

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Appendix K4.18 – 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	Excel line 28	Section K4.18.1.2, Page K4.18-11	Paragraph one on this page note that <i>"The average annual surplus from the open pit is about 3cfs."</i> It is not clear how this can be considered an annual surplus measurement since water flow is measured in units of volume per unit of time. Flow can be measured at cubic feet per second (cfs), gallons per minute (gpm), acre feet per day or other measurement units.	If the document is going to express the water flow surplus on an annual basis, please convert the number to one that make sense in terms of the unit of time.	Addressed. Text updated.
ADEC	Excel line 29	K4.18 - General	Many discussions in this section mention that solids or rejects from certain operations would be transferred to the TSF or the pyritic TSF. It is not clear from these discussions whether the TSF will be reclaimed after closure and how these discharges would impact the reclamation efforts.	Please provide details or a citation to discussions elsewhere in the document.	Bullets in Section K4.18.1.2 give timeline for reclamation of various project components including bulk and pyritic TSF. Section 4.18 describes water treatment processes and resultant sediment quality in the pyritic TSF. Statement was added to Appendix K4.18 providing a citation to Knight Piesold (2018d) for further information on reclamation.
ADEC	Excel line 30	Section K4.18.2.4, Page K4.18-27	The final paragraph on this page notes that <i>"However, based on the independent review conducted of the water treatment approach (AECOM 2018i), there is some concern that waste products high in selenium and salt placed in the pyritic TSF may, over time, lead to increased TDS concentrations in the main WMP."</i> It is not clear how waste products in the pyritic TSF would lead to increase TDS concentrations.	Please provide details or a citation to discussions elsewhere in the document.	AECOM (2018i) is an independent analysis of the proposed water treatment approach. Additional details from this document have been added to this discussion (now in K4.18.2.2).