

Nondalton Tribal Council Comments – Pebble Project Preliminary Draft EIS Section 4.6 – Commercial and Recreational Fisheries

Agency	Comment Number	Section, Paragraph, and Page #	Relevant Text/Subject	Comment	Response
Nondalton Tribal Council	1	Section 4.6	General	<p>Bristol Bay Watershed and Cook Inlet support several important salmonid species that will be irrevocably impacted by the proposed mine including Chinook salmon, coho salmon, chum salmon, pink salmon, and sockeye salmon. All these salmon species, particularly sockeye salmon, form and support world-renowned commercial fisheries and an economic engine for the region. The region also supports a robust crab and groundfish commercial fishery, robust recreational fishery, subsistence fishery, and cultural fishery.</p> <p>All three of the Commercial and Recreational Fisheries sections (Sections 3.6, 4.6, and K3.6) provide an incomplete and narrow discussion that is not appropriate for a proposed project of this size that spans several watersheds and would adversely impact multiple fishery resources, including State of Alaska Special Status Species in Bristol Bay and Cook Inlet, long after construction and operation of the mine and associated facilities. It is misleading to say this is a 20-year project when buildout and expansion will occur over 78 years, and multiple other mining projects would use the infrastructure that's part of the proposed Pebble Project. Based on the projects that intend to use the Pebble infrastructure, this project would continue impacting commercial and recreational fisheries forever.</p>	Comment acknowledged. The EIS addresses the project as described in the project application, per USACE authority. The cumulative effects section addressed the scenario of a 78-year project expansion.
Nondalton Tribal Council	2	Section 4.6	General	<p>The environmental impact statement (EIS) for the proposed Pebble Project must recognize and evaluate the potential for the project to devastate the subsistence, commercial, sport, and cultural resources that the tribes and many others rely on in the Bristol Bay and Cook Inlet Watersheds, including the economic engine provided by the world-class commercial, sport, and subsistence salmon fisheries. The EIS must identify and</p>	The analysis in the DEIS includes revenue created by ancillary and indirect employment from the fishing industry. No changes made.

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				evaluate potential impacts to other professions in addition to those it currently mentions. Many other people will be adversely impacted by reduced fisheries in the region, such as boat mechanics, net and gear manufacturers, medical facilities, etc.	
Nondalton Tribal Council	3	Section 4.6	General	All figures should show the entire area potentially affected by the proposed project including: the mine area and associated infrastructure, roads, ports, ferry terminals, and entire lengths of pipelines. The proposed project is massive and would cross and impact both Bristol Bay and Cook Inlet. Reducing the scope of the discussion to just areas “hydrologically connected to the project” is gravely inadequate. The area potentially affected by the proposed project and the resources within this area that support viable worldwide commercial and recreational fishery economies are all connected. The proposed project, if it is permitted, would impact estuary and nearshore rearing and foraging habitat for salmonids and prey resources. Forage fish, such as Pacific herring, are important prey resources and support an important commercial fishery. Salmon stocks depleted by mine impacts would in turn result in other stocks having to fill the gaps for commercial, subsistence, cultural, and sport fisheries. If the proposed project is permitted and constructed, escapement numbers decrease across all affected watersheds.	This section uses Section 4.24, Fish Values to determine the extent of impacts and the EIS analysis area. Streams that are hydrologically connected to the project would be where the impacts would occur.
Nondalton Tribal Council	4	Section 4.6	General	Given the importance of Bristol Bay and Cook Inlet salmon stocks to sport, commercial, and subsistence fishery groups in the region and beyond, and the severe impacts to both watersheds that a mine of this scale would pose, the EIS must take a hard look at these impacts to these valuable resources and evaluate direct, indirect and cumulative impacts to the Bristol Bay and Cook Inlet fisheries as well as additional fisheries that would be affected.	Comment acknowledged. This section uses the analysis in Section 3.24 and 4.24, Fish Values, to determine the impact on fisheries. No changes made.

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				These fisheries also provide an abundant prey resource for several aquatic and terrestrial species in both the freshwater and marine ecosystems of Bristol Bay and Cook Inlet Watersheds as well as in the other waters including the Pacific Ocean. The EIS must recognize, quantify, and evaluate the impacts related to the loss of this large prey resource that sustains aquatic and terrestrial species within the affected area of the proposed project and across the full range of their adult migratory routes.	
Nondalton Tribal Council	5	Section 4.6	General	Related to commercial and recreational fisheries are the prey resources on which these fisheries rely. The EIS must include a robust discussion on how the project will impact prey resources across Bristol Bay and Cook Inlet. The EIS must evaluate the direct, indirect, and cumulative impacts of the proposed project to prey resources in both Bristol Bay and Cook Inlet. This includes evaluating impacts to forage fish that serve as a prey resource, and in the case of Pacific herring, the EIS must evaluate the impacts to a commercial fishery.	Comment acknowledged. More information on additional species, such as Pacific herring, was added between the Preliminary DEIS and the public release of the DEIS.