

**Proposed Pebble Project
Preliminary Draft Environmental Impact Statement
Review Comments**

Reviewer: NARF Technical Team
Date: December 21, 2018
Chapter: Chapter 3: Affected Environment
Section: Section 3.6 Commercial and Recreational Fisheries
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Comments

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.

All three of the Commercial and Recreational Fisheries sections (3.6 and 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.

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 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.

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.

The following statements are taken from Section 3.6:

The fiscal contributions of the Bristol Bay salmon fishery depend on the long-term health of the fishery.

The processing sector in Bristol Bay ranges from small family owned operations to business units of multi-national corporations with operations across Alaska, the United States, and the rest of the world.

The ADF&G also manages a commercial herring fishery in the LCI Management Area, but since 2000 the spawning biomass has been too small to allow the opening of this fishery.

As stated in Section 3.6 and emphasized in the statements above, Bristol Bay and Cook Inlet support robust commercial and recreational fisheries. Because of this, the EIS must recognize, quantify, and evaluate the potential to irrevocably damage one of the largest salmon fisheries in the world and the repercussions this would have on Bristol Bay and Cook Inlet including economic losses and the pressure that would be put on other salmon fisheries in the immediate area and beyond.

Salmon stocks and forage fish (see statement above) are already depleted in some areas. For instance, according to Alaska Department of Fish and Game (ADF&G), the Chuitna River Chinook salmon stock in West Cook Inlet Management Area (WCIMA) is in decline, and in 2010, ADF&G recommended to the Alaska Board of Fisheries (BOF) that Chuitna River Chinook salmon be

given a “stock of management concern” status; and this stock was recognized as such in subsequent years (ADF&G, 2010, 2011, 2012, 2013).

Other Stocks of Concern in Cook Inlet include McNeil River chum; Susitna (Yentna) River sockeye; Theodore River Chinook; Lewis River Chinook; Alexander Creek Chinook; Willow Creek Chinook; Goose Creek Chinook; and Sheep Creek Chinook (ADF&G, 2018: ADFG Special Status Species webpage: <http://www.adfg.alaska.gov/index.cfm?adfg=specialstatus.akfishstocks>).

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.

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.

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.