EPA Comment #17 part 1 (from EPA letter) and EPA Issue #14

EPA Comment #17: The SDEIS describes current site conditions, including the acreage, type, and quality of the wetland resources at the tailings basin and mine sites. The SDEIS also describes the proposed direct impacts remaining after measures to avoid or minimize direct impacts. However, the SDEIS does not quantitatively assess indirect impacts or measures to minimize and mitigate these impacts, except with respect to wetland losses due to fragmentation. The SDEIS also omits all indirect impacts from the cumulative impacts analysis for wetlands (Section 6.2.3.4).

> **Recommendation:** The FEIS should quantitatively assess all indirect impacts. The FEIS should more clearly describe the proposed mitigation plan, including mitigation for indirect impacts. The monitoring and mitigation plans in the CWA Section 404 permit should clearly explain proposed measures to minimize and mitigate indirect wetland impacts during the project.

EPA Issue #14: The monitoring and mitigation plan for indirect impacts has not been finalized.

- Action: Co-leads will summarize available information on the monitoring and mitigation plan for indirect wetland impacts in draft EIS sections and provide to EPA for review and comment. In addition, EPA will continue to work with USACE to make sure monitoring and mitigation for indirect impacts meets permitting requirements.

EPA Comment #17 part 1 Response

Section 5.2.3.3 of the FEIS has been revised to include more information on the monitoring and mitigation plan for the indirect wetland effects.

In addition, the SDEIS quantitatively assessed all potential indirect wetland effects. Indirect wetland effects from the NorthMet Project Proposed Action were assessed as a result from one of the following six factors: 1) wetland fragmentation; 2) change in wetland hydrology from changes in watershed area; 3) changes in wetland hydrology from groundwater drawdown resulting from open pit mine dewatering; 4) changes in wetland hydrology from groundwater drawdown resulting from operation of the Plant Site, including groundwater seepage containment; 5) changes in stream flow near the Mine Site and Plant Site and associated effects on wetlands abutting the streams; and 6) change in wetland water quality related to atmospheric deposition of dust and rail car spillage associated with Mine Site and Plant Site operations. The assessments provided wetland type and acreage for all six factors; however only wetland acreages were provided for change in wetland water quality related to atmospheric deposition of dust and rail car spillage associated with Mine Site and Plant Site operations. The following table summarizes the page location of where the indirect wetland effects were discussed in the SDEIS.

Indirect Effects Factor Assessed	Mine Site	Transportation and Utility Corridor	Plant Site	Second Creek
Wetland fragmentation	page 5-239	page 5-239	page 5-291 of SDEIS	page 5-291
Change in wetland hydrology from changes in watershed area	page 5-243	---	---	---

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Indirect Effects Factor Assessed	Mine Site	Transportation and Utility Corridor	Plant Site	Second Creek
Changes in wetland hydrology from groundwater drawdown resulting from open pit mine dewatering	pages 5-247, 5-259, 5-260; Tables 5.2.3-3, 5.2.3-4	---	---	---
Changes in wetland hydrology from groundwater drawdown resulting from operation of the plant site including groundwater seepage containment	---	---	pages 5-297 and 5-298; Table 5.2.3-10	pages 5-297 and 5-298
Changes in stream flow near the Mine Site and Plant Site and associated effects to wetlands abutting the streams	page 5-273	---	page 5-299	page 5-299
Change in wetland water quality related to atmospheric deposition of dust and rail car spillage associated with Mine Site and Plant Site operations as well as leakage from Stockpiles/Mine Features and Seepage from Mine Pits	page 5-276, 5-284; Table 5.2.3-7	page 5-277	page 5-302, 5-307; Table 5.2.3-13	page 5-291

<u>Additional Information (Provided for this Response)</u>

- Wetland Management Plan Sections 4.2 and 4.3
- PFEIS Section 5.2.3.3 Wetland Mitigation and Monitoring

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