

Project Name: Pebble Project EIS
Date: December 16, 2019
Time: 9am-2pm
Location: AECOM 3900 C Street, Anchorage
Subject: Cooperating Agency Technical Meetings, Day 6
Introduction: Safety, housekeeping, opening remarks

Attendees and Affiliation:	
AECOM and subcontractors	Jessica Evans, Jon Isaacs, Lindsey Flagstad, Jonathan King, Elizabeth Bella, Wes Cornelison, Tara Bellion, Heather Patterson, Maxene Dwyer, Emily Newell
ACHP	No attendees
BSEE	Kyle Monkelien
Curyung Tribal Council	No attendees
EPA	Molly Vaughan, Matt LaCroix, Betsy McCracken, Michael Papenfus, Patty McGrath, Palmer Hough
LPB (Jade North)	Bob Loeffler
Nondalton Tribal Council (represented by NARF)	Wesley Furlong
NPS	Sharon Kim, Susanne Fleek Green, Davyd Betchkal, Dan Young, Buck Mangipane
State of Alaska (SoA)	Kyle Moselle, Ted Otis, Josh Brekken, Travis Elison, Ron Benkert
USACE	Katie McCafferty, Heather Markway, Kerri Hancock
USCG	David Seris
USFWS	Douglass Cooper, Catherine Yeargan, Melissa Burns, Angela Matz
PHMSA	Dave Hassell

Action Items	
Topic	Actions
Recreational Fisheries	AECOM – to check that the level of disclosure regarding the interconnection between recreational and commercial fisheries is sufficient.
Recreational Fisheries	AECOM – to check level of disclosure regarding data gaps on individual lodges.
Health and Safety	AECOM/USACE to revisit all public health SOC responses and edit to be more informative as to what specific changes have been made to the document if appropriate.
Aesthetics	AECOM and USACE to discuss how best to include lighting mitigation measures.
Aesthetics	AECOM/USACE to ensure that there is an SOC that captures the NPS concern that mine development would increase flights over park land.
Aesthetics	USFWS to provide examples of where in the EIS additive effects and interconnection of impacts (interconnected and interrelated impacts) is well presented.
Project Coordination	AECOM to send repeating invite for bimonthly cooperating agency meetings (done) – first one will be on January 7 at 11AM AST
Project Coordination	AECOM to send updated invite to all cooperating agency POCs for January 14 1:30PM AST water treatment plant technical meeting (done)

Agenda/Discussion:
Morning Session – Commercial and Recreational Fisheries, Health and Safety
Recreational Fisheries
<i>SOC: Commercial Fisheries – EPA-Update to 2018 information (row 69)</i>

Agenda/Discussion:

AECOM – explained that a paragraph has been added to discuss the 2018 and 2019 (partial) seasons, note this data was not incorporated to the 20-year retrospective analysis as these last two years are considered somewhat anomalous and their inclusion in the analysis would require a significant amount of work without much return; noted that Bristol Bay has had very productive years in 2018, 2019 this productivity translates to rivers, also that this increase in productivity expected to recede.

EPA – thanked AECOM/USACE for the updates.

EPA – disagreed with premise of not including data in 20-year retrospective on the basis the years being anomalous data or requiring too much work.

AECOM – explained that inclusion of data would not change our understanding of the fishery, and that the increase in productivity is already captured in the analysis as it began in 2015; reiterated that the amount of work does not merit inclusion in the analysis.

EPA – regardless, would like to see inclusion of data in analysis.

NPS – argued to include data if nothing else to capture the increased value of fishery.

AECOM – explained that the fishery cycle is not something that is regular in its periodicity, and that value of the fishery is captured qualitatively with a new paragraph of description of the document. Also noted that despite record numbers of fish, the value of the fishery is lower than the all-time high due to the lower price of fish.

EPA – suggested adding some basic statistics to show that inclusion of new data would not change the 20-year retrospective analysis.

ADF&G – approved of the approach to add a paragraph describing 2018, 2019 without incorporating these last two years of data to 20-year retrospective.

USACE – solicited the group for other discussion items regarding Commercial Fisheries.

AECOM – updated the group that he has checked on all four issues raised in previous meeting and can assure that each has been addressed.

ADFG – thanked AECOM/USACE for the updates.

Recreational Fisheries

SOC: Recreational Fisheries – Data and Process (row 447)

AECOM – explained that they used statewide harvest survey and freshwater guide logbook to estimate levels recreational fishing; noted that these are the only datasets available for recreational fishing; explained that statewide harvest survey was augmented with the total number of survey responses received from ADFG. Similarly, the freshwater guide logbook data was augmented by ancillary data provided by ADFG.

EPA – appreciates that best available data was used but pointed out that data may not be representative of actual angler effort.

AECOM – stated that there is no indication that the data is not representative, further that the margin of error is available and included. Noted that the comment did not provide any alternate, more representative datasets.

EPA – suggested talking to the survey administrators to gauge their confidence in the survey data.

AECOM – suggests that ADFG is typically transparent in their methodology and would not publish the survey data if they lacked confidence in its accuracy.

SOC: Recreational Fisheries – Recreation Setting Impacts (row 457)

AECOM – explained the issue is the perception of a large mine would lower recreational fishing activity; noted that angler perception matters.

LPB – agreed that negative perception surrounding the mine would decrease the amount that anglers are willing to pay for the experience, thereby restricting consumer surplus.

Agenda/Discussion:

AECOM – acknowledged that this is a valid concern, and that discussion of perception has been increased in the text; noted that it is difficult to predict how anglers would react, there may be no impact or that anglers may choose to fish elsewhere; currently ability to quantify impact is limited.

USFWS – concerned that the interrelatedness of sport and commercial fishery is not fully addressed, would like to see additional disclosure.

AECOM – pointed out that viewshed analysis addressed from where the mine would be visible, thus which reaches would potentially be less appealing; noted that from history we see lodges adapt to change in regulations and run strength, feels that this has been captured in the document.

LPB – agrees that visibility of the mine is difficult to quantify; noted that lower Talarik Creek is well known and likely targeted by wealthy out-of-state anglers.

AECOM – acknowledges that the lower Talarik Creek and the Gibraltar River will be most impacted by mine development, also that construction of the road will change accessibility to other rivers; noted that this has been addressed in the document.

USFWS – stressed that the issue is larger than individual lodges, rather a permanent change to the headwaters to the foundation of their businesses.

LPB – gave example of northern lights viewing industry, road construction did negatively affect individual lodges, but did not produce an industry-wide effect. Does not think that calling out individual lodges in the EIS would be appropriate or productive.

EPA – reiterated that the response of anglers to the presence of a large mine in the area is not knowable; requested that this data gap be disclosed.

AECOM – noted that anglers will fish for diverse reasons, some to eat, some to catch and release. Gave example of Fox River study in Wisconsin.

NPS – wondered if there couldn't be some quantification of lodges within a certain distance from the mine that would be adversely affected.

AECOM – argued that lodge location does not direct fishing location, reiterated the point that due to boats and float planes, lodges and guides are flexible as to where they fish.

EPA – asked if the point at which cost would become prohibitive to participate in the industry could be identified. If not would like to see the data gap acknowledged.

AECOM – does not feel we have the ability to quantify these increased costs due to lack of data on individual lodges.

LPB – wished to clarify that his comments on this subject (recreational fishing) are of personal interest, and not made as a representative of LPB.

NPS – suggested that the number of lodges affected could be identified.

AECOM – explained that it is difficult to pinpoint physical location of the lodges.

LPB – pointed out that we know generally where the lodges are in the region.

NPS – asked if the larger scale spill scenarios discussed in the last round of meetings would be included in the impact analysis for fisheries.

AECOM – clarified that yes, any change to spill section is translated to the appropriate biology sections.

USACE – explained that an evaluation of known dam failures will be included as an appendix of the next version of the EIS.

USFWS – asked which spills will be included.

LPB – listed: two in Brazil, Mt Polley, Acadia, plus comparison to the Lynker model.

Agenda/Discussion:

USCG – noted that boat operators are required to have a USCG license for recreational fishing and that there are different licenses for boats with under or over 6 person capacity; point being that this license data could be used to estimate the level of recreational fishing effort.

Public Health

SOC: Public Health – Baseline Health Disparities (row 411)

AECOM – read the SOC response. Emphasized that the project would have both positive and negative impacts; noted limitations of public health baseline data, specifically noted the difficulty of targeting subgroups using the baseline data.

LBP – LPB passed a socioeconomic law, which will require monitoring of socioeconomic impacts under project permitting. Agreed that consequences of mine development are expected to be both positive and negative and difficult to go beyond a qualitative description of impacts. Noted that local government can steer the magnitude of impacts to some extent via environmental controls, required counseling, training etc.

NTC – took issue with the assertion by the Applicant that the applicant will hire locally, noted that there is no mechanism requiring the applicant to do so. Noted that subsistence activity will continue regardless of increase in income, and that disruption to subsistence lifestyle due to mine development will have impacts to physical and mental health. Cautioned against equating the provision of jobs with better public health.

AECOM – asked if concerns relating to socioeconomic issues have been addressed in the document.

AECOM – affirmed that the document has been updated to address the effect of an altered subsistence lifestyle on mental and physical health.

USFWS – brought up the issue of toxins in subsistence food resources – asked if the perception of contamination in food resources and its impact on mental health issues has been addressed.

AECOM – yes this has been addressed in food safety and social determinants of health sections.

SOC: Public Health – Potential Impacts to Children (row 433)

AECOM – read the SOC response.

LPB – asked if the conclusion was that consequences were mostly negative?

AECOM – explained that consequences are both positive and negative, that discussion of health impacts to children has been increased in the document.

EPA – thanked for the inclusion of additional text on unique vulnerabilities of children.

SOC: Public Health – Protection of Public Safety (row 434)

AECOM – explained that text has been added to document, read from the SOC response.

NTC – requested that the substance of the additions to the document be provided in the SOC response rather than just the location of the additions; noted that it is not possible to evaluate the response without this information. Noted also that the protection of public safety is broader than emergency response, asked that the discussion include vulnerable populations and threats.

AECOM – explained that SOC responses are brief, and that this issue is partially addressed in following SOC responses.

SOC: Public Health – Increase in Crime and Drug Use (row 427)

AECOM – explained the concern that mine development would increase crime, drug use and violence; explained that clarifying text has been added to the document (see SOC response).

LPB – took issue with the assertion that development of an enclave mine like Pebble would produce the same sort of chaos as a 'commuter mine' such as the Bakken Oil Fields; further noted that we could look at arrest

Agenda/Discussion:

records during the Pebble exploration phase, when the man camp in Iliamna was operational; noted that there is no police officer or VPSO in the entire Lake and Peninsula Borough.

AECOM – asked where these data might be located.

LPB – suggested a separate discussion after the meeting.

AECOM – noted limitations of available data, specifically that they were unable to retrieve data at a local level, only regional scale data.

LPB – noted that the only crime data available is through the Naknek district court.

SOC: Public Health – Food security (row 417)

AECOM – explained that the issue was an incomplete understanding of what food security means to subsistence lifestyle; read the SOC, elaborated that food security is more than a socio-economic issue in subsistence societies.

USFWS – asked for confirmation that the appendix (K4.10) is where the perception of contamination of food sources is addressed.

USFWS – looks forward to seeing updates to the potential for contamination and the perception of contamination in food sources.

USACE – solicited group for additional concerns on Public Health.

Aesthetics

SOC: Aesthetics or Visual Concerns – Lighting (row 6)

AECOM – explained that comments suggested that the analysis of the night sky was insufficient. NPS provided modeling, which has been incorporated into the document, information also included for buffer distance, snow covered conditions now addressed.

LPB – offered the example of Fort Knox, explaining that the northern lights viewing industry from Cleary Summit was expected to be impacted by development of mine. However, lodge owners stated that mine had no effect on northern lights viewing. Also noted that Fort Knox mitigated lighting impacts by pointing the lights down.

NPS – asked if the lighting plan will be released prior to issuance of next version of EIS.

AECOM – explained that no, a lighting plan would remain as a proposed mitigation measure.

NPS – noted that it is difficult to comment without a full understanding of the lighting design.

AECOM – acknowledged this difficulty, explained that they compensated for uncertainty surrounding the lighting plan by taking a conservative approach towards mitigation.

USACE – asked where/how a lighting plan would be included in document.

AECOM - explained that a lighting plan, if available, could be included as an appendix to the EIS, but offered that individual recommendations could be pulled forward into the text. At this time, USACE does not plan to request a lighting plan from PLP.

SOC: Aesthetics or Visual Concerns – Flight Paths (row 3)

AECOM – explained that NPS had requested more information on flight paths, AECOM has added a figure and description of lower elevation flights (i.e. scheduled charters).

NPS – noted that the NPS concern is more that there will be more overflights of the park boundary and this would have an aesthetic effect on visitor experience.

AECOM – increased flight traffic is addressed in aesthetics section, Pebble flights are not expected to travel over the park, that is they would not fly through Lake Clark Pass due to the type of craft being used.

Agenda/Discussion:

LPB – noted that development of mine will likely cause a general increase in flight traffic along established routes including Port Alsworth.

SOC: Aesthetics or Visual Concerns – KOPs (row 5)

AECOM – explained that three Key Observation Points (KOPs) have been added to Keyes Point, Lower Talarik Creek Special Use Area, and at the mouth of the Gibraltar River.

USACE - solicited group for additional concerns.

USFWS - asked how cumulative effects are being addressed, stressed that the accumulation and interrelation of impacts (interconnected and interrelated impacts) is important and something USFWS would be interested in seeing in the document.

AECOM - explained that we are looking at cumulative impacts at the ecosystem level where applicable, and confirmed that USFWS interest was on accumulation of impacts rather than cumulative effects specifically.

LPB - asked when they could expect a revised schedule.

USACE - noted that a revised schedule can be expected after the first of the year and that the PFEIS will be released in mid-February.

AECOM – noted that the next bimonthly cooperating agency meeting set for January 7th at 11 am; technical meeting to discuss Water Treatment Plant RFIs is set for January 14th at 1:30PM AST. Bimonthly meetings will occur every other week on Tuesdays at 11AM.