

EPA 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
EPA	1	Section 3.6/4.6	General Comment	We recommend including precise definitions of the economic terms used, as well as a discussion of any data gaps or limitations of the available data and any assumptions used in the calculations. We also recommend that the document include some discussion on the screening process used to identify the impacts presented in the analysis.	Some definitions have been added and are also found in the project glossary. Section 4.6, Commercial and Recreational Fisheries, explains the process that was used for determining the parameters of analysis.
EPA	2	Section 3.6/4.6	General Comment	We recommend that the DEIS include a discussion of how the affected sectors link to other parts of the wider economy.	The analysis in the Draft EIS includes revenue created by ancillary and indirect employment from the fishing industry. No changes made.
EPA	3	Section 3.6/4.6	General Comment	We recommend that the DEIS acknowledge that the total economic value of the resource in a cost-benefit framework is not being considered in this assessment. This assessment is more narrowly focused on a few of the many sources of value and places a value of zero on passive use, existence, and bequest values. In addition, for the recreational fishery, expenditures represent the cost of accessing the resource, and do not reflect the consumer surplus or willingness-to-pay for a day of recreational or sport fishing. This is an important source of economic value.	Comment acknowledged. The information presented is included in the EIS in order to disclose the reasonably foreseeable impacts of the proposed project. No changes made.

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EPA	4	Section 4.6	General Comment	The economic impacts presented are limited to the direct impacts on commercial permit holders, the processing sector, and include some information on fiscal contributions to state and local governments. The impacts presented here do not include the downstream impacts that would typically be part of an economic impact analysis. (See Knapp, G., Guettabi, M. and Goldsmith, S., 2013. The Economic Importance of the Bristol Bay Salmon Industry. Institute of Social and Economic Research. University of Alaska for a more comprehensive assessment.) These omissions could have large effects on the analysis; therefore, we recommend that the DEIS explain the basis for the analysis area and the impact indicators.	The analysis in the Draft EIS includes revenue created by ancillary and indirect employment from the fishing industry. The document referenced has been reviewed and information incorporated as appropriate.
EPA	5	Section 4.6	General Comment	There is little discussion of how changes in the fishery could affect local households. The section on recreational fisheries is limited to information on the number of trips and days spent fishing. The expenditure estimates come from a single study conducted in 2007 [see Duffield et al. (2007)]. We recommend including discussion on how those numbers are derived, whether they are still applicable, and any limitations of the data.	Comment acknowledged. The information presented is included in the EIS in order to disclose the reasonably foreseeable impacts of the proposed project. The additional information requested would not be needed to make a comparison of alternatives. No changes made.

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EPA	6	Section 4.6	General Comment	<p>We recommend that the analysis in Section 4.6 address the following additional potential impacts of the proposed project:</p> <p>[A] Potential impacts of long-term tailing storage on fisheries and subsequent impacts on commercial and recreational activities;</p> <p>[B] How many temporary workers will be required to live and work in the area, and the impacts this temporary boost in population would have on the area and subsequent effects on commercial fishing and recreation;</p> <p>[C] The magnitude of the increased traffic as a function of the mine size. This could have significant effects on recreational activity; and</p> <p>[D] Potential impacts on the recreational fishery from increased shipping across Iliamna Lake. In addition to increased road traffic, increased boat traffic on Lake Iliamna during the summer and winter could affect local boat traffic, subsistence harvests, recreational fishing and other local activities.</p>	<p>[A] This section uses the analysis in Section 4.24, Fish Values, to determine the impact on fisheries based on the impacts to fish. No changes made.</p> <p>[B] This information is presented in Section 4.3, Needs and Welfare of the People—Socioeconomics. Reference to that section has been added.</p> <p>[C] Traffic increases and the impacts to the existing transportation systems are discussed in Section 4.12, Transportation and Navigation. An increase of traffic as it would impact recreation activities is discussed in Section 4.5, Recreation.</p> <p>[D] This section uses the analysis in Section 4.24, Fish Values, to determine the impact on fisheries based on the impacts to fish. No changes made. Impacts of boat traffic to transportation, recreation, and subsistence are discussed in those sections in the EIS.</p>
EPA	7	Section 4.6	...change in consumer willingness to pay...	<p>Use of the term consumer willingness to pay may be misused in this case. Consumer demand (as a function of brand identification) or brand premium/discount is probably more appropriate here and we recommend that this adjustment be considered in the DEIS</p>	<p>We respectfully disagree. The terminology used is correct for the point that is being made.</p>

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EPA	8	Section 4.6	<p>Recreational Fisheries. With recreational fisheries, the potential effects of the proposed project are:</p> <ul style="list-style-type: none"> • Direct loss of angling days on portions of the North and South Fork of the Koktuli River and Upper Talarik Creek, which are located in the project area. • A reduction in angling days downstream of the project area if the project reduces fish populations in downstream waters. • Reduction in angling days caused by the quality of opportunities on waterbodies affected by the selected transportation routes. • An increase in angling days caused by an increase in the number of opportunities through expansion of the local road network or an increase in regional population. 	We recommend that the DEIS explain how the four potential effects on recreational fisheries were identified.	Information added for clarity on how the potential effects were identified.
EPA	9	Section 4.6.1.2, Page 4.6-6		It is mentioned that one of the impacts to the recreational fishery will be a change in fishing 'experience' and the surrounding 'environment', although this type of value is not captured with the expenditures data. This value is part of the consumer surplus or WTP for a day of recreational fishing in the area. Expenditures data are separate, representing the cost of accessing these sites. We recommend that this difference be	This section uses the analysis presented in Section 4.5, Recreation, where recreational setting and experience is discussed.

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				discussed and analyzed in the DEIS.	
EPA	10	Section 4.6.2.2, Page 4.6-6		Under scenario 1, it is hypothesized that there are plenty of substitute sites for the Gibraltar River. It would be helpful to include a description and a discussion of its equivalence to the hypothesized impacted river in more detail.	More information has been added about the Gibraltar River, and where other opportunities are available.
EPA	11	Section 4.6.6.1, Page 4.6-11	This study does not estimate fish population changes associated with cumulative effects of the RFFAs.... Cumulatively, the more development, the greater likelihood of declining number of fish.	The cumulative effects discussion is inadequate because it does not analyze the cumulative effects of the Pebble Project Buildout RFFA. We recommend that the DEIS include this analysis so that the full extent and magnitude of cumulative effects are disclosed.	The cumulative effects section has been heavily edited, and expanded to include a more detailed description of the Pebble Buildout RFFA.