

**Proposed Pebble Project
Preliminary Draft Environmental Impact Statement
Review Comments**

Reviewer: NARF Technical Team
Date: December 21, 2018
Chapter: Chapter 4: Environmental Consequences
Section: Section 4.17 Surface Water Hydrology
Document: Sec4.17_Hydrogeology_FINAL

Comments

Section 4.17.2 Action Alternative 1 – Applicant’s Proposed Alternative. 4.17.2.1 Mine Site.

Pit Dewatering. Based on this description, a water treatment plant would be required in perpetuity to prevent contaminated pit lake water from entering the surrounding groundwater and surface water. How realistic is this? Is this provided for in post-closure plans and financial assurances? What is the design life of the extraction wells and water treatment plant, and what will be the consequences if and when the extraction wells and water treatment plant are no longer functional? This does not appear to be a stable post-closure approach to protecting surrounding groundwater and surface water quality over the long term.

Potable Well Supply. Rather than focusing entirely on mine site potable water needs, please describe whether the cone of depression and additional groundwater extraction by the mine will impact groundwater or surface water available to surrounding communities to meet their potable water needs and other existing water rights and uses.

Section 4.17.6 Cumulative Effects. Unlike other cumulative effects sections in this preliminary draft environmental impact statement, this section does not discuss the cumulative impacts of the proposed project in conjunction with other reasonably foreseeable future actions. This section only discusses cumulative effects related to other existing uses of groundwater. Please discuss the potential cumulative impacts on groundwater should the additional mining projects come to pass.