

**RFI 156
Pebble Project EIS**

Request for Information

Title/Subject:	Review of Cultural Resources Documents
Requestor:	AECOM
Date Transmitted:	11/8/2019
Recipient:	Pebble Limited Partnership
Response Requested by:	11/18/2019
Rationale:	<p>In response to an inquiry based on AECOM's review of comments submitted on the Pebble Project Draft Environmental Impact Statements, Native American Rights Fund, representing the Nondalton Tribal Council and United Tribes of Bristol Bay, provided copies of two source documents used in initial ANCSA 14(h)(1) land sections by project area regional ANCSA Corporations:</p> <ul style="list-style-type: none"> - Brelsford 1975, Cook Inlet Region Inventory of Native Historic Sites and Cemeteries - Shields 1977 Assessment of Cultural Resources in the Bristol Bay Region <p>Neither of these documents appear in the references of Environmental Baseline Documents 23 and 24, prepared by Stephen R Braund and Associates (SRB&A) for the Pebble Limited Partnership (PLP).</p>
Describe the Information Requested and Level of Detail:	AECOM requests that SRB&A review these documents and determine if the information presented in the reports on potential cultural resources would be of value in identifying potential data gaps and sites for consideration in future field investigations.

Recipient Response Form

Date Received from USACE:	11/8/19
Response from Recipient (Describe Information Requested to the Level of Detail Requested; Provide Attachments as Needed):	<p>SRB&A reviewed the two source documents and believes that the cultural resource information provided in the documents in relation to the current Pebble Project APEs does not provide additional value to identifying potential data gaps and sites for consideration in future field investigations because the sites have been identified already through other sources.</p> <p>Of all the cultural resources identified in Brelsford 1975, two (Site 220 and Site 205) occur within the Indirect APE. The Brelsford 1975 maps display points for these two sites, even though the features actually represent trails (i.e., no lines are shown for the trails on the map).</p> <ul style="list-style-type: none"> • Site 220: Lake Clark-Chekok Trail describes a prehistoric transportation route from Chekok village, Iliamna Lake to Port Alsworth, Lake Clark. This trail appears to be the same as IICR-0151 documented by SRB&A during cultural resource interviews for the Pebble Project. • Site 205. Pile Bay-Iliamna Bay Trail describes a prehistoric and historic transportation route from Iliamna Lake to Cook Inlet. SRB&A believes this trail is the same as the AHRS site Williamsport-Pile Bay Road (ILI-00132). <p>Because there is already an IICR and AHRS site associated with the two trails, and due to the lack of detailed mapping in the Brelsford report (e.g., trails identified as points rather than lines), SRB&A believes the information for Site 220 and Site 205, in addition to the remainder of the Brelsford report, provides no additional value in identifying potential data gaps and sites for future field investigations within the current Pebble Project APEs.</p> <p>Shields 1977 does not include maps showing the sites but does provide UTM coordinates. There are 43 entries for the Iliamna quad, 35 of which have AHRS numbers. Using the UTM coordinates in the report, SRB&A determined that only</p>

	<p>one of the eight non-AHRS sites falls within the Pebble Project APE. The site, BB 286, is named "Upper Talarik Creek" and is coded as a historic site.</p> <p>SRB&A did not identify any additional information within the report associated with BB 286. The fact that BB 286 was not given an AHRS site at the time of the report publication likely correlates to the lack of information gathered regarding BB 286 in 1977. SRB&A interviews for the Pebble Project documented a number of IICR features for various cabins and burials in the general area of Upper Talarik Creek.</p> <p>Due to the lack of information regarding BB 286 in Shields 1977, and the more detailed information collected by SRB&A for the Upper Talarik Creek area during the course of cultural resource interviews, SRB&A believes the BB 286 site, in addition to the remainder of the Shields report, provides no additional value in identifying potential data gaps and sites for future field investigations within the current Pebble Project APEs.</p>
List Number and Type of Response Attachments:	None
Date Returned to USACE:	11/14/19

AECOM Intake Form

Date Response was Received:	11/14/2019
Received by:	AECOM
Describe any Follow-up Related to this RFI:	Click here to enter text.