

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

**Reviewer:** NARF Technical Team  
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**Comments**

The first paragraph recognizes that *"In addition to jobs involving labor for wages, subsistence hunting and fishing can be an important component of the socioeconomic system"* and states that *"... food procured by hunting and fishing can be a significant contributor to household and community welfare."* While these statements may be true and correct, this paragraph devalues the subsistence lifeway by describing it as just another way to make a living. After making these statements that downplay the essential importance of the subsistence lifeway to indigenous people, Alaska Natives, and other Alaska residents and communities in the Bristol Bay Region, this brief, four-sentence paragraph refers the reader to another chapter and section of the EIS: *"Subsistence activity is discussed in Section 4.9, Subsistence."* This paragraph sets the stage for an effort to devalue the cultural and spiritual values that a subsistence lifeway has provided to indigenous people for hundreds of years and would continue to provide if these lifeways are not interrupted by industrial development and environmental degradation.

In Section 3.2 Potentially Affected Communities, the list of "potentially affected communities" is incomplete. Table 3.3-1 and the following tables in Section 3.2 are missing several communities evaluated for impacts in Section 4.1 Introduction to Environmental Consequences. Table 3.3-1 and the following tables in Section 3.2 need to be expanded to include King Salmon, Naknek, Aleknagik, Clarks Point, Manokotak, Dillingham, Ninilchik, South Naknek, and Seldovia. All but South Naknek are include in the subsection of Subsistence in Table 4.1-1: Potential RFFAs Evaluated for Cumulative Effects in Section 4.1.

**General.** The topics discussed in this section do not belong in an Environmental Impact Statement (EIS). The "monetized economy" is not an element of the affected environment, nor are jobs, wages, or taxes elements of the natural or built environment. Environmental impact statements exist to balance the economic or development considerations that would otherwise tend to dominate permitting decisions and should be focused as intended on the natural and built environment. As such, Sections 3.3 and 4.3 should be removed from the Environmental Impact Statement. Environmental impacts of the proposed alternative, alternatives that lessen

these impacts, mitigation for these impacts, and irreversible commitments of natural resources associated with the alternatives should be the focus of the EIS.

While comments are provided below on the preliminary draft text of Section 3.3, we reiterate that it should not be included in the EIS.

**Page 3.3-1, first paragraph.** The Subsistence section should not be separated from discussion of the monetized economy in the vicinity of the proposed project. As clearly shown in Table 3.4-1, the majority of the communities surrounding the proposed project are Alaska Native communities that obtain resources through subsistence hunting, fishing, and gathering, and their traditional ways of life, along with voluntary participation in the Western economy. Many of the statistics cited in this section and in Section 3.4 are misleading if community needs and welfare are not viewed with both ways and means of obtaining resources considered. Specific examples are provided in the comments below.

There is complex interplay between subsistence ways of life and the Western economy that cannot be ignored. In areas that have largely practiced traditional ways of life, the introduction of a single large employer can provide short-term gains in the standard of living (as defined by Western metrics), but can also destroy, contaminate, or eliminate access to natural resources on which subsistence communities have depended for millennia. Often, it is these same destructive or extractive industries that provide apparent economic benefits—at least for a few generations. In the meantime, natural resources and cultural knowledge can be irrevocably lost—so that when the industry leaves or the facility shuts down, the cultural knowledge and natural resources that once sustained Native American communities are no longer available to fill the basic needs of the community. Communities such as those in the vicinity of the proposed project are particularly vulnerable to this type of catastrophic loss, since they will have few other resources to fall back on should the global economy, environmental regulations, politics, or simply the end of its working life cause this project to shut down, eliminating the temporary economic benefits to the community that came from jobs, taxes, or infrastructure.

Because these two topics are so interrelated, if they remain in the EIS, Section 3.3 should be combined with Section 3.9, and Section 4.3 should be combined with Section 4.9 (the reference to Section 4.9 at the end of this paragraph was likely intended to be to Section 3.9). It is inexplicable why these topics have been placed so far apart in the structure of the EIS document.

**Page 3.3-1, second paragraph.** The first sentence of Section 3.3.1.1 displays the obvious objective of this section, which is to convince the reader that this project is economically

important to the State of Alaska; however, this is not the purpose of this document. There is no need to discuss the overall extractive economy of the state, with which most readers will be thoroughly familiar. As noted above, the overall economy of Alaska is not a natural or built element of the affected environment.

**Page 3.3-1, fourth and fifth paragraphs.** These paragraphs illustrate the disadvantages of an economy based on extraction of resources. Large extractive projects such as the proposed Pebble Mine are particularly vulnerable to changes in the global economy. The fourth paragraph states that large mines in Alaska have succeeded in avoiding this fate by “finding additional reserves adjacent to their mine, extending their operating life . . . .” This statement confirms what is obvious to any observer of the past and present permitting processes for the proposed Pebble Project—that the currently proposed project is just the tip of the iceberg and is not economically viable without the inevitable development and exploitation of the ore reserves beyond the initial open pit mine that’s currently proposed. Most, if not all, of the remaining ore body will ultimately be exploited, and the potential environmental impacts from the whole mining operation during the entire life of the mine need to be recognized and evaluated in the EIS.

As one example of the economic interplay discussed above, subsistence activities play a key role in smoothing out the boom-and-bust and seasonal cycles of other available employment in most Alaska communities, particularly in rural areas. A subsistence lifeway is, by necessity, viable year-round and has sustained Alaska Native communities for millennia. Any project that disrupts the cultural knowledge or resource base for these subsistence activities introduces serious risks of leaving these communities vulnerable when the mine inevitably suspends operations, closes, fails, or plays out.

**Page 3.3-2.** Leaving the subsistence economy out of a comparison of national versus southeast Alaska unemployment rates results in a comparison of apples to oranges. Unemployment rates need to be adjusted downward to reflect individuals engaged in subsistence activities that support the basic needs of a community, as well as those, such as elders, who have clear roles in the community but are compensated in a non-monetary manner (e.g., through sharing of food and other community resources). Most of the communities surrounding the proposed project are 65 to 95 percent Alaska Natives, and thus the percentage of non-traditionally “employed” individuals is proportionately high.

**Page 3.3-3, first paragraph.** This description of the economy near the proposed project betrays a typically Western attitude, characterizing communities in the Dillingham Census Area

as having “limited” economic activities. Yet these communities have thrived for millennia in traditional ways of life, generally not through participation in the limited Western job opportunities offered to them. The diversity of natural resources that sustain their communities is particularly high compared to most areas of the United States and compared to areas of Alaska, such as Anchorage, that have become more urbanized. Failure to recognize these traditionally used natural resources as a viable alternative to Western jobs and economic activities results in a highly flawed discussion of the economy of this area.

**Page 3.3-4, Lake and Peninsula Borough and Dillingham Census Area.** As noted above, it is important to integrate year-round subsistence contributions to community resources in comparison to the jobs and industries listed here. A quantitative comparison would be useful in evaluating how important these employment categories actually are for the communities closest to the proposed project.

**Page 3.3-4, Overview of the Cost of Living.** It is impossible to discuss the cost of living without including a full discussion of subsistence contributions to the basic needs of communities, such as Nondalton. Historically, these communities thrived without Western assistance. The more dependent Alaska Native communities become on the Western economy for goods and services, the more exposed these communities become to the high cost of living associated with transportation and importation of goods and services from elsewhere. Despite stating that subsistence would not be addressed in this section, the contribution of subsistence activities to ameliorating the high cost of living is mentioned in the last paragraph of this section on Page 3.3-5. A more quantitative and specific discussion of this contribution is necessary.

**Page 3.3-5, Section 3.3.1.3, Overview of the Regional Infrastructure.** It is unclear what most of these elements have to do with the proposed project and its alternatives, for example: education, health services, water/sewer/solid waste, etc. These are not aspects that will be materially affected by the proposed project. Of the topics included in this section, only regional transportation has the potential to be impacted by the project, and this is discussed in depth in Sections 3.12 and 3.13. It should not be discussed in more than one section and is more easily reviewed in a stand-alone section. Overall, very little of Section 3.3 has any meaningful use in the EIS, and what does is covered elsewhere.

**Page 3.3-6, Transportation, first paragraph.** This assessment of the current and future lack of access to regional transportation infrastructure in remote communities further highlights the critical contribution of traditional subsistence activities in sustaining Alaska Native communities. This is literally a matter of life and death, both physically and spiritually, to the community. If the

proposed Pebble Project or any of its alternatives or build-out scenarios have a detrimental impact on natural resources on which the surrounding communities depend, the viability of these communities will be disproportionately great. Impacts on subsistence ways of life must be placed front and center throughout the EIS and taken very seriously in determining whether this project can or should move forward.

**Pages 3.3-8 to 3.3-14, Potentially Affected Communities.** It is unclear why it is necessary or relevant to characterize these communities in terms of age structure, gender, population projections, employment sectors, housing, and education. These characteristics are not addressed in Section 4.3 as being impacted by the proposed project or its alternatives. Section 4.3 discusses potential employment associated with the proposed project, but only in very general terms and not quantitatively enough for comparison to Table 3.3-3.

A more appropriate characterization of the communities affected by the proposed project would be the degree to which they are dependent on a subsistence economy, as these resources are most likely to be impacted by construction and mining activities associated with the proposed project.

**Page 3.3-10, Economy and Income.** The importance of subsistence as it relates to income should be discussed here, rather than in Section 3.9. The economies of areas that appear to be low-income may instead be more subsistence oriented and subsistence based and are not necessarily lacking in resources to support healthy and fulfilling lifeways for the people living in these communities. In addition, the unemployment rate is misleading for subsistence areas, as discussed above (aside from the margin of error, which is large).

**Page 3.3-11 to 3.3-12, Table 3.3-4.** The number and percentage of individuals engaged in subsistence activities to support their households and/or the larger community should be added to this table to illustrate the importance of subsistence activities in these communities.

**Page 3.3-12, last paragraph.** It is unclear what housing type has to do with evaluation of the proposed project. At the top of Page 3.3-13 is one of several places that mentions declining populations in remote areas; however, Table 3.3-2 does not show declining population projections for these areas. These are thriving communities that wish to remain sustainable in place and should not be characterized otherwise.

**Page 3.3-13, last paragraph.** Again, it is unclear what the challenges of providing education in remote areas of Alaska have to do with evaluating the environmental impacts of the proposed

project. The EIS must be concise, focused, and on-topic to identify and evaluate the environmental impacts of the proposed Pebble Project.