

**State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 4.23 – Wildlife Values**

<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>
ADFG-Habitat	1	4.23-2	Chapter does not address the unique behavioral disturbance to birds and wildlife due to the presence of remote field camps.	Chapter should address the potential effects of remote field camps on birds and wildlife. A plan addressing specifics on temporary and permanent camps should be developed and reviewed by appropriate agencies.	The use of remote field camps would be addressed in a Waste Management Plan and a Wildlife Management Plan developed by the applicant as part of a later permitting process prior to commencement of construction, and the project would use BMPs for wildlife management. These plans would describe the equipment, methodology, training, and assessment techniques that would be used to minimize the potential for wildlife interaction with project activities and to minimize impacts to wildlife in the project area.
ADFG-Habitat	2	4.23-2 and 4.23-5	Chapter does not address the behavioral or physical disturbance to birds and wildlife associated with waste both (putrescible and non) generated during construction and operations.	Chapter should address the potential effects of improper disposal of waste on birds and wildlife. A Comprehensive Waste Management Plan should be developed and reviewed by the appropriate agencies.	Text has been added to recognize this potential impact. A Waste Management Plan developed as part of a later permitting process.
ADFG-Habitat	3	4.23-2 and 4.23-5	Chapter does not address the potential behavioral or physical disturbance to birds and wildlife due to human interaction such as feeding and defense of life and property.	Chapter should address the potential effects on birds and wildlife from human wildlife interaction. A Wildlife Avoidance and Human/Interaction Plan should be developed and reviewed by appropriate agencies as well.	A Waste Management Plan and Wildlife Management Plan developed as part of a later permitting process.

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ADFG-Habitat	4	4.23-2 and 4.23-5	Chapter does not address the behavioral or physical disturbance to birds and wildlife associated with waste both (putrescible and non) generated during construction and operations.	Chapter should address potential impacts to wildlife from wastes generated during construction and operations.	Text has been added to recognize this potential impact. A Waste Management Plan and Wildlife Management Plan developed as part of a later permitting process.
ADFG-Habitat	5	4.23-5	Chapter does not address the potential behavioral or physical disturbance to wildlife due to pipeline stringing.	"Chapter should address the potential effects on wildlife movements as a result of pipeline stringing both for prolonged periods of time and length. EIS should also describe applicant's plan to minimize animal entrapment in open ditches as well as barriers to animal movement created by pipe stringing operations.	This would be addressed in a Wildlife Management Plan developed as part of a later permitting process.
ADFG-Habitat	6	4.23-6	"The Amakdedori port would also be a source of long-term disturbance due to vessel traffic, loading and unloading activities, and the presence of workers and vehicles. The disturbance zone around the port site would likely be much smaller than the area around the mine site due to a lack of explosives, smaller vehicles, and less frequent human presence. " Chapter does not list the Lake Iliamna ports as	Chapter should also address the Lake Iliamna ports as a source of long-term disturbance.	The long-term disturbance from the Iliamna Lake Ferry Terminals has been added as a potential impact.

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			a source of long-term disturbance.		
ADFG-Conservation	7	4.23-1	"Draft EIS refers to the development of a Wildlife Management Plan to mitigate impacts to wildlife: ""Specific mitigation measures to minimize impacts are currently being developed. Impacts to wildlife species would be minimized or mitigated by development of a Wildlife Management Plan (WMP), which would detail management measures to minimize impacts to wildlife species."	Develop Wildlife Management Plan for inclusion in Draft EIS.	A Wildlife Management Plan would be developed as part of a later permitting process.
ADFG-Conservation	8	4.23-1	"Specific mitigation measures to minimize impacts are currently being developed. Impacts to wildlife species would be minimized or mitigated by development of a Wildlife Management Plan (WMP), which would detail management measures to minimize impacts to wildlife species. The WMP would describe the equipment, methodology, training, and assessment techniques that would be used to minimize the potential for wildlife interaction and minimize	The project proponent needs to collect species use and movement data and work with agencies to incorporate features into the DEIS project design that will avoid or minimize wildlife impacts. More data is required with respect to brown bears movements up and down the coast and through the transportation corridors and the proposed port site, especially with respect to McNeil River SGR and SGS. WMP's and BMP's will mitigate for	Comment noted. 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. A Wildlife Management Plan would be developed as part of a later permitting process.

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			<p>impacts to species from all aspects of the project."</p> <p>Impacts to wildlife resources cannot be simply dealt with using an as yet to be developed Wildlife Management Plan. The project proponent needs to collect species use and movement data and work with agencies to incorporate features into the project design that will avoid or minimize wildlife impacts. Specific features that may be needed are special waste management systems, wildlife underpasses or overpasses, relocating road sections or other facilities to avoid important habitats or use areas, or other changes to infrastructure. Data needs to be provided on species use and movements and important habitat areas and these data combined with project plans to develop infrastructure that avoids or reduces impacts to wildlife species. Thus far these data, analysis and infrastructure changes have</p>	<p>other impacts that cannot be addressed through project design.</p>	

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			not been done.		
ADFG-Conservation	9	4.23-1-4.23-2	It is difficult for the reader to gauge the impact of vessel traffic and the level of habituation without information on current and future vessel traffic in the area.	Please provide information on the approximate number of vessels per day that use the port site at present versus how many vessels will be expected during the construction phase operation phase and post-closeout.	Additional text has been added regarding the current level of vessel traffic and projected increase in vessel traffic.
ADFG-Conservation	10	4.23-2	The paragraph starting with "Some birds may habituate to noise from continuous sources." contains no references to support statements regarding bird habituation to noise. There is abundant research on birds, noise, and habituation and it should be cited here (see above suggestions for references).	Please provide evidence for each statement pertaining to bird habituation to noise. Also, please provide information on anticipated vessel activity levels at the Diamond Point port for Alternative 2.	Additional text has been included to address impacts to birds from noise as well as anticipated vessel activity levels at Diamond Point port for Alternative 2.
ADFG-Conservation	11	4.23-3	"Pipeline installation is anticipated to occur during summer months, when breeding birds are nesting. There are no nearby seabird colonies that could be disturbed (e.g., by being flushed off the nest or avoiding foraging areas) during pipeline installation."  This statement is	Correct section to present impacts to seabird nesting and molting.	The text has been revised. Additional text and reference to a seabird colony figure in Section 3.23 have been added to address this impact.

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			unsupported and incorrect. There are a number of seabird colonies in lower Kamishak Bay in the vicinity of the Amakdedori Port site and pipeline installation; including at Nordyke Island, Amakdedulia Islands, Amakdedulia Cove, McNeil Head and Islet, Contact Point, Chenik Head, and Kamishak Islands. In addition, to the potential disturbance at these nest colonies; adults will be feeding in offshore waters supporting nesting mates and chicks. Information on colonies and IBA's in 3.23.1.3 clearly shows that there are seabird colonies in the area and during sensitive nesting and molting life stages.		
ADFG-Conservation	12	4.23-3	Paragraph 3: "Additionally, there is a high level of summer vessel traffic in Cook Inlet, and additional boats associated with pipeline installation are not anticipated to contribute in a measurable manner to avian disturbance due to increased vessel traffic."	Please delete this sentence and provide more quantitative information on current and anticipated numbers of vessels associated with activities (see comment above). Distinguish between differences on east side Cook Inlet where there are	This text has been modified to remove speculative text and additional information on vessel activity in Cook Inlet has been included.

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			This statement is highly speculative, given that nearshore and offshore activity associated with the construction of the pipeline will be different from existing vessel patterns (mostly shipping traffic) in Cook Inlet and may increase vessel traffic to levels that will result in cumulative negative impacts to birds. Additionally, vessel traffic on the west side of Cook Inlet is much less than it is off shore of the Kenai Peninsula	fewer seabird colonies and higher vessel traffic and West Cook Inlet where there are more seabird colonies and less traffic. Also, surveys during the breeding and non-breeding seasons should be conducted so that they hypothesis of no impact of vessel traffic can be tested using a BACI (before-after-control-impact) design.	
ADFG-Conservation	13	4.23-3	There is a large body of research on bird responses to noise that has not been referenced in this section.	Please provide more detail on known bird responses to industrial noise. Good places to start are 1) Shannon et al. 2015, Biological Reviews 91: 982-1005 and 2) a compilation of papers on noise published in Ornithological Monographs, Volume 74, 2012.	Text on noise impacts to birds has been added.
ADFG-Conservation	14	4.23-4	"Wildlife management around the pit lake will be addressed in the WMP. Note: Analysis of risk to wildlife from pit lake water is pending."	Complete analysis of risk to wildlife from pit lake water and Wildlife Management Plan; revise and complete section; then submit for agency review.	A preliminary assessment of the impacts on birds from the pit lake has been included.

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			Analysis of risk to wildlife from pit lake water and Wildlife Management Plan are needed in order to review and comment on this section.		
ADFG-Conservation	15	4.23-5	Not sure if this is the best spot to mention this, but if salt will be used on the roads in winter, it could be an attractant to moose, caribou, porcupines, hares, etc. which could be problematic.	Address issue of salt use related to wildlife attractant and potential for road kills.	Comment Acknowledged. This would be addressed in a Wildlife Management Plan developed as part of a later permitting process. This has been added as a potential impact.
ADFG-Conservation	16	4.23-5	Page 4.23-19. "Wildlife would be anticipated to avoid the transportation and natural gas pipeline corridors as a result of vehicular traffic in an area that currently has no established roads ....."	This statement and conclusion would be applicable under the discussion for the south transportation corridor and pipeline ROW 4.23.2.2, Behavioral Disturbance.	This text has been added to the section on the port access road for Alternative 1.
ADFG-Conservation	17	4.23-5 and 4.23-10	Bear-human conflict resulting from the Amakdedori Port and Transport Corridor is a big concern especially due to the proximity of McNeil River SGR and McNeil River SGS. While the Behavioral and Bear sections generally recognize disturbance mechanisms and conclude the project will impact bears; the section does not adequately address the connection with McNeil River SGR / SGS, and Katmai NPP	Assess and include Environmental Consequences specific to the brown bears utilizing McNeil River SGR / SGS, and Katmai NPP.	Additional text has been added to address this concern.



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			and the ramifications to resources in these parklands due to behavioral and other disturbances occurring within the project footprint.		
ADFG-Conservation	18	4.23-7	<p>“...29 years of telemetry data that were analyzed found rare instances of caribou in the area covered by the transportation and natural gas pipeline corridors. Therefore, they are not anticipated to occur in large numbers in this area of the project, and may only be encountered on rare occasions. Therefore, no behavioral disturbance impacts on the population (such as shifting migration routes or patterns) are expected to occur.”</p> <p>ADF&amp;G caribou survey and inventory surveys were not designed to evaluate caribou use of and movements through the proposed mine site and transportation corridors. Caribou radio collaring efforts often target the core of the herd and thus track the core of the herd.....so, the lack of</p>	Revise section to qualify statements as suggested in comments, include some of the discussion regarding possible movement of the herd to habitats in the mine vicinity in this section as well.	This text has been revised to recognize additional potential impacts to caribou and to remove subjective text.

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			telemetry locations near the mine site or in the transportation corridor may not be representative of use (or future use) at these sites. It may be more related to data collection methods than a complete lack of caribou presence as this seems to imply. Caribou use in these areas does occur and caribou habitat exists in these areas; and more extensive use by caribou may have occurred in the past or occur in the future. The conclusion that “no behavioral disturbance impacts on the population (such as shifting migration routes or patterns) are expected to occur” is unsupported. Information in the EIS and literature clearly show that disturbance will occur at the mine site, transportation corridor and other project features should caribou try to use the area.		
ADFG-Conservation	19	4.23-7 through 13.	"Bear" subsections within the behavioral disturbance, injury and mortality, and habitat change sections misrepresents the habitat	Provide long term data and information on brown bear movement patterns, important habitat use areas and movement corridors	Comment noted. McNeil SGR/SGS and Katmai NPP are outside of the EIS analysis area. This information is not necessary to disclose the reasonably foreseeable

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			use of bears in the areas of the transport corridor and proposed Amakdedori port site. These project components are in an area of high bear densities along the borders of McNeil River SGR / SGS and Katmai NPP which are required to protect bear populations and habitats and have public bear viewing programs in close proximity of the project infrastructure. Brown bears in this area and using the McNeil River SGS/SGR are known to travel over 60 miles. Environmental consequent analysis needs to consider a number of factors including identifying important habitats, acreages and movement corridors; behavioral, mortality and public safety impacts of neutrally and negatively habituated and food conditioned bears; impacts to bears, populations, and programs within the adjacent parklands as a result of behavioral, mortality and habitat changes within the project area. These analysis	along the transportation corridors and port sites; in order to address impacts to brown bear habitats, behaviors, mortality, and bear viewing and recreation programs. Revise analysis given comments. This analysis should also consider functional loss of habitats due to behavior changes and avoidance, as well as the public safety and program quality and revenue losses within the McNeil River State Game Sanctuary and Refuge as a result of avoidance behaviors, altered behaviors and fragmentation due to infrastructure. Revise and expand text to fully account for bear and land management impacts in relation to the proposed Amakdedori port and transportation corridors proximity to McNeil River SGR/SGS and Katmai NPP, the large number of bears in the area and the movement of these bears	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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			impacts on these parklands and programs should also be considered in the Recreation sections. Focused research, pre- and post-project construction, is needed to determine brown bear use areas, movements, fidelity to MRSGS/SGR complex and mine project areas and to determine effect of project on landscape use by bears. Determine landscape use patterns and degree of relatedness among bears in area. Particularly for brown bear within and surrounding McNeil River SGS/SGR, Amakdedori beach site, Chenik Head area.	along the coast and their use of the MRSGS and MRSGR.	
ADFG-Conservation	20	4.23-8	Information on the timing and spacing of vehicles on the road being as frequent as every 5 minutes or every 12 minutes depending on whether it was just a summer activity or year around is appropriately presented in the bear section on page 4.23-8. This is very important information and it seems this should also be noted at the beginning of this section under "Behavioral	Consider adding language re: vehicle activity to the beginning of the section under "Behavioral Disturbance".	This text has been added to the beginning of the behavioral disturbance section.

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			Disturbance" to give the reader a better sense of just how much traffic is going to occur and the potential impact of this activity on the other species. Having this under each species is fine too, but it should be stated right up front as well.		
ADFG-Conservation	21	4.23-8	<p>"...As detailed in Chapter 3.23, Wildlife Values, <u>low numbers of wolves were incidentally detected, and no wolf dens were detected in the mine site.</u> Wolf behavior in the transportation corridor may be affected; either by avoiding the roadways or using them for travel (especially during the winter when roads are plowed/maintained). Overall, <u>impacts to gray wolves would be anticipated to be low, due to overall low numbers of wolves in the area and their general avoidance of humans.</u>"</p> <p>"Incidental" surveys for wolves (and wolf sign) is an inadequate method for evaluating wolf occurrence, density, and use of an area.</p>	Revise section to quality statements as suggested in comments.	Text has been revised as suggested.

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			Especially if these surveys were conducted when there was not adequate snow cover. Wolf dens are also often difficult or impossible to observe from aircraft, so lack of detected dens is a poor predictor of den occurrence. Further, the noted general avoidance of humans would be a "disturbance" impact in relation to mine activities and operations.		
ADFG-Conservation	22	4.23-9	"While the WMP will outline ways to reduce the potential for wildlife mortality along the road, varying weather and seasonal conditions would likely cause periods of increased mortality for some species (such as increased moose mortality during winter months, and reduced bear mortality during hibernation)."	As noted above, project applicant and EIS should collect species use and movement data, information on travel corridors and work with agencies to incorporate features into the project design that will avoid or minimize wildlife impacts along the transportation corridor.	This comment is less related to wildlife impacts as it is related to fish and the marine environment. This impact has been included in Section, 4.24, Fish Values.
ADFG-Conservation		General	Text of sections needs to be updated to describe impacts of the earthen access causeway constructed in the nearshore waters of Kamishak Bay poses significant impacts to the shoreline processes along Amakdedori Beach as well	Update and complete these sections to fully address the impacts of the solid fill causeway, sheet pile armoring, and any "...project design features and mitigation measures..." incorporated to avoid or reduce erosion and	

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			as fish and wildlife habitats at Amakdedori Creek / beach. This solid fill causeway would be expected to interrupt longshore movement of shoreline sediments that feed Amakdedori beach, erosion and sedimentation patterns in the area, as well as the fish and wildlife habitats and movements along Amakdedori Beach, the shallow waters offshore of Amakdedori Beach and at Amakdedori Creek. Depending on circulation and sediment transport mechanisms and wildlife use patterns these impacts may extend southward into the McNeil River State Game Sanctuary. Data collection, analysis and documentation need to be made on the impacts as a result of the causeway alternatives along Amakdedori beach and the mouth of Amakdedori Creek.	sedimentation; on longshore movement of sediments, erosion processes and coastal habitats. It also needs to consider disruptions to movement and migratory patterns of fish and wildlife the tidelands and beach area.	
ADFG-Conservation	23	4.23-10	"Bears are at risk of vehicular collisions during construction and operations; and to a lesser extent after closure, because the transportation	Revise conclusion to accurately reflect potential for vehicular collision beyond project life.	This text edit has been made.

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			<p>corridor would remain open, <u>but the traffic level would be reduced</u>. The south mine access road would remain in place for Kokhanok residents to travel to Amakdedori port."</p> <p>Not enough information is provided in the DEIS to support the traffic level being reduced. Various parts of the DEIS note the road corridor and port remaining in place as an industrial port and open for access. Depending on the level of those industrial uses and access the traffic levels may less or may be greater.</p>		
ADFG-Conservation	24	4.23-10	"The south mine access road is located in an area with high brown bear densities and occurs between Katmai National Park and Preserve and Lake Clark National Park and Preserve. Brown bears are common in the area, especially along coastal plains in the early summer, and then along salmon-spawning streams later in the summer and fall. Thus, bears are moving around in relation to available food resources.	Revise section per comments.	The text has been modified to define the different road sections. The mine access road is the road from the mine site to the north ferry terminal. The port access road stretches from the south ferry terminal to Amakdedori port.



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			<p>Bears would likely cross the south mine access road as part of their regular movement patterns, and would experience increased traffic with the summer-only ferry variant."</p> <p>Section needs to be revised and clarified. Unsure of area and road segments being discussed. South "mine" access road or south transportation corridor. The south transportation corridor, north transportation corridor and Amakdedori port are in an area of high brown bear densities and involve coastal plains, etc. The mine access roads however, may be in areas of lower bear numbers on the north side of Iliamna and don't fit the description. Bears along the south transportation corridor would experience increased traffic under all scenarios as there currently is little to none.</p>		
ADFG-Conservation	25	4.23-10	"There is a potential for bear mortality due to defense of life and property. Bears that become habituated and frequent the mine site, ferry	Fully document potential behavioral, mortality and public safety impacts of project design and operations as it relates to	This impact has been recognized in the EIS and would be addressed in a Wildlife Management Plan developed as part of a later permitting process.

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			<p>terminal vicinity, Amakdedori port, or other project locations, may become a safety risk. Implementation of a WMP is anticipated to minimize the potential for conflict between wildlife and humans. Additionally, the project will have a no hunting policy for non-local employees."</p> <p>This section needs to be expanded upon and related to the numerous public bear viewing areas and potential for bears that are neutrally habituated to human presence being placed in danger at project locations; as well as; bears that are negatively habituated by the PLP project and WMP actions, or food conditioned by poor food and waste management, becoming a danger to the public at bear viewing areas.</p>	<p>nearby public bear viewing venues, and bear resources in neighboring parks, sanctuaries and preserves.</p>	
ADFG-Conservation	26	4.23-11	<p>"Implementation of a WMP is anticipated to minimize the potential for conflict between wildlife and humans."</p> <p>The Wildlife Management</p>	<p>This Wildlife Management Plan and other baseline data on bear habitat use areas and movement patterns is required before we can accurately assess</p>	<p>A WMP will not be included as part of the Draft EIS. A Wildlife Management Plan would be developed as part of a later permitting process.</p>

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			Plan needs to be included, as well as, plans for other project infrastructure (such as waste management systems) in order to adequately address ADF&G concerns regarding bear-human conflicts in the area of the transportation corridor and the proposed Amakdedori port site.	impacts to brown bear resources, public safety and management issues at McNeil River SGR and SGS.	
ADFG-Conservation	27	4.23-11	Habitat Changes, "Bear" subsection, misrepresents the habitat use of bears in the areas of the transport corridor and proposed Amakdedori port site. Reporting a net loss of vegetation or habitat acreage without taking into account the relative importance of these habitats and knowing travel corridors is insufficient.	Provide long term data and information on brown bear movement patterns, important habitat use areas and movement corridors in order to address impacts to brown bear habitats along the transportation corridors and port sites. This analysis should also consider functional loss of habitats within the McNeil River State Game Sanctuary and Refuge as a result of avoidance behaviors, altered behaviors and fragmentation due to infrastructure. Revise and expand text to fully account for habitat impacts in relation to the proximity of the proposed Amakdedori	Additional text has been added to expand on this issue.

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				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.	
ADFG-Conservation	28	4.23-12	<p>"Given the brown bear <u>density estimate</u> and the acreage of habitat that would be removed by the project, <u>habitat would be lost for a few brown bears</u>. This estimate is based entirely on direct habitat removal, and additional brown bears would likely avoid areas around the project."</p> <p>As noted in other sections there would be loss of habitat from behavioral changes and avoidance, in addition to the direct habitat losses. Avoidance acreages should be calculated for bears similar to caribou estimates; and figures depicting these losses provided.</p>	Revise section to include loss of habitat from behavioral changes and avoidance, in addition to the direct habitat losses. Avoidance acreages should be calculated for bears similar to caribou estimates; and figures depicting these losses provided.	Additional text has been added to the Draft EIS. Acreage of habitat "lost" by avoidance of the port access road has been included for Alternative 1.
ADFG-Conservation	29	4.23-12	Impacts to gray wolves is minimized or under represented. Discussion centers on use in the mine area and does not discuss	Revise text to incorporate noted comments.	Additional text has been added to highlight this potential impact.

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			losses to wolf habitat throughout the project components. Should also include discussion of loss from avoidance and acreages.		
ADFG-Conservation	30	4.23-12	"Brown bears are not evenly distributed throughout the landscape and are concentrated around resources such as high quality vegetation sources (sedges, grasses, berry sources) and salmon-spawning streams."	More Accurate to say: "Brown bears are <del>not</del> <u>evenly</u> distributed throughout the landscape and are <u>seasonally</u> concentrated around resources such as high quality vegetation sources (sedges, grasses, berry sources) and salmon-spawning streams."	Suggested text changes have been made.
ADFG-Conservation	31	General	Injury and Mortality sections within chapter need to document and evaluate the impacts to increase mortality due to increased access and harvest pressure. Sections that specifically evade this include gray wolf, bear, caribou, moose.	Revise and update sections to include discussion of increased mortality due to increased access and harvest pressure.	The section has been updated to include increased access and harvest pressure.
ADFG-Conservation	32	4.23-18	"Since vessel speeds would be low in the bays, birds would likely avoid approaching vessels and the impact would be anticipated to be low." Again, this statement is speculative and overly optimistic. The impact	Delete this sentence and cite research by Schwemmer et al (2011), Agness et al. (2008) and others on the known effects of vessel traffic on waterbirds. Here are the citations:	Literature has been added and included.

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			of vessel traffic, even at low speeds, on seabirds can be substantial (Agness et al. 2008, Schwemmer et al. 2011).	Agness, A.M., Piaatt, J.F., Ha, J.C., and VanBlaricom, G.R. 2008. Effects of vessel activity on the near-shore ecology of Kittlitz's Murrelets in Glacier Bay, Alaska. <i>The Auk</i> 123: 346-353. Schwemmer, P., Mendel, B. Sonntag, N., Dierchke, V. and Garthe, S. 2011. Effects of ship traffic on seabirds in offshore waters: implications for marine conservation and spatial planning. <i>Ecological Applications</i> 21: 1851-1860.	
ADFG-Conservation	33	4.23-19	"Impacts to terrestrial wildlife from the mine site under <u>Action Alternative 1</u> would be similar and not repeated here."  Error in sentence structure or typo. As this is under the section for Action Alternative 2; this may mean impacts under Alternative 2 are same as Alternative 1 at the mine site. But that is not clear from the current wording.	Correct sentence.	Text edited.
ADFG-Conservation	34	4.23-21	Column heading "Impact <u>Causing</u> Project Component"	Rephrase column heading. "Impact <u>from</u> Project"	Text edited.

**State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 4.23 – Wildlife Values**

<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>
on			makes no sense.	Component" may be appropriate.	
ADFG-Conservation	35	4.23-23	The Cumulative Effects section is incomplete and cursory and requires additional analysis and detail regarding the cumulative effects of the other RFFA's in relation to the proposed project.	Revise and update section to completely describe the reasonably foreseeable cumulative effects.	This section has been revised.