

US Fish and Wildlife Service Comments – Pebble Project Preliminary Draft EIS, General Comments

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
USFWS	1	General	The Service submitted comments on preliminary draft chapters of the U.S. Army Corps of Engineers' (USACE) Draft Environmental Impact Statement (DEIS) on July 13, 2018, and August 31, 2018. There were no subsequent responses from the USACE indicating how or if our comments were addressed. Consequently, the Service is unable to discern which of our previous comments were incorporated into the current draft. Our review highlights instances where our previous comments were not adequately addressed, or the analyses remain unclear.	See Response.	Comments were received and incorporated in the DEIS as appropriate. For all comments received on sections in which the USFWS was identified as having authority or special expertise by the USACE, a response to comments matrix has been prepared.
USFWS	2	General	The Service recommends structuring each of the sections of Chapter 4 of the DEIS to thoroughly analyze the environmental consequences of the proposed project for each of the four main project components, as described in Chapter 2, Alternatives: the Mine Site, the Transportation Corridor, the Amakdedori Port and Lightering Locations, and the Natural Gas Pipeline. Structuring the analysis and discussion in this way will ensure full disclosure of the proposed project's environmental consequences in the DEIS. We recommend each of the sections of Chapter 4 adequately address the full scope of the potential direct, indirect, and cumulative environmental impacts from the proposed action or action alternatives; contain sufficient information to adequately assess the magnitude or intensity of the impacts; and evaluate the overall significance of these impacts to resources in the project area and surrounding region.	See Response.	Comment acknowledged. Analysis in Chapter 4, Environmental Consequences, follows the analysis framework discussed in Section 4.1, Introduction to Environmental Consequences, for the scope of analysis presented in Section 3.1, Introduction to Affected Environment. Analysis is provided for the four components for all alternatives by resource. The general outline is similar in Chapter 3 and Chapter 4 sections; some resources vary for organizational purposes.

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USFWS	3	General	The Service has management authority for the conservation of a variety of trust resources including migratory birds, inter-jurisdictional fish, threatened and endangered species, and their habitats. Invasive species have the potential to negatively impact these resources. Therefore, we recommend initial site evaluations be conducted to determine what appropriate control and management actions should be taken to avoid and minimize adverse impacts associated with invasive species and encourage the development of an invasive species control plan for all phases of the proposed project.	See Response.	Comment acknowledged. Chapter 5, Mitigation, includes information on invasive species mitigation. Table 5-2, Applicant's Proposed Mitigation Incorporated into the Project, states: "The project would utilize BMPs for prevention, control, and management of invasive species. An invasive species management strategy would describe the equipment, methodology, training, and assessment techniques that would be utilized to avoid the importation of invasive species into the project area due to project activities during construction, operations, and closure." In addition, the table states: "Water used for hydrostatic testing of the pipeline would be obtained from and discharged back to sources local to the section of pipeline being tested, thereby minimizing the potential for mobilization of invasive species."