required under the Clean Water Act to also have this Certificate of Reasonable Assurance.

24	ADEC Commissioner's Office	Section 3.1, Appendix K	K3.1	K3.1-5	This section references the EPA Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay Alaska. It is not clear how the EPA study is applicable unless there is a comparison of the size of the mine assumed in the EPA assessement and the size of the mine that is currently being proposed.	Please provide a comparison of the size of the mine in the EPA assessment and the mine currently being proposed.
25	ADEC Commissioner's Office	Chapter 3, Affected Environment	3.1.3.1	3.1-2	This section on traditional ecological knowledge references the EPA Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay Alaska. It is not clear how the EPA study is applicable unless there is a comparison of the size of the mine assumed in the EPA assessement and the size of the mine that is currently being proposed.	Please provide a comparison of the size of the mine in the EPA assessment and the mine currently being proposed.
26	ADEC Commissioner's Office	Chapter 4, Environmental Consequences	4.5.2.3	4.5-4	The first paragraph in the section notes that " <i>Boat traffic to and from the port would be <b>minimal</b> : up to 27 concentrate vessels and 33 supply barges per year during operations. There would be a <b>large number of boats</b> during construction...."</i>	It is not clear why the vessel traffic is being segmented this way. This document needs to address the impacts of vessel traffic over the life of the project.
27	ADEC Commissioner's Office	Chapter 4, Environmental Consequences	4.5.2.3	4.5-5	Paragraph three on this page notes that " <i>Overall, because recreational use of the Amakdedori Port is likely low, project-related wildlife and fish displacement, noise and actities would result in minimal displacement of wildlife viewing and fishing uses to other nearby shoreline areas."</i>	

28	ADEC Commissioner's Office	Chapter 4, Environmental Consequences	4.5.2.4	4.5-5	Paragraph four on this page note that " <i>The pipeline would not be visible above ground and would not remove any acreage from use for recreational opportunities.</i> " It is not clear how this statement can be true because the presence of underwater pipelines typically requires anchoring restrictions and restrictions on anchoring would remove an area from use for recreational opportunities.	Please clarify.
29	ADEC Commissioner's Office	Chapter 4, Environmental Consequences	4.5.3.2	4.5-7	Paragraph seven on this page discusses traffic on the Williamsport-Pile Bay Road and refers to "anglers". The final sentence notes that few of these boats are recreational anglers.	Please simplify the discussion and just state that the traffic is due to the transport of commercial fishing vessels.
30	ADEC Commissioner's Office	Chapter 4, Environmental Consequences	4.5.4	4.5-9	Paragraph five on this page discusses traffic on the Williamsport-Pile Bay Road and refers to "anglers". As noted on page 4.5-7, few of these boats are recreational anglers.	Please simplify the discussion and just state that the traffic is due to the transport of commercial fishing vessels.
31	ADEC Commissioner's Office	Chapter 4, Environmental Consequences	4.5.6	4.5-10	The bullets on this page include both the Alaska Standalone Pipeline Project and the Alaska LNG project. Only one of these projects will be built, so it could confuse some readers to have both listed.	Please clarify that although both projects are listed only one would be built.

32	ADec Commissioner's Office	Chapter 3, Affected Environment	3.19	General comment	A wide variety of discussions in this section note that " <i>baseline noise levels were not measured at the XXX site.</i> " NEPA case law requires the discussion of missing information, whether it is important to the decision making process, whether the information could be available and what the cost would be to collect the information if it was available.	Please clarify where appropriate.
33	ADec Commissioner's Office	Chapter 4, Environmental Consequences	4.19	General comment	A number of discussions in this section note that " <i>The anticipated noise impacts in XXXX would be temporary enduring only for as long as the project phase occurs.</i> " It is not clear how this statement can be true. The operations phase would last twenty years and that cannot be considered "temporary" to most readers.	Please clarify where appropriate.
34	ADF&G/Habitat/SPCS	Appendix E	Table E-1	E-15	Table lists ADF&G's only role from the Anadromous Fish Act is Fish Passage permits.	Should change to ADF&G Title 16 Fish Habitat Permits
35	ADF&G/Habitat/SPCS	Appendix E	Table E-1	E-15	Table lists "Fish Habitat Permits" under FWCA authority.	Should remove Fish Habitat Permits as authority under FWCA
36	ADF&G/Habitat/SPCS	Appendix E	Table E-1	E-15	Table lists role of Fishway Act AS 16.05.841) only as "Fish Passage sufficiency determinations"	Should change to ADF&G Title 16 Fish Passage Permits
37	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	Figure 1-1	6	Map does not include the proposed pipeline on the Kenai Peninsula.	Include the proposed pipeline route on the Kenai Peninsula in the figure.
38	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	3.1	51	"The pipeline will be buried in a trench adjacent to the road prism"	EIS should describe how the pipeline will be buried, particularly if blasting will be necessary as well as associated mitigation.



39	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	3.1	51	"A fiber optic cable will be ploughed in, or buried in a shallow trench, adjacent to the pipeline"	EIS should indicate if the fiber optic line will be buried in the same trench as the pipeline or a separate trench. Also, if it will be buried concurrently with the pipeline or if it will be plowed in at a different time.
40	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	3.1	51	There is no indication in Project description on how the pipeline will cross fish streams.	EIS project description should describe how the pipeline will cross fish streams.
41	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	3.1	51	The project description says that the pipeline will use HDD to enter Cook Inlet but does not indicate how it will leave Cook Inlet.	EIS project description should describe how the pipeline will leave the West Side of Cook Inlet.
42	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	3.1	52	The project description says that the pipeline transitions and burial through Illiamna Lake will be similar to the Cook Inlet Crossing but only describes the transition on the east side of Cook Inlet.	EIS project description should describe how the pipeline will leave the West Side of Cook Inlet as well as specifically describe the transition and burial through Lake Illiamna.
43	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	5.4.3.1	70	Environmental Construction Windows section only reference ADF&G and USFWS specific authorities.	This section should also reference that the environmental authorities from the ADNR ROW lease.
44	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	Table 7.1	77	"Fish collection permits for monitoring" "May be necessary for long term monitoring"	ADF&G Fish Collection Permits will be needed anytime fish will need to be captured or transported, and may be necessary for several aspects of construction and studies, not just monitoring.
45	ADF&G/Habitat/SPCS	10_10_2018 Updated Project Description	Table 7.1	77	Fish Habitat Permit- only indicates it is only necessary for "Water withdrawal in an anadromous fish waterbody, stream diversion, installation of culverts and bridges."	ADF&G Fish Habitat Permits will be necessary for most work in anadromous streams as well as for work in resident fish streams that might affect fish passage.

46	ADF&G/Habitat/SPCS	Recreation	Section 3.5	13	Existing recreational use along the pipeline alignment in Cook Inlet and on the Kenai Peninsula consists of boating on Cook Inlet and recreational use at the state park sites on the Kenai Peninsula. Sentence implies that recreational use along the pipeline on the Cook Inlet and Kenai Peninsula are limited to boating and state park use.	EIS should include the multitude of other recreational uses around the pipeline corridor on the Kenai Peninsula such as hunting and stream fishing.
47	ADF&G/Habitat/SPCS	Recreation	Section 3.5	13	Section only attempts to describe recreational use on the Kenai Peninsula and Cook Inlet with respect to the natural gas pipeline but ignores the recreational use on the west side of Cook Inlet and Iliamna Lake.	Include a description of recreational use for the rest of the natural gas pipeline.
48	ADF&G/Habitat/SPCS	Recreation	Section 3.5	14	"...though given the presence of <u>ledges</u> and communities around northern Iliamna Lake."	Change "ledges" to "lodges"
49	ADF&G/Habitat/SPCS	Environmental Consequences	Section 4.1.3.2	4	Section lists several activities that were considered for cumulative effects analyses but does not include the proposed natural gas pipeline.	EIS should include a thorough cumulative effects analysis for the natural gas pipeline.
50	ADF&G/Habitat/SPCS	Recreation	Section 4.5	5	"Existing recreational use along the pipeline alignment in Cook Inlet and on the Kenai Peninsula consists of boating in the inlet and recreational use on the peninsula." Extremely vague statement that states that recreational use on the Kenai Peninsula consists of recreational use.	EIS needs to give a more thorough description of recreational use on the Kenai Peninsula as it relates to the proposed natural gas pipeline corridor.

51	ADF&G/Habitat/SPCS	Recreation	Section 4.5	6	"Noise and activities during project construction and closure may also temporarily adversely affect recreation experiences for visitors to the Stariski State Recreation Site" Only describes noise impacts to users of the State Recreation Site.	EIS should describe impacts from noise and activities for the entire pipeline corridor on the Kenai Peninsula including hunting and fishing outside of the State Recreation Area.
52	ADF&G/Habitat/SPCS	Intro to Affected Environment-TEK	K3.1.1	1	Scoping comments refer to "underwater" streams in the headwaters that are important to small fish fry and fingerlings.	Further clarification would be helpful on what is meant by underwater streams.
53	ADF&G/Habitat/SPCS	Chapter 2 Alternatives	2.2.2.4	43	"The pipeline will be buried in a trench adjacent to the road prism"	EIS should describe how the pipeline will be buried, particularly if blasting will be necessary as well as associated mitigation.
54	ADF&G/Habitat/SPCS	Chapter 2 Alternatives	2.2.2.4	43	The project description says that the pipeline will use HDD to enter Cook Inlet but does not indicate how it will leave Cook Inlet.	EIS project description should describe how the pipeline will leave the West Side of Cook Inlet.
55	ADF&G/Habitat/SPCS	Chapter 2 Alternatives	2.2.2.4	44	For river crossings, the pipeline would either use HDD or be attached to the bridge structures. Does not mention open-cut for pipeline stream crossings yet Figure 2-35 references an open-cut typical.	If project intends to use open-cut to cross stream, they should indicate it in the EIS.
56	ADF&G/Habitat/SPCS	Chapter 2 Alternatives	2.2.2.4	44	The project description says that the pipeline transitions and burial through Illiamna Lake will be similar to the Cook Inlet Crossing but only describes the transition on the east side of Cook Inlet.	EIS project description should describe how the pipeline will leave the West Side of Cook Inlet as well as specifically describe the transition and burial through Lake Illiamna.
57	ADF&G/Habitat/SPCS	Chapter 2 Alternatives	2.2.3.4	74	From Diamond Point port, the pipeline would be buried in a trench that follows the general Alternative 3 north access road alignment with minor.	Unclear what "with minor" refers to. EIS should finish the sentence.

58	ADF&G/Habitat/SPCS	Chapter 2 Alternatives	2.2.2.4	74	Section does not describe how the proposed pipeline will cross streams.	EIS should include language in this section on how the proposed pipeline will cross streams.
59	ADF&G/Habitat/SPCS	Chapter 2 Alternatives			There is no detailed figure on the proposed pipeline infrastructure on the Kenai Peninsula.	EIS should include a figure on the proposed pipeline and associated infrastructure on the Kenai Peninsula.
60	ADF&G/Habitat/SPCS	Chapter 2 Alternatives	Figure 2-16		There is no attached pipeline on the bridge typical.	There should be a bridge typical drawing that includes the natural gas pipeline.