

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

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

**3.11 Aesthetics Resources.** In section 3.11.1 Environmental Impact Statement (EIS) Analysis Area, the U.S. Army Corps of Engineers (USACE) needs to detail the methods for establishing the distances for the "EIS analysis area." In addition, USACE needs to further explain the rationale behind choosing the 12 Key Observation Points (KOPs) in Section 3.11.2.4 and Section 3.11.6 for this analysis as described in Table 3.11-1 and shown in Figure 3.11-1. USACE's selection process is not clear. Groundhog Mountain and Frying Pan Lake are locations near the proposed mine site with viewsheds that are important to the residents and subsistence users of Nondalton, yet these locations are not included as KOPs.

As section 3.11.3.1 states, the Clean Water Act 404(b)(1), Section 230.53 says aesthetics "associated with the aquatic ecosystem consist of the perception of beauty by one or a combination of the senses of sight, hearing, touch, and **smell**." Based on this regulatory definition, USACE needs to include an olfactory analysis. The proposed project will have a smell that is different than the existing environment. The proposed Pebble Project could introduce new odors to the environment at a scale not experienced in the region. Examples of such new odors include, but are not limited to, vapors and dust from operating heavy equipment, dust from haul trucks and excavators, and dust from excavated earth. Including an olfactory analysis in the EIS process would not set a precedent, since USACE has included olfactory analysis in other EIS analyses, like the 2015 EIS for the American River Common Features.

In Section 3.11.4, please include the Newhalen River and Talarik Creek as primary rivers. The Newhalen River a crucial part of the Kvichak watershed. As this section notes, Lower Talarik Creek is a Special Use Area, and both Upper and Lower Talarik Creek "provide habitat for salmon, but also provide important travel routes to remote areas for subsistence use in the summer and winter."