



U.S. Environmental Protection Agency

Chuitna Coal Project Supplemental Environmental Impact Statement

Scoping Responsiveness Summary

October 2006

**Scoping Responsiveness Summary
for the
Chuitna Coal Project
Supplemental Environmental Impact Statement**

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1.0 INTRODUCTION

Two primary principles of the National Environmental Policy Act (NEPA) are full disclosure of potential environmental effects and open public participation throughout the decision-making process. The U.S. Environmental Protection Agency (EPA) is preparing a Supplemental Environmental Impact Statement (SEIS) for the proposed Chuitna Coal Project (Project), located in the Beluga Coal Field of Southcentral Alaska. EPA is the lead federal agency for the SEIS; the U.S. Army Corps of Engineers and the Alaska Department of Natural Resources are participating as cooperating agencies for the SEIS. This Scoping Responsiveness Summary provides an overview of the public scoping process, a summary of the scoping comments and the issues and concerns identified during the scoping process, and describes how the scoping comments will be addressed in the SEIS.

Proposed Project

PacRim Coal, LP (PRC), the Project applicant, is proposing a surface coal mining and export development project located approximately 45 miles west of Anchorage. PRC's proposed Chuitna Coal Project includes three major components:

1. The Chuitna Coal Mine, which includes a surface coal mine and associated support facilities;
2. The Chuitna Project Infrastructure, which includes mine access for delivery of materials and personnel, coal transport system, electric transmission line, personnel housing, and air strip facility;
3. The Ladd Landing Development, which includes a logistics center and coal export facility for loading ocean-going coal transport ships.

The original project, proposed in the early 1990s, was evaluated in an EIS, but the project was not developed. The current proposed Project represents substantial changes from the previous proposal; therefore, EPA determined that an SEIS is necessary to evaluate potential impacts associated with development of PRC's proposed Project.

2.0 PURPOSE OF SCOPING

Scoping is the process of actively soliciting input from the public and other interested federal, state, tribal, and local agencies. Information gained during scoping assists EPA in identifying potential environmental issues, alternatives, and mitigation measures associated with development of the proposed Project. The process provides a mechanism for determining the scope and the significant issues (40 CFR 1501.7 and 40 CFR 1508.25) so that the SEIS can focus the analyses on areas of interest and concern. Therefore, public participation during the scoping period is a vital component to preparing a comprehensive and sound NEPA document. Scoping provides the public, tribes, and agencies opportunities for meaningful public involvement in the decision-making process.

EPA's scoping goals for the Chuitna Coal Project SEIS include:

- Provide information about the proposed Project, and
- Provide an opportunity for the public to identify issues and concerns regarding the proposed Project and potential alternatives.

2.1 Scoping Process

The scoping process is designed to assist EPA in identifying areas and issues of concern and to ensure that all relevant issues are fully addressed during the SEIS process. The main objectives of the scoping process are to:

- Provide federal and state agencies, Tribal governments, local governments, private companies, organizations, and individuals with a basic understanding of the proposed Project;
- Explain where to find additional Project information;
- Provide an opportunity for the public to ask questions, raise concerns, identify specific issues, and recommend alternatives; and
- Ensure that substantive concerns are incorporated in the SEIS review process.

EPA prepared and distributed a Draft Scoping Document as a guide for the scoping process in June 2006 (see Appendix A). The document included the following information:

- Description of PRC's Proposed Project
- Project Permitting Requirements
- Agency and Government-to-Government Involvement
- Scoping Process
- Scoping Meetings and Schedule
- Where and How to Comment
- Schedule Following the Scoping Period
- Preliminary Issues of Concern

2.2 Consultation and Coordination with Federal, State, and Local Governments

Specific regulations require EPA to coordinate and consult with federal, state, and local agencies about the potential of the proposed Project and alternatives to affect sensitive resources. The coordination and

consultation must occur in a timely manner and are required before any final decisions are made. Issues related to agency consultation may include biological resources, cultural resources, socioeconomic, land and water management, and subsistence. Biological resource consultations apply to the potential for activities to disturb sensitive species or habitats. Cultural resource consultations apply to the potential for impacts to important cultural or archaeological sites.

2.3 Tribal Government-to-Government Consultation

Under Executive Order 13084, EPA is required to establish regular and meaningful consultation and collaboration with Native American or Alaska Native tribal governments on development of regulatory policies and issuance of permits that could significantly or uniquely affect their communities. EPA has developed a Draft Government-to-Government Consultation Plan (Plan) for the Chuitna Coal Project based on EPA Region 10's Tribal Consultation Procedures. The Plan has been shared with the 10 potentially affected tribal governments for their review and input. A copy of the Plan and EPA Region 10's Tribal Consultation Procedures are provided in Appendix B. **Table 2-1** summarizes the tribal consultation activities through July 2006 for the Chuitna Coal Project.

Table 2-1 EPA Tribal Consultation*

Consultation Activity	Date
Native Village of Tyonek requested EPA to initiate government-to-government consultation regarding the Chuitna Coal Project. The request also included training on National Pollutant Discharge Elimination System permitting, surface coal mining operations, and the NEPA process.	February 14, 2006
EPA responded to the Native Village of Tyonek and arranged a meeting with the Tribal Council on April 7, 2006.	March 7, 2006
EPA sent letters to nine other potentially affected Tribes in the Cook Inlet area inviting them to initiate consultation for the Chuitna Coal Project: Chickaloon Native Village Native Village of Eklutna Kenaitze Tribe Salamatof Tribal Council Knik Tribe Ninilchik Village Native Village of Nanwalek Seldovia Native Village Native Village of Port Graham	March 22, 2006
EPA and representatives from the Alaska Department of Natural Resources, U.S. Army Corps of Engineers, the National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and PRC met with the Tyonek Tribal Council members to discuss the Project and answer questions.	April 7, 2006
EPA sent all 10 tribes a copy of the Draft Scoping Document (via email). The cover letter announced the start of scoping and invited the Tribes to separate meetings with the agencies on July 10 in Kenai and/or July 11 in Anchorage.	June 6, 2006
EPA sent hard copies of the Draft Scoping Document to all 10 Tribes.	June 8, 2006
EPA met with a Kenaitze Tribe representative.	July 10, 2006
EPA held a meeting with the Native Village of Tyonek President and Tribal Council.	July 12, 2006

*Through July 2006.

Appendix C summarizes the comments and input EPA received during meetings with tribal governments and representatives to-date. EPA will continue to meet and consult with the Cook Inlet area tribes throughout the duration of the SEIS evaluation and Project permitting process.

3.0 SCOPING RESPONSIVENESS SUMMARY

3.1 Purpose of Scoping Responsiveness Summary

The purpose of the scoping responsiveness summary is to provide a summary of the Project's scoping process. The document is a means of communicating to the public a summary of the issues and concerns EPA received during the public scoping period and describes how the scoping comments will be addressed in the SEIS.

3.2 Document Organization

The Scoping Responsiveness Summary is organized as follows:

Summary of Scoping Meetings and Comments

A summary of the scoping meetings and public comments EPA received during the scoping period.

Identification of Issues

Summary of key issues identified during the scoping process.

Alternatives to be Considered

Project or project component alternatives to be considered in the SEIS evaluation.

Activities Following Scoping

The key milestones in the SEIS schedule and future opportunities for public participation in the process.

Information Sources

Where to access additional information about the Project and the SEIS process.

4.0 SUMMARY OF SCOPING MEETINGS AND COMMENTS

4.1 Notification

The initial step in the NEPA process is to notify the public, other government agencies, and tribes of the lead agency's intent to prepare an SEIS by publishing the Notice of Intent (NOI) in the Federal Register. The NOI for the Chuitna Coal Project was published in the Federal Register on June 9, 2006, and included a project description, information about the scoping meetings, and EPA contact information. The 45-day public scoping comment period, which was originally scheduled to close on July 24, was extended by EPA for

15 additional days to August 8, 2006. The extension allowed additional time for the public and agencies to submit comments.

The following public notices were published or distributed during the public scoping period:

Newspaper Notices

Scoping Meetings Reminder

- Anchorage Daily News – July 9, 2006
- Peninsula Clarion – July 10, 2006
- Frontiersman – July 9, 2006
- Homer News – July 6, 2006
- Homer Tribune – July 5, 2006

Scoping Extension Notice

- Anchorage Daily News – July 27, 2006
- Peninsula Clarion – July 26, 2006
- Frontiersman – July 28, 2006
- Homer News – July 27, 2006
- Homer Tribune – July 24, 2006

Posters (mailed and/or faxed)

- Tyonek
- Beluga
- Chuitna Coal Project
- Kenai, Sodatna, and Anchorage (Loussac) libraries

Online Announcements

- What's Up weekly email/website list
- Alaska Public Radio Network
- HomerNews.com
- Anchorage Daily News
- KBBI Community Calendar
- Peninsula Clarion

Public Service Announcements

- KNBA
- APRN (Alaska Public Radio Network)
- KBBI
- Pickle Hill Public Broadcasting
- KRUA

4.2 Scoping Meetings

Public scoping meetings offer an opportunity for public involvement during the scoping period. The meetings are designed to promote information exchange about the proposed Project and to gather public input. EPA hosted four public scoping meetings: Kenai/Soldotna, Anchorage, Beluga, and Tyonek. The dates, locations, and number of attendees at the scoping meetings are provided in **Table 4-1**.

Table 4-1 Public Scoping Meetings

Meeting Location	Meeting Date	Number of Attendees that Signed In
Kenai/Soldotna	July 10, 2006	33
Anchorage	July 11, 2006	33
Beluga	July 12, 2006	13
Tyonek	July 12, 2006	13

The scoping meetings were conducted in a variety of formats to ensure meeting attendees were well informed about the Project, and a variety of avenues were available for public input. An informal open house was held prior to an EPA project presentation. Meeting attendees were provided Project information and given the opportunity to ask agencies, the Project applicant, and SEIS contractor representatives questions about the Project. Posters illustrating project facilities and descriptions of the NEPA process aided in the information exchange with meeting attendees. Following the informal open house, EPA presented an overview of PRC's proposed Project to the public, and the cooperating agencies described their roles and authority associated with the Project. This was followed by a question and answer session. The question and answer session allowed meeting attendees the opportunity to ask specific questions to gain information and clarification about the proposed Project. Following the question and answer session, formal comments from the public were recorded by a court reporter for the official project record.

In addition to verbal comments received during the scoping meetings, attendees were given the option to submit their comments in writing. Comment forms were available for the public to complete and submit to EPA at the meeting, or for mailing/faxing to EPA at a later date.

4.3 Summary of Scoping Comments

EPA received a total of 435 comment submittals (e.g., letter or comment form, email, meeting transcript) containing 1,911 individual comments during the public scoping period. Of the 435 total submittals, approximately 370 were "action alert" letters, representing 1,492 comments, or approximately 78 percent of all of the comments received during scoping. Similar to the submittal of a form letter, which is characterized as multiple submittals from individuals with identical text, the "action alert" letter consisted of similar text, but included additional distinct and individual comments. The "action alert" letters were treated as individual submittals to ensure that all new and unique comments were captured in the database. No form letters were submitted to EPA during the scoping period.

Most of the comments EPA received were from individuals (1,554 comments, or 81 percent). Nongovernmental organizations submitted the next largest number of comments, 132 comments or

7 percent, followed by 111 comments from tribal groups, representing approximately 6 percent of the total comments. Approximately 41 percent of the comments submitted originated from Alaska residents; approximately 35 percent were from non-Alaska residents. The high percentage of the non-Alaska resident submittals is related to the high volume of “action alert” letters. The following list illustrates the number of comments by type of commenter group.

Table 4-2 Summary of Scoping Commenters

Commenter Group	Number of Comments
Private Individual	1,554
Nongovernmental Organization	132
Tribal Group	111
State Agency	43
Business	35
Federal Agency	19
Landowner	17
Total Comments	1,911

Following the close of the public scoping period, comments were compiled and analyzed to identify issues and concerns. Each comment was identified, reviewed, and entered into an electronic database. As comments were entered, contact information for the commenter was added to the mailing list to ensure that all interested parties receive information throughout the SEIS process.

Once the individual comments were compiled in the database, reports were generated categorizing the issues by topic (e.g., NEPA process, alternatives, cumulative impacts, etc.) and/or resource (e.g., marine mammals, socioeconomics, air quality, etc.). The summary reports were reviewed to identify data entry errors and eliminate duplication. A comprehensive list of the scoping comments was sorted by topic and is presented in Table D-1 in Appendix D. Additionally, the table provides information about where in the SEIS the comment will be addressed. A Draft SEIS outline is included in Appendix E.

Some of the scoping comments were eliminated from consideration in the SEIS because they addressed issues that were outside of the scope of detailed analyses (e.g., the proposed Project’s contribution to global warming); the comment stated an opinion (e.g., I oppose this project); or the comment was not considered to fall under EPA’s NEPA authority (e.g., EPA should take action to reduce the country’s need for electricity; the government should provide loan incentives to power plants to remove pollutants). Scoping comments that will not be considered in the SEIS are identified in Table D-2 in Appendix D.

5.0 IDENTIFICATION OF ISSUES

Information gained during scoping assists EPA in identifying the potential environmental issues, alternatives, and mitigation measures associated with development of PRC’s proposed Project. As previously discussed, the process provides a mechanism for narrowing the scope of issues so that the SEIS can focus the analysis on areas of high interest and concern. The following discussion presents a summary of the key issues identified during scoping by topic and/or resource category.

Comments on the NEPA Process

NEPA and the Permitting Process

- SEIS should be thorough by addressing all of the direct, indirect, and cumulative impacts; alternatives; and mitigation measures as required by NEPA and other regulatory requirements.
- Concern was expressed about the adequacy of the public scoping notification, written responses to scoping questions, and extension of the scoping period to avoid conflicts with the fishing season.

Project Description

- The project description should provide additional detail such as: sources of construction gravel and description of the tank farm, stormwater and wastewater systems, and sedimentation ponds.
- The SEIS should provide more detail on restoration and reclamation of mine infrastructure.
- The SEIS should disclose potential buyers of the coal and confirm the validity of the buyers.

Cumulative Impacts

- The cumulative impact study area should expand beyond the 50-mile radius of the proposed mine site.
- The cumulative impact evaluation should consider potential local uses for the Chuitna coal (e.g., Pebble mine project, Agrium project).
- Cumulative impacts should consider other industries in the area such as the oil industry.
- The entire Cook Inlet air and watershed should be part of the cumulative impact analysis.
- Future development of LMU_2 and 3 should be considered in the cumulative impact analysis.
- Port of Anchorage expansion and new highway should be part of the cumulative impact analysis.

Mitigation

- The SEIS should address the testing and monitoring of streams, wildlife, and fish for toxic mine runoff.
- The SEIS should address the mitigation to reduce the effects of coal dust to the environment.
- Construction should avoid migration, peak salmon runs, and commercial fishing days.

-
- The SEIS should address the mitigation to reduce impacts to streams and wildlife associated with the conveyor system.

Issues Related to Resources

Air Quality

- Impacts to air quality as a result of using Chuitna coal as a source for energy.
- Impacts to the environment and human health from coal dust.
- Project impacts to Alaskan climate.
- Cumulative air quality impacts from other projects in the area should Chuitna coal be used as a source for energy.

EPA received numerous comments about air quality issues related to coal combustion and the potential increase in carbon dioxide (CO₂) emissions. The SEIS will evaluate the potential direct, indirect, and cumulative impacts of regulated pollutants to air quality from emissions associated with on-site mining, coal-hauling equipment, and other project facilities. In addition, the contribution to atmospheric emissions related to burning coal produced by the proposed Chuitna coal mine will be evaluated in the cumulative impact assessment. The cumulative analysis will address the sources of greenhouse gases, the contribution of CO₂ emissions to those gases, and the amount of CO₂ that would be produced from the burning of Chuitna coal. The analysis will be presented in the context of national and international coal consumption.

Environmental Justice

- No comments.

Freshwater Aquatic Ecology

- Impacts associated with reduced surface water and groundwater flows to salmon and other fish species.
- Effects to surface water quality from coal dust.
- Impacts to salmon fry and other fish species' breeding areas in freshwater streams.
- Wastewater and stormwater runoff effects to streams and the impact to aquatic species.
- Contamination of PCBs, PCHs, and mercury to salmon and other freshwater aquatic resources.
- Impacts to benthic macroinvertebrates from mine dewatering and changes in water chemistry.

Geology and Physiography

- Erosion impacts to shoreline from construction of the dock facility and increased ship traffic.
- Potential impacts to coal loading and shipping from earthquakes and other seismic activity.
- Irreversible impacts to topography.

Groundwater

- Potential impacts to residents' deep water wells from water withdrawal for mine activities.
- Potential contamination of deep water wells from uranium and coal leaching.

Hazardous Materials and Wastes

- Impacts from spills of fuels, lubricants, and coal during transport between the mine and the loading dock facility.
- Potential coal and fuel spills from barge vessels.
- Impacts to Cook Inlet from untreated wastewater spills and runoff.

Land Use, Access, and Recreation

- Impacts to recreational activities such as fishing and hunting.
- Impacts to local transportation and existing road systems.
- Effects to local beach access used for recreation and the commercial fishing industry.

Marine and Commercial Fisheries

- Impacts to marine fish and the commercial fishing industry from construction of the dock facility resulting in potential alteration of fish migration paths.
- Impacts to marine fish and commercial fishing from potential contamination of fish from mercury, trace-minerals, and other toxic mine wastes.
- Impacts to shore fisheries leases from Project development.

Marine Mammals

- Impacts to the beluga whale including altered migration as a result of construction noise, and increased ship traffic.
- Project impacts to seal pupping and haulout areas at the mouths of the Chuitna, Threemile, and Beluga rivers.

Noise

- Noise impacts to recreational areas and nearby National Park Service lands.
- Noise impacts to residents from mine operations and helicopter flyovers.
- Noise impacts to songbird and raptor reproduction.
 - Noise impacts to sand cranes from Project construction.

Oceanography

- Coal dust effects to marine waters.
- Water chemistry changes (salinity, temperature) to Cook Inlet waters from Project construction and operation.
- Potential for coastline erosion at Threemile Beach.

Socioeconomics

- Beneficial impacts to the Alaskan and area economy by providing jobs and generating income for local businesses.
- Project-related impacts to local hunting and fishing businesses and tourism.
- Effects from the increased population of transient mine workers.
- Impacts to costs of fuel, goods and services, and public infrastructure.

Soils and Reclamation

- Concerns about the introduction of non-native plants during reclamation.
- Project impacts to soil permeability and the resulting effects to wetlands.

Subsistence and Traditional Ecological Knowledge

- Project-related impacts to fish, wildlife, and plants harvested for subsistence.
- Impeded access to hunting areas as a result of Project development.
- Concern about the potential of increased poaching.
- Project-related changes to migration or displacement of small, furbearing mammals affecting subsistence trapping.
- Project impacts to migratory bird hunting, moose, wolves, and Ptarmigan and grouse hunting subsistence areas.

Surface Water

- Project-related impacts to water quality in the Chuitna River and its tributaries.
- Impacts from mine operations to area spring-fed lakes.
- Stormwater runoff and wastewater contamination to area freshwater streams.
- Impacts to hydrologic function of streams and integrity of floodplains from stream crossing structures.
- Effects of coal dust on surface water quality.

Vegetation

- Coal dust effects to wild and cultivated vegetation.
- Introduction of noxious weeds during restoration.

Visual Resources

- Impacts to visual resources along the coastline and upland areas used by recreationists, residents, and aircraft passengers.

Wetlands

- Potential impacts to wetland and waterfowl/migratory bird habitat from discharges of mine operations water.

-
- Impacts to wetlands from lower groundwater flows.

Wildlife

- Project effects on wildlife movement and habitat fragmentation from construction of the coal conveyor and road.
- Impacts to wildlife from direct and indirect loss of habitat related to development of the mine and other project facilities.
- Impacts to wildlife from increased road traffic.
- Potential impacts to migratory bird resulting from bird collision with the proposed project trestle.
- Impacts to bears should fish supplies decrease from Project development.
- Impacts to wildlife populations in the area from increased human presence.

6.0 ALTERNATIVES IDENTIFIED

One of the objectives of scoping is to identify alternatives or options to the applicant's proposed Project for evaluation in the SEIS. The first step is to identify potential alternatives, then to screen out alternatives or options that do not meet the project's purpose and need. Potential alternatives are then narrowed down to options that are "feasible" and "reasonable" based on technical, economic, and environmental factors. EPA also will consider component options presented by the Project applicant or the public. Alternatives or options that were eliminated from detailed evaluation will be discussed in the SEIS including reasons for elimination.

EPA will review alternatives identified during the scoping period. Below is a summary of key public comments associated with alternatives to PRC's proposed Project.

- Alternative power line route along the access road from Beluga to Ladd Landing.
- Alternatives to the location of the dock facility (Tyonek, Granite Point) and bulkhead and dock design.
- Alternative locations to the worker's camp, road, and conveyor system to avoid impacts to wetlands.
- Alternative conveyor system design.
- Alternatives to reduce the Project's "footprint" to avoid or reduce impacts to wildlife and fish habitat.

These comments and issues were used to develop an array of potential alternatives for consideration by the Agencies. Through multiple interagency meetings and discussions, the array of potential alternatives was refined to those shown on **Table 6-1**, in addition to the No Action Alternative. For the alternatives discussion

in the SEIS and as depicted in this table, the proposed project was separated into individual components or activities for which individual options were identified. **Table 6-1** presents columns showing two complete alternative scenarios: 1) PRC's Proposed Action in relation to this array of components, and 2) the 1990 EIS Proposed Action (Southern Port and Corridor) in relation to these same components. It should be noted that PRC's current Proposed Action generally reflects the Preferred Alternative identified in the 1990 EIS. Where additional options were identified for these individual components, they are shown in additional columns without representing full project alternative scenarios. The right-hand columns present options for some of these individual components that were considered by the Agencies to be impractical or not environmentally advantageous, and which will, thus, be dropped from detailed analysis in the SEIS. Numerous additional project activities or minor components associated with the proposed project were considered for which no specific alternatives were identified, but for which permit stipulations or mitigation measures may be required following analysis in the SEIS process.

Table 6-1. Preliminary Alternatives for Chulitna Coal Project

Project Component/Activity	Alternatives to be Considered in Detail				Alternatives Considered but Eliminated from Detailed Analysis (CBE)	
	PRC Proposed Action for the SEIS	Alternative A - 1990 EIS Proposed Action (Southern Port & Corridor)	Alternative B - Individual Components	Alternative C - Individual Components	Alternative D - Individual Components	
Mine Alternatives						
Mine Dewatering Disposition	Infiltration basins Consider in SEIS	Treatment & discharge Consider in SEIS	Reinjection wells Consider in SEIS			Discharge to surface streams CBE - Greater environmental impacts.
Surface Water Controls Disposition	Direct discharge Consider in SEIS	Direct discharge Consider in SEIS	Infiltration Consider in SEIS			
Mining Methods Disposition	Shovel/drapline combination Maintain - achieves max recovery	Shovel/drapline combination Maintain - achieves max recovery				Truck and shovel only CBE - would reduce coal type of mine situation.
Wastewater Handling at Mine Disposition	Treatment & discharge Consider in SEIS	Treatment & discharge Consider in SEIS	Partial or full reuse at mine Consider in SEIS			
Port Corridor, Housing Area, Airstrip Package Alternatives						
New versus existing port facility	Develop new port facility for loading ocean-going vessels Consider in SEIS	Develop new port facility for loading ocean-going vessels Consider in SEIS				Use existing Point MacKenzie facility CBE - would still need major and ferry or bridge, road would have to cross wildlife refuge.
Alternate Sites for New Loading Facility	Ladd	Granite Point Consider in SEIS				Tyonek/North Foreland CBE - Tidal currents & ice conditions prevent ship berthing/loading to full project production capacity. Existing pier inadequate.
Housing Location	East of Mine Site (Northern routes) Consider in SEIS	Lone Ck Site (Southern route) Consider in SEIS	Beluga Consider in SEIS			Three-mile Site (1990) CBE - isolated location, doesn't fit with any corridor route or port site.
Wastewater Handling at Housing Area Disposition	Treatment & discharge Consider in SEIS	Treatment & discharge Consider in SEIS	Injection or reuse at mine Consider in SEIS			
Airstrip Location	On-site, consolidated w housing east of mine area Consider in SEIS	Lone Ck Site (1990) (Southern route) Consider in SEIS	Beluga and bus workers to site Consider in SEIS			Tyonek and bus workers to site CBE - not practical without major road upgrades on TNC lands; opposed by Tyonek residents.

Table 6-1. Preliminary Alternatives for Chulitna Coal Project

Project Component/Activity	Alternatives to be Considered in Detail				Alternatives Considered but Eliminated from Detailed Analysis (CBE)	
	PRC Proposed Action for the SEIS	Alternative A - 1990 EIS Proposed Action (Southern Port & Corridor)	Alternative B - Individual Components	Alternative C - Individual Components	Alternative D - Individual Components	
Other Infrastructure Alternatives						
Transport/Utility Corridor						
Coal Transport Methods Disposition	Conveyor Consider in SEIS	Conveyor Consider in SEIS	Truck Consider in SEIS	Rail Consider in SEIS		Pneumatic CBE - not practical for this application and volume of material.
Corridor Route to Port Disposition	Proposed - Modified Northern Route to Ladd Consider in SEIS	Southern Route to Granite Point Consider in SEIS	Direct Line (1990 Eastern) to Ladd Consider in SEIS	Northern (1990 Northern) to Ladd Consider in SEIS		Southern along Chulitna River to Ladd - Pan Am Road CBE - land ownership patterns create problems with limiting road access to project-related traffic.
Conveyor Design/Enclosure Options	Partial enclosure Consider in SEIS	Partial enclosure Consider in SEIS	Total enclosure Consider in SEIS	Partial enclosure/total at stream crossings & other critical habitat areas Consider in SEIS		
Conveyor Height (elevation)	Elevated segments at streams Consider in SEIS	Elevated segments at streams plus buried segments for wildlife crossings Consider in SEIS	Elevated entire length to permit wildlife passage Consider in SEIS			
Disposition	Co-located with conveyor on north segment Consider in SEIS	Existing line to oil tank farm then north along conveyor route Consider in SEIS				Separate routing with Pan Am road CBE - system would not facilitate desired reliability.
Power Line Construction	Conventional pole construction Consider in SEIS	Conventional pole construction Consider in SEIS	Buried in road Consider in SEIS, if feasible			
Disposition	Existing grid Consider in SEIS	Existing grid Consider in SEIS				Wind / Hydro / Geothermal CBE - no existing providers and not practical for the project; no proposed development of local geothermal potential; hydro not readily permitted; wind not suitable for primary power source.
Corridor/Road Width	Proposed total width = 120' Consider in SEIS	Proposed total road width = 96'; separated from conveyor Consider in SEIS	Narrower width of ca. 80' Consider in SEIS	Single lane road with turnouts (minimum width) Consider in SEIS		
Disposition	Along conveyor route Consider in SEIS	Along conveyor route Consider in SEIS	Externally located & barged to landing site Consider in SEIS			
Material Site Locations	Existing Borough landfill at Beluga Consider in SEIS	Landfill at mine site plus organic waste incinerator Consider in SEIS	Ship off-site to Anchorage or Kenai Consider in SEIS	On-site incineration Consider in SEIS		
Disposition						

Table 6-1. - PRELIMINARY ALTERNATIVES FOR CHUITNA COAL PROJECT					
Project Component/Activity	Alternatives to be Considered in Detail				Alternatives Considered but Eliminated from Detailed Analysis (CBE)
	PRC Proposed Action for the SEIS	Alternative A - 1990 EIS Proposed Action (Southern Port & Corridor)	Alternative B - Individual Components	Alternative C - Individual Components	
Logistics Site and Loading Facility Development					
Coal Storage Facility Design Options	Open	Open	Partial enclosure/Wind Shelter	Total enclosure	
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS	Consider in SEIS	
Coal Storage Capacity & Location	500,000 MT at logistics site, minimal storage at mine	1.1 million ton MT capacity at port site, 50,000 ton storage at mine	smaller capacity facility at logistics site, larger storage at mine site		
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS		
Wastewater Handling at Ladd Area	Treatment & discharge	Treatment & discharge	Injection or reuse at mine		
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS		
Bulkhead					
Bulkhead versus No Bulkhead	Construct bulkhead at Ladd beach	No bulkhead - barge landing on beach	Use existing Tyonek dock		
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS		
Bulkhead Design	Fill island with bridge to shore	Not applicable	Fill supported at shore	Partial pile-supported fill island	Pile supported at shore
Disposition	Consider in SEIS		Consider in SEIS	Consider in SEIS	GBE - Not economically feasible; inadequate work space.
Trestle					
General Design	Non-dredged facility - 10,000' (for Cape class)	Non-dredged facility - 12,500' (for Cape class)	Dredged berthing areas and shorter trestle - 5,000'		Berthing dock with transloading from barges
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS		GBE - not practical to build and require larger bulkhead to handle increased barge traffic.
Construction Design	Covered, open bottom, single conveyor	Covered, open bottom, dual conveyors	Total enclosure		
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS		
Fuel and Materials Transport and Storage Areas					
Fuel Delivery	Barge to bulkhead, truck to mine	Barge to beach, truck to mine	Barge to bulkhead, pipeline to mine	Barge to Tyonek, pipeline to mine	Pipeline across Cook Inlet
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS	Consider in SEIS	GBE - quantities required are not sufficient to justify pipeline.
Fuel Storage Areas	Ladd area (onshore)	Granite Point Port Site	Mine area		
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS		
Materials and Supplies Delivery	Barge to bulkhead	Barge to beach at Granite Point			
Disposition	Consider in SEIS	Consider in SEIS			Barge to Tyonek dock
Workforce Mobilization, Transit					
Mobilization Locations	Kenai	Kenai and Anchorage	Anchorage		
Disposition	Consider in SEIS	Consider in SEIS	Consider in SEIS		On-site living GBE - No environmental advantage identified.
Transit Methods	Air charter to local airstrip	Air charter to local airstrip			
Disposition	Consider in SEIS	Consider in SEIS			Air cushion vehicle to bulkhead GBE - not economically practicable.
Color code:	To be considered in SEIS				Considered but eliminated

Note: This page of table revised 10/20/06.

7.0 ACTIVITIES FOLLOWING SCOPING

The NEPA process provides numerous opportunities for public input. Following the scoping period, the Draft SEIS will be prepared incorporating information received from the public during the scoping period. Once the Draft SEIS is complete, EPA will publish and distribute the document for public review. During the review period, the public can comment on key issues and the adequacy of the purpose and need, alternatives analysis, and proposed mitigation presented in the Draft SEIS. Public hearings will take place to allow the public to formally present their comments. The oral comments will be recorded by a court reporter. **Table 7-1** identifies additional opportunities and the anticipated schedule for the public to provide comments and participate in the SEIS environmental review process.

Table 7-1 Opportunities for Participation in the NEPA Process

Steps in the Process	Anticipated Date
Publication of the Draft SEIS	Spring 2007
Draft SEIS Public Hearings	Spring 2007
Close of Public Review Period	Summer 2007
Publication of the Final SEIS	Fall 2007

8.0 INFORMATION SOURCES

Project documents can be viewed at the following locations:

Chuitna Coal Project website: www.ChuitnaSEIS.com

EPA

222 West 7th Avenue, Room 537, Anchorage
1200 Sixth Avenue, Seattle
or EPA's website: www.epa.gov/r10earth/water.htm

ADNR

550 West 7th Avenue, Suite 900, Anchorage

Z.J. Loussac Public Library

3600 Denali Street, Anchorage

Kenai Community Library

163 Main Street Loop, Kenai

Tyonek Tribal Office

Contact Teresa Standifer (907) 583-2111

3 Mile Creek Services, Beluga

Contact Robert Freeman (907) 583-2641

For questions, contact Ms. Hanh Shaw, EPA's Chuitna Project Manager:

U.S. Environmental Protection Agency

1200 Sixth Avenue, OWW-130

Seattle, WA 98101

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E-mail: shaw.hanh@epa.gov

APPENDIX A
EPA SCOPING DOCUMENT

Draft Scoping Document
For the Chuitna Coal Project
Supplemental Environmental Impact Statement

Chuitna Coal Project
Beluga Coal Field, Alaska

Prepared by
U.S. Environmental Protection Agency

June 2006

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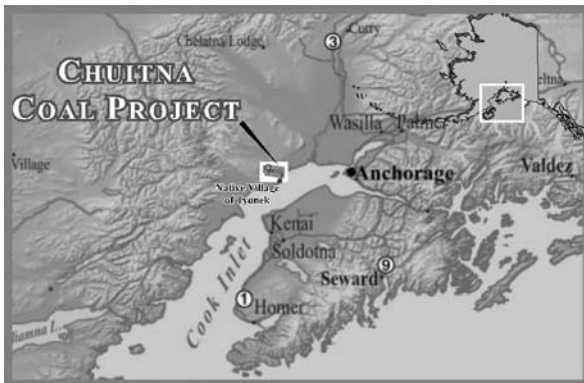
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Purpose

This scoping document has been prepared for the Chuitna Coal Project (Project) located near Beluga, Alaska. Scoping is one of the first steps in the National Environmental Policy Act (NEPA) process. Scoping serves to inform interested parties about the proposed project, issues, and alternatives, and to seek input on the project, issues, and alternatives. This input will be used in developing a Supplemental Environmental Impact Statement (SEIS) for the Project. This scoping document provides a description of the Project and Project alternatives and identifies how and by when to submit comments.

Introduction

Project Background



The Chuitna Coal Project is a surface coal mining and export development located in the Beluga Coal Field of Southcentral Alaska, approximately 45 miles west of Anchorage. The Project is based on the development of a 1 billion ton, ultra low sulfur, subbituminous coal resource, the center of which is approximately 12 miles from the coast of Cook Inlet.

The Project area is largely undeveloped except for a system of primitive roadways that remain as a result of oil and gas exploration and production, and logging activities. Landownership in the Project area consists of a combination of public (State of Alaska, Mental Health Trust & Kenai Peninsula Borough) and private entities (Tyonek Native Corporation, Cook Inlet Region, Inc. and individuals).

The proposed Project includes: a surface coal mine and associated support facilities (Chuitna Coal Mine); mine access road, coal transport conveyor, personnel housing, air strip facility (Chuitna Project Infrastructure); a logistic center, and coal export terminal (Ladd Landing Development). The coal export terminal would include a 10,000-foot trestle constructed into Cook Inlet for the purpose of loading ocean-going coal transport ships. PacRim Coal, the project proponent (Applicant), predicts a minimum 25-year mine life based on the proven reserves in one of three mining areas within the 20,571 acre coal lease area.

A previous Project design was evaluated in an Environmental Impact Statement (EIS) and permitted by most of the applicable state and federal regulatory programs in the early 1990s, but the Project did not proceed to development. There have been substantive

changes in the Project design and in the regulatory requirements since this project went through the first permitting and EIS process. Therefore, a comprehensive, stand-alone Supplemental EIS (SEIS) will be prepared for the new proposal.

Agency Involvement

On March 17, 2006, the Applicant submitted a new source NPDES permit application to EPA for discharges of treated wastewater from the mining area and associated mining-related facilities to surface waters of the United States. The permit is a new source subject to the requirements at 40 CFR Part 434, effluent limitation guidelines for the coal mining point source category. As described at 40 CFR Part 122.29 and EPA's NEPA implementing regulations at 40 CFR Part 6, a new source is subject to compliance with NEPA prior to taking a final action on the NPDES permit. The Applicant also submitted another NPDES permit application on March 3, 2006, for discharges from coal storage runoff, facility stormwater runoff, and equipment washdown wastewater from the proposed Ladd Landing Export Terminal and Logistics Center. Because the proposed Project has the potential to cause significant impacts on the environment, EPA determined that a Supplemental EIS (SEIS) would be prepared. EPA will be the lead federal agency for the SEIS process, and will issue a Record of Decision (ROD) documenting the SEIS conclusions and the NPDES permit decision at the end of the process.

On March 13, 2006, EPA entered into a Memorandum of Understanding (MOU) with the Applicant that sets out the terms of cooperation between the Applicant and EPA in the development of the SEIS. Pursuant to the MOU, EPA has selected ENSR Corporation, a third-party contractor, to assist with the preparation of the SEIS and related documents. ENSR is managed by EPA and paid for by the Applicant.

Two other agencies, the U.S. Army Corps of Engineers (Corps) and the Alaska Department of Natural Resources (ADNR), are participating closely in the SEIS process as cooperating agencies and will coordinate their permit application reviews with the SEIS process. The U.S. Fish and Wildlife Service (USFWS) is participating as a consulting agency and will provide input throughout the SEIS process. The roles and responsibilities of the above agencies (EPA, Corps, ADNR, and USFWS) are described in a MOU that was finalized on May 26, 2006. The MOU also describes the coordination between the federal NEPA process and the Alaska Surface Coal Mining Control and Reclamation Act (ASCMCRA) process for the Project. In addition to working with these agencies, EPA will coordinate with the National Marine Fisheries Service (NMFS) throughout the SEIS process as required by the Endangered Species Act (ESA).

Permitting Requirements

The proposed Project would have to obtain several permits before development could proceed. The major permits that may be required are listed below:

Federal Authorities

U.S. Environmental Protection Agency

- Clean Water Act Section 402 National Pollutant Discharge Elimination System (NPDES) permits for wastewater discharge
- NPDES permits for storm water discharges during construction and operation
- Spill Prevention, Control, and Countermeasure (SPCC) plan

U.S. Army Corps of Engineers

- Clean Water Act Section 404 permit(s)
- Rivers and Harbors Act Section 10 permit

National Marine Fisheries Service

- Incidental Take Authorization (ITA)

State Authorities

Alaska Department of Natural Resources

- Alaska Surface Coal Mining Control and Reclamation Act (ASCMCRA) permit
- Reclamation bond
- Fish habitat permit
- Water rights
- Rights of way/access
- Consistency determination with the Alaska Coastal Management Plan (ACMP)

Alaska Department of Environmental Conservation

- Clean Water Act Section 401 certificate of reasonable assurance of EPA Section 402 NPDES and Corps Section 404 permits
- Air quality permit
- Water supply and sewage treatment system approval
- Wastewater disposal permit
- Stormwater Discharge Pollution Prevention Plan
- Oil discharge prevention and contingency plan
- Landfill permit and bonding

Purpose of Scoping

Scoping is a process intended to reach out to all interested parties to assist EPA in identifying areas and issues of concern associated with the proposed Chuitna Coal Project. The process is designed to help ensure that all significant issues are fully addressed during the course of the SEIS process. The main objectives of this scoping process are to:

- Provide the federal and state agencies, Tribal governments, local governments, private companies, organizations, and individuals with a basic understanding of the proposed Chuitna Coal Project
- Explain where to find additional information about the Project
- Provide a framework for the public to ask questions, raise concerns, identify specific issues, and recommend options other than those proposed by the Applicant
- Ensure that those concerns are incorporated in the SEIS review process

To assist in reaching these objectives, this Scoping Document:

- Presents a schedule for the scoping process
- Describes the scoping open houses to be held in July 2006
- Identifies where additional information about the proposed Project can be obtained
- Describes how the public can participate in the SEIS process after scoping, and presents a tentative SEIS schedule
- Presents both a brief summary of the Applicant's Project proposal as well as more specific details for each Project component

Scoping Schedule

The scoping process formally begins when EPA publishes the Notice of Intent (NOI) to prepare a SEIS in the Federal Register on June 9, 2006. This Scoping Document was distributed for public and agency review and comment at the same time. The comment period has been extended from the required 30 days to 45 days in recognition that this period falls during the fishing season. Following a 4-week period during which interested parties can review the Scoping Document and seek additional information; EPA will conduct public SEIS scoping meetings in Kenai/Soldotna on July 10, 2006, in Anchorage on July 11, 2006, and in Tyonek and Beluga on July 12, 2006, to listen to and record comments and to answer questions. The scoping comment period will end on July 24, 2006.

EPA will review all comments, identify the issues, and distribute a final scoping document along with a scoping responsiveness summary to the public and to the State and federal agencies by August 21, 2006. The scoping responsiveness summary will

summarize comments received during the scoping period and describe how EPA intends to respond to them during the SEIS process.

Scoping Meetings

EPA will host three Chuitna Coal Project scoping meetings. The first scoping meeting will be held on July 10, 2006 in Kenai/Soldotna at the Kenai Peninsula Borough at 144 North Binkley; the second meeting will be held on July 11, 2006 in Anchorage at the Hilton Garden Inn at 100 West Tudor Road; and the third will be held in the Tyonek and Beluga communities on July 12, 2006. The agenda of the Kenai/Soldotna and Anchorage scoping meetings will be as follows:

4:00 p.m. to 6:00 p.m.	Informal Open House
6:30 p.m. to 7:30 p.m.	Project Presentation and Q&A
7:30 p.m. to 9:30 p.m.	Formal Public Testimony

Below is the schedule for the Tyonek and Beluga communities scoping meetings:

9:00 a.m. to 11:30 a.m.	Beluga Camp Cafeteria
3:30 p.m. to 6:00 p.m.	Tyonek Tribal Center

The scoping meetings will serve two important purposes. One is to listen to and record the public's comments about the proposed Project as described in the Scoping Document. The second is to respond to the public's requests for the background information that they might need to fully understand the project description and the proposed scope of the SEIS analysis before commenting. EPA and the participating State and federal agencies project staff and staff from ENSR Corporation, will be available to answer questions and explain methodologies for interested members of the public. Scoping comments from the public will be welcomed that day, or they may be submitted to EPA in writing until July 24, 2006.

Information Sources

Copies of the Scoping Document and copies of the previous EIS on CD, may be viewed at the following locations:

- EPA: 1200 Sixth Avenue, Seattle
222 West 7th Avenue, Room 537, Anchorage
- ADNR: 550 West 7th Avenue, Suite 900, Anchorage
- Z.J. Loussac Public Library, 3600 Denali Street, Anchorage
- Kenai Community Library, 163 Main Street Loop, Kenai

- Tyonek Tribal Office; Contact Teresa Standifer (907) 583-2111
- 3 Mile Creek Services, Beluga; Contact Robert Freeman (907) 583-2641

The Scoping Document and the previous EIS is also available on EPA's website at www.epa.gov/r10earth/water.htm. EPA will assist in obtaining other relevant documents and reports if requested.

How to Comment

Comments may be submitted in writing or recorded verbally at the scoping meetings, or they may be submitted to EPA in writing, by e-mail, or by fax, until the comment period deadline at the close of business on July 24, 2006. Comments should be sent to:

Ms. Hanh Shaw
 Chuitna Project Manager
 U.S. Environmental Protection Agency
 1200 Sixth Avenue, OWW-130
 Seattle, WA 98101

Phone: (206) 553-0171
 E-mail: shaw.hanh@epa.gov
 Fax: (206) 553-0165

Activities After Scoping

Following the scoping process and its identification of issues, the third party contractor, ENSR Corporation, will prepare the SEIS under EPA's direction. The various steps involved in SEIS preparation and public and agency review of the document are shown on the attached figure. The public is welcome to participate throughout the SEIS process, and there are specific points at which public input is specifically sought. These are listed below with their tentative dates, though schedule changes will likely occur.

Public participation process:

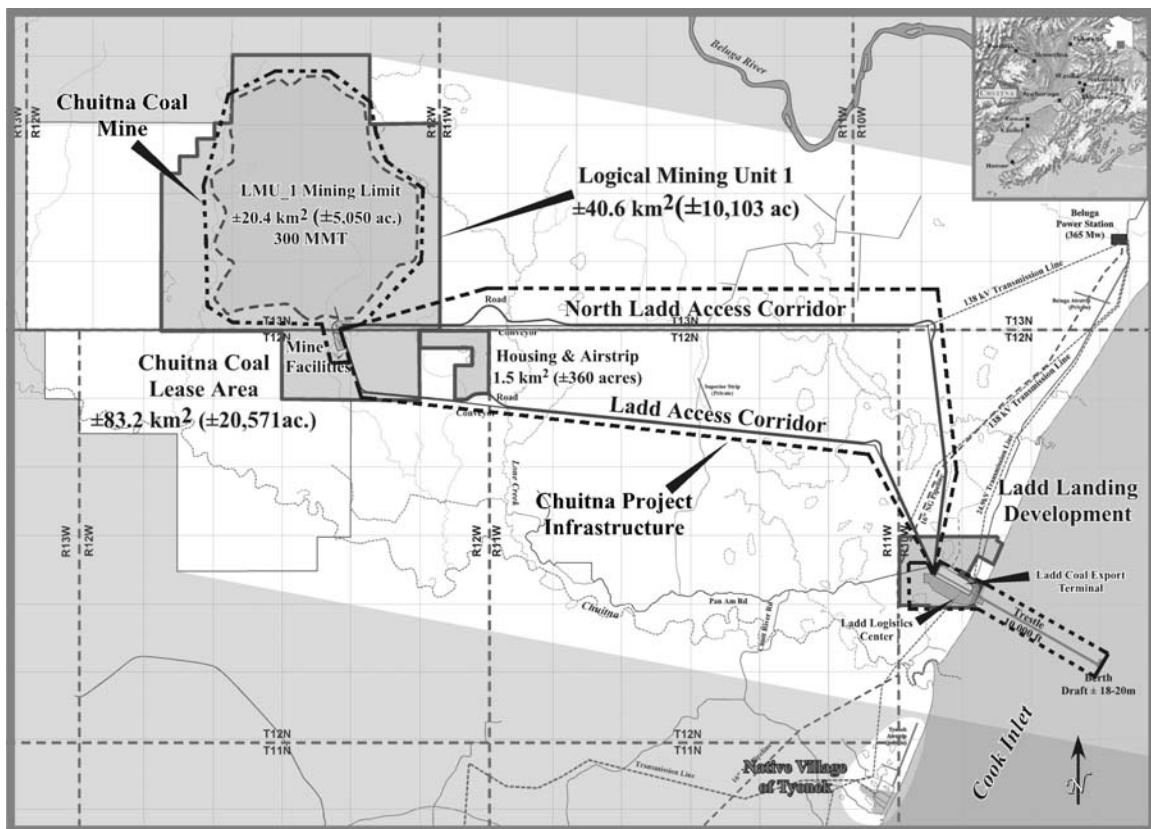
- | | |
|--|---------------|
| ▪ Distribution of Draft SEIS and draft permit decisions for public/agency review | February 2007 |
| ▪ Draft SEIS open houses and public hearings | March 2007 |
| ▪ Close of public/agency Draft SEIS review period | April 2007 |
| ▪ Distribution of Final SEIS | Summer 2007 |
| ▪ EPA ROD and other State and Federal decisions | Open |

Applicant’s Proposed Project

The Chuitna Coal Project is a “greenfield”, “run-of-mine” coal export development. The Project is “greenfield” in that no coal has been produced in the region and, except for the Beluga Power Plant owned and operated by Chugach Electric Association, there is no existing supporting infrastructure typically available elsewhere in the United States. The Project is also “run-of-mine” in that there is no processing (other than crushing to a size of 2 inches or less) of the coal.

The Chuitna Coal Project is unique in that it is the only coal development project in the United States, wherein all components of the Project (Mine, Infrastructure & Logistics Center, Export Terminal) will be permitted and bonded under the Surface Mining Control and Regulatory Act, a federal program for which the State of Alaska was authorized in 1982 under the Alaska Surface Coal Mining Control and Reclamation Act (ASCMCRA).

As shown in the following figure and described in the following paragraphs, the Chuitna Coal Project is composed of three major components: the Chuitna Coal Mine, Chuitna Project Infrastructure and Ladd Landing Development.



Chuitna Coal Mine

The Chuitna Coal Mine, cornerstone of the Chuitna Coal Project, is based on a +1 billion metric ton (MT) ultra low sulfur subbituminous coal reserve located within the 83.2km² (20,571 acre) Chuitna Coal Lease Area. The first area to be mined, located within the logical mining unit no. 1 (LMU_1), would yield approximately 300 million MT of coal. The design installed production capacity for the LMU_1 is 12 million MT per year for an estimated mine production life of 25 years. The SEIS will evaluate the potential environmental impacts associated with LMU_1. Other mining areas within the Chuitna Coal Lease Area may be developed at some point in time.

The sizes and locations of the coal seams, the nature of the overburden and interburden, and the economics involved in mining the coal are such that only surface mining would be feasible. The coal is contained in five major seams, each varying in thickness between 1.8 and 6.1 m (6-20 ft), with the first seam located approximately 20 feet below ground surface.

The Chuitna Coal Mine consists of two subcomponents: Mine Facilities and the LMU_1 Mine Plan Area.

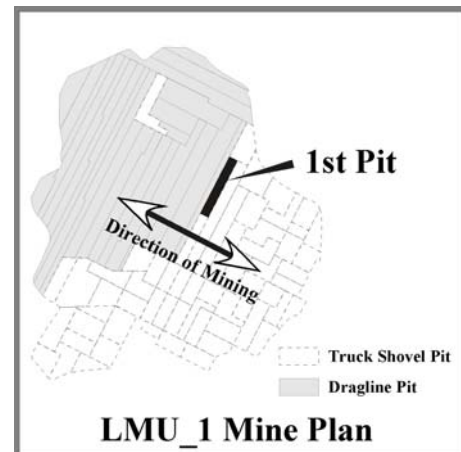
The Mine Facilities would consist of:

- ◆ Shop/Office/Warehouse Facility
- ◆ Fuel Storage Facility and Fueling Station
- ◆ Electrical Substation
- ◆ Ready Line
- ◆ 30,000 Ton Covered Surge Bin and Enclosed Coal Crusher
- ◆ Truck Dump with Stilling Shed and Coal Crusher
- ◆ Roads and Power Distribution
- ◆ Coal Transport Conveyor, Mine Access Road & Power Transmission are part of the Project Infrastructure component (see below)

LMU_1 Mine Plan Area:

As shown in the adjacent figure, mining would begin in approximately the middle of the 20.4 km² (5,050 acre) LMU_1 mine plan area. Initial operations would employ a truck shovel mining method and progress to the South and East. A dragline would be operating in year 3 and would work in conjunction with a truck shovel mining method.

Prior to mining the “glacial drift” overlaying most of the area, the major water bearing zone will be dewatered via wells with the recovered water infiltrated into the ground adjacent to the mined area.



The mined coal would be trucked to the crusher at the mine area, crushed, and then loaded onto the conveyor.

In general, mining and contemporaneous reclamation would involve the following steps:

- ◆ Clearing and grubbing, consisting of removal of trees, brush and vegetation. This work would be accomplished with dozers
- ◆ Removing topsoil with direct haul back to the regraded backfilled surface (topsoil from the initial pit would be temporarily stockpiled until a regraded surface is available)
- ◆ Removing overburden/interburden material, which would be either backhauled (truck shovel) or cast (dragline) to a previously mined area
- ◆ Removing coal using excavators, which would then be hauled to the truck dump in the Mine Facilities area
- ◆ Rough grading and contouring of the backfilled surface
- ◆ Finish grading and contouring of the rough graded surface
- ◆ Replacing topsoil and restoring stream drainages
- ◆ Revegetation

The preceding steps represent a continuous process of overburden/interburden removal, coal removal, backfilling, grading and revegetation/reclamation. As part of this process, the entire area would be returned to the approximate original contour with drainage basins replaced and stream channels restored. Monitoring would occur to determine the success of the reclamation. Because the mined area is reclaimed with overburden material, there would be no permanent overburden disposal area associated with the Project.

Four point discharge locations are planned for the Chuitna Coal Mine:

- 001 – Mine area runoff located at Latitude 61 degrees, 12 minutes, 28 seconds; Longitude 151 degrees, 21 minutes, 27 seconds into Lone Creek (Stream 2002)
- 002 – Mine area runoff located at Latitude 61 degrees, 10 minutes, 40 seconds; Longitude 151 degrees, 25 minutes, 38 seconds into 2003 Stream
- 003 – Mine area runoff located at Latitude 61 degrees, 10 minutes, 3 seconds; Longitude 151 degrees, 22 minutes, 38 seconds into 2003 Stream
- 004 – Mine facilities runoff, equipment washdown and sanitary wastes located at Latitude 61 degrees, 9 minutes, 43 seconds; Longitude 151 degrees, 22 minutes, 47 seconds into 2003 Stream

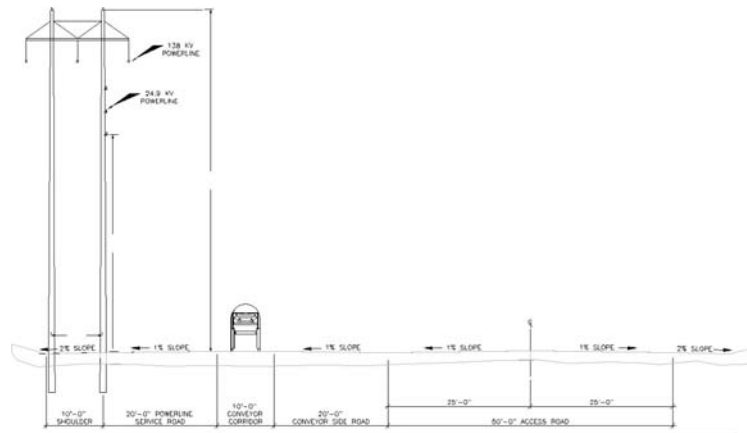
All discharges are surface water runoff from precipitation and snowmelt within the affected area of the active pits and reclamation area except for 004 which collects runoff from mine facilities. Treatment measures planned for mine discharges include multi-cell sediment ponds to control suspended solids. Treatment for other 004 discharges includes an oil/water separator and hydrocarbon treatment prior to discharge. A package plant for treatment of sanitary waste would be utilized as pre-treatment for this waste stream.

Mine area surface water controls include use of best management practices (BMPs) that incorporate diversion of runoff from undisturbed areas around affected areas. In addition, run-off from within small affected areas include vegetation barriers, sediment fence, temporary vegetation strips, rock/gravel check dams, and similar measures as individual units or in combination as series depending on site conditions.

Chuitna Project Infrastructure

The Project Infrastructure is composed of four subcomponents:

- **Housing & Airstrip Facility:** Single-status housing for the Project operating workforce (approximately 200-250 personnel) and an airstrip for transport of personnel and small equipment to and from the Project Area. The Housing & Airstrip Facility would be located in close proximity to the Chuitna Coal Mine.
- **Mine Access Road:** An approximately 20 km (12 mi) all-weather road connecting the Mine with the Ladd Landing on the coast of the Cook Inlet. The road would be used during development/construction of the Chuitna Coal Mine and the Housing & Airstrip facility and during operations to transport equipment and operating supplies to and from Ladd Landing. Two road corridors are currently being considered, the North Ladd Access Corridor and the Ladd Access Corridor (see map, above).
- **Coal Transport Conveyor:** A covered overland coal transport conveyor with an annual throughput capacity of 15 million MT per year would be constructed. The conventional continuous belt conveyor would transport coal from the mine service area to the Ladd Coal Export Terminal. The entire conveyor structure would be approximately 2.9 m (9.6 ft) tall and 2.2 m (7.3 ft) wide. The coal-carrying belt would be a minimum of 1.0 m (3.3 ft) above the ground and would be supported by heavy duty pipe yokes attached to the horizontal steel pipe at 2 m (6.5 ft) intervals. The conveyor belt would be covered on top and one side with a weatherhood to protect the coal from moisture and wind. The open side would permit visual inspection of and access to the rollers for maintenance. Whenever the conveyor crosses streams, it would be partially enclosed on the underside to prevent coal or dust from entering the stream.
- **Power Transmission Facility:** A 4.5 mile long 138kV power line would be constructed connecting the existing Beluga Power Plant to the selected access corridor. A 138kV with a 25 kV underbuild transmission line would be constructed within the selected access corridor to provide power to the mine facilities, housing and airstrip facility, coal transport and Ladd Landing development.



The Mine Access Road, Coal Transport Conveyor and the Power Transmission Facility would be co-located in either the North Ladd Access Corridor or the Ladd Access Corridor. The above figure is a typical of an access corridor with all facilities co-located.

Management of surface water off the affected area of the infrastructure corridor would be by BMPs. These measures include diversion of runoff from undisturbed areas around affected areas. In addition, control of run-off from within small affected areas include vegetation barriers, sediment fence, temporary vegetation strips, rock/gravel check dams, and similar measures as individual units or in combination as series depending on site conditions. This linear corridor allows use of these measures to control peak flows, erosion, and suspended solids.

Reclamation of the affected area would be completed in two phases. Following construction, adjacent areas such as cut and fill slopes would be graded to final configuration and topsoil replaced for re-vegetation. The gravel-surfaced corridor would provide a stable surface for location of the power transmission line, coal transport conveyor, adjacent service roads, and the mine access road. Upon completion of coal mining by the Chuitna Coal Mine, these facilities may be removed unless there is a use identified and approved by the land owners for leaving this corridor in place. The access road would provide access for other resource development owners such as the State of Alaska, Mental Health Trust, and others.

Ladd Landing Development

The Ladd Landing Development is composed of two subcomponents:

- Ladd Coal Export Terminal: A trestle facility 3,048 m (10,000 ft) long would be constructed into Cook Inlet that would be capable of an annual throughput of 15 million MT per year with upland storage of approximately 250,000 MT; an offshore vessel berth with an 18-20 m (± 60 ft) minimum draft and

installed capacity to load ocean going vessels at approximately 75,000 to 80,000 MT per day.

Coal would enter the onshore Ladd Landing facility on the overland conveyor and be transferred directly to the shiploader on the approach trestle if a barge or ship was being loaded. If loading were not in progress, coal would be stored onshore. The amount of coal stored at Ladd would vary depending upon shipping schedules, marine weather conditions, and downtime in mining operations.

The coal stockyard would have the capacity to store 100,000 to 500,000 MT in an open stockyard that would be contained within a graded foundation and surface water collection ditches. Surface water is routed to two sediment ponds where suspended solids would be removed to meet discharge limitations prior to discharge to Cook Inlet. Two outfalls would be used with discharge piped to approximately the mean lower low water level of Cook Inlet. One system (001) located at Latitude 61 degrees, 6 minutes, 46 seconds; Longitude 151 degrees, 5 minutes, 31 seconds would be for the exclusive use of the coal stockyard. The second system (002) located at Latitude 61 degrees 6 minutes, 28 seconds; Longitude 151 degrees, 5 minutes, 47 seconds is for the collection and containment of surface water from other facilities on the site. An equipment wash facility would be a closed system but may discharge excess water that has undergone treatment at the Chuitna Coal Mine facilities system to remove hydrocarbons (oil and grease).

- Ladd Logistics Center: The central receiving, storage, warehouse, and logistics support facility for the Chuitna Coal Project. The Ladd Logistics Center would include a bulkhead structure with a 3 m (\pm 10 ft) minimum draft.

Closure of this facility would involve replacement of topsoil and seeding to re-establish native vegetation after the site is no longer needed for export of coal or other bulk commodities such as gravel that may be mined by others from the adjacent region. It is likely that the facility would continue to be used after all reserves currently under lease by the Chuitna Coal Project have been mined and these facilities would remain in-place if requested by the landowner.

Other Options to be Considered

One of the primary purposes of the scoping process is to identify the range of feasible alternatives that should be evaluated in the SEIS. In addition to the Applicant's proposed project described above, other component options have already been identified that will be considered during the SEIS process. These are described below. It is important in

evaluating the Applicant's proposed options above, that the reader understands that EPA is seeking input to identify other feasible options.

Mine Access Road and Conveyor Alignment

The Applicant is considering two access road and conveyor routes from the Ladd Landing Area to the mine site. EPA will also consider other access and conveyor alternatives.

Coal Export Terminal

Alternatives to the construction of the bulkhead structure and the proposed 10,000 ft coal export trestle will be considered.

Airstrip Locations

The proposed airstrip locations and options to air transport will be considered.

Wastewater Discharges

EPA will evaluate alternatives to the wastewater management and discharge locations proposed by the Applicant.

Issues of Concern

Several important concerns have been identified that will be considered during the SEIS process. These are listed below. EPA is seeking public input to identify still other important issues. All substantive issues identified by the public will be considered by EPA in formulating the scope of analysis for the SEIS.

Cook Inlet Belugas
Impacts to Local Population/Tyonek
Trestle
Intertidal Fill/Bulkhead
Water Quality (surface and groundwater)
Stormwater
Reclamation, Restoration, and Post-Mining Land Use
Access Road
Air Quality/Dust
Subsistence Use

Set Netters

Wildlife (habitat and movement)

Anadromous and Resident Fish

Stream Crossings

Cumulative impacts due to increased access to the area and potential for mine expansion or other separate future mining activities

Public Solicitation of Input for Actions in the Chuitna Coal Project Area

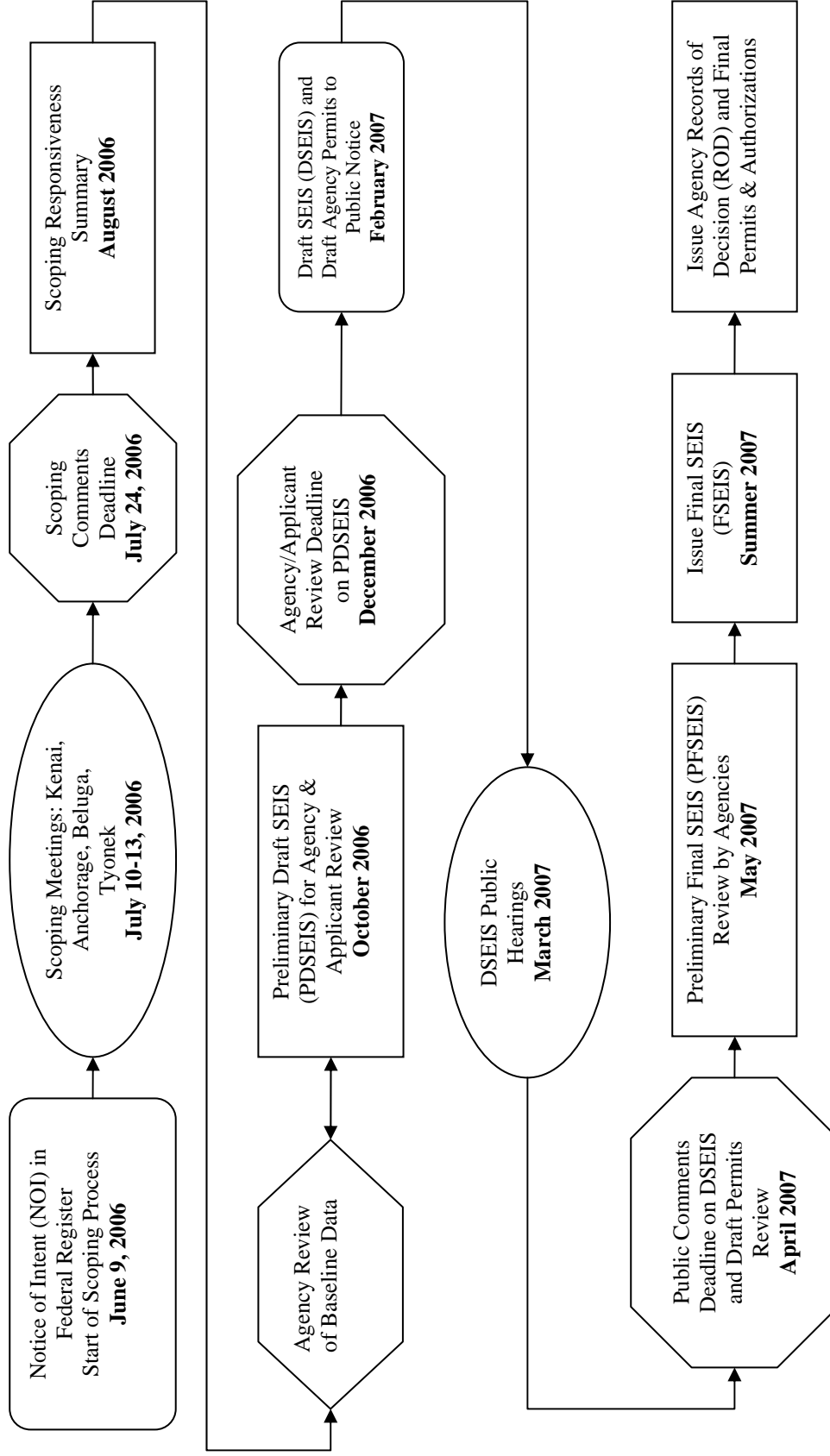
All federal and state agencies, Tribal governments, local governments, private companies, organizations, and individuals are asked to notify EPA of any past, present, or future actions they are aware of or may undertake within a fifty mile radius of the Chuitna Coal Project. EPA respectfully requests this information to ensure that the SEIS adequately addresses the cumulative impacts that may occur to the environment if the Chuitna Coal Project were to be developed.

NEPA requires EPA to assess cumulative impacts in an EIS. Specifically, 40 CFR Part 1508.7 defines cumulative impacts and directs federal agencies to assess, “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”

For example, EPA would like to know if other coal and natural resource development would occur near the project area as a result of new mine access and infrastructure. These developments would cause significant additional impacts of a nature similar to this project, including additional large mine areas, more roads and airstrips, and increased human population and activity. The SEIS will need to assess such future actions to determine whether there might be cumulative or threshold environmental impacts from mine development and such related future foreseeable actions on wildlife, vegetation, air quality, subsistence, etc.

If you are aware of another agency or entity that has, is, or likely will take action within a fifty mile radius of the proposed mine, please contact Hanh Shaw of EPA at (206) 553-0171 or shaw.hanh@epa.gov with such information by the close of the scoping process comment period on July 24, 2006.

**Chuitna Coal Project
Supplemental Environmental Impact Statement (SEIS) Process and Schedule**



APPENDIX B

DRAFT GOVERNMENT-TO-GOVERNMENT CONSULTATION PLAN

****DRAFT****

**CHUITNA COAL PROJECT
GOVERNMENT-TO-GOVERNMENT CONSULTATION PLAN
FOR THE SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT AND
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT**

This Government-to-Government Consultation Plan (the Plan) describes the U.S. Environmental Protection Agency's (EPA) and the potentially affected tribes' plan for conducting government-to-government consultation on the Chuitna Coal Project. EPA's regulatory authorities for this project include issuance of National Pollutant Discharge Elimination System (NPDES) permits and development of a Supplemental Environmental Impact Statement (SEIS) in compliance with the National Environmental Policy Act (NEPA). This Plan covers consultation for both of these actions.

EPA has invited ten potentially affected Alaska Native Tribal Governments to participate in the evaluation of the environmental affects of the proposed Chuitna Coal Project, located approximately 80 kilometers west of Anchorage, Alaska. This evaluation will take place over the course of the coming year through the preparation of an SEIS. The NPDES permits will be developed concurrently with the SEIS.

Pursuant to Executive Order 13084 (Consultation and Coordination with Indian Tribal Governments) EPA will undertake a concerted government-to-government consultation effort on the Chuitna Coal Project. This consultation effort is in addition to the NEPA scoping effort and public comment periods for the draft SEIS and draft NPDES permits.

“‘Consultation’ means the process of seeking, discussing, and considering the views of federally recognized tribal governments at the earliest time in EPA Region 10’s decision-making. Consultation generally means more than simply providing information about what the agency is planning to do and allowing comment. Rather, consultation means respectful, meaningful, and effective two-way communication that works toward a consensus reflecting the concerns of the affected federally recognized tribe(s) before EPA makes its decision or moves forward with its action.”

U.S. EPA Region 10 Consultation Procedures
Tribal Consultation Handbook
July 17, 2001

Ten tribes are considered to be potentially affected by the proposed Chuitna Coal Project by virtue of their location within the potentially affected Cook Inlet watershed and subsistence use areas. These are:

- Salamatof Tribe
- Kenaitze Tribe

- Native Village of Tyonek
- Ninilchik Village
- Seldovia Village Tribe
- Knik Tribe
- Native Village of Eklutna
- Chickaloon Native Village
- Native Village of Port Graham
- Native Village of Nanwalek

The participation of these tribes in the environmental review and permitting processes is very important. EPA proposes the following opportunities for meaningful participation by Tribal governments to be incorporated into the SEIS and NPDES permitting processes in order to meet EPA's working definition of Tribal Consultation. Unfortunately, EPA has no travel or per diem monies available for the tribes or the general public on this project. As such, communications about the project, such as meetings, will utilize teleconference capabilities, e-mail, or will be planned in conjunction with other tribal meetings to provide opportunity for all interested tribes to participate, regardless of resources, and to avoid financial burden.

The estimated timeframes presented in this Plan may change slightly, but it does provide the tribes and the agencies with a road map noting the milestones in the SEIS and NPDES permitting processes where it would be important to consult and coordinate.

Milestone: Send Scoping Document to Potentially Affected Tribes

Timeframe: June 8, 2006

The Scoping Document describes the extent of PacRim Coal's (Applicant) proposed Chuitna Coal Project as understood as of that date by EPA. It provides a preliminary identification of alternatives and significant issues that will be addressed in the SEIS. EPA asked the tribes to review the document and let us know if there are any additional issues that they would like the SEIS to address.

Milestone: Consult with Tyonek Tribal Council to Identify Issues

Timeframe: April 7 and July 12, 2006

Due to the proximity of the Native Village of Tyonek to the Chuitna Coal Project, it is appropriate for representatives of the agency team to travel there to meet with the Tyonek Tribal Council and tribal members. The purpose of the meetings was to discuss the proposed scope of the SEIS effort and to record any additional issues or concerns that the Tribe wished to see addressed in the SEIS study process. These meetings took place before the planned SEIS scoping open house in the community of Tyonek.

Milestone: Consult with Tribal Representatives to Identify Issues
Timeframe: July 10-12, 2006

EPA, the U.S. Army Corps of Engineers (Corps), and the Alaska Department of Natural Resources (ADNR) invited tribal representatives to meet with the permitting agencies prior to the general public Scoping Open Houses in Anchorage, Kenai/Soldotna, Tyonek, and Beluga, Alaska. An invitation to attend this meeting was sent to tribes by email on June 8, 2006. The Kenaitze Tribe responded to this invitation. The agencies met with a representative of the Tribe on July 10, 2006. The scope of the project was discussed at this meeting and tribal issues and concerns were documented. Information gained through this meeting and the meetings with the Tyonek Tribal Council on April 7 and July 12, 2006 will be considered by the agency team as they begin the evaluation of the project's possible affects.

In addition to the separate meetings with tribes, EPA hosted four public scoping meetings:

<u>Scoping Open House</u>	<u>Timeframe</u>
Kenai/Soldotna	July 10, 2006
Anchorage	July 11, 2006
Beluga	July 12, 2006
Tyonek	July 12, 2006

Tribal representatives were also be invited to these four meetings as well. The general public open houses included displays and maps describing the proposed project. The public had the opportunity to talk to the agency team informally during the open houses. Then, there were formal public testimony from anyone who wishes to speak, including tribal representatives

Milestone: Review Baseline Information for Adequacy
Timeframe: Ongoing

The tribes have the opportunity to review the baseline reports posted online at the Chuitna Project website at www.ChuitaSEIS.com or request copies from EPA. The baseline reports form the background against which potential impacts would be measured. The baseline reports that may be of interest, or topics which they have especially in-depth knowledge, include: Cultural Resources, Subsistence and Traditional Ecological Knowledge, Hydrology and Water Quality, Marine Mammals and Fish, Wildlife, and Socioeconomics. The tribes may share with EPA any questions or concerns regarding the adequacy of the baseline data.

Milestone: Review Scoping Responsiveness Summary
Timeframe: September 2006

The agency team will develop a Scoping Responsiveness Summary (SRS) that will clearly describe the ways in which the information received from the tribes and the public

will be incorporated into the SEIS evaluation process. Specifically, the SRS will summarize all tribal comments and public comments received, identify issues and options, list resources for detailed project information, and describe the public involvement and communication steps. The Tribes will have the opportunity to review the SRS and consult with EPA as to any questions or concerns they might have regarding how the SRS reflects the issues they have raised regarding the proposed project. EPA will schedule a teleconference to discuss the SRS with the tribes.

Milestone: Review of Cultural Resources and Subsistence Impacts Analyses
Timeframe: Early 2007

Cultural resource impacts will be evaluated for the NEPA and the National Historic Preservation Act (NHPA) Section 106 processes. A Programmatic Agreement (PA) will be developed for identification, evaluation, and treatment of historic properties, and treatment of inadvertent discovery of human remains. The PA will be signed by EPA, the cooperating agencies, the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Office (SHPO), and the project Applicant. The tribes will be invited to be concurring parties to the PA. The PA will serve as the guiding document for disposition of any and all cultural/historic sites, as well as inadvertent discoveries of human remains, identified in areas proposed to be disturbed by the proposed Chuitna Coal Project and support facilities.

Milestone: Review and Discuss PDSEIS
Timeframe: Early 2007

The tribes will have an opportunity to review and then discuss the Preliminary Draft Supplemental EIS (PDSEIS) with the agency team before the Draft SEIS is released to the general public. The preliminary draft will be delivered to the tribes three weeks prior to the scheduled discussion to allow them time to review the document. Issues or concerns that they might wish to raise to EPA regarding the alternatives, the potential impacts described in the document or the proposed corrective measures (mitigation strategies) can be raised at that time – early in the evaluation process. After the joint meeting, EPA will follow-up with the tribes to ensure that any additional information they wish to convey is received. All concerns raised by the tribes will be considered in preparing the public notice draft.

Milestone: Review and Discuss Preliminary Draft NPDES Permits
Timeframe: Early 2007

The tribes will have an opportunity to review and then discuss the preliminary draft NPDES permits with EPA before the draft NPDES permits are released to the general public. The preliminary draft NPDES permits will be delivered to the tribes at the same time that they are sent to the Alaska Department of Environmental Conservation (ADEC) for preliminary Clean Water Act Section 401 certification. The tribes will have 30 days to review and comment on the preliminary draft NPDES permits. If requested, EPA will have a conference call with the tribes to discuss any issues or concerns with the permits.

Milestone: Opportunity to Comment During Draft SEIS and Draft NPDES Permits Review Process

Timeframe: Late Spring 2007

The Draft SEIS (DSEIS) and draft NPDES permits will be published for public review after the tribes' comments are considered and the revised draft documents (the DSEIS and draft NPDES permits) have been produced. EPA will organize a meeting with the potentially affected tribes during the public comment period wherein EPA will accept comments from the tribes on the DSEIS and draft NPDES permits. The tribes will also have the opportunity to attend public hearings and comment in person or submit written comments to EPA.

Milestone: Discuss Preliminary Final SEIS

Timeframe: Summer 2007

Following the public comment period, a Preliminary Final SEIS will be developed that reflects input from the public comment period and includes a response to comments received. The Preliminary Final SEIS will be sent to the tribes for their review. After a two-week review period, EPA will schedule a consultation meeting with the agencies and the tribes wherein they will have an opportunity to voice any outstanding concerns that they might have. EPA will ensure that all concerns are considered prior to the publication of the Final SEIS and EPA's Record of Decision (ROD).

Milestone: Discuss Preliminary Final NPDES Permits

Timeframe: Summer 2007

Following the public comment period, the preliminary final NPDES permits will be developed. EPA will offer the interested tribes an opportunity to discuss the changes that have been made to the permit before it is finalized. EPA will ensure that all tribal concerns are considered prior to issuance of the final NPDES permits and NPDES Permit Response to Comments document.



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U.S. ENVIRONMENTAL PROTECTION AGENCY- REGION 10 TRIBAL CONSULTATION FRAMEWORK

REGION 10 WORKING DEFINITION OF TRIBAL CONSULTATION

"Consultation" means the process of seeking, discussing, and considering the views of federally recognized tribal governments at the earliest time in EPA Regions 10's decision-making. Consultation generally means more than simply providing information about what the agency is planning to do and allowing comment. Rather, consultation means respectful, meaningful, and effective two-way communication that works toward a consensus reflecting the concerns of the affected federally recognized tribe(s) before EPA makes its decision or moves forward with its action.

REGION 10 GUIDING PRINCIPLES

1. The Region will consult with federally recognized tribal governments in a sensitive manner respectful of tribal sovereignty and culture.
2. The Region will maintain government-to-government communications with federally recognized tribal governments by interacting through officials of appropriate stature and authority as determined by the Regional Administrator and tribal government. For major consultation issues, the time frame and manner in which EPA will consult with a specific Tribe will be negotiated between EPA and the Tribe.
3. In situations where EPA has the ultimate decision-making authority, federal policies direct EPA to consult with affected federally recognized tribal governments prior to decision-making. The Region will work within the following guidelines when deciding how to consult with federally recognized tribes:
 - When the matter may directly affect the environment, resources, treaty rights or other legal rights of a specific or small number of federally recognized tribes, EPA will meet with, have conference calls, and send letters to tribal leaders of the affected individual tribe(s). EPA will provide feedback as specifically requested by the Tribe(s) and take any agreed upon follow-up action on the matter in a timely manner;
 - When seeking perspectives from all interested federally recognized tribes in the Region on national or broad Regional issues, EPA will meet with, or have a conference call, or solicit written views in a letter from EPA;
 - When looking for broad guidance on tribal policy or implementation matters of national or Regional interest either at a preliminary stage or requiring fast turn-around, EPA will rely on the Regional Tribal Operations Committee for assistance and input. This dialogue will not replace the government-to-government relationship and communication between EPA and the Tribe(s);
4. On specific matters, the Region should contact and provide any available materials necessary to the potentially affected federally recognized tribes as early as practicable, to provide time for

consultation prior to making a decision.

5. Where feasible and appropriate, the Region will encourage regular participation of federally recognized elected tribal representatives or their designees on Regional planning groups and work groups.

6. The Region will directly notify federally recognized tribe(s) where specific tribal interest or trust resources may be involved, and offer the respective tribe(s) an opportunity to participate without resolving whether the tribe(s) has a legal right to consultation.

7. The Region will meet with individual federally recognized tribes upon request of the tribe's leaders.

8. The Region should endeavor to build an on-going relationship with each federally recognized tribal government(s) to increase communication, and to ensure that consultation on specific proposals will be more constructive and effective.

9. The Region will encourage meetings with federally recognized tribal governments on their homelands, to the extent resources allow, to strengthen the EPA federal-tribal relationship and facilitate EPA understanding of respective tribal issues, concerns and perspectives.

10. Public participation which involves individual citizens of Indian Country, is not the same as consultation with affected federally recognized tribal governments. EPA has the responsibility to consult with federally recognized tribal governments separate from, and in addition to, the public participation process for interested stakeholders.

11. Consultation with tribal governments should occur independent of the public participation process. Tribal consultation does not replace requirements to promote public participation that may apply to a given proposed federal action.

ISSUE RESOLUTION

Should disputes arise between one or more tribes and EPA Region 10, the parties will strive to address the matter informally, at the staff level. In the event that staff are unable to resolve a dispute, the issue will be presented to immediate supervisors, who will attempt to resolve the dispute. If the dispute is not resolved, the staffs will present the matter to progressively higher levels of management until consensus is reached. In the event consensus is not reached, the EPA Regional Administrator, after consulting with the elected leader(s) of the federally recognized Tribe (s), will make the final decision.

IndianPolicy/TribalConsultationFinal7-16-01

Unit: Tribal Program

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Last Updated: 07/15/2005 02:34:25 PM

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URL: <http://yosemite.epa.gov/r10/tribal.NSF/Programs/Consultation>



APPENDIX C
COMMENTS AND INPUT RECEIVED FROM TRIBES TO-DATE

**Chuitna Coal Project Meeting
in the Native Village of Tyonek, Alaska
April 7, 2006**

On April 7, 2006, a government to government meeting was held in the Native Village of Tyonek (Tribe) in response to Tyonek's request. The purposes of the meeting were to: 1) meet the Tribal leaders and council members; 2) introduce the Tribe to the project and to the representatives of the federal, State, and project Applicant; 3) provide the Tribe with an overview of the project, including all the relevant permits and State/federal regulatory actions; and 4) allow the Tribe an opportunity to ask questions and express their concerns.

Present at the meeting were: Robert Stephan, Sr., Harriet Kaufman, Joe Standifer, Connie Burnell, Jessica Standifer, Randy Standifer, Maryanne Standifer, and Lindsay Bismark from the Tribe; Hanh Shaw, Mike Lidgard, Cindi Godsey, Phil North, and Jennifer Curtis from EPA; Leroy Phillips from the U.S. Army Corps of Engineers; Barbara Mahoney from the National Marine Fisheries Service; Bruce Buzby from the Alaska Department of Natural Resources; and Bob Stiles and Patty Bielawski representing the project Applicant, PacRim Coal.

The following is a summary of concerns and questions raised by Tribal Council Members in attendance at the meeting and the answers to each of the questions, as provided by the agencies and project Applicant.

- Would the mined areas be revegetated with native species?

Answer: Yes.

- How much fuel would be stored in each of the mine areas (Ladd, housing complex, mine site)?

Answer: 20,000 gallons diesel at Mine Facilities; 10,000 gallons aviation fuel at Airstrip; 6,000 gallons gasoline at Housing (don't know where else this would be); 800,000 gallons diesel; and 20,000 gallons gasoline at Ladd Logistics Center.

- How would sanitary wastes be managed and where would they be discharged to?

Answer: Package plant at Mine Facilities and Housing with point source discharge in accordance with NPDES permit limitations and monitoring requirements; Drain field at Ladd Logistics Center with ADEC permit conditions on design, construction, and operation.

- How would hunting and fishing be regulated for employees?

Answer: None will be allowed within the Project permit (ASCMRCA) and according to regulations of ADF&G for surrounding area while not working on the project.

-
- How would the road be used (given the two options currently under consideration)? What are some of the possible restrictions?

Answer: Private use for Project operations only with restricted access controlled by Project security personnel. This general policy would apply irrespective of which access corridors were developed.

- How is dust coming from the mine, conveyor, and Ladd area be contained?

Answer: This will be regulated either under the ASCMCRA air pollution control plan and/or with ADEC air quality permits. Haulage road and Mine Access Road surface maintenance by mobile equipment to control dust through use of durable surface materials (gravel) and including application of water and use of suitable dust suppressants during above freezing temperatures conditions. Control of dust from the stockpile at Ladd Coal Export Terminal will be by addition of water during stockpiling and reclaiming activities.

- How tall is the conveyor? How would wildlife travel under it or around it?

Answer: The conveyor structure will be approximately 7 feet in height and be elevated above the prepared foundation by approximately 3 feet. Wildlife crossings have been included in the design. Both elevated and buried sections are planned that would accommodate crossing by wildlife

- Please verify that the wetland area at Ladd that is proposed to be filled is not connected to any rivers or streams.

Answer: Based on everything we know at this time, this area is not connected to any rivers or streams. We believe intensive field studies to begin in late May-early June this year will definitively determine if a connection exists.

- The Chuit River is a spawning river and a subsistence resource. How is it going to be protected under the current mine plan?

Answer: Protection will be according to the requirements of the approved NPDES (with 401 certification by ADEC) and ASCMRCA permits for quality and quantity from affected or disturbed areas of the Project.

- Are there financial resources available to assist the Tribe with such that they are able to fully participate in the process?

Answer: EPA staff has searched extensively for available funding options, and has not been able to identify any beyond the GAP grant. GAP recipients can use a portion of their GAP funds for NEPA and project permitting activities.

- What is the potential for coal to combust as part of the mining operations, either through blasting, material handling, or while in stockpiles?

Answer: Coal fires can occur either within the coal seams themselves or in stock piles and overburden dumps on the surface. There are several factors causing coal fires, but they all can be attributed to the

coals ability to react with oxygen. Spontaneous combustion is one of the most frequent reasons for coal fires. It is caused by coals ability to react with oxygen contained in the air or water. As a result of the oxidation process, the temperature of the coal starts to rise. If the temperature reaches a certain temperature noxious gases are produced such as carbon dioxide. Finally, if the temperature still continues to rise the coal reaches the flash point and starts to burn. This is similar to what you might observe in a compost pile or from a large amount of sawdust.

If a fire occurs in a coal waste material, coal material that is not salvaged for the fire must be extinguished in accordance with a plan, approved by the Mine Safety and Health Administration (MSHA) and filed with ADNR.

If a fire occurs in the active operation at a stockpile, the operator would be required to handle the fire in accordance with the operations or air resources protection plan.

- How would cultural resources discoveries or inadvertent discoveries of human and archaeological remains be handled?

Answer: EPA, and the other cooperating agencies, will coordinate with the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Office (SHPO), the potentially affected Tribes, and the Applicant to develop a Programmatic Agreement (PA) for identification, evaluation, and treatment of historic properties, and treatment of inadvertent discovery of human remains. The PA will be developed in consultation with the Tribes and will meet National Historic Preservation Act (NHPA) Section 106 requirements. The Applicant will also be conducting cultural resource surveys this summer as part of the baseline data gathering.

- What is the company's policy for local and native hires?

Answer: The Applicant does not have a written policy regarding local and native hire. For this particular phase of development (i.e., field studies related to engineering, environmental, and permitting) all our subcontractors have been instructed to consider the potential availability of village residents. There is an established procedure in place working through the Tribal Administrator for job postings. A specific policy regarding local and native hires will be developed in advance of the start of construction and subsequent operations.

- How high would the trestle be? Would this impede fish and marine mammal migration?

Answer: The trestle off-shore of Ladd is designed as a pile supported truss located 50 feet above mean lower low water level and 24 feet above mean high tide. Piles are wide spaced (275 feet to 300 feet) to minimize structures in the Inlet.

- Would blasting and explosives be used in the mining operation?

Answer: Limited blasting supplies will be present at the mining area. Blasting of overburden and coal is not planned and only minor blasting supplies required for fracturing large boulders in a portion of the overburden or to break large lumps of coal that may plug the chutes of the truck dump is planned.

ASCMCRA requires the Applicant develop of a comprehensive "Blasting Plan." Development of the required comprehensive "Blasting Plan," which would be subject to public review and comment, is not planned to begin until later this summer.

**EPA/COE/ADNR and Kenaitze Tribal Meeting
Chuitna Coal Project
July 10, 2006**

Attendees:

EPA – Hanh Shaw, Valerie Randall (ENSR)
USACE – Skip Joy
ADNR – Tom Crafford
Kenaitze Tribe – Brenda Trefon, Tribal Environmental Specialist

Summary of Tribal Issues and Concerns:

Public scoping period occurs during fishing season; suggested extending the deadline for scoping comments and hold additional public meetings in the fall.

Asked how close the mine would be to the Native Village of Tyonek.

During land clearing, would Tyonek residents be able to work with Pac Rim Coal to salvage spruce or birch trees?

The Tribe prefers that the project be a “dry” operation (i.e., no alcohol be allowed).

Will the project use coal for fuel (i.e., an onsite power plant)? What about later in the future?

Suggested that the use of coal for power is less preferable than alternative energy sources.

Asked where the coal will be burned.

Suggested this project was a way to try to get power to the Pebble Mine via a power plant and transmission line.

Concern with increased vessel traffic in Cook Inlet.

Asked who owns the coal once it is on the ship? She would prefer the use of U.S. vessels, and she would like to see Alaska benefit from the mine and the coal transport.

Asked whether the trestle would be a solid structure; expressed concern regarding fish migration patterns and effects to set netters. Would effects be mitigated and would fishermen be compensated for losses?

Concern regarding potential discharges from ships, especially in shallow waters.

SEIS should consider alternative of a transfer facility for large ships outside of Cook Inlet, with smaller vessels to the port site.

Would like opportunity for Tribe to request certain vegetation types (important native plants) be included in site revegetation.

Asked what regulations govern solid waste? Can Tribe request compliance with "Green Star" recycling standards?

Requested copy of oversize project location map and ADNR coal figure (ENSR sent).

Contact information:

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**EPA and Tyonek Tribal Council Meeting
Chuitna Coal Project
July 12, 2006**

Attendees

EPA: Hanh Shaw, Patty McGrath, Cindi Godsey, Jennifer Curtis

Native Village of Tyonek Tribal Council: Peter Merryman (President), Randy Standifer, Jenna, Angela, Robert Stephan, Joe Standifer, Harriet Kaufman

Tyonek Native Corporation: Tom Harris

Summary of Tribal Issues and Concerns

The Tribe's biggest concern is the drainage from Lone Creek to the Chuit River, an important resource for fishing and subsistence.

The Tribe would like to request EPA to prevent discharges to Lone Creek.

How is EPA going to take care of the rivers, streams, and wildlife? EPA needs to look at these issues early; the Tribe does not want to be told later that it is too late.

The Tribe is concerned about the health and welfare of the people (e.g., dust from coal handling and conveyor transport; drainage). Asthma is more common and has become a prevalent issue.

Are there going to be continuous testing/monitoring of the streams?

Can there be other uses for the water that are proposed to be discharged into Lone Creek and others within the Chuit watershed? Perhaps one possible use is for dust control of the coal piles.

The Tribe expressed concerns regarding erosion of the Chuit River and silt accumulation over time.

There should not be any discharges into Lone Creek or the Chuit River (top 20 salmon streams in Alaska).

Cumulative effects – There are many layers of effect as a result of this mine.

Allotment owners have had problems with trespassing. The Tribe does not want the trespass or the abuse that comes with it.

The PamAm road should be fenced.

Tribal members do not want their lifestyle to change. They value the peace, quiet, and food resources.

The Tribal Council requested that Mr. Peter Merryman be notified of worker activities on and near Tribal land relating to the Chuitna Coal Project (e.g., surveyors).

Tyonek is the government authority on their land, including the beach.

The people of Tyonek value their isolation, which will disappear if this project moves forward.

EPA should be consulting with the Conservation District.

This project would create awareness among others of what is here and they will take away the Tribe's valuable resources.

Timber companies in the past have made promises they did not keep; they go through the permitting and evaluation process then do what they want to.

Private property laws have not been protected – there is a long history of trespass.

There used to be a lot of moose; now there are not many left due to abuse during the time of timber harvest.

Alaska Department of Fish and Game is the primary agency that can protect the Tribe's food resources. Why are they not involved in this process?

The Council does not want village frustrations to run high. Their concerns must be addressed.

The Tribal Council's job is to represent the people and protect their children's resources.



APPENDIX D
REPRESENTATIVE SCOPING COMMENTS

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
COMMENTS ON NEPA PROCESS	
NEPA and Permitting Process	
SEIS should only update the data and evaluations conducted in the previous 1990 EIS.	All sections of Chapter 3.0
Future projects should be evaluated in the cumulative impact assessment, not as part of Proposed Action.	Section 2.5.2
SEIS should analyze all direct, indirect, cumulative impacts, alternatives, and mitigation measures as required under NEPA, ESA, and the Global Change Research Act (GCRA).	Chapters 2.0 and 3.0
The impacts addressed in the 1990 EIS should be reviewed and updated to reflect the current issues.	All sections of Chapter 3.0
Public notification was insufficient, and a review should be conducted to determine if the requirements under NEPA for public involvement were met.	Section 1.6
The market for coal and the end users of any coal from the proposed project should not be part of the SEIS analysis.	Section 2.5.2
The SEIS should describe the permitting process, including the permit renewal process during the life of the project.	Section 1.4
The USDA should be invited to participate in the SEIS process because of their involvement in the restoration of natural resources on private lands.	Section 1.4
The Tyonek Tribal Conservation District should be part of the planning process for the proposed project.	Section 4.2
SEIS should address whether the proposed project is compatible with the Alaskan constitution (Article VIII, Section 1), which outlines the state's policy of ...encouraging development of its resources by making them available for maximum use consistent with public interest...	Section 1.4
The public scoping period should be extended to avoid conflict with the fishing season.	Section 1.6
The Surface Mine Control and Reclamation Act requirements were developed for the lower 48 states and are not adequate for Alaska. EPA needs to impose additional requirements.	Sections 1.4 and 4.3
The EPA, along with the USFWS, NPS, USCG, USACE, FWHA, and FERC, should decide lead and cooperating agency roles.	Section 4.3
Land ownership information on lands proposed for development should be disclosed.	Section 3.13.1
SEIS should consider reasonably foreseeable interrelated actions beyond the 50-mile range.	Section 2.5.2
The cumulative analysis should consider all current and reasonably foreseeable coal leases in the Beluga region.	Section 2.5.2
Written responses should be provided to comments EPA receives during the scoping period.	Section 1.6
The SEIS should define the role of the Alaska Department of Fish and Game in the permitting and compliance process.	Section 1.4
Project should be evaluated relative to 'identifying land as unsuitable for mining under the Alaska Surface Coal Mining Control and Reclamation Act.'	Section 1.4
New baseline data for the proposed project should be collected and included in the SEIS.	All sections of Chapter 3.0

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Project Description	
SEIS should describe the planned tank farm and distribution of the fuel (including identifying whether distribution would be public or private).	Section 2.1.2
SEIS should define how the proposed project workers will interact with the local population.	Section 2.1
SEIS should describe the sources for gravel used during construction (roads, airstrip, docks, housing, etc.) and the plans for restoration once mining activities are complete.	Sections 2.1.2 and 3.3.3
SEIS should assess the viability of the market for Chuitna coal.	Section 2.1
SEIS needs to describe the planned storm water and wastewater systems and discuss potential issues associated with release of that water.	Section 2.1.2
The project description should include an in-depth discussion of the proposed sedimentation ponds (including whether the ponds will be lined, plans for dredging and disposal methods) and the potential for groundwater contamination.	Sections 2.1.1 and 3.4.1
SEIS should describe how the coal storage area wastewater will be treated in accordance with EPA guidelines.	Section 2.1.2
Upon mine closure, infrastructure to be reclaimed should be specified under the permits and only infrastructure not specified should remain. Funding for removal of mine infrastructure after cessation of mining needs to be guaranteed.	Section 2.1.4
SEIS should include updates to the newer water quality standards, an analysis of essential fish habitat, and changes to the orientation of the planned pits.	Sections 1.4 and 2.1.1
The bulkhead dock should be eliminated from the proposed project; barge beach landings should be used.	Section 2.1.3
The Ladd coal storage area should not be located near Cook Inlet to avoid pollution to Cook Inlet.	Section 2.1.3
Alternatives	
SEIS should consider a power line alternative that routes the power line from Beluga to Ladd Landing and then along the access road.	Section 2.3
Project impacts to anadromous fish, migratory birds, and wetlands should be avoided or minimized through proper consideration of designs and alternatives.	Section 2.3
Alternatives should be evaluated that would reduce the "footprint" and thereby minimize impacts to wildlife and fish habitat.	Section 2.3
Alternative should be considered that would re-locate the camp, road, and conveyor system to avoid project impacts to wetlands.	Section 2.3
The existing dock at Tyonek, west of the Chuitna River delta, should be considered for fuel transfers to avoid potential for spills from southeast wave hazards.	Section 2.3

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Granite Point should be considered an alternative to Ladd Landing for the coal loading facility to avoid potential pollution impacts from southeast wind.	Section 2.3
Alternatives to the coal stockpile at Ladd Landing should be considered as part of the SEIS analysis.	Section 2.3
Discuss why barge beach landings, originally addressed as an alternative in the 1990 EIS, were dropped from consideration in the proposed SEIS.	Sections 2.1.3 and 2.3
SEIS should analyze alternative ports, such as North Foreland, Ladd, and Granite Point, and if these alternatives are not carried forward for analysis, then reasons for their elimination should be explained.	Sections 2.3 and 2.4
The SEIS should consider an alternative that would locate the transfer facility outside of Cook Inlet and use smaller vessels at the proposed port site.	Section 2.3
Potential alternatives, such as a pile-supported structure vs. the proposed bulkhead, should be considered in the SEIS.	Section 2.3
Alternatives such as covered stockpiles and fully enclosed conveyors should be examined in the SEIS.	Section 2.3
SEIS should address disposal alternatives for wastewater discharge to avoid potential impacts to freshwater and marine resources.	Sections 2.3 and 3.20.2
Cumulative Impacts	
The cumulative impact analysis should include the concentration of mercury from Beluga coal resources and the addition of power plants in the area.	Section 3.1.2
Project's cumulative impact analysis should consider the proposed project's impacts to species from air pollutants generated from coal combustion.	Section 3.1.2
The cumulative impact analysis should include potential local uses for the Chuitna coal, such as the Pebble Mine project power source and the Agrium project power source.	Section 2.5.2
Concern about the eventual coal distribution and indirect cumulative effects on Alaska, specifically the effects of using coal power as the Pebble Mine power source.	Section 2.5.2
The cumulative impact analysis should address the potential of the proposed project to induce development of other Beluga coal projects.	Section 2.5.2
The cumulative impact analysis should include impacts associated with development of the Pebble Mine if coal is used as the primary power source.	Section 2.5.2
SEIS should evaluate the cumulative impacts to Cook Inlet and include existing activities in addition to the proposed coal mine.	Sections 2.5.1 and 2.5.2
The cumulative impact analysis should include other industries that are currently in the area, such as the oil industry.	Section 2.5.1

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The Agrium Blue Sky Project and coal to liquid (CTL) projects should be evaluated as part of the cumulative impact analysis.	Sections 2.5.1 and 2.5.2
The cumulative impact analysis should address the following projects: Agrium Blue Sky project, the need of Placer Dome/Barrick Coal to construct a conveyor and port system without access to Chuitna's system, Alaska CTL, and proposed road construction.	Sections 2.5.1 and 2.5.2
The contribution of burning coal to acid rain should be addressed in the SEIS.	Sections 2.5.2 and 3.1.2
The contribution of burning coal to greenhouse gas emissions should be addressed in the SEIS.	Sections 2.5.2 and 3.1.2
The contribution of project-related diesel fuel consumption to greenhouse gas emissions should be addressed in the SEIS.	Sections 2.5.2 and 3.1.2
The cumulative impact analysis should address the following: on- and off-shore oil and gas development, production shipping and refining activities, Port of Anchorage expansion, Port Mackenzie, Knik Arm Bridge, municipal wastewater, and coastal development.	Sections 2.5.1 and 2.5.2
The availability of low-cost coal from the proposed project will increase the potential for new coal-fired power generation in southcentral Alaska and should be addressed in the cumulative impacts analysis.	Section 2.5.2
The planned transportation corridor needs to be analyzed in the cumulative impact analysis of the SEIS.	Section 2.5.2
Cumulative impacts to visual resources at nearby parks and refuges from Chuitna coal burned at the Agrium facility should be addressed in the SEIS.	Section 3.18.2
The SEIS should address the reasonably foreseeable interrelated actions beyond the 50-mile study area.	Sections 2.1 and 2.3
Future development of LMU_2 and 3 should be considered in the SEIS.	Section 2.5.2
The cumulative impacts analysis should address heavy metal emissions from coal-burning which may contribute to limitations on subsistence hunting and fishing.	Section 2.5.2
The Cook Inlet air and watershed should be considered within the study area for cumulative effects.	Section 2.5.1
The Agrium coal gasification facility and power plant, including the entire network of development, should be included in the cumulative analysis if Chuitna coal will be burned at this facility.	Section 2.5.2
The Port of Anchorage expansion should be evaluated in the cumulative impacts analysis.	Section 2.5.2
Induced development from the Chuitna Coal Mine should be included in the cumulative impacts analysis.	Sections 2.5.2 and 3.14.2
The cumulative impact analysis should include the potential provision of coal for power to the new coal gasification plant at the Agrium plant in Nikiski and to the proposed Pebble Mine.	Section 2.5.2
Potential cumulative impacts to air quality should include SO ₂ , NO _x in addition to coal dust.	Section 3.1.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The SEIS should provide an explanation for a 50-mile radius from the proposed mine site as the cumulative analysis study area.	Section 2.5
A new 350-MW generating facility and/or activities in the Far East that burn the coal will contribute air pollution including mercury to the environment.	Section 3.1.2
Impacts to air quality from burning coal at the Agrium facility including an analysis of mercury emissions and transport should be addressed in the SEIS.	Section 3.1.2
The potential impacts to air quality in the Upper Cook Inlet area should be addressed, especially in conjunction with related actions.	Sections 2.5.2 and 3.1.2
Mitigation	
Annual monitoring of fish and wildlife during mine operation to determine effects of toxic mine runoff should be included as mitigation for the proposed project.	Sections 3.9.2 and 3.8.2
Mitigation should include a written policy and procedures for enforcement from the mine operators that would prohibit trespass on private property and federal trust lands, and prohibit hunting and fishing by employees on and off the job.	Section 3.13.3
The SEIS should identify the specific streams and locations that will be monitored.	Section 3.5.3
The SEIS should identify the entity (e.g., federal, state) responsible for monitoring impacts of the proposed project, including frequencies.	All sections 3.0
Coal leaching tests during mine operations should be included as mitigation in the SEIS.	Section 3.20.3
The SEIS must identify Essential Fish Habitat and efforts to mitigate project impacts to EFH.	Section 3.9.3
The SEIS should include contingency plans for fuels, lubricants, and coal spills.	Section 3.20.3
The SEIS should discuss the procedures for monitoring impacts associated with coal and coal dust release as well as storm water impacts.	Sections 3.1.3 and 3.5.3
The SEIS should discuss potential methods for monitoring and controlling concentrations of naturally occurring metals.	Section 3.20.3
Potential restoration measures should be described in detail and performance measures developed.	Section 3.3.3
Conveyor height should allow for free movement of wildlife.	Section 3.8.3
Beach landing vessels would reduce impacts to commercial fisheries.	Section 3.12.3
Coal piles should be wetted down to limit coal dust in surrounding area.	
Limit construction in Cook Inlet during smelt migration, peak salmon runs, and commercial fishing days.	Section 3.12.3
Ban barge landings during commercial fishing day openings in May, June, July and August.	Section 3.12.3
Require an onsite marine pollution response plan to protect river estuaries and Cook Inlet beaches.	Sections 3.9.3 and 3.12.3

Table D-1 Summary of Representative Scoping Comments

	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
<p style="text-align: center;">COMMENT BY TOPIC CATEGORY</p> <p>Mitigation for potential damages to the Chuitna River fisheries should include ADNR and ADF&G plans for restoration to the salmon populations of the Theodore, Lewis, and Ivan Rivers. This would decrease likelihood of trespassers to fish the Chuitna.</p>	Section 3.5.3
Construction of the trestle should be conducted on dates when fish and wildlife would not be migrating.	Sections 3.8.3 and 3.12.3
The proposed project should comply with "Green Star" recycling standards.	Section 3.20.3
Mine infrastructure abandonment should be addressed in the SEIS, not at the end of project life.	Section 2.1
Describe how coal deposits (dust and spillage) would be cleaned up from the beach.	Section 3.20.3
Require lessee to create abatement and cleanup schedules for Cook Inlet beaches, local roads, conveyor corridor, local properties, and mine dust accumulations near mine itself.	Section 3.20.3
Utilize natural gas burning vehicles in the coal vehicle fleet and electric shovels for mine operation.	Section 3.1.3
Water down, compact, and cover all coal at Ladd to limit dust in surrounding area. Limit all coal storage piles to 35 feet to avoid air pollution.	Section 3.1.3
As part of project development procedures, the Tyonek Tribal Council should be notified of worker activities on and near Tribal land.	Section 2.1
Ensure sufficient bonding to cover damages in all affected areas of the proposed project.	Section 2.1.4
Revegetation of the mine and other disturbed areas should use native plants to reduce potential spread of noxious weeds.	Sections 3.3.3 and 3.6.3
SEIS should address how unavoidable habitat impacts will be mitigated.	Sections 3.6.3, 3.8.3, and 3.9.3
Mitigation options for loss of habitat should consider economic valuation of the impacted resource.	Section 3.14.3
Mitigation plans should include evaluation on the effectiveness of restoring habitat and ecological functions.	Sections 3.6.3, 3.8.3, and 3.9.3
For any unavoidable impacts to important salmon habitats (Middle Creek), habitat creation in another portion of the creek should be considered as mitigation.	Section 3.9.3
Portions of the conveyor that cross streams and wetlands should have containment structures.	Section 3.5.3
Portions of the conveyor should be elevated or buried in identified travel corridors and at stream and wetlands crossings.	Sections 3.5.3 and 3.7.3
Mitigation measures should include incentives for the lessee for adhering to the lease terms by requiring 5- and 10-year renewals.	Section 3.13.3
Benchmark penalties for violation of CWA provisions on the Chuitna River should be included in mitigation.	Section 3.5.3

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Mitigation should require lessee to create abatement and cleanup schedules for Cook Inlet beaches, local roads, conveyor corridor, local properties, and mine dust accumulations near mine.	Section 2.1.4
COMMENTS ON RESOURCES	
Air Quality	
The SEIS needs data not only on wind speed, but tidal movement, which would be directly sideways to the strong southeast winds and could create a hazard for docking fuel vessels.	Sections 3.1.1 and 3.10.1
Project is beneficial to the environment because the coal being mined is low-sulfur.	Sections 2.1 and 3.1.2
What are the impacts to air quality, economics, and mercury concentration in salmon if coal is used for power generation in southcentral Alaska.	Sections 3.1.2 and 3.14.3
SEIS should address the indirect impacts resulting from air emissions generated by local utilities' use of coal; emissions could increase mercury levels in salmon, impacting the local commercial fisheries economy.	Sections 3.1.2 and 3.12.2
The SEIS should address the potential effects of dust from the (as proposed) uncovered coal transport conveyor system and coal piles.	Section 3.1.2
Discharges should be directed from the mining operation to the Ladd Landing port site (Cook Inlet) where water will be needed for dust control.	Section 3.1.3
BACT measures should be required to minimize impacts of trace minerals from coal dust created from the conveyor, transfer points, storage, and loading operations.	Section 3.1.2
With the increase in worker population, the road system will have major increase in traffic and dust pollution. The SEIS should address the potential impact of increased dust pollution.	Section 3.1.2
The environmental analysis should describe the distance coal dust would disperse from the mine, conveyor belt, and Ladd landing.	Section 3.1.1
Project impacts to air quality in the Homer area should be addressed in the SEIS if Chuitna coal is used to generate power for the Pebble Mine project.	Section 3.1.2
Impacts to air quality in Beluga area need to be included in the environmental analysis.	Section 3.1.2
The Coast Guard and EPA should require Best Available [Control] Technology for pollution including dust mitigation, water discharge, and emissions.	Section 3.1.3
Potential project impacts to the Alaskan climate should be addressed in the SEIS.	Section 3.1.2
The SEIS should address the potential health effects resulting from coal dust pollution from the conveyor belt, as well as the potential for groundwater contamination.	Sections 3.1.2 and 3.4.2
The contribution of burning coal to greenhouse gas emissions should be addressed in the SEIS.	Sections 2.5.2 and 3.1.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The contribution of project-related diesel fuel consumption to greenhouse gas emissions should be addressed in the SEIS.	Sections 2.5.2 and 3.1.2
Cultural Resources	
The SEIS should discuss how cultural resources and inadvertent discoveries of human and archaeological remains would be handled.	Section 3.17.2, Section 3.17.3
Environmental Justice	
No comments.	--
Freshwater Aquatic Ecology	
The SEIS should address whether the reduction of groundwater from the removal of wet coal would lower surface water flows and reduce the survival of salmon fry in the rivers over the winter.	Sections 3.4.2, 3.5.2, and 3.9.2
The potential impact of uncovered coal piles on fishable streams as well as the impacts of port and berth operations on the Cook Inlet beluga whale should be included in the environmental analysis.	Sections 3.9.2 and 3.11.2
BACT measures should be applied to any water discharges from the project.	Sections 3.1.3 and 3.7.3
The SEIS should address whether streams and lakes in the area will remain fishable/swimmable once the proposed project is developed.	Section 3.5.2
The SEIS should discuss how water from the project will be managed and whether it will affect insect and fish habitat of the Chuitna, Lewis, Theodore, or Beluga rivers.	Sections 2.1.2, 3.5.2, and 3.9.2
The ADF&G instream flow reservation for the Chuitna River should be considered in the SEIS.	Section 3.5.2
Potential impacts to salmon fry from increase levels of zinc, manganese, iron, and sulfate in the rivers and streams should be addressed in the SEIS.	Sections 3.5.2 and 3.9.2
The SEIS must identify Essential Fish Habitat and describe measures to mitigate such impacts.	Sections 3.9.1 and 3.9.2
The SEIS should evaluate the potential impact to eggs in spawning areas should the proposed project reduce flows in the Chuitna River below the mouth of Lone Creek.	Section 3.9.2
The SEIS should describe monitoring procedures of fish production in Threemile Creek.	Section 3.9.3
Potential short- and long-term impacts on streams resulting from project development should be disclosed for streams 2002, 2003, and 2004.	Sections 3.5.2 and 3.9.2
The SEIS should address the potential for impact to aquatic life resulting from project water discharges/runoffs altering surface water temperature, chemistry, mineral, and pH.	Sections 3.5.2 and 3.9.2
The SEIS should identify and describe the direct and indirect project impacts on freshwater habitats (streams, lakes, wetlands).	Section 3.9.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Potential impacts from mine dewatering on streams, lakes, and wetlands, resulting in net loss of productivity areas for freshwater species, should be evaluated in the SEIS.	Sections 3.5.2, 3.7.2, and 3.9.2
Impacts to benthic macroinvertebrates (prey for fish) from mine dewatering that could result in water chemistry change should be analyzed in the SEIS.	Section 3.9.2
SEIS should evaluate whether mining operations, such as the partially covered conveyor and wastewater and storm water discharges to streams, would result in impacts to salmon and salmon-bearing streams.	Sections 3.5.2 and 3.9.2
The Chuitna River is considered to be one of the top 20 salmon streams in the Cook Inlet. The SEIS should include a commitment to ensure no discharge from mining operations enter the Chuitna River or associated drainages.	Section 3.9.2
Runoff and drainage from coal piles at the port should be discharged directly to Cook Inlet and not to Lone Creek (tributary to the Chuitna River), which is valuable habitat for King salmon spawning beds.	Section 3.9.2
The SEIS should consider that the Chuitna River has "navigable" status and should not be affected from project runoff.	Sections 3.5.2 and 3.9.2
Potential project impacts to salmon-rearing streams from coal dust should be evaluated in the SEIS.	Section 3.9.2
The SEIS should describe and disclose how streams and rivers will be protected from runoff from the coal mine. Storm water events need to be included in the evaluation.	Section 3.9.2
A monitoring plan for discharge into Lone Creek should be described in the SEIS to ensure no effects.	Section 3.9.3
The SEIS should address project impacts to salmon streams and tributaries to marine and freshwater systems.	Sections 3.9.2 and 3.12.2
Potential project impacts to pink salmon, which already show signs of contamination from PCBs, PCHs, and mercury, should be evaluated in the SEIS.	Section 3.9.2
Mitigation of potential impacts to the Chuitna River fisheries should include ADNDR and ADF&G plans for restoration to the salmon populations of the Theodore, Lewis, and Ivan rivers. This would decrease likelihood of trespass to fish the Chuitna River.	Section 3.9.3
Project components must be evaluated in the SEIS to avoid and minimize disturbance to fish and wildlife.	Sections 3.9.2 and 3.8.2
The SEIS should evaluate the potential impacts of dewatering to freshwater aquatic resources in the project area and the entire Chuitna River watershed.	Section 3.9.2
The potential for water from the project to enter area streams and creeks negatively impacting the fish should be quantified.	Section 3.9.2
The SEIS should include compensation for restoring the Theodore, Lewis, and Ivan rivers to offset potential impacts to the Chuitna River as well as to protect the overall area feed stock against damages.	Sections 3.5.2 and 3.9.2
Geology and Physiography	
Irreversible impacts to the topography, including mountains, should be addressed in the SEIS.	Sections 3.2.2 and 3.22.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The SEIS should address seismic activity and conduct studies within Cook Inlet, particularly where two main fault lines are located in the vicinity of the proposed dock site.	Section 3.2.2
Erosion and sloughing occurrence along the coastal bluff should be addressed in the SEIS.	Section 3.2.2
The potential for earthquake in the region and the corresponding risk of pollution from the stockpiled coal being shaken into the Cook Inlet needs to be addressed within the SEIS.	Sections 3.2.2 and 3.10.2
Erosion impacts to the Threemile Beach from ship wakes should be evaluated in the SEIS.	Section 3.2.2
Groundwater	
Potential impacts to Beluga residents' deep water wells from water drawn to support the proposed mine should be evaluated in the SEIS.	Section 3.4.2
The SEIS should address potential impacts from the removal of groundwater in the form of wet coal.	Section 3.4.2
BACT requirements should apply to all reclamation and ground water control programs.	Section 3.4.3
Potential impacts to the drinking water supply for humans and wildlife should be addressed in the SEIS.	Section 3.4.2
Potential impacts to spring-fed lakes from groundwater pumping should be evaluated in the SEIS.	Sections 3.4.2 and 3.9.2
Testing of the water table for the entire project development area should be part of the baseline information in the SEIS.	Section 3.4.1
Water chemistry and physical characteristics, such as temperature data should be included in the baseline data for surface hydrology and groundwater analysis.	Sections 3.4.1 and 3.5.1
The SEIS should describe the proposed dump and wastewater system planned for the camp and identify any potential impacts to local water wells and measures to protect them.	Section 3.4.2
The potential for negative health effects to the local population, including Tyonek and Beluga residents, needs to be addressed in the SEIS (e.g., drinking water).	Section 3.4.2
Hazardous Materials and Wastes	
Landfill operations within the Chuitna River drainage, including the proposed landfill to service mine operations and the camp, should not be allowed. Landfill could contain hazardous waste and remain after mine operations have ceased.	Sections 2.1.2 and 3.20.2
Impacts to wetlands and streams from spills of fuels, lubricants, and coal during transport should be addressed in the SEIS.	Section 3.20.2
A description of how much fuel will be stored at Ladd Landing, the housing complex, and mine site should be included in the SEIS.	Section 3.20.1
The SEIS should evaluate the potential for mercury leaching and groundwater contamination.	Sections 3.4.2 and 3.20.2
Contingency plans for fuels, lubricants, and coal spills should be included in the SEIS.	Section 3.20.3

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Ice and tides in the inlet should be addressed in the SEIS to minimize the potential of damage to coal barges that could result in coal spills and pollution.	Section 3.20.2
The SEIS should describe the planned fuel storage facility and how potential fuel spills would be handled.	Sections 2.1.2 and 3.20.1
Potential impacts from blasting and use of explosives should be analyzed in the SEIS.	Section 3.20.2
Potential impacts from approximately 4 lbs/acre/day of coal and coal dust should be evaluated in the SEIS.	Section 3.20.2
The SEIS should provide an in-depth description of the sedimentation ponds and include whether the ponds will be lined, methods to control overflow, and plans for dredging and disposal methods for dredged material.	Section 3.20.2
The SEIS should address levels of aqueous hydrocarbons that are expected to be released into the onshore and offshore watershed.	Section 3.20.2
Impacts to human health should be addressed in the SEIS including increased coal burning and asthma and mercury contamination in salmon.	Section 3.20.2
The SEIS should describe naturally occurring metals such as arsenic, cadmium, lead, mercury, and selenium present in the over- and inter-burden associated with the coal deposit and methods for monitoring.	Section 3.20.1
Potential impacts associated with coal combustion resulting in fire should be evaluated in the SEIS.	Section 3.20.2
Cottonwood and Threemile beaches as well as the tides in Cook Inlet, should be tested and monitored for pollution as part of mitigation in the SEIS.	Section 3.20.3
The SEIS should address the potential impacts of acid mine production, including a discussion on base/acid ratio with comparisons of the Chuitna coal value to other coal deposits.	Section 3.20.2
The SEIS should consider impacts to docking fuel vessels during Turnagain storms and tidal movement to reduce the potential for spills.	Section 3.20.2
The SEIS needs to address potential impacts associated with previous military activities such as a military range and ordnance remains.	Section 3.20.2
The SEIS should address the potential uranium deposits within coal seams and develop measures to ensure that uranium does impact river drainages.	Sections 3.20.2 and 3.5.2
The potential for untreated wastewater spills to impact Cook Inlet should be addressed in the SEIS.	Sections 3.20.2 and 3.5.2
The SEIS should include a discussion that describes how sanitary wastes would be managed and identify where the wastes would be discharged.	Section 3.20.1
Homeland security measures should be included in the SEIS.	Section 3.20.2
The SEIS needs to describe protection measures for the population from hazards, such as the potential for fire associated with the fuel tanks located on the Ladd Landing.	Section 3.20.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Land Use, Access, and Recreation	
Potential project impacts to recreational activities such as fishing, hunting, and enjoying quiet nature should be addressed in the SEIS.	Section 3.13.2
The SEIS should identify improvements to the road systems as a result of increased project-related traffic.	Section 3.13.3
The SEIS should address project impacts to four salmon streams, particularly the Chitna River and Lone Creek, used for recreation, subsistence, and commercial fisherman.	Sections 3.13.2 and 3.16.2
Concerns expressed by the Trustees of the Mental Health Lands associated with the proposed project should be fully disclosed in the SEIS.	Sections 1.6 and 3.13.1
The SEIS should evaluate the potential for impacts to Tyonek's hunting and fishing areas, which have already been adversely affected from past development, because of additional people using the resources.	Section 3.13.2
Potential project impacts to wilderness areas should be evaluated in the SEIS to protect and maintain a healthy ecosystem.	Sections 3.6.2 and 3.13.2
The SEIS should address how trespassing will be managed.	Section 3.13.2
The impacts analysis in the SEIS should address potential project impacts to the sport fishing tourism economy.	Sections 3.13.2 and 3.14.2
The SEIS should discuss the potential for public beach access to be impacted by the proposed project.	Section 3.13.2
The potential of project impacts to local beaches used for recreation, set-netting, and subsistence should be evaluated in the SEIS.	Sections 3.13.2 and 3.16.2
A description of improvements to the road system as a result of project development should be included in the SEIS.	Section 3.13.2
Potential impacts to exploration and enjoyment of the countryside should be evaluated in the SEIS.	
The potential for the project to impact access to areas currently open for hunting and subsistence harvesting should be discussed in the SEIS.	Sections 3.13.2 and 3.16.2
The SEIS should address the potential for coal dust on the roads to affect spruce hen habitat resulting in an adverse impact to the hen hunting party tourism business.	Sections 3.8.2, 3.13.2, and 3.14.2
Potential project impact to the sport fishing tourism industry from contaminated fish should be addressed in the SEIS.	Sections 3.13.2 and 3.14.2
The Alaska Department of Public Safety has responsibility for protection of private property (including Native allotments) from trespass and poaching; their role should be considered in the SEIS as a mitigation measure.	Section 3.13.3
The cumulative analysis should address impacts associated greenhouse gas emissions from project-provided coal, the development of fuel, and fuel transport.	
The SEIS must fully analyze the proposed project's direct, indirect, and cumulative effects on greenhouse gas.	

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The proposed project would allow expansion of coal export to domestic and international markets, especially considering the ability to move larger vessels into the Cook Inlet relative to Tyonek.	
Marine and Commercial Fisheries	
Potential project impacts to marine traffic at the port facility should be evaluated in the SEIS.	Section 3.12.2
The SEIS should address whether the proposed project constitutes a “reasonable concurrent use” under the Shore Fisheries Leases and the potential to impact those leases.	Section 3.12.2
The SEIS should evaluate the potential project impacts to commercial fishing, particularly on Threemile Beach and upstream on the Chuitna River.	Section 3.12.2
Potential project impacts associated with construction of the proposed dock could impact King salmon fishing during low tide and could alter traditional movement of salmon stock.	Section 3.12.2
The SEIS needs to assess impacts of the loading facilities on salmon rearing and escapement. Salmon migrations are a narrow band along the shore to reach the spawning streams. Baseline data should include salmon counts/movements in the port area.	Sections 3.12.1 and 3.12.2
The SEIS should assess the potential impacts to coal deposition on beaches and creeks that could result in obstruction of salmon movement.	Section 3.12.2
Potential effects of the project on halibut fishing and associated tourism in the Cook Inlet, Homer, and Ninilchick, should be addressed in the SEIS analysis.	Section 3.12.2
Impacts to migratory salmon and beluga whale routes from construction of the proposed trestle should be evaluated in the SEIS.	Section 3.12.2
The SEIS should address the potential for discharge of bilge and ballast water from increased project-related ship traffic to introduce non-indigenous marine life into the Cook Inlet and other Alaskan waters.	Section 3.12.2
Project impacts to the natural salmon migration at Threemile Beach and the subsequent effect to commercial fishing should be analyzed in the SEIS.	Section 3.12.2
The SEIS should provide measures that limit construction in Cook Inlet during smelt migration, peak runs of salmon, and commercial salmon fishing days.	Section 3.12.2
The SEIS should consider the Shore Fishery Leases and determine if the proposed project constitutes a “reasonable concurrent use.”	Section 3.12.2
The SEIS should evaluate the potential of introducing invasive species into Cook Inlet from the increased ship traffic and pumping of bilge/ballast water.	Section 3.12.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Impacts to the natural salmon migration that moves from the south to the north toward spawning rivers as a result from construction of the trestle should be evaluated in the SEIS.	Section 3.12.2
SEIS should consider potential project effects to invertebrate and groundfish resources that are harvested for commercial and noncommercial purposes.	Sections 3.12.2 and 3.16.2
The proposed trestle, docking facility, and associated barges will not allow concurrent use as spelled in existing shore leases and will limit the ability to maintain the fishing locations at Threemile Beach for profit. Impacts to shore leases from project development should be addressed in the SEIS.	Section 3.12.2
Runoff water from the proposed project to the Cook Inlet should be analyzed in the SEIS to avoid adverse impacts to migrating salmon, beluga whales, and fish fry.	Sections 3.5.2 and 3.12.2
The SEIS should include measures to annually monitor, by an independent party, and report to local residents the quantities, distribution, and health of fish and wildlife.	Sections 3.8.2 and 3.12.2
Marine Mammals	
Concern expressed that existing baseline data for the beluga whale is not adequate for the SEIS.	Section 3.12.1
Noise impacts to beluga whales from mine operations and construction of the pilings in Cook Inlet should be evaluated in the SEIS.	Sections 3.11.2 and 3.19.2
The SEIS should analyze the potential impacts to the beluga whale from increased shipping traffic in Cook Inlet.	Sections 3.11.2 and 3.19.2
Noise impacts from project development to sand cranes should be evaluated in the SEIS.	Section 3.11.2
Beluga whales are candidates for listing under the Endangered Species Act, and native villages have stopped hunting the whales in an effort to bring them back. The proposed additional pier, associated traffic, and use of wood may reduce their recovery.	Section 3.11.2
Potential impacts from sonic noise pollution from project components (conveyor, ships) to whales and other marine life need to be evaluated.	Sections 3.11.2 and 3.19.2
The SEIS should evaluate the potential for impacts to the seal nursery on the west side of the Cook Inlet.	Section 3.11.2
Potential impacts from the bulkhead and trestle to local beluga whale movements and seasonal migration should be addressed in the SEIS.	Section 3.11.2
The SEIS should address the potential impacts to marine mammals from shifts in water flow as a result of the project development.	Section 3.11.2
Potential impacts to the beluga whale or their prey from coal dust should be addressed in the SEIS.	Section 3.11.2
The SEIS should address impacts to seal pupping and haulout areas located at the mouths of the Chuitna, Threemile, and Beluga rivers.	Section 3.11.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The SEIS needs to fully disclose all potential impacts to beluga whales in the Cook Inlet.	Section 3.11.2
Potential impacts to plankton and marine mammals from increases in carbon dioxide should be addressed in the SEIS.	Section 3.11.2
The SEIS should address runoff water to Cook Inlet and potential impacts to beluga whales.	Section 3.11.2
The SEIS should evaluate the potential impacts to the beluga whale habitat from increased project-related ship traffic in Cook Inlet.	Section 3.11.2
Noise	
Potential noise impacts from coal conveyance to recreational areas and nearby National Park Service lands should be addressed in the SEIS.	Sections 3.13.2 and 3.19.2
Potential noise impacts to local residents from the conveyors and coal ship loading activities should be addressed in the SEIS.	Sections 3.12.2 and 3.19.2
The SEIS should address the potential noise impacts to residences from additional helicopter flyovers.	Section 3.19.2
Potential noise impacts to songbird and raptor reproduction should be addressed in the SEIS.	Sections 3.8.2 and 3.19.2
Potential noise impacts from project development should be quantified in the SEIS.	Section 3.19.2
Oceanography	
Potential project impacts to the ocean from coal dust blowing from the partially covered conveyor should be evaluated in the SEIS.	Section 3.10.2
The SEIS needs to include data on Cook Inlet salinity and assess how the port facilities may affect natural salinity gradients.	Section 3.10.2
The potential coastline erosion at Threemile Beach from increased ship wave action should be evaluated in the SEIS. Potential impacts to salmon migration from developing sandbars caused by construction of the new trestle should be examined in the SEIS.	Sections 3.2.2 and 3.10.2 Sections 3.10.2 and 3.12.2
Socioeconomics	
The proposed project would promote future Alaska coal resource development.	Section 3.14.2
The SEIS should consider the positive benefits the proposed project would provide to the Alaskan economy.	Section 3.14.2
The proposed project would create new, high quality jobs for southcentral Alaska.	Section 3.14.2
The proposed mining project would generate income to the local businesses that provide supplies and services to the mining industry.	Section 3.14.2
The proposed mining project would benefit U.S. balance of trade, since coal sales could be to foreign buyers.	Section 3.14.2
The SEIS should examine the economic feasibility of the proposed project relative to the impacts that could potentially occur in the area.	Section 3.14.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The potential project impacts to the hunting and fishing business, and tourism should be addressed in the SEIS.	Section 3.14.2
The SEIS should discuss the potential effect to housing valuation as a result of project development.	Section 3.14.2
The Ladd Landing development and offshore trestle would severely undermine shore-side and offshore fishing in the area with serious economic and cultural ramifications.	Section 3.14.2
The SEIS should address the costs associated with moving the coal facility to Granite Point.	Section 3.14.2
Electricity required to power the proposed project may result in a reduced supply and increased cost to consumers in the Cook Inlet.	Section 3.14.2
The beneficial impacts associated with the development of the Chuitna Coal Project by creating new economic opportunity (jobs, businesses) in southcentral Alaska and encouraging the development of Alaska energy resources should be discussed in the SEIS.	Section 3.14.2
The SEIS should address potential project impacts to the currently robust salmon fisheries industry.	Section 3.14.2
The potential for non-economic impacts, such as changes in lifestyle, should be analyzed in the SEIS.	Section 3.14.2
SEIS should evaluate the existing rights of shore fishery leases and consider the relationship of reasonable concurrent use in balancing economic and non-economic impacts.	Section 3.14.2
The SEIS should consider tribal members for construction of the proposed project.	Section 3.14.2
The SEIS should address issues associated with transient workers to the Beluga area and training of Alaskans for construction and operation of the proposed project.	Section 3.14.2
Potential project impacts to the livelihood and lifestyle residents enjoy in the western Cook Inlet area should be identified and evaluated in the SEIS.	Section 3.14.2
The SEIS should address the potential impacts to the economic viability of existing bulk fuel plants if the new facility were open to the public.	Section 3.14.2
Potential project effects to the cost of fuel, goods and services, and impacts to public infrastructure with a population increase should be addressed in the SEIS.	Section 3.14.2
The socioeconomic impacts analysis should include an evaluation of economic impacts resulting from increased mercury emissions.	Section 3.14.2
U.S. vessels should be considered so that Alaska can economically benefit from shipping the mine's coal.	Sections 2.1 and 3.14.1
The economic impacts analysis should include potential loss of fisheries resources, habitats, and sport angler dollars resulting from project development.	Section 3.14.2
The SEIS should discuss project impacts to gas supply on the Tyonek Village.	Section 3.14.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Adverse impacts to the Grant family fishing business from the proposed project's development at Ladd Landing should be evaluated in the SEIS.	Sections 3.12.2 and 3.14.2
Adverse impacts to the Jorgenson fishing business from development at Ladd Landing should be considered in the SEIS.	Sections 3.12.2 and 3.14.2
Adverse impacts to the Kaloa and Company family fishing business should be considered in the SEIS.	Sections 3.12.2 and 3.14.2
Potential project impacts to small furbearers could affect the availability of furs trapped for sale.	Sections 3.14.2
Soils and Reclamation	
The SEIS should identify potential impacts to soils from coal and coal dust.	Section 3.3.2
Changes to soil permeability resulting from the proposed project and impacts to the water table should be considered with concomitant impacts to wetlands/streams.	Sections 3.3.2, 3.5.2, and 3.7.2
The SEIS should ensure that there is sufficient bonding to restore the level of productivity to the area once the proposed mine is closed.	Section 3.3.2
The restoration plan following mine closure must include re-vegetation with native plants.	Sections 3.3.3 and 3.6.3
The potential project effects from removal of topsoil and vegetation to restoration and flood peaks should be considered in the SEIS.	Sections 3.3.2, 3.3.3, and 3.6.2
Subsistence and Traditional Ecological Knowledge	
Potential project impacts to four salmon streams, particularly the Chuitna River and Lone Creek, which are used for subsistence.	Section 3.16.2
Past development has negatively affected Tyonek's hunting and fishing areas with additional people using them. The SEIS should address impacts to subsistence hunting and fishing areas.	Section 3.16.2
During project development land clearing, Tyonek residents should be allowed to salvage spruce and birch trees.	Section 3.16.3
The SEIS should address impacts to Alaska Native subsistence with the addition of 200 to 300 employees in the area and the potential for increased poaching.	Section 3.16.2
The SEIS should incorporate the findings of previous subsistence studies, which found PCHs, PCBs, and mercury in subsistence fish.	Section 3.16.2
Access to areas historically used may be impacted by project development and areas now open for hunting could be closed. The SEIS should address any potential impacts to subsistence permits.	Section 3.16.2
Concerned that lack of baseline data on existing species will make quantifying impacts difficult. Impacting small species such as voles will impact furbearers that are trapped for sale.	Section 3.16.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Potential impacts to subsistence hunting and trapping from relocating wildlife because of project development, should be considered in the SEIS analysis.	Section 3.16.2
SEIS should address whether mine employees will be allowed to hunt or fish, which could potentially interfere with subsistence hunting.	Section 3.16.2
The SEIS should address toxicity to trees and native plants, used for fuel and food, as a result of project development.	Section 3.16.2
Potential project impacts to the moose population should be evaluated in the SEIS.	Section 3.16.2
Discharges into Lone Creek or Chuitna River drainages should not be allowed. Chuitna River and tributaries are salmon streams protected for the benefit and economic survival of the indigenous Tyonek.	Section 3.16.2
Potential project impacts to traditional subsistence lifestyles such as beluga whale harvesting, loss of set-net sites near the proposed pier, fishing, and interruption or reduction of terrestrial hunting and gathering should be analyzed in the SEIS.	Section 3.16.2
The SEIS should examine the potential for impacts to federally recognized subsistence migratory bird hunting, moose, wolves, Ptarmigan and grouse hunting areas as well as fish harvested on the beaches at Tyonek and Beluga.	Section 3.16.2
Impacts to subsistence salmon set-net fishing on the beaches of the Tyonek Subdistrict between May and October should be addressed in the SEIS.	Section 3.16.2
The SEIS should evaluate the potential impacts to the Tyonek residents' subsistence harvesting of seals and beluga whales.	Section 3.16.2
Potential impacts to subsistence harvesting activities should be evaluated as a result of upstream and down-stream sedimentation from solid fill of the intertidal dock facility.	Section 3.16.2
The SEIS should address impact to subsistence harvesting activities related to any changes to fish and marine mammal migration patterns.	Section 3.16.2
Impacts to subsistence harvesting as a result of boat restrictions associated with the proposed project's loading activities which would limit small boat access to beach sites.	Section 3.16.2
Impacts to subsistence harvesting as a result of increased wave action created by large cargo vessels should be evaluated in the SEIS.	Section 3.16.2
The potential impacts to the Native Alaskans' way of life and the effects of pollutants to the wildlife and fish they depend on for subsistence need to be evaluated in the SEIS.	Section 3.16.2
The SEIS should address the potential health effects on the automatic organic lifestyle.	Sections 3.14.2 and 3.16.2
Surface Water	
Potential impacts to the Chuitna River and wetlands would be reduced from the previous proposal.	Section 3.5.2

Table D-1 Summary of Representative Scoping Comments

	COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
	The SEIS should consider the potential for increased flooding with the removal of vegetation.	Sections 3.5.2 and 3.6.2
	Lone Creek, which feeds into the Chuitna River, should be considered as part of the recent decision regarding CWA and feeder waters of navigable rivers.	Section 3.5.2
	Water quality impacts associated with uncovered coal storage and natural mineralization should be addressed in the SEIS.	Section 3.5.2
	SEIS should identify and describe the direct and indirect project impacts on freshwater habitats (streams, lakes, wetlands).	Section 3.16.2
	The SEIS should identify potential project impacts to Felt, Bishop, and Long lakes, which are spring fed lakes below the proposed mine to the north.	Section 3.5.2
	Increased stream flows from project operations could increase TSS and potentially impact salmon or other fish spawning in the streams.	Sections 3.5.2 and 3.9.2
	The SEIS should stipulate that mining from any coal seam or water column that is known to exceed the CWA standards during spring runoff should cease.	Section 3.5.2
	The SEIS should include water quality characteristics of the Chuitna River in 2006 in the baseline data (including conductivity, SS, Fe, Zn, ammonia, Mn, As, Hg, pH).	Section 3.5.1
	A description of where wastewater will be tested (edge of mixing zones or source of outflow as required by permit) and monitored should be described in the SEIS.	Sections 3.5.3 and 3.20.3
	All potential impacts to rivers and waterways, particularly the Chuitna River, from mine effluent should be evaluated in the SEIS.	Section 3.5.2
	Lone Creek is protected under Alaska fishing regulations and drains into the Chuitna River (declared navigable by BLM May, 2006); both are protected under the Clean Water Act.	Section 3.5.2
	Potential project impacts from coal dust to streams and waterways, particularly with strong Turnagain winds, should be evaluated in the SEIS.	Section 3.5.2
	Project components must be evaluated in the SEIS to avoid and minimize disturbance to drainage systems.	Section 3.5.2
	Project components must be evaluated in the SEIS to avoid and minimize changes in character, polluting, or silting of State waters.	Section 3.5.2
	All stream crossing structures (conveyer, road, or utilities) should maintain the hydrologic and ecologic function of the stream and integrity of the floodplain.	Section 3.5.2
	The SEIS should address potential impacts of coal dust to surface water quality.	Section 3.5.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
The potential for water from the proposed project to enter area streams and creeks before negatively impacting the fish should be quantified in the SEIS.	Section 3.5.2
Wastewater and surface water runoff from all project components should meet or exceed the State of Alaska water quality standards.	Section 3.5.2
Vegetation	
The SEIS should address how the proposed project might cause toxicity to trees and native plants which are used for heat and food.	Section 3.6.2
The SEIS should address how the spread of coal dust might affect both wild and cultivated vegetation through water and the resulting impacts to people's health.	Section 3.6.2
Potential project impacts to climate change from tree removal should be addressed in the SEIS.	Sections 3.1.2 and 3.6.2
The SEIS should address the loss of vegetation as a result of mine development and its impact to plant gathering for subsistence.	Sections 3.6.2 and 3.16.2
Re-vegetation of the mine and other disturbed areas should use native plants to reduce potential spread of noxious weeds.	Sections 3.3.3 and 3.6.3
Visual Resources	
Potential project effects to visual resources along the beach should be addressed in the SEIS.	Section 3.18.2
The SEIS should consider the potential impacts to the beautiful country as well as to the sport fishing streams.	Sections 3.13.2 and 3.18.2
Wetlands	
Potential project impacts to wetland and waterfowl/migratory birds from the coal conveyor should be identified in the SEIS.	Sections 3.7.2 and 3.8.2
Potential impacts associated with discharges of mine water into natural waters and project-related withdrawals could adversely affect wetlands at the mouth of the Chuitna River.	Section 3.7.2
The SEIS should identify any impacts to wetlands from lowering groundwater as a result of wet coal removal.	Section 3.7.2
Potential project impacts to wetlands, which are critical habitat for migratory birds, should be discussed in the SEIS.	Section 3.7.2
Wildlife	
Potential displacement of wildlife and birds should be evaluated in the SEIS and mitigation identified.	Section 3.8.2
Potential project impacts to wildlife from reduced beach access should be evaluated in the SEIS.	Section 3.8.2
Potential project effects on wildlife movement and habitat fragmentation from construction of the conveyor and road should be analyzed in the SEIS.	Section 3.8.2
The SEIS should consider measures that would increase conveyor height and allow for free movement of wildlife.	Section 3.8.2

Table D-1 Summary of Representative Scoping Comments

COMMENT BY TOPIC CATEGORY	SEIS CHAPTER WHERE COMMENT WILL BE ADDRESSED
Project impacts to wildlife, especially the beluga whales, should be addressed in the SEIS.	Sections 3.8.2 and 3.11.2
The SEIS should discuss the potential for impacts to wildlife from increased road traffic.	Section 3.8.2
The SEIS evaluation should include bear surveys prior to mine construction to avoid impacts (trapped or destruction) to denning bears.	Section 3.8.2
The SEIS should address impacts to bears should fish supplies be adversely affected by project development.	Section 3.8.2
Potential impacts from project development to the yellow-legged sandpiper that winters at the mouth of the Beluga River and feeds on small clams, should be identified and discussed in the SEIS.	Section 3.8.2
Impacts to already over-harvested moose habitat and whether reclamation would improve habitat should be included in the environmental analysis.	Section 3.8.2
The SEIS should evaluate the impacts of increased human presence on wildlife populations in the area, particularly along roads.	Section 3.8.2
Mine and port operational plans should include measures to avoid bear habituation to humans or garbage.	Section 3.8.2
The SEIS should consider impacts to black and brown bears that search the beaches for stranded fish.	Section 3.8.2

Table D-2 Comments Not Considered in the SEIS Evaluation

- Environmental review process should be expedited.
- The SEIS should use the National Assessment issued under the GCRA Act and additional report in the NEPA analysis of the proposed project.
- EPA should not “fast track” the SEIS process.
- Chuitna Coal Project will provide a benefit to development of coal-to-liquids technology.
- Continued coal use will contribute to global warming and will adversely impact salmon habitat as streams continue to warm.
- SEIS should analyze the effects to air quality if gas-fired power plants are being converted to coal-fired, particularly carbon dioxide which contributes to global warming.
- SEIS must evaluate the proposed project's contribution to global warming since burning coal produces more CO₂ than other fossil fuels.
- The proposed project represents responsible development of Alaska's coal and mineral resources.
- EPA should review impacts from global warming, regardless of where the coal is burned, in context with ESA and its effects to all species.
- The SEIS should consider the proposed project's indirect impacts to the polar bear as a result of global warming.
- Indirect impacts to polar bears and Alaska walrus from use of Chuitna coal for power generation, which contributes to global warming should be addressed in the SEIS.
- The potential impact this project could have on global warming and global warming's effect on the Arctic region needs to be considered.
- The proposed Project will encourage the continued use of coal to generate power resulting in a contribution to global warming impacts, not only in Alaska, but worldwide.
- Continued use of coal to generate power will contribute to global warming impacts to polar bears and Alaska walrus.
- Use of coal to generate power will contribute to global warming impacts to sea ice and glaciers, and increase fires in Alaska.
- Coal used for power generation will contribute to global warming, and the effects of warmer temperatures are responsible for the rise in human disease.
- Coal used to generate power will contribute to global warming and will adversely affect marine habitat in the Bering Sea and Arctic Ocean.
- Burning fossil fuel contributes to climate change. Creating a 25-year supply of coal is a deterrent to finding other fuel alternatives.
- Coal used for power generation will contribute to global warming and adversely affect vegetation, wetlands, Alaska's boreal forest, and yellow cedar.
- Coal used to generate power will contribute to global warming and will jeopardize Alaskan artifacts washed away by eroding coastlines.
- Coal used for power generation will contribute to global warming and will adversely affect Alaska's economy and winter recreation and tourism.
- The Chuitna Coal Project could further intensify the problem of global warming in Alaska.
- The SEIS should address CO₂ emissions.
- The potential for climate change resulting from continued use of fossil fuels may increase, as

Table D-2 Comments Not Considered in the SEIS Evaluation

<p>inexpensive fuels become more available.</p> <ul style="list-style-type: none">• Describe compensation for loss of lifestyle to residents and landowners in the area.• Opposes the Chuitna Coal mine because the nation's energy solutions lie in conservation, efficiencies, and renewable energy sources.• Alaska is contributing more than its fair share of energy to the U.S.• This country needs a sound energy policy that uses renewable energy, not coal which is harmful to the environment.• Priorities should shift from making money to protecting the environment.• Armory Lovins and the Rocky Mountain Energy Institute should be hired as consultants to bring an energy plant to this country.• The EPA should take actions to reduce this country's dependence on electricity.• The devastation of coal mines in Kentucky caused should not be repeated in Alaska.• Conservation would decrease energy use by 40% and could be substituted with other technologies such as solar and geothermal.• If the Republicans want to be re-elected, they should support the public's demand for alternative energy sources.• Destruction to environmental resources should stay in already-impacted states.• The U.S. government should provide loan incentives to current power plants to fund the removal of pollutants from the stacks.• Burning animal fat should be considered an alternative to burning coal as a fuel source.• First world nations should actively support renewable energy alternatives rather than coal.• The EPA should support the world's demands on the U.S. to mitigate the effects of global warming.• An assessment of potential project impacts to global warming should be included in the SEIS.• The project should be postponed until better regulations are in place to protect the land, air, and water from mining operations.• Opposes any new commercial activity in Alaska including drilling, mining, and commercial development.• The proposed mine will increase the impacts that have already occurred from timbering harvesting and other extractive industries.• Opposes the proposed project because the local people will not benefit.• The recent British Petroleum pipeline leak demonstrates the potential to damage the Alaskan ecosystem.• Keep Alaska beautiful for visitors and recreation.• SEIS should fully describe all potential buyers of Chuitna project coal.• Energy conservation measures and transition to renewable energy sources should be considered as alternatives to burning coal.• Renewable power such as tidal, wind, geothermal, wave energy, and small-scale hydro should be considered as an alternative instead of coal power.• Requests the EPA adopt a No Action Alternative.• Nuclear power plants should be considered as a clean alternative to coal-fired plants, which result in increased emissions of CO₂ and global warming.

Table D-2 Comments Not Considered in the SEIS Evaluation

- SEIS should examine an alternative of using petroleum coke for fuel.
- Alternatives to coal mining and burning coal should be considered in the SEIS, which would reduce contributions to global warming and potential impacts to Alaska's ecosystem.
- Alternatives to fossil fuels should be considered in the alternatives analysis of the SEIS.
- EPA is encouraged to support renewable energy as an alternative.
- Criteria for making preferred alternative decisions should be broadened to include impacts on global warming and potential uses for Chuitna coal.
- SEIS should analyze the effects on air quality if gas-fired power plants are being converted to coal-fired, particularly carbon dioxide, which contributes to global warming.
- Monitoring of gases created by coal combustion, such as methane, should be described in the environmental analysis.
- The SEIS needs to describe access to the mine's camp once the Knik Arm Bridge is built.
- Economic impacts to commercial and sport fishing as a result of mercury contamination and shift from gas-fired power plants to coal-fired power plants should be addressed in the SEIS.
- THE SEIS should consider new carbon sequestration technology to avoid potential impacts to the economy and environment.
- SEIS should disclose the economic costs of greenhouse gas pollution as a result of proposed project development using \$64/tc as a low benchmark.
- The SEIS should not only consider the quantitative costs of greenhouse gas, but should include qualitative impacts on the environment and society.
- The SEIS should address the effects of coal used to generate electric power and its contribution to global warming that could adversely affect Alaska's economy.

APPENDIX E
DRAFT SEIS OUTLINE

CHUITNA COAL PROJECT SEIS TABLE OF CONTENTS

COVER SHEET

EXECUTIVE SUMMARY

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- 1.2 Purpose of and Need for Action
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- 1.4 Agency Roles and Responsibilities, Authorizing Actions (i.e., permits and approvals)
- 1.5 Government-to-Government Consultation
- 1.6 Scoping (summary – expanded description in Chapter 4)
- 1.7 Issues and Concerns (bulleted summary – expanded description in Chapter 4)
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- 2.5 Past, Present, and Reasonably Foreseeable Future Actions (for cumulative impact assessment)
 - 2.5.1 Past and Present Actions
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- 4.1 Public Participation and Scoping (Scoping, including issues and concerns, will be summarized in Chapter 1.0 and discussed in further detail here)
- 4.2 Government-to-Government Consultations
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- 4.5 List of Agency Contacts
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COMPLIANCE WITH ENVIRONMENTAL LAWS AND EXECUTIVE ORDERS (EPA/ENSR to discuss relative to agency/applicant compliance)

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Clean Water Act
Noise Control Act
Safe Drinking Water Act
National Historic Preservation Act
Endangered Species Act
Magnuson-Stevens Fishery Conservation and Management Act – Essential Fish Habitat
Floodplain Management Executive Order
Wetlands Protection Executive Order
Migratory Bird Protection Executive Order
Environmental Justice Executive Order
Protection of Children from Environmental Risks Executive Order
Consultation and Coordination with Indian Tribal Governments Executive Order

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