

NPS Comments – Pebble Project Preliminary Draft EIS, Appendix K3.1 - TEK

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
NPS	1	General Comment on Appendix K3.1- Traditional Ecological Knowledge	<p>The NPS (2018) defines TEK as “...the ongoing accumulation of knowledge, practice and belief about relationships between living beings in a specific ecosystem that is acquired by indigenous people over hundreds or thousands of years through direct contact with the environment, handed down through generations.” Unlike Western science, TEK is inseparable from the social and spiritual context of the culture, and represents a tradition of interpreting relationships in the natural world, passed down from one generation to the next (Kimmerer, 2002).</p> <p>In Appendix K of the EIS, Section K3.1, offers some examples of TEK regarding subsistence uses in the study area. These are taken from the Environmental Baseline Document done in 2011, which included tables, charts and maps derived from surveys and interviews, or from an EPA study of TEK in the EPA watershed assessment (2014) based on interviews in the region in 2013. Other information said to qualify as TEK was taken from review by cooperating agencies or from tribal consultation. The examples are statements about fish, animals and other</p>	<p>Recommendation: Several studies conducted over the last two decades provide good examples of TEK specific to the project area. For example, for Stickman et al. 2003, key interview respondents provided information relating to past and present fishing practices; geographic locations including Dena’ina place names of traditional fishing areas; changes in the relative abundance of sockeye salmon and other freshwater fish used for subsistence and observations of change in the environment. Another source of TEK specific to knowledge about caribou in the project area, Van Lanen et al 2018, provides key information on caribou distribution over the previous 50 years; shifts in subsistence uses of caribou, particularly related to access, geospatial information through participatory landscape mapping including vegetation change; local observations of caribou herd, and integration of local and western scientific knowledge. Deur et al. 2018 provides information relating to the values, meaning, beliefs and relationship of the land to the Dena’ina people along with observations of changes to the landscape and watersheds over time. Evanoff 2010, Gaul 2007, Jones et al. 2013, Stanek et al. 2006 also provide TEK specific to the project area. If the EIS intends to recognize all the impacts of the proposed project on sociocultural dimensions of subsistence, it must more fully incorporate possible interruptions and discontinuations in implementation and transmission of TEK.</p>	<p>Although not included in this particular TEK section, many of these documents have been used and are referenced in the analysis of the Cultural Resource Sections (Section 3.7 and 4.7). Section 3.1, Introduction to Affected Environment, provides USACE framework for considering TEK in the EIS.</p>

NPS Comments – Pebble Project Preliminary Draft EIS, Appendix K3.1 - TEK

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
			resources on the lands proposed for development. There is little cultural context and in many cases seem more like recent observations than TEK passed down over generations.		