

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 4.4 – Environmental Justice

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
ADHSS/ DPH/ SOE	1	4.4.2.3	It may be useful to add examples from other mines, such as Red Dog, to the discussion of impacts to implement, incomes, educational attainment, etc.	Add existing relevant examples from other projects, if possible	Examples from other mines have been added to Section 4.3, Socioeconomics, and Section 4.10, Health and Safety.
ADHSS/ DPH/ SOE	2	4.4.2.3	"...there may be additional stress over perceived impacts to fish and the quality of the fish resource, associated with construction and operation of the project. ": this point needs to be addressed in detail in HEC1 SDH	Add potential increased stress from real/perceived impacts to fish quality/quantity to Health and Safety sections, especially social determinants of health	"perceived" impacts has been changed to "real or perceived" or "actual or perceived" impacts throughout.
ADHSS/ DPH/ SOE	3	4.4.2.3	"Impacts on access to and quantity of subsistence resources could be both adverse and positive to health and safety, and many of these effects would be most noticeable to minority and low-income communities in close proximity to the mine site and transportation corridor.": This supports the comment submitted by ADHSS to increase the geographic extent of potential impacts to subsistence	Revise row in Table K4.10-8 with increased geographic extent for construction and operations	The geographic extent was edited, as per the response to comments by ADHSS.
ADHSS/ DPH/ SOE	4	4.4.1.3	Due to uncertainty associated with emissions estimates, complex interactions between multiple contaminants, biomagnification, and the presence of additional environmental stressors, recommend erring on the side of caution and using the phrase "real or perceived effects" or "potential effects" rather than "perceived effects" in the last sentence of the health and safety paragraph.	Consider revising phrasing to "potential impacts on salmon" or something similar. Consider including other wildlife used for subsistence purposes.	Changed to "real or perceived" or "actual or perceived" impacts throughout.

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ADHSS/ DPH/ SOE	5	4.4.2.3	The phrase "changes in cultural perceptions of resources (e.g., fish and animals are seen as tainted-contaminated...", does not capture the inherent uncertainty involved in these large-scale, multi-stage, complex projects that directly impact natural resource deposits.	Suggest using the phrase "real or perceived changes in ..."	Edit made.
ADHSS/ DPH/ SOE	6	4.4.2.3	The phrase "there may be additional stress over perceived impacts to fish and the quality of the fish resource" does not capture the inherent uncertainty involved in these large-scale, multi-stage, complex projects that directly impact natural resource deposits.	Suggest using the phrase "real or perceived changes in ..."	Edit made.
ADHSS/ DPH/ SOE	7	4.4.2.3	spelling error "recourses" should be "resources"	correct spelling of "resources"	Typo corrected.
ADHSS/ DPH/ SOE	8	4.4.2.3	Recommend discussing the risk of neurobehavioral/cognitive disorders posed by exposure to maternally-transferred contaminants in the context of environmental justice.	Recommend discussing the risk of neurobehavioral/cognitive disorders posed by exposure to maternally-transferred contaminants in the context of environmental justice.	Discussion of potential impacts on chronic disease from neurodegenerative/neurobehavioral disorders was not added to this section because of the minimal baseline data and the estimated negligible increases of metals from the project. The following text was added to HEC 7: "Consideration of monitoring of key metrics related to food availability and affordability is recommended to avoid negative impacts on chronic disease and long-term health status. Monitoring of exposure to project-related hazardous chemicals in dietary media may be considered to address uncertainties in exposure and use assumptions."

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ADHSS/ DPH/ SOE	9	4.4.6.2	Changes in subsistence resources can also include quality and safety	Recommend adding a "quality/safety of subsistence foods for consumption" section to discussion.	This section is based on the conclusions in Section 4.9, Subsistence, which did not determine an impact to the quality of subsistence resources, as there would be resources in other areas to access (although that would increase the time and distance).
ADF&G/ Subsistence	10	Secs 4.4.2, 4.4.3, 4.4.4	Mapped subsistence resource harvest areas do not represent just one year of use, but areas that have been used over some period of time. Because an area has been used in one year, does not mean it's always used or vice versa. Stating that the impacts of access to subsistence harvest areas would not be high and adverse neglects the unpredictable nature of subsistence resources. If large land mammals are not present in an area that has been hunted in years past, then the availability of this alternate area does not mitigate the loss of access to the areas around the mine and transportation corridors.	Acknowledge in the assessment the variable nature of subsistence resources in terms of location and abundance and qualify the statement that impacts would not be high and adverse.	Noted that the magnitude of impacts would vary from year to year depending on location of subsistence resources during any given year."