

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

Reviewer: NARF Technical Team
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Chapter: Appendix K, Section 3.1 Intro to Affected Environment (TEK)
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Comments

K3.1 Introduction to Affected Environment – Traditional Ecological Knowledge

As noted in our comments on section 3.1.1 Introduction to the Affected Environment, USACE is relying on a limited list of TEK sources. While this appendix section is a start, it is far from thorough. The list of TEK sources needs to be expanded beyond sources related to Pebble Project documents and agency actions. The “Subsistence Activities” sub-section details some culturally important areas (e.g., Frying Pan Lake, Talarik Creek watershed, mountain behind Nondalton) that are not listed in the next sub-section “Culturally Important Areas.” USACE will need to develop and implement a method for cross-referencing TEK data that describes multiple themes listed in this section. The USACE will also need to define “Culturally Important Areas.” Any such definition can only be appropriately developed through either direct government-to-government consultation between the USACE and the region’s federally recognized Tribes or through the Section 106 process that will occur outside of government-to-government consultation.

This is a very basic start to obtain traditional ecological knowledge. Far more work needs to be done in this area. All TEK information needs to be referenced and threaded through the entire EIS to inform the assessment. Full coordination and collaboration needs to grow and continue to occur throughout this entire process. The USACE should sit and listen, rather than directing the conversation or deciding what is important to include and what is not important enough to include.

Without figures and maps it is not possible to do an in-depth and specific review of this section.