

Nondalton Tribal Council Comments – Pebble Project Preliminary Draft EIS, Section 4.12 - Transportation and Navigation

Agency	Comment Number	Section, Paragraph, and Page #	Relevant Text/Subject	Comment	Response
Nondalton Tribal Council	1	Section 4.12	Transportation and Navigation	The introduction identifies potential impacts associated with transportation and traffic. The section should also identify the potential for spills of chemicals, concentrates, and other releases as a result of transportation and navigation activities or otherwise identify the section of the environmental impact statement EIS in which this information can be found.	Impacts from spills are found in Section 4.27, Spill Risk. A reference to that section was added.
Nondalton Tribal Council	2	Section 4.12.2.1	Action Alternative 1 - Applicant's Proposed Alternative	According to Section 3.12.1, "There were no fatal motor vehicle accidents reported for 2016 and 2017 on any existing internal community roads that would be connected to the mine site or transportation corridor (AHSO 2018)." Section 4.12.2 should acknowledge an increase in the likelihood of fatal motor vehicle accidents as a potential consequence of the proposed action.	Motor vehicle accidents are discussed in Section 4.10, Health and Safety and Appendix K4.10, Health and Safety. No changes made.
Nondalton Tribal Council	3	Section 4.12.2.1	Surface Transportation. Mine Site	This subsection describes public access to or through the mine site being restricted for safety. The subsection should specifically identify where the restrictions would occur, such as at the property boundaries, permit area boundaries, or otherwise. How access would be controlled should also be described, such as using fencing and signage. The subsection should address how long the closure restrictions would be maintained and over what areas.	The exact location would be determined after the NEPA process, but it would likely be at the permit boundary. That text was added.
Nondalton Tribal Council	4	Section 4.12.2.1	Surface Transportation. Mine Site	According to the subsection, "... subsistence overland travel that occurs in the area of the mine site that may require adjustments to traditional routes." The subsection must identify which traditional routes would require adjustments and indicate how the new routes would compare in terms of distance and elevation gains and losses and whether they provide comparable access to subsistence resources.	Section 4.9, Subsistence, discusses the overland routes used for subsistence, and the impacts to them.

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Nondalton Tribal Council	5	Section 4.12.2.1	Surface Transportation. Mine Site	The subsection contains a sentence that confuses the decrease in impacts that would occur at closure with the need to maintain some level of access after mine closure for water treatment and monitoring. The sentence, including a suggested change, is provided here: "The magnitude of impact would decrease after mine closure, but not be eliminated, because the road system would be retained as long as required for the transport of bulk supplies needed for long-term post-closure water treatment and monitoring."	The magnitude, as discussed in this statement, refers to the intensity of the impact, which would decrease as truck traffic decreases after closure. The impact would not be eliminated, however, as there would be some traffic needed to maintain the facilities.
Nondalton Tribal Council	6	Section 4.12.2.1	Surface Transportation. Transportation Corridor	<p>This subsection should in all places indicate the miles and type of roads that would be constructed. The subsection should contain a table summarizing and comparing the existing roads and new roads and their current and proposed conditions.</p> <p>The subsection should identify the current maintenance requirements and responsibilities for the existing roads and identify each party that would be responsible during each phase of the mine life-cycle for maintenance once the roads are constructed. This should be recognized and identified as a Key Issue, together with the Potential for Spills and Other Releases.</p>	The information that is requested is more detail than is necessary to include in the EIS in order to disclose the reasonably foreseeable impacts of the proposed project and determine differences in alternatives. No changes made.
Nondalton Tribal Council	7	Section 4.12.2.1	Surface Transportation. Transportation Corridor	According to the subsection, "Impacts on surface transportation would last through the life of the mine, and through post-closure, until the roads are no longer deemed necessary for post-closure monitoring activities." The following should be added to this statement and similar statements throughout the EIS concerning post-closure activities: Post-closure activities are assumed to be necessary into perpetuity; therefore, the impacts to some extent will likewise last forever.	We respectfully disagree. The infrastructure could be deemed no longer necessary. No changes made.

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Nondalton Tribal Council	8	Section 4.12.6	Cumulative Effects	This section identifies Reasonably Foreseeable Future Actions but does not adequately analyze the potential impacts in terms of additional roads and other transportation requirements including maintenance and the potential for spills and other releases. The section fails to describe the cumulative impacts in comparison to the existing conditions in particular and how many of the potential future actions are more likely or likely at all, as a result of the proposed action.	The cumulative effects section has been expanded and heavily edited. NEPA does not require a determination on likelihood.