

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 4.25 – Threatened and Endangered Species

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
ADF&G-conservation	1	4.25-1	"Note: data from 2018 baseline field surveys will be included in the DEIS." Need this in order to review sections.	Provide completed section including pertinent baseline data.	The summer 2018 field survey data has now been included in Section 4.25.
ADF&G-conservation	2	4.25-1 and 4.25-2	The document refers to mitigation measures for Threatened and Endangered Species that are under development. Prior to developing and implementing mitigation measures, the project applicant needs to provide information on avoidance and minimization actions in terms of project design by identifying infrastructure conflicts with T&E species and then modifying project design in order to avoid or minimize those impacts. This information is needed in order to adequately review environmental consequences of the proposed actions.	Provide avoidance and minimization design actions as well as mitigation measures. Then revise section on environmental consequences.	Avoidance and minimization design actions, as well as mitigation measures are provided in the two Biological Assessments for the USFWS and NFMS. Additional information is included in Chapter 5, Mitigation, but many of the measures are still being discussed and will be finalized in the Final EIS. The lightering locations for Alternative 1 were chosen partially to avoid impacts to Cook Inlet beluga whale and northern sea otter critical habitat.