

State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 3.8 – Historic Properties

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
DNR/DPOR/OHA	1	3.8	Use of Appendix C: 36 CFR 800 are the implementing regulations for the National Historic Preservation Act. As a result of consultation for Section 106, it was determined that 36 CFR 800 are the appropriate regulations to follow for Section 106 compliance for the Pebble Project as USACE will be fulfilling collective responsibilities as lead federal agency.	Amend 3.8 to indicate that 36 CFR 800 will be followed for Section 106 compliance and revise this section to reflect 36 CFR 800 definitions and process.	Section has been edited to note that 36 CFR 800 will be used in the Section 106 process in conjunction with Appendix C.
DNR/DPOR/OHA	2	3.8.1	No 2018 information - HDR and SRB&A conducted fieldwork in 2018.	Information from 2018 studies should be included in this section.	The description of all previous research, including 2018, is in Section 3.7. Date amended per this comment.
DNR/DPOR/OHA	3	3.8.1	Section 106 consultation has produced new information about potential historic properties.	Include information gathered as a result of Section 106 consultation.	At this juncture, it is premature to add this information. Some information gathered to date has been added to Section 3.7.
DNR/DPOR/OHA	4	3.8	Compliance under Section 106 will use Area of Potential Effect (APE) as USCG and BSEE need to use 36 CFR 800. Any reference to Permit Area will be for internal USACE use.	Use APE instead of Permit Area throughout section when talking about Section 106 compliance.	Section edited to include both.
DNR/DPOR/OHA	5	3.8.2	Compliance under Section 106 will use Area of Potential Effect (APE) as USCG and BSEE need to use 36 CFR 800. Any reference to Permit Area will be for internal USACE use.	Revise this section to define APE.	Section edited to include and define the APE.
DNR/DPOR/OHA	6	3.8.3	These sections are only looking at the project footprint. The APE will at a minimum need to include an area outside of the project footprint to accommodate construction, maintenance, travel, staging, and accidental use (buffer).	Analysis of how many historic properties or potential historic properties may be impacted by each alternative will need to be revised once the APE has been determined and, if possible, once identification	Once the APE is defined, this will be the case. In the meantime, AHRS sites in the defined EIS analysis area are used for this section and Section 3.7.

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				efforts and determinations of eligibility have been completed on potentially impacted historic properties.	
DNR/ DPOR/ OHA	7	3.8.3.3	References the 2018 HDR work, which was not included in the previous summary.	Include HDR's 2018 work in 3.8.1.	Work by HDR was added.
DNR/ DPOR/ OHA	8	3.8.3.4	This section mentions the absence of information concerning marine archaeology, but does not mention the absence of information concerning on-land resources.	Clarify that only a small amount of the on-land natural gas pipeline corridor and transportation corridor has been surveyed.	This section has been shortened to focus on historic properties only. Section 3.7 discusses marine archaeology data and gaps.