

**State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 3.6 – Commercial and Recreational Fisheries**

<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>
ADF&G/ Wildlife/ Refuges	1	Table K3.6-1	"Sources: Sigurdsson and Powers 2012; Sigurdsson and Powers 2013; Sigurdsson and Powers 2014; Powers and Sigurdsson, 2016."  Source noted at bottom of Table not included in References Chapter 9.	Provide citation/references.	References have been added to Chapter 9, References and are available on the project website.
ADF&G/ Comm. Fish/ Homer	2	3.6.1.1	The DEIS presents data on the price of Bristol Bay sockeye compared to other fisheries. While the reasons given are mostly factual they only reflect the past and current market pressures and the trends in how the fish are processed.	Historic average prices should be adjusted to reflect present day values.	Prices per pound have been shown in real terms where appropriate. Bristol Bay processing has shifted in product form over the last decade from primarily canned to a fishery which balances market demand for frozen H&G and canned products. These changes in product form are reflected in prices shown in the document.
ADF&G/ Comm. Fish/ Homer	3	3.6.3.1	No mention of the Cook Inlet communities that benefit from sport fisheries, particularly as it relates to charter vessel businesses and tourism, as well as sport harvests that are important food source of Alaskan residents that put up fish for freezing and canning in these communities as well as Anchorage.	Include information on economic benefit to livelihood of residents and visitors to the Kenai Peninsula who fish in Cook Inlet.	Added new saltwater recreational section. New Cook Inlet information added throughout.
ADF&G/ Wildlife/ Refuges	4	Sec 3.6.3	The EIS incorrectly estimates and reports on the sportfishing use and importance of streams on the west side of lower Cook Inlet; significantly underestimating the use and importance of sport fisheries in the project area. The SWHS data is based on user responses which may under report actual use. For instance they note the Kamishak River has only 276 average annual use days and only 1 mention in 20 years of SWHS data	Consider all data sources and accurately report on sportfishing use and importance in all project areas.	Changed text and table, and added Kamishak.

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			<p>(Table 3.6-16); and no streams of importance in area N (Table 3.6-17).</p> <p>ADF&amp;G McNeil River Sanctuary data reporting and Alaska Guide Logbook Program reporting clearly show that this system is used annually (particularly for guided fishing) and from 2006 - 2016 sport fish guides made about 111 trips (mean 93.6 MRSGS data, 128.6 SF Guide data) per year (about a 3 month season) to these Kamishak streams. Spending an average of 340 angler days (334 and 346 respectively). Angling an annual average of 4,358 fish of four species, with a harvest average of 489 fish, primarily Coho salmon. Even the EIS Appendix K3.6 notes that the Kamishak River has an average of 8 companies, 133 trips per annum, and 356 user or client days. As such Table 3.6-17 should reflect the Kamishak River, as well as, others in Area N that may have sport fishing value.</p>		
ADF&G/ Sport Fish	5	Sec 3.6.3	The sport fisheries at the eastern terminus of the pipeline and along the pipeline corridor in Cook Inlet salt waters are not accurately represented and there should be a complete discussion for these fisheries.	The Lower Cook Inlet Sport Fish Management Area supports roughly 10% of the total sport fishing effort in AK. Most of that effort is focused on salt water opportunities including halibut, nearshore Chinook salmon, and intertidal razor clams. All three of these fisheries may be impacted	Added additional recreation data in new saltwater recreational section.

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				with the proposed activities. Halibut fisherman routinely anchor and fish on the bottom along the pipeline corridor.	
ADF&G/ Comm. Fish/ Homer	6	3.6.3	No mention of recreational marine fisheries including Pacific halibut, multiple groundfish species, and Tanner crab, along with the potential for additional shellfish species if populations were to recover.	Include information on sport fisheries for halibut, groundfish, and Tanner crab, which are an important resource for the communities of Cook Inlet.	Added data suggested.
ADF&G/ Comm. Fish/ Homer	7	3.6.2	The following statement " Federal management areas are much larger than state management areas; thus, fishermen have greater flexibility to avoid fixed assets such as buried pipelines and undersea cables. For example, the statement, "halibut fishermen holding halibut quota for International Pacific Halibut Commission 3.6-23Area 3A, which includes Cook Inlet, can fish anywhere in the 3A managed area." implies that a takings is ok. Many halibut IFQ holders are small boat fishermen that salmon fish in the summer. To assume a small boat fishermen can go anywhere in 3A in the fall and winter months is not realistic. The loss of fishing opportunity is also cumulative, as this would not represent the first displacement of the fishing industry in the area.	The EIS should not determine what the value of one resource is over another. The EIS should instead state what the possible losses would be to existing activities should the development go forward. Delete quoted text and referenced map and replace with a statement that there would be a loss of fishing opportunity if these activities proceeded. Provide a surveyed map of the pipeline installation and state what if any buffer would be required for on bottom fishing gear and vessel anchoring to avoid conflict with the pipeline.	Statement added to note that flexibility is not without cost; greater travel distance from home ports increases operating costs and increases uncertainty if commercial harvesters are forced to harvest from less familiar or less productive areas.  Map was not replaced.
ADF&G/ Comm. Fish/	8	3.6	Two paragraphs referencing groundfish and halibut are poorly organized and include inaccuracies,	Revise text to include the following information: The Pacific cod fishery is the	Much of the suggested text was added.

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Homer			such as "Limited fishing occurs near the pipeline's western terminus" (not true for halibut fishery), inaccurate summarization of management of the commercial halibut fishery, and minimizing the amount of harvest that occurs in the area of the proposed pipeline. Scoping comments provided by ADF&G previously summarized these fisheries.	largest commercial groundfish fishery in the Cook Inlet Area with about half of the total harvest occurring in the Cook Inlet District (waters of Cook Inlet north of a line from Cape Douglas to Point Adam). For combined federal and state waters of the Cook Inlet District over the recent 20 years, annual Pacific cod harvest has averaged ~2.7 million lb with a high of ~4.4 million lb, about 40% of which typically occurs in the federal waters between Kamishak and Kachemak Bays. The exvessel value of the fishery in the Cook Inlet District in 2017 was just under \$1 million with 37 vessels harvesting Pacific cod. The federally managed commercial Pacific halibut fishery in the Cook Inlet District had an average annual harvest of ~437,000 lb of halibut over the recent 10 years, with 66% of that harvest occurring in the federal waters between Kamishak and Kachemak Bays. In 2017, 42 vessels participated in the halibut fishery. Other commercially important species harvested in the Cook Inlet District	

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				include lingcod, rockfish, sablefish, walleye pollock, spiny dogfish, and skate species.	
ADF&G/ Comm. Fish/ Homer	9	3.6.2	Description of LCI groundfish species targeted in commercial fisheries in state waters should include lingcod and non-targeted commercial harvest should include octopus. Also, the paragraph focusing on groundfish fisheries uses generic "Rockfish" as opposed to listing the various species of rockfish harvested.	Add lingcod and octopus to the list of species commercially harvested in state marine waters of Lower Cook Inlet. Also, list rockfish by species rather than lumping them under "rockfish".	Added information on lingcod, octopus, and rockfish including noting which rockfish species within the rockfish complex are taken by harvesters.
ADF&G/ Comm. Fish/ Homer	10	3.6.2	There is no mention of Tanner crab, red king crab, or weathervane scallop fisheries. Though crab fisheries are currently closed due to low stock abundance (due to funding cuts, no surveys are conducted in Kamishak Bay so the population status is currently unknown) these used to be very valuable fisheries. There is a commercial weathervane scallop fishery within the pipeline corridor. Development could result is a direct loss of fishing opportunity since the dredge gear is hard on bottom. These suggestions were previously included in ADF&G's scoping comments.	Revise section to include additional fisheries and provide historical harvest levels and the potential to impact stocks that are currently closed to fishing, but could be opened in the future.	Revised information on weathervane scallops including a discussion on harvest amounts, the difference between the beds, and historic harvest effort.
ADF&G/ Habitat/ SPCS	11	Sec. 3.6.2	Section only addresses current salmon, herring and ground fisheries near the proposed pipeline but does not describe current scallop and historic crab fisheries that are temporarily closed due to low abundance.	Include current scallop and historic crab fisheries near the proposed pipeline that are temporarily closed due to low abundance.	Added Lower Cook Inlet shellfish data.

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ADF&G/ Wildlife/ Refuges	12	Table 3.6-17	<p>"Sources: Sigurdsson and Powers 2012; Sigurdsson and Powers 2013; Sigurdsson and Powers 2014; Powers and Sigurdsson, 2016."</p> <p>Source noted at bottom of Table not included in References Chapter 9.</p>	Provide citation/references	References have been incorporated into Chapter 9, References, and are available on the project website.
ADF&G/ Sport Fish	13	Sec 3.6.3	Guided angler-days for the Newhalen do not appear to be correct. The 2012-2016 average should be 288 not "fewer than 200".	Review and update the data and text for this section.	We were not given access to the 2015 and 2016 logbook data and were referred to published reports which only went through 2014. The average for 2011-2014 is 174.
ADF&G/ Wildlife/ Refuges	14	Sec 3.6.3	<p>"Angler effort is concentrated north of the project area for all the named sites, with the exception of the Kamishak River located north of Tuxedni Bay. The Kamishak River, which appears once as a named site in 20 years' worth of data, is located south of the project area near the McNeil River State Game Sanctuary and roughly 25 to 30 air miles from the potential Amakdedori port site (see Table 3.6-16)."</p> <p>Descriptions are incorrect and in conflict with one another. The Kamishak River is well south of Tuxedni Bay, and only 18 miles south of the Amakdedori site. Tuxedni Bay is approximately 80 miles northeast of the Amakdedori site and about 96 miles north of the Kamishak River.</p> <p>As noted above the SWHS does not accurately depict all sportfishing in the project area. There are significant</p>	Correct geographical errors in descriptions and accurately report on sportfishing use and importance in all project areas.	Sentence corrected.

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			resources in the vicinity of the Amakdedori port site that are not being identified and represented in the EIS		
ADF&G/ Sport Fish	15	Sec 3.6.3	Guided angler-days for the Newhalen do not appear to be correct. The 2012-2016 average should be 288 not "fewer than 200".	Review and update the data and text for this section.	We were not given access to the 2015 and 2016 logbook data and were referred to published reports which only went through 2014. The average for 2011-2014 is 174.
ADF&G/ Wildlife/R efuges	16	Sec 3.6.3	<p>"Angler effort is concentrated north of the project area for all the named sites, with the exception of the Kamishak River located north of Tuxedni Bay. The Kamishak River, which appears once as a named site in 20 years' worth of data, is located south of the project area near the McNeil River State Game Sanctuary and roughly 25 to 30 air miles from the potential Amakdedori port site (see Table 3.6-16)."</p> <p>Descriptions are incorrect and in conflict with one another. The Kamishak River is well south of Tuxedni Bay, and only 18 miles south of the Amakdedori site. Tuxedni Bay is approximately 80 miles northeast of the Amakdedori site and about 96 miles north of the Kamishak River.</p> <p>As noted above the SWHS does not accurately depict all sportfishing in the project area. There are significant resources in the vicinity of the Amakdedori port site that are not being identified and represented in the</p>	Correct geographical errors in descriptions and accurately report on sportfishing use and importance in all project areas.	Sentence corrected.

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ADF&G/ Comm. Fish/Hom er	17	3.6.2	Statement that "halibut fishermen...can fish anywhere in the 3A managed area" is an opinion that does not take into account travel time, weather, location of halibut resource, home port of fishermen, vessel size limiting ability to fish offshore, fuel costs being cost prohibitive to long trips for some fishermen, etc. Also, stating that "fishermen have...flexibility to avoid... pipelines and... cables" is minimizing the potential impact and gear impacts as well as making assumptions about fisheries and resources without providing facts to back up these statements.	The DEIS should refrain from irresponsible opinions implying that it doesn't matter if the resource is adversely affected in that area or if the project might displace fishermen. The document should maintain professional integrity and provide information on current fishing practices and potential impacts from the project.	Comment acknowledged. The impacts in this paragraph have been moved to Section 4.6 (Environmental Consequences) and were not changed.
ADF&G/ Comm. Fish/Hom er	18	3.6.2	Commercial shellfish fisheries are completely omitted from this chapter. Extensive comments on shellfish fisheries in Cook Inlet that could be impacted by the proposed pipeline were provided in scoping comments. In particular, the weathervane scallop fishery and the scallop resource (bed) would be impacted, and there exists the potential for gear conflicts from scallop dredge interaction with the pipeline.	Revise text to include the following information: Weathervane scallops are found throughout the Kamishak Bay District and commercial harvest of this resource began in 1983. The fished component of the population is aggregated in two areas, or scallop beds, located east (North bed) and southeast (South bed) of Augustine Island in depths ranging from 30 to 90 m. Population biomass of whole scallops estimated from ADF&G dredge surveys conducted since 1996 has averaged ~5.7 million lbs. in the North bed and ~2.5	Additional information on these resources was added.



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				<p>million lbs. in the South bed peaking at ~12.9 million lbs. in the North bed and ~6.8 million in the South bed. This biomass has supported a commercial fishery of up to 5 vessels harvesting ~28,000 lbs. of shucked scallop meats. Commercial harvest of Tanner crab in Kamishak Bay began in the mid-1960s but has been closed since 1991 due to low stock abundance. Harvest over this period for the Kamishak Bay and Barren Islands districts averaged ~1.6 million lb to over 4.6 million lb. Although the commercial fishery is currently closed, the noncommercial fishery was reopened to harvest in 2017 after being closed since 2012 due to low stock abundance. A commercial red king crab fishery occurred in the Kamishak Bay and Barren Islands districts from 1960 until 1984 when it was closed due to low stock abundance. Harvest over this period averaged ~2 million lb of king crab and peaked at ~5.5 million lb. The current population status of king crab in Kamishak Bay is</p>	

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				unknown due to lack of assessment data, although it is considered a depressed stock. An active commercial razor clam fishery occurs around Polly Creek in Upper Cook Inlet, where the average annual harvest over the past 10 years was 314,000 lbs (in the shell). Other commercially important crab and shellfish species occur in Kamishak Bay including Dungeness crab, red sea cucumber, octopus, and many species of Pandalid shrimp.	