

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>	
Title of the draft being reviewed:	Draft guidelines for the preparation of an environmental impact statement
<i>General Comments</i>	
<p>The guidelines do not sufficiently include alternatives for analysis and should have a section dedicated to comparison of impacts of alternatives. Decision makers need to be able to consider and analyze the impacts of a reasonable range of alternatives to the proposed action, including a no-action alternative. The environmental effects of the proposed action and alternative(s) should be presented in comparative form. Without this comparison of impacts, the EIA process and resulting EIS lose their value as decision making tools and become simply pro forma.</p>	
<p>The terms “Environmental Impact Assessment,” “Environmental Impact Statement,” and “Environmental Risk Assessment” are defined in this Guideline and in the EIA Standard and Guideline. The United States would support including definitions of these terms in the Exploitation Regulations, so that there is a common understanding of the meaning of these terms between the Exploitation Regulations and Standards and Guidelines.</p>	
<p>The use of the term “residual impacts” or “residual effects” presents an opportunity for confusion regarding which effects or impacts are being referenced, in particular compared to the use of “residual” in the exploitation regs. Propose that the term “residual” be removed from these guidelines.</p>	
<p>This Guideline contains a paragraph apparently purporting to establish the status of the Guidelines relative to other ISA documents, in a relatively confusing manner, at page 3/line 49.</p>	

Additionally, this Guideline contains legally binding language (“shall” in numerous instances) and appears to inaccurately paraphrase the Exploitation Regulations.

Specific Comments

Page	Line	Comment
2	67	Include REMF in Section B. Terminology.
2	72	Recommend cross-referencing the definitions for EIA and ERA. The two processes should be related in a tangible manner.
2	88	If there are to be multiple definitions for terms throughout the regulations, standards, and guidelines, then this should be noted in all documents (i.e., the regulations should also note which terms have varying meanings in a standard or guideline document).
3	EIS Table	2.1.5 Emphasis should be on the near environment and not open to interpretation of assessing global socioeconomic conditions more broadly. The focus of the third point should be on other activities in the area. Propose: “Description of other activities in the marine environment.
3	EIS Table	2.1.6 “and proposed mitigation” should be struck from all three points. Contractors should consider prevention, mitigation, and management of potential adverse effects as part of assessment of impacts and analysis of alternatives, and mitigation may not always be possible. “Assessment of impacts on the [physicochemical[biological] environment” is therefore sufficient. Further, “impacts” is a neutral term, and this as written presumes it is negative. Suggest instead including the consideration of prevention, minimization, and mitigation in the body below.

3	117	Consider assessing impacts to cultural resources or areas of cultural significance.
6	269	Delete “preferably.” This word ironically may signal that a less detailed bathymetric map is equally desirable.
10	451	References to any studies should be included in a reference section.
11	508	Suggest adding cultural to “archeological or historical” significance to align with exploitation regs. These sites should likely be addressed in other sections as well. These resources are unique, irreplaceable, and non-renewable.
12	536	Also discuss why mitigation is relevant to the proposed requirement to avoid and remedy effects and how effective the measure is at its intended purpose. Additionally, this discussion should describe if there is a need to monitor the efficacy/results of the mitigation to ensure the effects are reduced, avoided, offset, and the expected residual impacts correspond to EIA estimates or projections.
15	668	Suggest adding “Cultural and Historical Resources.”
15	682	Standardize the use of acronyms related to ERP and Emergency Response Plan. Related guidelines are unclear about the distinction between accidents or extreme nature events and normal discharges.
<p><i>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</i></p>		