

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 3.23 – Wildlife Values

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
ADF&G-Habitat	1	3.23-5	Second paragraph in water birds sub-section states that thousands of ducks stage around Nikabuna and Long Lakes in the fall. This contradicts what is depicted on Figure 3.23-3 which shows 25-100 birds at Long Lake and 251-500 birds near Nikabuna Lakes. Only data for 2005 is depicted in figures. Tundra swan surveys were conducted in 2006 but no results are reported. The inconsistencies, discrepancies, and possible errors make it difficult to determine what the affected environment is for water birds.	Reconcile discrepancy between text and figure for accuracy. Include 2004 and 2006 data in figures. Include tundra swan survey data from 2006 or explain why it is excluded. Make section consistent across sub-sections.	The text and figures have been reconciled so that the figures now show the highest densities of birds recorded (which were during Spring 2005 and Fall 2005 surveys). The 2005 data is shown instead of the 2004 data since the 2005 data encompassed a large survey area. Swan nesting locations from 2004 and 2005 are now shown on Figure 3.23-4. Swan data from 2006 are excluded because surveys were conducted to look for broods and only 1 brood was detected in the study area during the September 2006 survey (and no location was provided).
ADF&G-Habitat	2	3.23-5	Last paragraph highlights and details areas with the largest numbers of birds including Nikabuna and Long Lakes. However, Figure 3.23-3 shows the highest concentration of birds as overlapping and adjacent to a mine stockpile and the main water management pond. Stating in the text that the largest numbers of water birds are found 20 km north of the mine site while the figures show the largest fall concentration directly over mine facilities creates confusion for reviewers. The general condition of this section does not lend confidence in regard to accuracy	Reconcile discrepancies in this section so that assessment of the affected environment can be completed. Historical data would improve this section and give greater confidence for bird resources potentially affected.	This was a mapping error and has now been edited. The text is correct, and Figure 3.23-3 has been updated to accurately reflect the text.

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			and ability to assess the affected environment.		
ADF&G-Habitat	3	3.23-12	Caribou sub-section references Figure 3.23-5 for historical caribou trails to illustrate caribou activity as primarily west of the mine site. The referenced figure provided for DEIS review does not depict caribou trails, nor does any other figure provided.	Figures should depict information for which they are referenced in DEIS.	This figure has now been updated to show historic caribou trails. The current figure number is Figure 3.23-6.
ADF&G-Habitat	4	3.23-16	Figure 3.23-7 is referenced in the text on p. 3.23-13 but was not provided for review.	Include referenced figures in DEIS.	This figure has now been created and provided in the DEIS.
ADFG-Habitat	5	3.23-19	The Raptors sub-section states that raptor data for the transportation corridor was collected in 2004 and 2005, but also references raptor surveys in 2018. Figure 3.23-8 is referenced, but was not provided for review. This sub-section is confusing and it is unclear what data was collected and when it was collected.	Revise text to make clear what data was collected and over what years, provide the referenced figure.	This figure has now been created and provided in the DEIS. The text has been updated to provide additional clarity on when and raptor surveys were conducted.
ADF&G-Habitat	6	3.23-19	Section only describes bird and wildlife species on the west side of Cook Inlet and ignores species on the east side where a compressor station as well as some natural gas pipeline will be located.	Include a description of bird and wildlife species on the east side of Cook Inlet around proposed infrastructure, if determined necessary.	Impacts to wildlife species on the Kenai Peninsula would be temporary during trenching of the gas pipeline in an area that already has known human disturbance. Therefore a detailed discussion on the affected environment for wildlife on the Kenai Peninsula was considered unnecessary. Additional text has been added to the document to highlight some of the wildlife species in the area since the compressor station would result in noise impacts.

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ADF&G-Habitat	7	3.23-25	Only bald eagles are discussed for the port in Raptors sub-section.	Other raptors utilize the port area and should be included for a comprehensive description of the affected environment.	While other raptor species likely utilize the area around Amakdedori Port, field surveys in 2018 support the conclusion that bald eagles are the most common raptor in the area. One golden eagle was detected and the closest golden eagle nest is several miles west of Amakdedori Port and is discussed under the section on the port access road. Additionally a northern harrier was detected at the port. This data has now been included in this section. Additionally, according to the most recent survey data by ABR in 2018, only bald eagles nest around the port.
ADF&G-Conservation	8	Sec 3.23	In a number of locations there are NOTES TO REVIEWERS that specify missing data or information that will be generated.	The missing information and data is needed in order to provide comments on this section as well as other sections.	Comment acknowledged. This information was provided in a technical memorandum to USACE and distributed to the cooperating agencies in January 2019.
ADF&G-Conservation	9	3.23-7 4.23-	"Therefore, while the project transportation corridor is primarily east of the main use area of the Mulchatna caribou herd, ..." "The Mulchatna caribou herd currently does not typically range in the area of the transportation and natural gas pipeline corridors. Caribou move between calving grounds (May to June), insect relief areas (June to July), and seasonal foraging areas (fall and winter months); however, none of these movements are through the transportation and natural	Update and revise Chapter 3 and Chapter 4 sections to include caribou herd use along north and south road corridors. Information on these herds should be presented and habitat evaluated. Additional surveys through all seasons should be conducted and integrated into analysis.	Aerial transect surveys for caribou were conducted in 2018 by ABR around the port access road. Those data are included in a figure in the DEIS (Figure 3.23-11), however, very few caribou were detected during surveys. Additional text on ADF&G's incidental sightings of caribou at the described lakes has been included.

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			<p>gas pipeline corridors. Therefore, no behavioral disturbance impacts on the population (such as shifting migration routes or patterns) are expected to occur. "</p> <p>There is no reference to a smaller portion of caribou, likely associated with the Mulchatna herd, that is known to spend most of the year in the area south from Kokhanok in the higher country around Kukaklek and Nonvianuk Lakes east to Paint River. Not much is known about them, but they are a permanent resident of this area. These smaller localized herds that do inhabit parts of the transportation corridor and port site, such as the herd in the area south and east of Kokhanok, in the higher country around Kukaklek and Nonvianuk Lakes, and east to the coast. In 2018, ADF&G observed caribou at Chenik Lake, about 5.5 miles from the proposed port site; and historically caribou have occasionally been observed within the McNeil River State Game Sanctuary south of there.</p>		
ADF&G-Conservation	10	3.23-13	"Historical surveys by the ADF&G of the various GMUs around the mine site have yielded varying population	Compile all existing bear population and survey data from various agencies, for all project areas. Complete	This information is not necessary to disclose the reasonably foreseeable significant impacts of the proposed project. Additionally, the requested information would not be essential to make a

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			<p>estimates, but the focus of these surveys has been in areas not specifically related to the mine site. Therefore, those data are not included." "...Overall, brown bears were not common in the mine site footprint itself, but were distributed throughout the mine analysis area, primarily along streams and waterways."</p> <p>While historical surveys may not focus on the mine site, they do represent data that can be used to characterize the importance of the brown bear resources in the region or area and should be included. One time or one season surveys of the mine site or other project components for brown bear resources is not sufficient to correctly characterize the affected resource, nor complete accurate analysis of impacts.</p>	<p>additional multi-season surveys to determine use patterns at project components. This information is necessary in order to accurately characterize affected brown bear resources, determine impacts and develop avoidance, minimization and mitigation measures.</p>	<p>reasoned choice among alternatives. It has not been included in the DEIS.</p>
ADF&G-Conservation	11	3.23-16	Figure 3.23-7 is noted in multiple places throughout Chapters 3 & 4	Provide figures for review	This figure has now been created and provided in the DEIS.
ADF&G-Conservation	12	3.23-16 through 3.23-35	Figures 3.23-7 through 3.23-11 were not provided for review, which makes review of the textual sections these figures refer to incomplete.	Provide figures for review	These figures have now been created and provided in the DEIS.
ADF&G-Conservation	13	3.23-17	"The ADF&G actively removes wolves in a large portion of GMU 17B/C in the range of the	Either remove the language or rephrase as indicated.	This language has been removed to avoid further confusion.

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			<p>Mulchatna Caribou Herd, west of Iliamna Lake, which does not overlap with the mine site."</p> <p>This is not correct. The ADF&G is not actively "removing wolves". The IM program authorizes permitted hunters who are private pilots to take wolves by additional means within the IM area in order to increase caribou calf survival and meet Mulchatna caribou IM objectives for abundance and harvest. It is also unclear if it is the IM management area or the Mulchatna caribou herd that does not overlap with the mine site. Explain how this addition is relevant.</p>		
ADF&G-Conservation	14	3.23-18	<p>"Population information for these species is limited, and is provided by trapper questionnaires (Parr 2018). Table 3.23-1 lists species with their relative abundance, if known, based on trapper questionnaires for GMU 17B, where the mine site facilities are located, and for GMU 9, where the transportation and natural gas pipeline corridors exist (west of Cook Inlet)(Parr 2018)."</p> <p>Wording is misleading suggesting data is more accurate and more specific in</p>	<p>Project specific species abundance data and information on the effected small game and furbearer resources should be provided by the applicant; revise wording to reflect broad regional classification of information, entailing all of GMU's 17 & 9, Bristol Bay; include map of area with GMU's to show full extent of GMU's; look into additional data sources from sealing records for nearby communities of Iliamna, Igiugig, Nondalton, etc. For</p>	<p>The text has been reworded to more accurately reflect the purpose of the trapper questionnaires and limitations of that data.</p> <p>Additional information on sealing records for nearby communities is not necessary to disclose the reasonably foreseeable significant impacts of the proposed project. Additionally, the requested information would not be essential to make a reasoned choice among alternatives. It has not been included in the Draft EIS.</p>

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			geographical context than it really is. Population information for furbearer and small mammal species for the project area is not available. The relative abundance information provided by the Alaska Trapper Surveys is only an index of relative abundance throughout the entire region, based on the perceptions and responses of relatively few trappers (n=8 for the data noted) for all of GMU 17 (most of Bristol Bay), not the smaller unit 17B. And is not specific to the mine site.	species that requiring sealing these might provide more specific information ion about area specific furbearer harvest.	
ADF&G-Conservation	15	3.23-18	"There are additional mammal species that are not considered "furbearers," and are known to occur in the mine analysis area. These include hoary marmot (<i>Marmota caligata</i>), arctic ground squirrel (<i>Spermophilus parryii</i>), snowshoe hare (<i>Lepus americanus</i>), tundra hare (<i>Lepus othus</i>), collared pika (<i>Ochotona collaris</i>), and various species of mice, lemmings, shrews, and voles. These species are generally common to abundant, depending on their population cycles."	Provide complete list of furbearers and other effected species in Table or appendices. Correct tundra hare to Alaska hare.	This information is included in the Environmental Baseline Data and has been referenced as such. Tundra hare has been changed to Alaska hare.
ADF&G-Conservation	16	3.23-20, 3.23-23, 3.23-26	"No project-specific waterbird surveys have been conducted to date for areas south of Iliamna Lake." And at the end of the	Incorporate 2018 South Access Road and Amakdedori Port site survey data, as well as other available survey data,	These data have now been incorporated into the DEIS for the port access road and Amakdedori port.

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			<p>Waterbirds subsection there is a place holder note from USACE - "Note: 2018 field data for the south access road will be incorporated into the analysis of the Draft EIS."</p> <p>The results of the 2018 bird surveys have not been incorporated into the report.</p>	to fully identify affected resources and impacts and so that comments can be provided.	
ADF&G-Conservation	17	3.23-23	The term "conservation species" is vague. Also common names of birds need to be capitalized.	<p>Please replace "conservation species" with "species of greatest conservation need (SGCN) in Alaska" throughout this section, and the waterbirds section. A list of these species can be found here: https://www.adfg.alaska.gov/static/species/wildlife_action_plan/2015_alaska_wildlife_action_plan.pdf. Please also capitalize common names of birds as is customary (American Ornithological Society http://www.bioone.org/doi/full/10.1642/AUK-18-62.1)</p>	<p>Text has been updated to replace "conservation species" with "species of greatest conservation need in Alaska".</p> <p>Common names of birds in text are not capitalized for consistency with other wildlife species common names in the DEIS.</p>
ADF&G-Conservation	18	3.23-24	EIS presents information and concludes that disturbance to brown bears from road construction and operation is probable. DFG concurs, however, the applicant needs to supply data and information on movement patterns and habitat use areas within the project	Provide long term data and information on brown bear movement patterns and habitat use areas in order to avoid, minimize or mitigate adverse impacts to brown bear and the McNeil River State Game Sanctuary and	This information is not necessary to disclose the reasonably foreseeable significant impacts of the proposed project. Additionally, the requested information would not be essential to make a reasoned choice among alternatives. It has not been included in the DEIS.

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			area. Brown bear densities along the southern road corridor and in the vicinity of Amakdedori port are high and this species is of high value in this area. Information on movement patterns and use areas is critical to being able to avoid, minimize or mitigate impacts to brown bear and the McNeil River State Game Refuge and McNeil River State Game Sanctuary.	Refuge.	
ADF&G-Conservation	19	3.23-24	"Per ADF&G area management biologist Dave Crowley, for GMUs 9 and 10, there are approximately 0.19 moose per square kilometer or less for most of the Alaska Peninsula due to limited habitat (Lill 2017)."	Should be moose per square mile, not kilometer. Cited literature (Lill 2017) does not appear in References.	For consistency, all units in this section are provided in English units. Lill 2017 is included in list of references.
ADF&G-Conservation	20	3.23-24	Surveys conducted in May 2018 documented a concentration of brown bear dens on both sides of the south access road and around Amakdedori port (Figure 3.23-7). Surveys documented bear dens throughout the length of the south access road, with the majority observed near Cook Inlet north of Amakdedori Creek. Additional Dens were located around the outflow to Gibraltar Lake near the south shore of Iliamna Lake. Several of the dens were close to the south access road, with the closest one around 300 feet north of the road. Additional surveys for	Text references studies that are not documented or cited. Provide citations and data details. The stream surveys for bears were conducted mid-July, mid-August and early September 2018 according to the ABR field summary report. The surveys likely significantly underestimates the number of bears using these areas. Bear use of streams is highly dependent upon species of fish, run size, fish run timing, bear gender, bear age, and access to fish. Three surveys	The studies described are now referenced in the DEIS. In response to the text that references "This area is also likely a travel corridor for bears along the coast and heading inland." please provide this data if available.

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			<u>bears around salmon streams were conducted in mid-August 2018.</u> Bears were primarily located near the south shore of Iliamna Lake, at the east end of Gibraltar Lake, and fishing in the river flowing into Bruin Bay, with a few individuals upstream in Amakdedori Creek.	throughout one summer are not likely to capture accurate bear and habitat use patterns. There were bears noted in Amakdedori Creek at the port site that should be noted here also. Amakdedori Creek supports chum Coho, pink and sockeye salmon. And likely has higher bear use throughout the season, than the two bears noted. This area is also likely a travel corridor for bears along the coast and heading inland.	
ADF&G-Conservation	21	3.23-24	"Amakdedori port would be north of the McNeil River State Game Refuge and Sanctuary, which is a world-famous brown bear viewing location. During bear surveys in May 2009 for the mine site, black bears were more commonly documented east of Iliamna Lake and in some areas near the Cook Inlet. Brown bears were also common on the southern side of Iliamna Lake near Gibraltar Lake. Surveys for bears around salmon-spawning streams in summer 2018 documented a few brown bears fishing upstream in Amakdedori Creek, approximately 1 to 1.5 miles west of the port (Figure 3.23-7)."	Collect and present data on brown bear use at Amakdedori site and along southern transportation / pipeline corridor during entirety of season at appropriate timing. This section should highlight the high densities of brown bears along the Kamishak Coast, not just bears observed in Amakdedori Creek during one survey. For example, the coast is used in general as a migration corridor, the mudflats are used for feeding, the beach is used for early season foraging, streams are used for feeding, breeding occurs in the area, etc.	Comment noted, however, this information is not necessary to disclose the reasonably foreseeable significant impacts of the proposed project. Additionally, the requested information would not be essential to make a reasoned choice among alternatives. It has not been included in the DEIS. This figure mentioned has been included in the DEIS and, and the figure number is Figure 3.23-12.

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			<p>The text substantially underrepresents the brown bear resources in the area of the Amakdedori Port site and road / gas line corridor. Brown bear are very common in the area and have seasonally high concentrations at area salmon streams. Stream surveys are highly dependent upon fish run size, bear gender, bear age, and access to fish. The single survey noted in late August 2018 is not adequate to characterize bear resources in the proposed Amakdedori Port and south road / gas line corridor. The survey was not repeated regularly nor timed correctly to captured congregations on Amakdedori Creek, or other coastal streams in the area. Nor along the road / gas line corridor. Regular brown bear surveys at McNeil River, and incidental surveys at other streams in the area such as Chenik Creek and Iniskin Bay place high numbers of bears on these streams during the peak of salmon runs and lower numbers throughout the season. This very likely holds true for Amakdedori Creek as well. And as fish runs dwindle at the coast bears move inland to higher berry resources or streams at the upper reaches of Bristol Bay</p>	<p>Figure 3.23-7 is referenced in this and other sections for brown bear den locations yet it was not provided for review.</p>	

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			<p>streams. In addition to the seasonal timing, the daily timing will make a difference to. Bears are more likely to be fishing the intertidal reaches of Amakdedori Creek adjacent the port site during low tide periods as fish move up through the shallows. And then move upstream above the tidal zone as the tide rises. Generally, stream surveys for bears are not a good way to gauge resource use unless they can be repeated regularly and over time.</p> <p>Also noted survey data and assertions not cited.</p>		
ADF&G-Conservation	22	3.23-25	<p>"The terrestrial habitat around the Amakdedori port generally lacks large waterbodies where waterbirds may breed and stage. Habitat is composed primarily of upland vegetation communities that drain east toward Cook Inlet and do not form extensive wetland areas."</p> <p>Statement is incorrect and misleading. In addition to large backwatered portions of Amakdedori Creek, there are over 45 small wetland pothole type waterbodies in the immediate vicinity of the Amakdedori Port site, ranging in size from .01 to ~4 acres.</p>	Update characterization of Amakdedori Port site to accurately portray waterbird habitats present, and update Chapter 4 environmental consequences accordingly.	Text regarding wetlands around Amakdedori Port has been updated.

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			Typically these waterbodies would provide excellent nesting, rearing and staging habitat for a number of waterbirds and shorebirds. Additionally, there are a number of larger waterbodies to the west within 5 miles of the port site.		
ADF&G-Conservation	23	3.23-26	<p>For the subsection, Waterbirds, in 3.23.1.3 Amakdedori Port, there is a place-holder note regarding important baseline data: "Note: 2018 field data for the Amakdedori port is being synthesized and will be provided in a later EIS draft."</p> <p>This information is needed in order to accurately characterize the affected environments and analyze impacts.</p>	Incorporate 2018 South Access Road and Amakdedori Port site survey data, as well as other available survey data, to fully identify affected resources and impacts and so that comments can be provided.	This data is now included in the DEIS.
ADF&G-Conservation	24	3.23-26	<p>"Therefore, although the Amakdedori port footprint may not support large numbers of breeding waterbirds, it is flanked by two nearby IBAs, and is situated in a global IBA (Smith et al. 2017)."</p> <p>If no surveys have been conducted at the port itself, how is it possible to discern whether it has large numbers of breeding waterbirds or not?</p>	Please replace this sentence with "The Amakdedori port is flanked by two nearby IBAs and is situated in a global IBA (Smith et al. 2017). Provide breeding bird data specific to the port site on the numbers of waterbirds using the area throughout the year (both winter and summer bird surveys are recommended).	The sentence has been updated as recommended. Bird data has been included based on surveys in 2018.
ADF&G-Conservation	25	3.23-27	The section on "Large Mammals" for the Amakdedori	Provide long term data and information on brown bear	McNeil River State Game Refuge and Sanctuary are outside of the EIS analysis area.

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on			Port site lacks significant explanation of the Amakdedori Port Affected Environment with respect to the brown bears utilizing McNeil River SGS and severely under represents the significance of the brown bear resources in this area and brown bear resources in the McNeil River State Game Refuge and Sanctuary. Information regarding bear numbers utilizing the area, movement patterns, and habitat use areas around the proposed port site and transportation corridor cannot be ascertained from the survey presented. Brown bear densities along the southern road corridor and in the vicinity of Amakdedori port are high and this species is of high value in this area. The applicant needs to supply baseline data and information on brown bear movement patterns and habitat use areas within the project area. Information on movement patterns and use areas is critical to being able to avoid, minimize or mitigate impacts to brown bear and the McNeil River State Game Refuge and McNeil River State Game Sanctuary is required to understand how the port infrastructure would affect the high concentration of brown bears in the area.	movement patterns and habitat use areas in order to avoid, minimize or mitigate adverse impacts to brown bear and the McNeil River State Game Sanctuary and Refuge. Revise and expand text to fully account for affected environment in relation to the proximity of the proposed Amakdedori port to McNeil River SGR and SGS, the large number of bears in the area and the movement of these bears along the coast and their use of the MRSGS and MRSGR.	This information is not necessary to disclose the reasonably foreseeable significant impacts of the proposed project. Additionally, the requested information would not be essential to make a reasoned choice among alternatives. It has not been included in the Draft EIS.

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ADF&G-Conservation	26	3.23-31	"The peak date of births in Iliamna Lake was based on the peak percentage of pups found in aerial surveys of the lake during May through August of 2010 to 2013 (excluding 2012), compared to those in Navak Bay."	Correction: Nanvak Bay	Name has been updated to Nanvak Bay.