

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

Reviewer: NARF Technical Team
Date: December 21, 2018
Chapter: Chapter 4: Affected Environment
Section: Section 4.8 Historic Properties
Document: Sec4.8_HistProp_reviewdraft_2018.11.09

Comments

It is not clear why historic properties have their own section. In the opening paragraph of Section 4.8, the U.S. Army Corps of Engineers (USACE) states, ". . . *at this time, there are no historic properties identified in the analysis area (see below). Therefore, Section 4.7, Cultural Resources, offers a discussion of the effects on cultural resources that includes known AHRS sites, archaeological sites, place names, and interview-identified cultural resources.*" This is exactly what Section 4.7 does. Please combine this Section 4.8 with Section 4.7, because it is redundant, and historic properties are a type of cultural resource.

Section 4.8.3 Mitigation. Please change the opening sentence from "*Site-specific mitigation measures will be developed through the Section 106 and PA process to avoid or minimize effects on historic properties, to the extent practicable*" to "Specific mitigation measures will be developed through the Section 106 and PA process to avoid or minimize effects on historic properties, to the extent practicable." Historic properties include districts, buildings, structures, objects, and sites.

In the last bullet item of this section, USACE again reveals its archaeological bias by stating the first mitigation option is data recovery (i.e., dig, document, and destroy). USACE needs to be prepared to mitigate the loss of important cultural places that do not have physical evidence of use.