

**State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 4.18 – Water and Sediment Quality**

<b>Agency</b>	<b>Comment No.</b>	<b>Section, Paragraph, and Page #</b>	<b>Cooperating Agency Comment (and Purpose of Comment)</b>	<b>Proposed Resolution (Additions or Deletion of Text)</b>	<b>Response</b>
ADF&G (habitat)	Excel line 76	Section 4.18.2.3, Page 4.18-16	Section only addresses impacts on surface water from the Amakdedori Port and not the ports on Iliamna Lake.	EIS should describe impacts on surface water quality from the Iliamna Lake ports.	Surface water quality impacts from ferry and terminal operations are discussed in Section 4.18.2.2.
ADF&G (habitat)	Excel line 77	Section 4.18.2.4, Page 4.18-18	Surface water quality at pipeline stream crossings is expected to be within water quality standards for turbidity during construction.	EIS should describe how they will maintain within water quality standards for turbidity during pipeline trenching operations through streams as well as monitoring and mitigation plans.	Text clarified on potential stream impacts. Mitigation is addressed in Chapter 5.
ADF&G (habitat)	Excel line 78	Section 4.18.2.4, Page 4.18-18	Chapter does not address likely erosion and resultant stream sedimentation from trenching through thaw unstable ice-rich slopes.	Project should identify all areas of permafrost along the proposed natural gas pipeline in the EIS particularly any thaw unstable slopes that will need to be trenched. This is necessary due to likelihood of erosion and subsequent stream sedimentation once permafrost is trenched. Mitigation measures should also be identified to monitor and stabilize these post-construction.	As described in Section 3.14 and 3.15, permafrost has not been identified anywhere within the footprint of any proposed project alternative. Although the area is mapped as intermittent permafrost, no permafrost areas have been reported during baseline studies.
ADF&G (habitat)	Excel line 79	Section 4.18.2.4, Page 4.18-18	Chapter does not address erosion and subsequent stream sedimentation from overland flows intercepting the pipeline ditch.	Chapter should address erosion from surface waters intercepting the pipeline ditch and describe how the ditch will be stabilized and monitored for erosion.	Text clarified to address potential impacts from erosion after construction (during operations).
ADF&G (habitat)	Excel line 80	Section 4.18.2.4, Page 4.18-18	"Impacts on surface water quality within the natural gas pipeline corridor would be associated with installation of the pipeline at water crossings and the use of local water sources for hydrostatic testing. Impacts at material sites and stream crossings would be the same as those described above for the transportation corridor." Section only describes two sources of impacts to surface water from the proposed pipeline.	In addition to stream crossings and hydrostatic testing, EIS should describe impacts and consequences from overland flows intercepting the pipeline ditch causing erosion, sedimentation and channelization especially on thaw unstable slopes. EIS should also describe the impacts and consequences of HDD and inadequate bank protection/restoration.	Text clarified to address potential impacts from erosion during and after construction (during operations) based on PLP (2018-RFI 011).

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ADF&G (habitat)	Excel line 81	Section 4.18.2.4, Page 4.18-18	Chapter does not address impacts from turbid water from within the pipeline ditch migrating to streams and streambank and streambed restoration.	Chapter should address how waters within the pipeline ditch will be handled as well as plans for streambed and streambank restoration.	Text clarified to address potential impacts from erosion after construction (during operations).
ADF&G (habitat)		Section 4.18.2.4, Page 4.18-19	"Horizontal Directional Drilling (HDD) operations would be required only for the natural gas pipeline at the Kenai shore approach near Anchor Point."	Pipeline HDD may be a requirement of Title 16 Fish Habitat Permits for high value fish lakes and streams. Chapter should describe potential impacts of HDD on areas other than just the east side of Cook Inlet. Section 4.24.2.1 indicates that HDD will be used in Iliamna Lake as well.	Noted; text clarified to allow for application of HDD at other locations as permits require. Text expanded to address potential surface water quality impacts.
ADEC	Excel line 31	Section 4.18.2.1, Page 4.18-6	The first paragraph on this page discusses details of ADEC regulation of wastewater from hard-rock mining through various permits. It is not clear from this general discussion whether all point source discharge locations have been described. It will be important for the draft EIS to evaluate the potential impacts from those discharges over appropriate spatial and temporal scales. Please provide details on all point source discharge locations or cite to where the information can be found.	Please also add the following text regarding the department's regulatory authority: The DEC administers the Alaska Pollutant Discharge Elimination System (APDES) Program, in compliance with the Clean Water Act (CWA), 33 U.S.C §1251 et seq., as amended by the Water Quality Act of 1987, P.L. 100-4, Alaska Statute (AS) 46.03, and the Alaska Administrative Code (AAC), as amended, and other applicable state laws and regulation, to authorize and set conditions on discharges of pollutants from facility to waters of the United States. To ensure protection of water quality and human health, APDES permits place limits on the types and amounts of pollutants that can be discharged from a facility and outlines best management practices to which a facility must adhere.	Text has been added to better define ADEC authorities over the APDES program.