

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

Reviewer: NARF Technical Team
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Chapter: Chapter 4: Environmental Consequences
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Comments

General. As noted for Section 3.3, 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 the regional or state economy, taxes, cost of living, or population characteristics elements of the natural or built environment. Transportation and other infrastructure are already addressed in Section 4.12, and do not need to be further discussed here.

As such, Sections 3.3 and 4.3 should be removed from the EIS. 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 4.3, we reiterate that this section should not be included in the EIS.

Nearly everything discussed in this chapter is purely speculative. The Permit Application itself properly focuses on the mining and transportation elements of the project, as well as describing the natural resources and communities surrounding the project. No claims or promises are made by the applicant regarding training and education; public use of roads, ferries, ports or other infrastructure; providing natural gas to local communities; reducing cost of living; or the amount of taxes that may flow to state or local jurisdictions. The mining operation is clearly designed to be self-sufficient, except to the extent that it may employ individuals from surrounding communities and other areas. Other than wages to individuals that may be employed at the mine, it is not clear that any substantial economic benefits will flow to local communities. Much more likely, profits from the proposed project will not be shared with affected people and communities, while they will bear the brunt of the damages to the

environment and loss of natural resources they currently rely upon for sustainable subsistence and commercial hunting and fishing.

The EIS should not make assumptions or rely on anything not contained in the permit application. Past statements and claims made by the company are relied on in a number of places, and pure speculation is included in others. However, if the proposed project is ever permitted, it is unlikely to have the same ownership structure or financial investors as it does now, and the concessions that future mine owners may make to the people and communities of this region are entirely unknown at this stage. The proposed project must be evaluated on its face, without presumptions of benefits not plainly stated in the permit application, and without assumptions about how affected communities will benefit from taxes yet to be paid and received and considering many other competing uses for such taxes.

4.3 Needs and Welfare of the People – Socioeconomics. As noted for Section 3.3, the regional economy cannot be discussed purely from a monetized standpoint. Subsistence is integrally woven into the economic, social, cultural, and spiritual identities of most of the communities that would be affected by the proposed project. Any discussion of community welfare must take into account resources provided by both monetized and subsistence activities. Section 4.3, if retained, should be merged with Section 4.9 to provide an integrated and comprehensive overview of community resources and welfare.

The potential impacts of a relatively short-term (generationally speaking) but large employer temporarily providing higher-paying jobs and then closing the project should be recognized and evaluated, since this boom-bust cycle would have a highly detrimental impact on the cohesion and structure of Alaska Native communities. Ways of life that depend on subsistence economies and that have sustained Alaska Native communities for millennia can be lost in a few short generations. This sudden loss of the extractive economy and sudden lack of resources to fall back on can be devastating to Alaska Natives once the unsustainable project has run its course. In addition, the resources previously relied on may have been impacted by the project to the extent that even if the traditional knowledge remains, the resources may not.

An assumption that more and higher-paying Western jobs that are available for a couple of decades are automatically beneficial to surrounding communities entirely disregards the destructive dynamic between unreliable and unsustainable extractive economies and traditional and sustainable means of supporting Alaska Native communities through seven generations and beyond.

Section 4.3.2.1 Regional Setting. Education and cultural education opportunities of passing on traditional knowledge for Nondalton residents at Groundhog Mountain, Frying Pan Lake, Upper Talarik Creek and Koktuli watersheds, and the stand of cottonwoods encompassing Alaska Heritage Resources Survey (AHRS) site ILI-00254 will be disrupted because of their proximity to the proposed mine site. Groundhog Mountain, Frying Pan Lake, Upper Talarik Creek and Koktuli watersheds, and the stand of cottonwoods must be included as educational places that would be impacted by the proposed project.

4.3.2.1 Regional Setting. In describing the number of jobs that the proposed project would provide to local communities, the percentage of the mine work force made up by local individuals is not as illustrative as the percentage of jobs in the local communities provided by the mine. Framing the topic in this manner would improve this discussion by placing the number of jobs into context with respect to the existing local and regional economy. This comment also applies to the first paragraph of the Economy and Income subsection under Section 4.3.2.2 Potentially Affected Communities.

The last sentence of the first paragraph states, "These activities could potentially create a large number of indirect and direct jobs in the region, relative to the population." More specific information needs to be provided to support this statement. Exactly how many jobs are expected to be provided? Are there enough qualified individuals in the region to obtain these jobs (i.e., any more than were employed during the pre-development phase), or would most workers be imported from other areas? Are those who are opposed to the proposed project going to be available to work for the mine operator? If the U.S. Army Corps of Engineers (USACE) does not know the answer to these questions, it should not speculate about whether the proposed project is likely to create any more jobs for local communities than it has in the past during pre-development activities, nor whether the few jobs that may flow to local communities could reasonably be expected to even out seasonal fluctuations in income. This comment also applies to the Economy and Income subsection under Section 4.3.2.2 Potentially Affected Communities, which repeats the same information and arguments.

Cost of Living. This section contains many statements unsupported by the permit application. All the transportation components are described as private, and there is no discussion whatsoever in the permit application about community use of roads, the ferry, the port, or the natural gas pipeline. The statements cited by the company (Pebble Limited Partnership (PLP)) are vague and unsupported by the official information in the permit application. Consequently, these statements cannot be relied upon, especially since the future owners and shareholders would make their own choices about the logistics and liability associated with public use of their facilities. There is insufficient discussion of whether the needs of the proposed project would

allow for other uses of the infrastructure (e.g., whether there would be excess ferry or port capacity, whether the mine would require all the natural gas capacity of the pipeline, etc.). There certainly is no evidence that shipping or freight that would benefit the public would be authorized. The statements and conclusions in this section are unsupported by evidence and should be removed.

Education. This subsection contains several unsupported statements and claims, essentially none of which are addressed in the permit application. There is no guarantee that PLP would continue to support technical training, much less expand it, or if it did that it would benefit local communities or increase wages for individuals in these communities. Training or support of local schools is not part of the permit application, and any assumptions about this support should be disregarded. Even more speculative is any possible benefit or impact to local schools, as this depends on a long and unforeseeable chain of events, causes, and effects, including how many families might choose to leave or stay in the area affected by the proposed project, and future choices made by the Alaska legislature about how tax revenues will be used.

Transportation. Again, this subsection relies on wholly unsupported assumptions, including vague statements by the company about “working with all local communities.” There is a description of how use of the roads and ferries might work, without any references at all. The one reference provided in this section is not in the reference list and makes no real commitments. As public use of these facilities is not part of the permit application, it cannot be identified as a potential benefit to surrounding communities. The only use of the spur roads to surrounding communities described in the project application is for transportation of workers living in those communities to the project site (i.e., their workplace).

4.3.2.2 Potentially Affected Communities. This entire section reflects a Western point of view and does not incorporate the views of Alaska Native communities within the areas that would be affected by the proposed project. Specific examples of this insensitivity to the lifeways and culture of the people and communities of this region are provided below:

- An increase in businesses relating to the mining site, while speculative, may provide short-term employment, but may not be long-term and sustainable for the community. The project may bring activities and individuals to the region that may disrupt the cohesiveness and traditional practices of the community, adversely affecting its spiritual and cultural health and resulting in a loss of traditional knowledge and practices.

- A short-term gain in employment and wages may not be considered worth the loss of valuable natural resources on which Alaska Natives have traditionally depended for subsistence and on which current Alaska residents depend for their livelihoods and sustenance. Statements like “any increase in jobs would help the local community” are particularly out of touch with traditional lifeways and community values—because it depends entirely on what kinds of jobs those are, whether they are sustainable, whether they have the potential to enhance or destroy natural resources in ways that can never be recovered.

The failure of this document to reflect Alaska Native views is evident in nearly every section, and results in conclusions that are strongly biased and inaccurate. This is particularly problematic given that most of the affected communities within the areas potentially affected by the proposed project are Alaska Natives. The perspectives of PLP and USACE are clearly represented; however, the perspectives and interests of the affected communities are suppressed and replaced by the USACE’s view of what it believes these communities should want and what is best for the people of the region. This preliminary draft EIS (PDEIS) does not reflect an investment of time or effort by the USACE to determine, recognize, and properly consider what the people of the region actually need and want. Through meaningful consultation, USACE must invest the time and effort necessary to ensure that a balanced viewpoint is presented in the EIS that demonstrates an understanding and cultural awareness of the affected communities and the practices, concerns, and sustainable lifeways of the people in these communities. The voices of the residents in this region need to be heard and recorded in the EIS, and currently their voices are entirely absent in this PDEIS.

Tax Revenue and Other Fiscal Effects. This subsection in particular does not belong in an EIS, and this is just the sort of consideration that an EIS is intended to balance by focusing on impacts to the environment. The tax revenue estimates are out of date and it is impossible to know what these future tax revenues would be used for or whether they would benefit local communities in any way. Most readers are aware that the State stands to benefit from permitting the proposed project. The vital question that the EIS is intended to answer is: What are the costs of the proposed project in terms of adverse impacts to the environment and affected communities and can these costs be minimized to an acceptable degree?

4.3.3 Action Alternatives 2 and 4.3.4 Action Alternative 3. The very slight differences between these two alternatives and Action Alternative 1 (Section 4.3.2) highlight the fact that these are not meaningfully different alternatives to the proposed project. A full range of alternatives have not been provided in this PDEIS.