

**State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 4.9 – 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>
ADHSS/ DPH/ SOE	1	4.9.2.4	The predicted number of employees from surrounding communities presented in the first paragraph of this section would be useful to include in 4.10 and K4.10 as they add context, especially to SDH	Add predicted number of employees from surrounding communities to relevant parts of Health and Safety sections	This information has been added to Appendix K4.10
ADHSS/ DPH/ SOE	2	4.9.2.4	The discussion on out-migration due to employment at Red Dog appears to contradict the "stemming of out-migration" discussed in K4.10.2.4 (page K4.10-28). Potential increase of out-migration and subsequent potential impacts on health should also be discussed in K4.10.2.4	Add potential increase of out-migration and related health impacts to Health and Safety sections	Appendix K4.10 draws on Section 4.3, Socioeconomics, for conclusions without repeating all relevant information. No changes made.
ADF&G/ Subsistence	3	Sec 4.9.2.2	Use area maps depict all the places that people use for harvesting wild resources in any given year, but not all areas are equally productive any given year. Although communities may have access to other areas for resource harvest outside of proposed areas with likely disrupted access, those areas may not be an equal substitute.	Include some discussion to this effect, similar to what was included in Chapter 3.	Statement added to the first paragraph.
ADF&G/ Subsistence	4	Sec 4.9.2.2	End of 2nd paragraph, crossing at designated points may add travel time and expense for subsistence users, not just travel time.	Add in that expense may increase with the use of designated crossing points.	Text edited as suggested.
ADF&G/ Subsistence	5	Sec 4.9.2.3	"visit for recreational trips" could include sport hunting or fishing.	Recreation trips to nearby destinations, including for the purposes of sport hunting or fishing.	Text added as suggested.
ADF&G/ Subsistence	6	Sec 4.9.2.4	If there are adverse impacts on salmon runs, the communities affected would not be limited to those closest to the project's infrastructure and transportation activities. Downriver	Change the second to last paragraph to recognize the movement of resources, such as of	The information presented in Section 4.24, Fish Values, does not back up this assertion.

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			communities would be impacted by reduced salmon runs and would not just have "perceived concerns"	salmon runs, and the potential impact that could have on subsistence practices of downstream communities.	
ADF&G Wildlife/ Reg IV	7	Sec 4.9.2.2	<p>The statement..."Once constructed, the transportation corridor roads and the natural gas pipeline corridor ROW could have a positive effect on access to subsistence resources (depending on the level of access agreed to between the State, PLP, and the Lake and Peninsula Borough [LPB]) because these cleared routes could facilitate some overland travel by ATVs and snow machines."</p> <p>Positive effect on access to subsistence resources cannot be supported without further detail and analysis. There is just as likely to be a net negative effect depending on how access to the road and surrounding land is managed, and management of the subsistence resources. Increased access, while opening other areas, is likely to also increase harvests by both subsistence and non-subsistence users and may have a negative effect on subsistence opportunity.</p>	Analyze and present the potential negative effects to subsistence resources of increased access, as well as benefits.	This is addressed in the subsections for "Changes in Competition for Resources".