

Nondalton Tribal Council Comments – Pebble Project Preliminary Draft EIS Section 4.17 - Groundwater Hydrology

Agency	Comment Number	Section, Paragraph, and Page #	Relevant Text/Subject	Comment	Response
Nondalton Tribal Council	1	Section 4.17.2, 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.	As described in DEIS Chapter 2 (Alternatives), closure of the project would be conducted in accordance with the Alaska Reclamation Act (Alaska Statute 27.19) under the jurisdiction of ADNR and ADEC. A detailed closure cost model required by the State would be developed following ADNR guidance as part of Reclamation and Closure Plan to address all costs required for funding of post-closure monitoring and water treatment. The estimate would include the costs of capital and sustaining capital; operating costs for water treatment, monitoring, and other ongoing activities over the long-term post-closure period; identification of the design life of the water treatment plant facilities and provisions for their periodic replacement; indirect costs and contingencies; and bonding requirements. Reclamation and Closure Plan approval and associated financial assurance mechanisms would be in place prior to commencing project construction; and the plan, cost model, and financial obligations would be updated on a 5-year cycle in accordance with State regulatory requirements to address any changes in post-closure requirements and costs. Long-term pumping and water treatment is a common closure design established for other open pit mines in Alaska and worldwide; would effectively prevent contaminated pit lake water from flowing away from the site; and would be paid for through State-required financial instruments established in the Reclamation and Closure Plan.
Nondalton Tribal Council	2	Section 4.17.2, 4.17.2.2	Pebble 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.	Text has been added to this section of the DEIS describing that no effects are expected on community water supplies.

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Nondalton Tribal Council	3	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.	Text has been added to this section of the DEIS describing the cumulative effects of RFFAs, including an expanded Pebble mine buildout and other neighboring mine projects.