



# United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, Alaska 99501

IN REPLY REFER TO:  
(AKRO-EPC) 20180817

NOV 28 2018

Shane McCoy  
Regulatory Division  
U.S. Army Corps of Engineers  
P.O. Box 6898, 2204 3<sup>rd</sup> Street  
JBER, Alaska 99506-0898

Sent via email

Dear Mr. McCoy,

The National Park Service (NPS) appreciates the opportunity to provide review comments on Section 3.11 and 4.11 Aesthetics of the Pebble Project review Draft Environmental Impact Statement. NPS comments on these sections are as follows:

## Visual Impacts

### *General*

- The analysis should consider not only visual impacts of the projects to those flying over the project, but the visual impact to those on the ground from the increase in overflights that construction and operations will bring. In particular, consideration of concentrated overflights visible in the area of Pt. Alsworth, Lake Iliamna, and the mine site should be analyzed.
- If viewed from higher elevations near the west end, the north road may be visible from Lake Clark National Park and Preserve (NPP), three miles away. The road and the traffic movement would be visible though impacts would be relatively minor.

### *Night Skies*

- NPS Management Policies §4.10 requires that "The [National Park] Service will preserve, to the greatest extent possible, the natural lightscapes of parks, which are natural resources and values that exist in the absence of human-caused light." Proactive lighting design can minimize the environmental impacts of skyglow and preserve the ability of recreationists to experience the night sky at a regional scale (in excess of 100 miles.) To better understand impacts to Lake Clark and/or Katmai we request additional information about the proposed design of facility lighting at the Mine Site, the North Ferry Terminal, Eagle Bay Ferry Terminal, Diamond Point Port, and Amakdedori Port. For our own facilities, the National Park Service implements minimal impact lighting techniques, which include

important considerations about where, when, and how much light to utilize for a specific task: <https://www.nps.gov/subjects/nightskies/practices.htm>

- Night sky quality is an identified aesthetic value of Lake Clark National Park in formal planning documents such as the Visitor Experience section of the Long Range Interpretive Plan. The NPS' Night Skies program's darkest skies readings anywhere in the nation are within the area addressed by this analysis. The NPS recommends ambient light pollution from the mine site and transportation corridor be analyzed for all alternatives, including consideration of winter reflectivity on snow. The analyses should extend beyond direct sight of lights or halo, making Key Observation Points alone an insufficient tool to analyze impact to night sky.
- Night skies should be addressed in the cumulative impacts analysis.

### Soundscapes

- The analysis should consider aviation overflight impacts to soundscapes in addition to impacts from the mine and ground based transportation corridor. The analysis should identify aviation transportation corridors between Anchorage and employment and operational destinations. In addition, the analysis should consider flight paths between local airports (Iliamna, Port Alsworth) and destination points for employee transport, freight, and operational field needs. This should address types of aircraft and numbers of flights expected. This will be particularly important to the aesthetic soundscape in Wilderness and over Lake Clark National Park and Preserve immediately underneath the flyway. As with Visual Impacts, consideration of concentrated overflights visible in the area of Pt. Alsworth, Lake Iliamna, and the mine site should be analyzed.
- The draft analysis states that the transportation corridor could *"result in impacts to soundscape that extend to up to 0.5 miles from the road corridor, as measured by the potential for a 45 dBA Lmax value."* However, §4.19 states that this prediction assumes a speed limit of 25 mph. Does such a speed limit also apply to all other vehicles operating on the road - such as light vehicles (work trucks), or maintenance vehicles such as snowplows? If not, this section likely underestimates noise impacts from road vehicles traveling along access roads.
- The NPS is required by policy to use the natural ambient level - *"the environment of sound that exists in the absence of human-caused noise"* - as the baseline from which to measure noise impacts. Because Alternative 2 passes within 3.1 miles of the boundary of Lake Clark National Preserve, we seek additional information that may be used to determine the potential audibility of the road corridor. Please provide information on the distance beyond which Lmax would drop below the natural ambient level.

Thank you again for the opportunity to review these sections. If you have any questions or need additional detail regarding any of our comments, please contact Joan Kluwe, Environmental Protection Specialist, at [joan\\_kluwe@nps.gov](mailto:joan_kluwe@nps.gov) or 907-644-3535.

Sincerely,

A handwritten signature in blue ink that reads "Brooke Merrell". The signature is written in a cursive, flowing style.

Brooke Merrell  
Team Lead, Environmental Planning and Compliance Alaska Region