

**ACHP Comments – Pebble Project Preliminary Draft EIS, Section 3.7 - Cultural Resources**

<b>Agency</b>	<b>Comment No.</b>	<b>Section, Paragraph, and Page #</b>	<b>Cooperating Agency Comment (and Purpose of Comment)</b>	<b>Proposed Resolution (Additions or Deletion of Text)</b>	<b>Response</b>
ACHP	1	3.7	highways	??highways are usually considered structures. Usually the term buildings is used here.	Text edited to say “highways and other structures”
ACHP	2	3.7	Important in conveying	Locations connected with events or activities referenced in oral histories?	Text added to include events.
ACHP	3	3.7.1	Data and analytical gaps will be addressed through the ongoing Section 106 process	But not just by consultation	Sentence was edited to read: “Data and analytical gaps will be addressed through ongoing research, including input from public comments, and will allow for additional characterization of the affected environment for cultural resources in the Final EIS.
ACHP	4	3.7.1	RFI 097	?Request for Information?	Yes, this refers to a Request for Information, which is a formal process for the USACE and contractors to request information. This RFI was received, the data included in the Draft EIS, and this statement deleted.
ACHP	5	3.7.1	physical manifestations	Places where cosmological events or activities occur may not necessarily have demonstrative “physical manifestations”. It could be just a place.	The text has been revised to clarify this.
ACHP	6	3.7.1	This will be incorporated into the Final Programmatic Agreement (PA)	Spell out a little bit better what “this” means.	This bullet has been deleted.

**ACHP Comments – Pebble Project Preliminary Draft EIS, Section 3.7 - Cultural Resources**

<b>Agency</b>	<b>Comment No.</b>	<b>Section, Paragraph, and Page #</b>	<b>Cooperating Agency Comment (and Purpose of Comment)</b>	<b>Proposed Resolution (Additions or Deletion of Text)</b>	<b>Response</b>
ACHP	7	3.7.1	Assessment for off-shore	Assessment of previously collected information or research to gather additional information about such properties, or both?	Sentence added to clarify.
ACHP	8	3.7.1	has not yet been completed	This is passive voice. Who has not yet completed such work?	Text edited per this comment.
ACHP	9	3.7.3.1	However, aside from the small surveys near Amakdedori port (see below), the complete Amakdedori port site and the transportation corridor have not been surveyed	See comment below. Is this consistent?	This statement has been deleted. The information presented about the Amakdedori port surveys has been clarified in the subsequent paragraphs.
ACHP	10	3.7.3.1	In July 2018, HDR completed an archaeological survey of the Amakdedori port site on behalf of PLP.	A survey of the port site, or of part of the port site?	The information presented about the Amakdedori port surveys has been clarified.
ACHP	11	3.7.4.1 Cultural Resources	and ethnographic interviews	Under Section 106, the federal agency responsibility to make a reasonable and good faith effort to identify such properties that may be eligible is not limited to just consultation. There has to be a proactive, systematic effort to identify/inventory such properties. The federal agency consults about their significance, eligibility, the effects of the undertaking on such properties, and resolution of adverse effects. To the extent that the referenced previous oral interviews do not cover portions of the project APE appropriately, some level of additional ethnographic research will need to be carried out.	This statement has been deleted.
ACHP	12	3.7.4.3 Place Names	have not yet been provided	The use of the word “provided” suggests the passive role improperly assumed by the federal agencies. The federal agencies have	The text has been edited per this

**ACHP Comments – Pebble Project Preliminary Draft EIS, Section 3.7 - Cultural Resources**

<b>Agency</b>	<b>Comment No.</b>	<b>Section, Paragraph, and Page #</b>	<b>Cooperating Agency Comment (and Purpose of Comment)</b>	<b>Proposed Resolution (Additions or Deletion of Text)</b>	<b>Response</b>
				a responsibility to actively and systematically identify properties that are known to be or may be eligible for the NRHP and that may be affected by the undertaking. They can't just wait for the tribes to provide the information.	comment.