

EPA Comments – Pebble Project Preliminary Draft EIS, Section 3.6 – Commercial and Recreational Fisheries

Agency	Comment Number	Section, Paragraph, and Page #	Relevant Text/Subject	Comment	Response
EPA	1	Table 3.6-1, Page, 3.6-2		We recommend presenting actual values, rather than a percentage, in this table.	Percentages were used as a relevant comparison tool. No changes made.
EPA	2	Table 3.6-8, Page 3.6-12		We recommend that the document clarify if “resident” refers to watershed resident or Alaska resident.	This has been clarified throughout the text.
EPA	3	Section 3.6.1.1, Page 3.6-13	“Theories as to why permits have left Bristol Bay include...”	We recommend adding overall population decline in the region as a possible explanation.	Population decline was added.
EPA	4	Table 3.6-9, Page 3.6-14		We recommend including the sample size for each group/year combination and clarifying the number of vessels that values are based on in each category.	The baseline 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.
EPA	5	Section 3.6.1.2, Page 3.16-16	“Collective watershed resident wages averaged \$1 million per year...”	We recommend clarifying if per worker wages decreased over the period (if have fewer workers, may not see per worker decrease).	The text has been clarified.
EPA	6	Table 3.6-11, Page 3.6-17		We recommend including the number of workers for each category (not just the percentage) and wages per worker for each category, not just total amounts.	The baseline 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.
EPA	7	Figure 3.6-11, Page 3.6-18		Please clarify what “H&G” means in the legend.	Clarification added to text.
EPA	8	3.6.1.2, Page 3.6-19	“In 2016 and 2017, the ex-vessel of the fishery was \$156 and \$216 million respectively (see Table 3.6-13).”	Table 3.6-13 does not contain 2016 or 2017 data; we recommend correcting the reference.	Reference has been corrected.
EPA	9	Table 3.6-13, Pages 3.6-19 and 3.6-20		In the table, the 6th row is labelled “lower bound estimate of fishers’ tax obligation,” but the text (p 3.6-19) refers to the \$6.83 million value as a processors tax amount paid. We recommend including whichever reference is the correct one.	Text has been corrected.

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EPA	10	Section 3.6.2		We recommend that Section 3.6.2 Cook Inlet Commercial Fisheries include additional detail, considering that there is a significant groundfish fishery there and that it crosses a wide variety of “complex fisheries.”	More information has been added about Cook Inlet fisheries, including groundfish.
EPA	11	Table 3.6-14, 3.6-15, Page 3.6-25		We recommend presenting data on total number of surveys returned.	The baseline 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. The information presented was chosen for relevancy and comparison.
EPA	12	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 more can be found in the project glossary. Section 4.6 explains the process that was used for determining the parameters of analysis.
EPA	13	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 included revenue created by ancillary and indirect employment from the fishing industry. No changes made.
EPA	14	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	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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				surplus or willingness-to-pay for a day of recreational or sport fishing. This is an important source of economic value.	