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First name: Sarah

Last name: Meitl

Organization: Alaska State Historic Preservation Office

Title:

Comments: The current cultural resources analysis relies on the ability of Section 106 of the National Historic Preservation Act (NHPA) to be phased and completed at a later date thereby allowing effects of an undertaking to be taken into consideration once project-specific information is known. However, NHPA only addresses effects to historic properties, or properties eligible for listing in the National Register of Historic Places, whereas cultural resources under NEPA encompasses a broader range of resources. How will impacts to NEPA cultural resources that are not historic properties be addressed should alternative A or B be chosen?