

Nondalton Tribal Council Comments – Pebble Project Preliminary Draft EIS Section 3.23 – Wildlife Values

Agency	Comment Number	Section, Paragraph, and Page #	Relevant Text/Subject	Comment	Response
Nondalton Tribal Council	1	Section 3.23	Wildlife Values	It is unclear why this section is titled “Wildlife Values” and why Section 3.24 is titled “Fish Values.” These titles indicate that some kind of numerical value is being placed on the wildlife and fish—monetary values, Natural Resources Damage Assessment (NRDA) thresholds, or some other valuation of the resource. Yet, these uses and human values are described in other sections. Simply titling these sections “Wildlife” and “Fish” might be more appropriate.	Comment noted; the term “Values” was direction received from USACE per their public interest review factor terminology. See Section 3.1, Introduction to Affected Environment, for a complete list of PIR topic location in the DEIS.
Nondalton Tribal Council	2	Section 3.23	Wildlife Values	It is odd to have fish disconnected from the other aquatic life discussed in this section, such as marine mammals. Terrestrial invertebrates and aquatic invertebrates (benthic and epibenthic species) seem to be missing from the discussion, even though these organisms form the foundation of the food chain and will certainly be impacted by the proposed project.	Fish are addressed separately to keep the discussion more streamlined. Discussions on invertebrates that have an aquatic life stage are discussed in the Sections 3.24 and 4.24, Fish Values.
Nondalton Tribal Council	3	Section 3.23	Wildlife Values	This section is solely based on Western science and fails to consider Indigenous knowledge. USACE will need to change this section heading because the only time “values” appears in this chapter is in the title. Nowhere in this section does USACE define and address “values.”	Comment noted. Traditional ecological knowledge is incorporated in the Subsistence Sections 3.9/K3.9/4.9 - Subsistence, and in Section 4.23, Wildlife Values, in regards to information on caribou changes. See also Appendix K3.1 for a summary of TEK discussion in the document. See response to comment 1 on the term “values” as applied by USACE.

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Nondalton Tribal Council	4	Section 3.23	Wildlife Values	<p>Priscilla Russell, in her 1995 paper Some Large Game Animal Traditions of the Inland Dena'ina, describes some of the Inland Dena'ina's wildlife values and spiritual connections to this wildlife this way:</p> <p><i>The Inland Dena'ina have a strong spiritual connection to the natural world of which they believe themselves to be a part. They believe that large game animals and other non-human entities have spirits as do human beings. Because all beings have spirits, they are sacred and should be respectfully treated. (page 14)</i></p> <p>Dr. Duer, Karen Evanoff, and Jamie Herbert address Inland Dena'ina wildlife values, respect, and spirituality in their 2018 report "Respect the Land – It's Like Part of Us" A Traditional Use Study of Inland Dena'ina Ties to the Chulitna River and Sixmile Lake Basins, Lake Clark National Park and Preserve:</p> <p>... animals are traditionally understood to be sentient, and to possess a spirit or something closely analogous to that concept. So too, it must be understood that game species are also traditionally seen as being provided as a gift by the Creator or, at least, creative spiritual forces that reward good behavior and punish bad behavior. While Russian Orthodoxy eclipsed some of these beliefs and values, many aspects of this traditional belief system remain remarkably durable; in some respects, they have been woven seamlessly into Orthodox practice.</p> <p><i>Reflecting these underlying beliefs and values,</i></p>	<p>While some of the locations mentioned in this comment are outside of the EIS analysis area, the values and concepts are addressed under the Sections 3.9/K3.9/4.9, Subsistence and Sections 3.7 and 4.7, Cultural Resources, since those sections discuss values that wildlife have to Alaska Native communities. Additionally, Appendix K3.1 includes comments and input from local communities in regards to impacts on wildlife species.</p>

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				<p><i>some modern tribal members report that people with special training and abilities can spiritually “connect with animals.” They can monitor them remotely through spiritual means. They have dreams of animals that can reveal the animal’s movements and motivations— guiding hunting activities, but also sometimes causing hunters to pause such activities in defense of certain animals. They also can engage with animals to the point that they can “ride along with them” in spiritual form, traveling with walking moose or flying birds, for example. It is suggested that such skills were formerly more common, aiding in shamanic efforts but also in hunting as people became more intimately familiar with animals, their habits, the motivations, and their identities. A small number of individuals report participating in such practices today. (Pages 93-94)</i></p> <p>These quotes are specific to Inland Dena’ina wildlife values. USACE will also need to address Alutiiq and Yup’ik wildlife values. It is unfortunate USACE chose not to include Indigenous values in this section. USACE will need to correct this error of omission.</p>	
Nondalton Tribal Council	5	Section 3.23	Wildlife Values	After addressing “values,” USACE needs to include Alutiiq, Dena’ina, and Yup’ik names for the wildlife discussed in this chapter. Indigenous names for wildlife are just as valid as Latin and common names.	Comment acknowledged. While wildlife species have different names in different languages (and sometimes multiple names in the same language), the English and Latin names are the most commonly used names in the scientific literature and included as identifiers for each species.

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Nondalton Tribal Council	6	Section 3.23.1, 3.23.1.1	Action Alternative 1 - Applicant's Proposed Alternative. Mine Site. Birds	<p>The terminology in this subsection should be revised to refer not to birds “within the mine site” but to birds in the area affected by the proposed project. The proposed mine site does not yet exist, and the potential effects of the proposed project on birds will range well beyond the proposed mine site.</p> <p>The Public Review Draft EIS should be self-sufficient and should not rely on documents to which the reader may not have access. At a minimum, key lists and maps from the reports referenced should be included in the section to give an overview of the presence, distribution, and conservation status of birds and other species.</p> <p>A single set of surveys conducted to support the proposed Pebble Project should not be considered a comprehensive compendium of information. Historical surveys should be reviewed to determine whether they add to the body of knowledge regarding distribution, use, and status of birds in the area.</p> <p>Habitat value maps and lists are good examples of the types of information that should be brought forward into the EIS. More comprehensive versions of studies and reports should be provided in a technical appendix and informative maps in the main section of the EIS.</p>	<p>This section has been revised to include all bird species within a 10-mile radius around the mine site (mine analysis area) to include the vast majority of birds that occur in the area. Species lists will vary overtime, however the majority of species were likely detected during the baseline surveys. Historical survey data was included where appropriate, however the majority of historical data do not provide the level of detail that is provided by the more recent ABR survey data (from 2004 to 2012). To prevent repetition of publically available survey data, a reference has been provided in the text for the key species lists and maps that give an overview of the presence, distribution, and conservation status of birds and other species.</p>
Nondalton Tribal Council	7	Section 3.23.1, 3.23.1.2	Raptors. Results	<p>Beginning in this subsection, maps are referred to that would be very helpful to review; however, none of these maps have been provided for review.</p>	<p>These maps are now available for review in the version of the DEIS released to the public.</p>

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Nondalton Tribal Council	8	Section 3.23.1, 3.23.1.3	Waterbirds.	<p>It is difficult to imagine how baseline surveys conducted for only a couple of years that are now more than 12 years out of date could be a better resource than USFWS surveys conducted twice annually. Comprehensive and long-running data sets are generally better to evaluate long-term averages and trends and identify important outliers.</p> <p>Surveys such as those conducted by the USFWS should be reviewed to identify the additional information these surveys could provide, particularly on recent trends in bird populations and birds use of the area. The USFWS distribution maps would be useful and should be included in an appendix.</p> <p>There is generally an overreliance throughout the EIS on specific baseline studies conducted for the proposed Pebble Project that do not include long-term monitoring and often do not represent current conditions within the area affected by the proposed project.</p>	<p>While long-term data is always valuable, the traditional USFWS aerial transects (located in Survey Strata 8) do not specifically cover the area within the mine site. They are more focused on regions outside of the EIS analysis area (in the Bristol Bay lowlands). They cover areas closer to the west end of Iliamna Lake and towards Bristol Bay. Therefore, their data are more regional and less specific to the Pebble Mine Site. USFWS distribution maps are publically available (https://www.fws.gov/alaska/mbmp/mbm/waterfowl/surveys/ebpsare.htm) and have been reviewed however they do not provide meaningful data since they are older than the baseline survey data.</p>
Nondalton Tribal Council	9	Section 3.23.1, 3.23.1.4	Results	<p>Lists of species (including common names) should be included in the main text or in an appendix. Such lists would allow individuals living in nearby communities to check the lists based on their personal knowledge of the area and evaluate the accuracy and comprehensiveness of this information.</p>	<p>These are all listed in the Environmental Baseline Documents on the Pebble website (https://pebbleresearch.com/download/), which is publically available.</p>
Nondalton Tribal Council	10	Section 3.23.1, 3.23.1.5	Terrestrial Mammals.	<p>In the same way as for birds, maps of habitats and habitat suitability for mammal species should be included in the EIS.</p>	<p>These are provided in the Environmental Baseline Documents on the Pebble website (https://pebbleresearch.com/download/), which is publically available.</p>

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Nondalton Tribal Council	11	Section 3.23.1, 3.23.1.6	Large Mammals. Caribou.	It is good to see some observations in this section from elders and community members living in the region to round out survey observations. Often those living closest to the wildlife have insights into distribution, behavior, and trends that cannot be determined from limited surveys. Other discussions in this section could benefit from more input based on local traditional knowledge—particularly when surveys don't yield sufficient information for species such as for black bear and small terrestrial vertebrates.	Comment acknowledged. This information is included where possible. Comments from local community members are included in Appendix K3.1. Additional information is located in Sections 3.9/K3.9/4.9, Subsistence.