

**Proposed Pebble Project
Preliminary Draft Environmental Impact Statement
Review Comments**

Reviewer: NARF Technical Team
Date: December 21, 2018
Chapter: Chapter 3: Affected Environment
Section: Section 3.8 Historic Properties
Document: Sec3.8_HistoricProp_reviewdraft_2018.11.09

Comments

It is not clear why historic properties have their own section. The last sentence of the second paragraph in Section 3.7 states, ". . . *cultural resources do not need to be eligible or listed on the NRHP for consideration under NEPA.*" USACE reiterates this same thought in the opening paragraph of Section 3.8 when they state, "*Federal agencies must consider impacts to all types of cultural resources, including those that do not meet the definition of historic properties as set forth in the NHPA, and Appendix C and its implementing regulations.*" This statement supports the widely agreed upon premise that historic properties are a type of cultural resource. This means historic properties should be included in Section 3.7. USACE needs to combine this section with Section 3.7.

Section 3.8.1 Data Gap Summary. In the second bullet item, please change "surveyed" to "researched" in the following sentence, "*The proposed transportation and pipeline corridors for each alternative and Diamond Point have not been systematically surveyed for historic properties.*" The use of the term "surveyed" indicates an archaeological bias and historic properties are much more than archaeological sites.

Please justify why the EIS Analysis for this section is different than Section 3.7. In the last bullet item of Section 3.8.1, USACE states, "*The analysis in this section focuses on the footprint of the proposed facilities for each alternative.*" Please use the same EIS Analysis Area as was used in Section 3.7.

In the last paragraph of Section 3.8.1, USACE states, "*It is expected that the USACE will be addressing these data gaps throughout its Section 106 consultation process. The procedures detailing further work beyond the issuance of the Final EIS (e.g., the process for additional identification research and surveys, evaluation, and mitigation measures) will be established*

through the development of a PA." As we noted in comments for Section 3.7, this mindset is unfortunate and ill-advised.