

**Nondalton Tribal Council Comments – Pebble Project Preliminary Draft EIS, Section 4.11 - Aesthetics**

Agency	Comment Number	Section, Paragraph, and Page #	Relevant Text/Subject	Comment	Response
Nondalton Tribal Council	1	Section 4.11	General	<p>Based on the regulatory definition of Aesthetics in the Clean Water Act (CWA) Section 404(b)(1), Part 230.53, the U.S. Army Corps of Engineers (USACE) needs to include an olfactory analysis. This project will have a smell that is different than the existing environment. If the USACE chose not to include an assessment of olfactory impacts, please explain the rationale behind this decision.</p> <p>Another issue with this aesthetics analysis is that is limited to a Western science approach and does not include an analysis of impacts from Indigenous perspectives. In the Native Village of Nondalton Integrated Resources Management Plan (2014), the community voices their concerns regarding visual impacts from the proposed Pebble Project to burials and sacred places, yet this environmental impact statement (EIS) analysis makes no attempt to address such impacts from an Indigenous perspective. Please correct this omission, because aesthetics is not just a Western concept based on Western values and perspectives. Groundhog Mountain and Frying Pan Lake are locations near the Mine Site with viewsheds that are important to the residents and subsistence users of Nondalton, yet this important viewsheds are not included as Key Observation Points. This viewsheds should be identified and described in the EIS, and the potential impacts should be recognized and evaluated.</p>	<p>An olfactory analysis has been added, and included in the DEIS.</p> <p>The discussion of visual impacts to burials and sacred places is discussed in Section 4.7, Cultural Resources. Groundhog Mountain has been added as Key Observation Point. Frying Pan Lake was not added as a Key Observation Point because it would be within the area that would be closed to the public.</p>