

**State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 3.9 – Subsistence**

<b>Agency</b>	<b>Comment No.</b>	<b>Section, Paragraph, and Page #</b>	<b>Cooperating Agency Comment (and Purpose of Comment)</b>	<b>Proposed Resolution (Additions or Deletion of Text)</b>	<b>Response</b>
ADF&G/ Subsistence	1	3.9.3, page 4	Effects are minimized.	Document states small effects on resources in the watershed as a whole; impacts would be localized to the vicinity of the project area. Adverse impacts on salmon populations would be felt by all communities in the watershed.	Effects language deleted, and impacts to wildlife and other subsistence resources are discussed more in Section 4.9.
ADF&G/ Subsistence	2	Sec 3.9.3, page 5	Incorrect statement that data available through the ADF&G Community Subsistence Information System are not as recent as the technical paper database.	Either give a different explanation for relying on the technical papers or delete what comes after "reviewed and incorporated into this analysis..." Data in the CSIS is the most current source of data.	Agree, text revised.
ADF&G/ Subsistence	3	Sec 3.9.3, page 7	Would be helpful to have the communities in the immediate vicinity delineated in this table	Highlight those communities, move Port Alsworth since it is not discussed with the other nearby communities.	Port Alsworth was moved further down the table. A note was added to say that the first six listed are closest to the project area.
ADF&G/ Subsistence	4	Sec 3.9.3, page 9	More recent salmon and non-salmon harvest data is available	Salmon harvest data for 2007-2008 (Tech Paper No 352) non-salmon harvest data from 2013 (TP #411).	For consistency in analysis, we determined that data for all resources would come from the same year for each community.
ADF&G/ Subsistence	5	Sec 3.9.3, page 12	More recent salmon and non-salmon harvest data is available	Salmon harvest data for 2007-2008 (Tech Paper No 352) non-salmon harvest data from 2013 (TP #411).	For consistency in analysis, we determined that data for all resources would come from the same year for each community.
ADF&G/ Subsistence	6	Sec 3.9.3, page 15	More recent non-salmon harvest data is available	Non-salmon harvest data 2012-2013, ADF&G TP 411	For consistency in analysis, we determined that data for all resources would come from the same year for each community.
ADF&G/ Subsistence	7	Sec 3.9.3, page 18	More recent salmon and non-salmon harvest data is available	For consistency in analysis, we determined that data for all resources would come from the same year for each community.	For consistency in analysis, we determined that data for all resources would come from the same year for each community.

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ADF&G/ Subsistence	8	Sec 3.9.3, page 21	More recent non-salmon harvest data is available	Non-salmon harvest data 2012-2013, ADF&G TP 411	For consistency in analysis, we determined that data for all resources would come from the same year for each community.
ADF&G/ Subsistence	9	Sec 3.9.3, page 12	Why are only marine mammals singled out as a species group "a smaller proportion of households harvest"? Non-salmon fish and large land mammals, migratory birds and bird eggs, as well as vegetation are all used and/or harvested by greater percentages of households.	Specify why marine mammals are singled out or include other resource categories.	Agree, revised text
ADF&G/ Subsistence	10	Sec 3.9.3, page 15	Why are only marine mammals singled out as a species group "a smaller proportion of households harvest"? Non-salmon fish and large land mammals, bird eggs, as well as vegetation are all used and/or harvested by greater percentages of households.	Specify why marine mammals are singled out or include other resource categories.	Agree, revised text
ADF&G/ Subsistence	11	Sec 3.9.3.4, page 18	Why are only marine mammals singled out as a species group "a smaller proportion of households harvest"? Non-salmon fish and large land mammals, small land mammals, as well as vegetation are all used and/or harvested by greater percentages of households.	Specify why marine mammals are singled out or include other resource categories.	Agree, revised text
ADF&G/ Subsistence	12	Sec 3.9.3.5, page 21	Why are only marine mammals singled out as a species group "a smaller proportion of households harvest"? All other resource categories are used and/or harvested by equal or greater	Specify why marine mammals are singled out or include other resource categories.	Agree, revised text

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			percentages of households.		
ADF&G/ Subsistence	13	Sec 3.9.3.5, page 22	Singling out two reasons that were not given for changes in harvest and use is of limited value. These were open-ended questions, so lots of reasons were not given, not just these two.	Provide reasons that were given or provide more context about reasons for changes in harvests and uses.	Agree, revised text
ADF&G/ Subsistence	14	Sec 3.9.3.5, page 22	This is the only community for which reasons given, or not, for changes in households' harvests and uses was given.	Provide similar data for the other communities.	Most communities had some explanations for changes in harvests; text improved in the paragraphs for Nondalton and Kokhanok
ADF&G/ Subsistence	15	Sec 3.9.3.6, page 24	It isn't stated to what Kokhanok's economy is being compared to. Explain that it has "comparatively little industrial or tourist based economic development."	Explain what it is being compared to - other communities in the region, in the state?	Deleted "comparatively" because the source document did not explain this.
ADF&G/ Comm. Fish/ Homer	16		Although Cook Inlet communities of Ninilchik and Seldovia are referenced, the native villages of Nanwalek and Port Graham and their residents' use of subsistence resources is omitted.	Include specific information on use of subsistence resources by Cook Inlet communities, and include sections by community, particularly for Nanwalek and Port Graham (similar to information provided for Bristol Bay native communities).	According to the most recent comprehensive surveys for Port Graham and Nanwalek, the search and harvest areas for these communities are not near the project area and impacts to subsistence are not expected to occur.