

**RFI 154
Pebble Project EIS**

Request for Information

Title/Subject:	Alternate Newhalen River Crossing
Requestor:	AECOM
Date Transmitted:	10/23/2019
Recipient:	Pebble Limited Partnership
Response Requested by:	11/1/2019
Rationale:	The Summary Report of 2019 Cultural Resource Field Activities describes an alternate location for the Newhalen River crossing that was assessed for cultural resources. This location should be evaluated in the EIS to determine if it is a reasonable alternative and if it would reduce overall environmental impacts.
Describe the Information Requested and Level of Detail:	Please provide adequate information to determine if the alternate location is reasonable and has potential to reduce environmental impacts.

Recipient Response Form

Date Received from USACE:	Click here to enter text.
Response from Recipient (Describe Information Requested to the Level of Detail Requested; Provide Attachments as Needed):	Click here to enter text.
List Number and Type of Response Attachments:	RFI 154_Alternate Newhalen Crossing Response.pdf
Date Returned to USACE:	Click here to enter text.

AECOM Intake Form

Date Response was Received:	10/29/2019
Received by:	AECOM
Describe any Follow-up Related to this RFI:	Click here to enter text.



From: James Fuego, Pebble Limited Partnership

To: Shane McCoy, US Army Corps of Engineers

Date: October 29th, 2019

RFI 154 requested adequate information to determine if the alternate location for the Newhalen River crossing evaluated by PLP is reasonable and has potential to reduce environmental impacts.

PLP made a decision to evaluate an additional crossing location for the Newhalen River bridge when cultural resource assessment surveys of the bridge embankments at the proposed (northern) location identified multiple cultural artifacts on both embankments. Based on the results of the assessment it appears likely that the bridge abutments at the proposed location will be eligible for inclusion in the National Register of Historic Places.

To assess the southern (alternative) crossing location PLP engineers have provided a footprint for the rerouted road and bridge embankments, a new material site location and footprint, and an updated bridge design for the new crossing. The two alignments and associated features are shown in Figure 1 – Newhalen River Crossing Alternatives.

A cultural resource assessment of the bridge embankments at the southern (alternative) location did not identify any cultural artifacts, which is the primary concern with the northern (proposed) location.

Table 1 shows a comparison of environmental factors for the two alternatives.

Factor	Proposed (North Crossing)	Alternative (South Crossing)
Total Footprint (acres)	46.6	26.9
Wetlands Footprint (acres)	0.06	0
Length of road alignment (miles)	2.03	2.32
Stream Crossings	1	1
Anadromous Stream Crossing	1	1
Bridge Length (ft)	510	510
Number Spans	5	5
Cultural Artifacts Identified	Yes	No

Table 1 – Comparison of Environmental Factors




The southern route is 0.3 miles (14%) longer than the northern route. However, the overall footprint of the southern route is 19.7 acres (42%) smaller due to the reduced requirement for additional fill material and the topography at the proposed material site. The southern route has no wetland impacts, resulting in a reduction of 0.06 acres of wetland impact. The only water crossing on either route is the Newhalen River. The bridge designs for the two crossings are essentially equivalent, with both requiring five spans. No substantive differences in feasibility, including cost, have been identified for the two alternatives. Based on the above analysis the alternative location results in a reduced overall footprint,

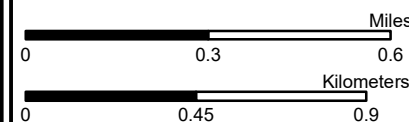
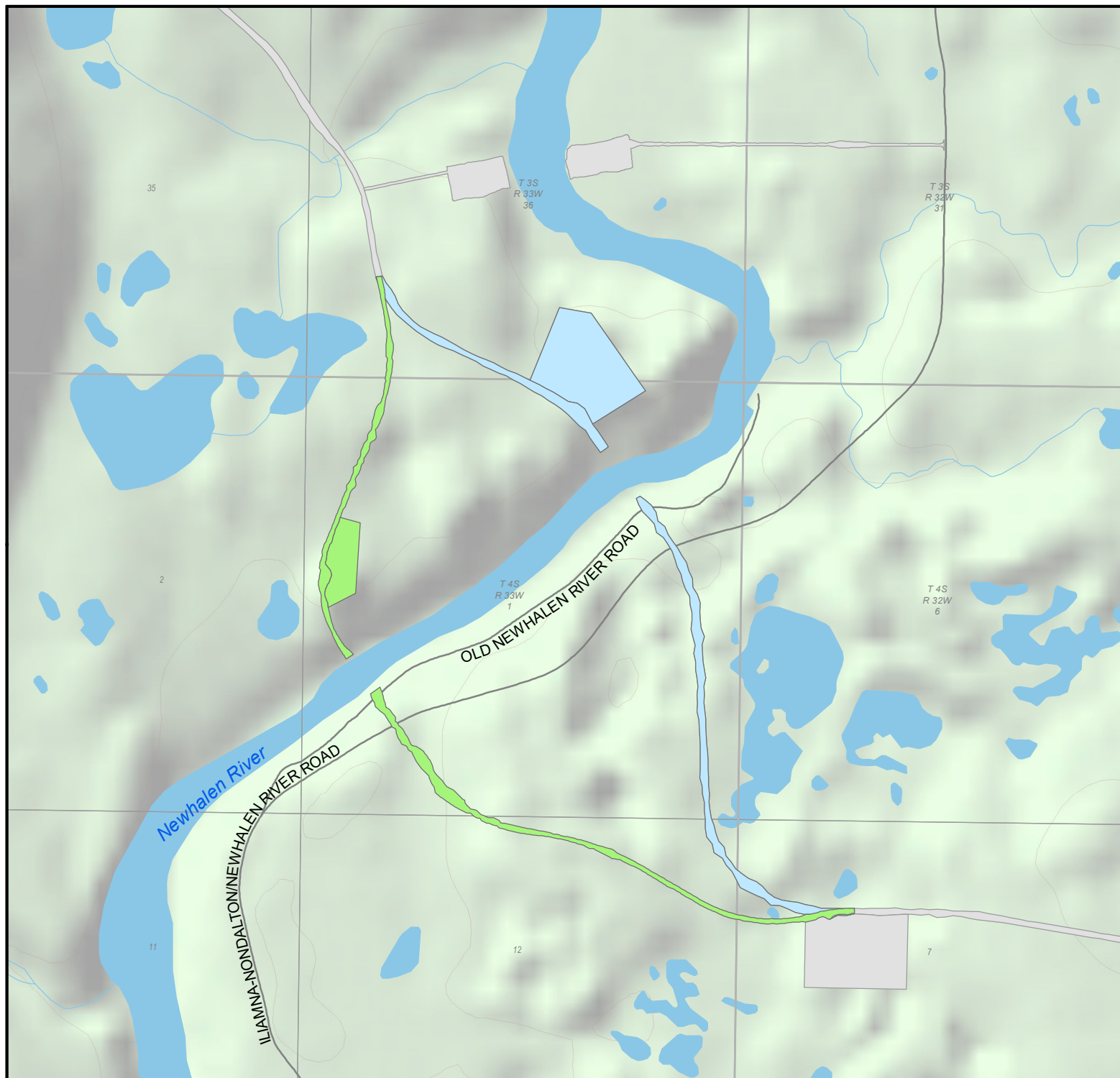
reduced wetlands impacts, and avoids known impacts to significant cultural resources without impacting the feasibility, or increasing the environmental impact, of the Newhalen River Crossing.

As such, PLP believes that the alternative (southern) crossing location reduces overall environmental impacts. As further avoidance and minimization for the Pebble project, PLP will incorporate the southern Newhalen River crossing into the proposed project and proposes to advance the associated permitting actions with US Army Corps of Engineers and US Coast Guard on that basis.

FIGURE 1

Newhalen River Crossing Alternatives

-  Newhalen River Proposed (North Crossing)
-  Newhalen River Alternative (South Crossing)
-  Mine to Eagle Bay Access Road



Scale 1:20,000

Alaska State Plane Zone 5 (units feet)
1983 North American Datum



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Version: x	Author: HDR