

**PROGRAMMATIC AGREEMENT
AMONG
THE DEPARTMENT OF ENERGY, IDAHO OPERATIONS OFFICE,
THE IDAHO STATE HISTORIC PRESERVATION OFFICE,
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
CONCERNING MANAGEMENT OF THE MANNER IN WHICH THE DEPARTMENT
OF ENERGY WILL MEET ITS NATIONAL HISTORIC PRESERVATION ACT
RESPONSIBILITIES
ON
THE IDAHO NATIONAL LABORATORY SITE**

WHEREAS, the Department of Energy, Idaho Operations Office (DOE) operates, manages, uses, and administers the Idaho National Laboratory Site (INL), consisting of approximately 890 square miles of land located within Bingham, Butte, Bonneville, Clark, and Jefferson Counties in Idaho, along with DOE facilities located in Idaho Falls, Idaho; and

WHEREAS, the INL in major part constitutes land initially set aside by Public Land Orders in 1946 and 1949 for use of the U. S. Navy Department as a Naval Proving Ground and Public Land Orders in 1950, 1958, 1962, and 1963 that involved lands withdrawn for use of the Atomic Energy Commission (AEC) as a National Reactor Testing Station, which later became the INL in support of the AEC's and, later, DOE's mission; and

WHEREAS, DOE is responsible for compliance under the National Historic Preservation Act of 1966, as amended, (NHPA) [54 United States Code (U.S.C.) § 300101 et seq.] for all historic properties at the INL owned by DOE; and

WHEREAS, DOE has determined that operation, management, use, and administration of INL entails undertakings that may affect historic properties, which are therefore subject to review under Section 106 of the NHPA [54 U.S.C. § 306108 (previously 16 U.S.C. § 470f, hereinafter referred to as Section 106)] and the Section 106 implementing regulations [36 Code of Federal Regulations (C.F.R.) § 800]; and

WHEREAS, DOE is responsible for compliance with NHPA Section 106 for all federal undertakings on the INL for which DOE is the designated lead federal agency, in accordance with 36 C.F.R. § 800.2(a)(2); and

WHEREAS, DOE, in consultation with the Idaho State Historic Preservation Office (Idaho SHPO) and the Advisory Council on Historic Preservation (ACHP), has determined that DOE's Section 106 requirements can be more effectively and efficiently implemented if a programmatic approach is used in accordance with 36 C.F.R. § 800.14(b)(2); and

WHEREAS, this Programmatic Agreement (PA) supersedes the Programmatic Agreement among the Department of Energy Idaho Operations Office, the Idaho State Historic Preservation

Office, and the Advisory Council on Historic Preservation Concerning Management of Cultural Resources on the Idaho National Engineering and Environmental Laboratory dated July 15, 2004; and

WHEREAS, cultural resource management at INL is part of a large set of planning activities that have as their common goal the responsible use of the INL built environment and landscape in support of DOE missions and execution of this PA will facilitate management and expedite adaptive reuse, repair, and maintenance of historic properties at INL; and

WHEREAS, DOE's vision is for INL to be an enduring national resource known for excellence in operations and the timely delivery of solutions to nuclear energy and other energy resources, national security, and environmental management challenges by developing and delivering cost-effective solutions to both fundamental and advanced challenges in these areas. As such, the agency is encouraged to expedite the National Environmental Policy Act (NEPA) process, requiring the need to collaborate with Idaho SHPO and the ACHP in developing alternative procedures for NHPA compliance within an expedited NEPA timeline; and

WHEREAS, this PA is intended to achieve compliance with NHPA Section 106 through program alternatives pursuant to 36 C.F.R. § 800.14. DOE intends that efficiencies in the NHPA Section 106 process, realized through this PA, will enable DOE, Idaho SHPO, and ACHP staffs to devote a larger percentage of their time and energies to Section 110, including: (1) analysis and synthesis of data accumulated through decades of NHPA Section 106 compliance; (2) historic property identification where information is needed, not just in reaction to proposed undertakings; (3) long-term preservation planning; (4) National Register nominations; (5) planning and priority-based historic property management; (6) creative public education and interpretation; (7) more efficient and effective DOE, Idaho SHPO, Tribal, and ACHP coordination, including program monitoring and dispute resolution; and (8) other activities that will contribute to readily recognizable tribal and public benefits; and

WHEREAS, the DOE intends to coordinate its compliance with NHPA Section 106 with the applicable requirements of the NEPA (42 U.S.C. 4321-4347) pursuant to 40 C.F.R. § 1500-1508, 10 C.F.R. § 1021, and as described in CEQ's (Council on Environmental Quality) and ACHP's *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106*; and

WHEREAS, DOE recognizes the unique legal relationship of the Federal Government with federally recognized Indian Tribes as set forth in the Constitution of the United States, treaties, statutes, and court decisions; and

WHEREAS, DOE acknowledges that federally recognized Indian Tribes possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them as provided in 36 C.F.R. § 800.4(c)(1); and

WHEREAS, DOE recognizes the potential effect of mission activities on archaeological sites, sacred places, and traditional use areas that are affiliated with Indian Tribes; and

WHEREAS, DOE recognizes the government-to-government relationship with Indian Tribes and has entered into an Agreement in Principle (AIP) with the Shoshone-Bannock Tribes to continue and improve upon the government-to-government relationship that is founded upon the Fort Bridger Treaty of July 3, 1868, 15 Stat. 673; and

WHEREAS, nothing in this PA expands or diminishes tribal treaty rights or the AIP; and

WHEREAS, DOE has agreed to consult with the Shoshone-Bannock Tribes as specified in the AIP, including consideration of the Tribes' perspectives in evaluating historic property eligibility and effects from DOE undertakings; and

WHEREAS, DOE recognizes the potential effect of mission activities on local, state, and nationally significant districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places, including artifacts, records, and material remains related to such a property or resource; and

WHEREAS, the Idaho SHPO has an interest in continuing a cooperative relationship with DOE to facilitate a more effective and efficient NHPA Section 106 consultation process, to promote activities of mutual benefit, and to participate in the development of this PA; and

WHEREAS, the Signatories support measures that enable the ongoing use of INL scientific and technical facilities while encouraging preservation of their significant components to the extent possible as recommended in ACHP's *Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities (current version)*; and

WHEREAS, DOE has invited members of the public to participate by commenting on this PA; and

WHEREAS, DOE in accordance with 36 C.F.R. § 800.14(b)(2)(i), has notified ACHP of the development of this PA and ACHP has elected to participate; and

WHEREAS, DOE in accordance with 36 C.F.R. § 800.14(b)(2)(i), has invited the Shoshone-Bannock Tribes to consult on the development of this PA and the Tribes have elected to participate as consulting parties; and

WHEREAS, DOE has invited fifteen (15) interested parties to consult on the development of this PA and Bingham County, Butte County, U.S. Bureau of Land Management, U.S. Department of Energy Headquarters Office, Museum of Idaho, and Preservation Idaho: The Idaho Historic Preservation Council, have elected to participate as consulting parties; and

NOW, THEREFORE, DOE, Idaho SHPO, and ACHP agree that DOE and INL activities that have the potential to affect historic properties shall be administered in accordance with the stipulations section of this PA to satisfy DOE's responsibilities under Section 106 and Section 110 of NHPA.

STIPULATIONS

DOE will ensure that the following stipulations are implemented.

I. Roles and Responsibilities

A. DOE:

1. Perform federal responsibilities identified in 36 C.F.R. § 800 and ensure the terms of this PA are carried out.
2. Ensure that all work conducted under this PA is carried out or supervised by personnel who meet the qualifications set forth in the Secretary of the Interior's Standards and Guidelines for Professional Qualifications (36 C.F.R. § 61) appropriate to the resources.
3. Oversee work performed under this PA by the INL Management and Operations (M&O) contractor Cultural Resource Management Office (CRMO), including as permitted by 36 C.F.R. § 800.2(a)(3), and ensure all work complies with applicable federal and state requirements and guidelines. This includes, but is not limited to, documents, studies, information, analyses, and recommendations.
4. Establish and maintain policies and procedures for federal agency responsibilities to implement this PA and manage DOE's cultural resources.
5. Ensure that a determination, finding, or agreement made pursuant to this PA is supported by sufficient documentation to enable any reviewing parties to understand its basis, and coordinate review with Idaho SHPO and the Shoshone-Bannock Tribes.
6. Make decisions based on effects findings and eligibility determinations recommended by the CRMO.
7. Ensure DOE personnel have knowledge of Section 106 requirements commensurate with their level of responsibility in the Section 106 review process.
8. Fulfill federal agency responsibilities for proactive management of DOE cultural resources by implementing a comprehensive approach to cultural resource management and planning that addresses the requirements of Section 110.
9. Designate DOE personnel to implement this PA. Appendix A shows the DOE organizational structure.
 - a) DOE Manager. The DOE Manager is a signatory to this PA and is the principal agency official (36 C.F.R. § 800.2(a)) with the authority to make and

execute decisions for DOE Office of Nuclear Energy and all INL sitewide scope under its cognizance; has approval authority for an undertaking and the ability to commit the DOE to take appropriate action for a specific undertaking as a result of Section 106 compliance; may enter into memoranda of agreement (MOA) or separate PAs for adverse effects; and is responsible for government-to-government consultation with the Shoshone-Bannock Tribes. The DOE Manager will designate a Cultural Resource Coordinator to serve as the federal agency official in carrying out the terms of this PA. The DOE Manager can delegate duties pursuant to this Agreement to other qualified DOE personnel. Designations and delegations made by the DOE Manager will be formally communicated to Idaho SHPO.

- b) DOE Idaho Cleanup Project (ICP) Manager. The DOE ICP Manager is the agency official with authority to commit DOE resources and enter into MOAs and PAs to resolve adverse effects caused by undertakings performed within the Office of Environmental Management ICP. The DOE ICP Manager can delegate these duties to other qualified DOE ICP personnel.
- c) DOE Environment and Sustainability (ESD) Director. The DOE ESD Director provides direct programmatic support for INL environmental compliance programs administered by DOE line organizations and the DOE Manager, including National Environmental Policy Act compliance and the cultural resource management program; advises the DOE Manager and DOE ICP Manager on the implementation of this PA and the Section 106 review process in general; directs the DOE Cultural Resource Coordinator in implementing the terms of the PA; performs the functions identified in Stipulation I.A.9.d and identifies other DOE ESD personnel who can perform these functions as needed; and performs additional duties as delegated by the DOE Manager.
- d) DOE Cultural Resource Coordinator (CRC). The DOE CRC is responsible for day-to-day oversight of work performed under this PA and is authorized to concur in determinations made by the CRMO, including but not limited to, Area of Potential Effect, NRHP eligibility, and effects findings; lead consultation with Idaho SHPO; ensure necessary training for DOE staff; ensure implementation of the cultural resource management program, including Sections 106 and 110; ensure government-to-government consultation with the Shoshone-Bannock Tribes for Section 106 projects consistent with the DOE Manager's direction and 36 C.F.R. § 800; ensure actions stipulated in MOAs and PAs for adverse effects are completed; approve research proposals, test plans, and other documents produced by the CRMO; and to develop agreement documents. The CRC will ensure that reports and documentation, including determinations, findings, or agreements, are compliant with document quality standards in 36 C.F.R. § 800.11, Idaho SHPO guidelines, National Register Bulletins, and other applicable industry-accepted standards. The CRC will

coordinate communications with the CRMO, ACHP, Idaho SHPO, and other parties.

B. CRMO:

1. The INL M&O contractor will develop and implement a comprehensive INL Cultural Resource Management Program. The CRMO Manager and staff will develop and maintain NHPA procedures to ensure DOE's federal responsibilities are met under 36 C.F.R. § 800 and the stipulations of this PA. Appendix A shows the INL organizational structure.
2. Maintain a staff of cultural resource specialists who meet the qualifications set forth in the Secretary of the Interior's Standards and Guidelines for Professional Qualifications (36 C.F.R. § Part 61), or work under the supervision of individuals who meet these qualifications. This includes the discipline-specific categories of archaeologist, architectural historian, and archivist.
3. The INL M&O Contractor will develop and implement NHPA Section 110 programs and projects. The CRMO Manager will ensure necessary training for CRMO staff, an effective monitoring program, and implementation of a proactive historic preservation program including public outreach and partnerships.
4. The INL M&O Contractor will manage Experimental Breeder Reactor I as a National Historic Landmark (36 C.F.R. § 65).
5. The CRMO staff with qualifications in the appropriate discipline(s) will determine areas of potential effect (APEs) and make findings of No Effect and No Historic Properties Affected. The CRMO staff will prepare reports (as per Idaho SHPO guidelines) that document findings of No Adverse Effect (as applicable) or Adverse Effect. For Adverse Effect findings, the CRMO staff follows the procedures outlined in Stipulation V.C of this PA and assists DOE in the completion of the NHPA Section 106 procedure to resolve effects pursuant to 36 C.F.R. § 800.6(b).
6. The CRMO staff will maintain the cultural resource records and the CRMO manager will transmit reports to the DOE CRC for review and approval.
7. The INL M&O Contractor will or CRMO Manager will ensure successful implementation of the stipulations outlined in this PA by allowing the INL CRMO staff to maintain currency in program policy, initiatives, training, and professional development, and participate in societies and professional organizations, conferences, and meetings.

II. Lead Federal Agency

- A. DOE may use this PA to fulfill its Section 106 responsibilities and those of other federal agencies that designate DOE as the lead federal agency pursuant to 36 C.F.R. § 800.2(a)(2) for the undertakings described in this PA. Identification of the lead federal agency will be provided to the Idaho SHPO via email.
- B. This PA does not cover Section 106 compliance for undertakings proposed within the fenced perimeter of the Naval Reactors Facility (NRF) but does cover Section 106 and 110 within the administrative boundary (Appendix B), including Naval Reactors Laboratory Field Office/Idaho Branch Office (NRLFO/IBO) undertakings. If the NRF facility perimeter or administrative boundary is changed, DOE will follow the process identified in Stipulation XV to amend this PA with revised boundaries.

III. Program Documents and Data

- A. In support of this PA, the following documents and data will be completed by DOE and CRMO within the specified target due dates provided below. If DOE determines a due date to be infeasible, DOE will notify Idaho SHPO thirty (30) calendar days before the due date and the parties will mutually agree to an alternative date.
 - 1. Legacy data (including Archaeological Survey of Idaho (ASI), Idaho Historic Site Inventory (IHSI) forms, National Register listings, and survey data) will be reconciled with Idaho SHPO data. Data reconciliation would include data that has not been previously reported to Idaho SHPO. All legacy data will be reconciled, and an updated geodatabase and appropriate site records will be provided to Idaho SHPO data by December 2022.
 - 2. Completion of Legacy Project Reports – Several reports have not been finalized. These will be completed and submitted to Idaho SHPO by March 2023 for review.
 - 3. INL Contexts - INL Contexts will be completed in concert with the INL Historic Property Integrity Guidelines in Stipulation III.C and finalization of Revision 7 of the INL Cultural Resource Management Plan in Stipulation III.A.4. The goal of contexts is “evaluate, register, and treat the full range” of representative historic properties during DOE preservation planning (FR 44781). Through research and data collection, INL historic properties will be identified and defined and their relationship with other historic properties investigated to develop property types that will be most useful in establishing important historic trends.
 - a) The Pre-Contact/Native American Context Theme will include the following sub-themes and related research questions: Cultural Chronology, Landscape and Environment, Land Use and Site Distributions, Seasonal Mobility, Extra-Regional Relationships and Tribal Ethnohistory. This context will be completed by May 2023.

- b) The Post-Contact/Euroamerican Context Theme will include the following sub-themes: Commerce, Western Expansion, Transportation and Water, Military and Defense, and Commercial Reactor Development. This context will be completed by September 2023.
- 4. INL Cultural Resource Management Plan (CRMP) – The INL CRMP revision will be completed by March 2024.
- B. INL Historic and Cultural Resource Inventories – INL will maintain a database of cultural resources that will be used to inform the cultural context. The inventory will adhere to the current version of the *Idaho SHPO Guidelines* and will be used to develop the INL Historic Property Integrity Guidelines.
 - 1. Archaeological Inventory – The existing inventory will be reconciled with the Idaho SHPO database by December 2022. The INL Archaeological Inventory will include previously recorded Pre-Contact cultural resources; resources associated with the Oregon Trail and other historic migrations; travel corridors, rail lines, trails and ditches associated with timber or mining activities; historic drivelines for livestock; and homesteading sites.
 - 2. Architectural (Built Environment) Inventory – The existing inventory will be updated by September 2023. The INL Architectural (Built Environment) Inventory will include previously recorded linear resources such as: roads; rail lines and travel corridors not associated with timber or mining activities; water conveyance systems; transmission and communication lines; and historic buildings, structures, objects, sites, and districts with intact built components.
- C. Historic Property Integrity Guidelines – Completed contexts will develop property types and assign the significance to historic properties. This document will analyze soils, fire frequency, and geomorphology to evaluate the integrity of Pre-Contact sites that qualify under criterion D. These guidelines will be developed in consultation with the Idaho SHPO and Shoshone-Bannock Tribes by December 2023.

IV. Approach to Section 106 Compliance

- A. For the purposes of this agreement, the consultation process outlined in 36 C.F.R. § 800.3 through 800.6 will be replaced with a program alternative (as per 36 C.F.R. § 800.14). NHPA Section 106 review will be completed per the streamlined process identified below.
- B. The Program Documents and Data referenced in Stipulation III of this PA provide information on INL operations, past and present land use, natural setting, historic themes and contexts, research designs, archaeological and architectural inventories, cultural resource monitoring, and professional qualifications and training. The

documents and data form the basis for the INL Cultural Resource Management Program and inform Section 106 and 110 reviews and studies. The documents will be updated and maintained as new data are obtained through surveys and research.

- C. DOE initiates the NHPA Section 106 process early in the undertaking's planning process so that a broad range of alternatives may be considered.
- D. The CRMO staff receives notification of potential undertakings through several inputs including, but not limited to, environmental/NEPA review processes, CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) actions, maintenance requests, and other work proposals and requests, including those undertakings proposed by other contractors performing work at the INL. The CRMO staff reviews the proposed action to identify and make recommendations to DOE on whether: 1) the proposed action constitutes a federal undertaking (as defined by 36 C.F.R. § 800.16(y)) and, 2) the proposed action has the potential to cause effects to historic properties (as per 36 C.F.R. § 800.3(a)(1)). DOE will use information from the Section 106 review process and other technical reviews to inform the level of NEPA evaluation (categorically exclude or initiate an environmental assessment). This process applies to undertakings proposed under the INL M&O and ICP contracts. Actions proposed by NRLFO/IBO within the NRF administrative boundary under Stipulation II.B of this PA will be evaluated by the INL CRMO as requested by the NRLFO/IBO.
- E. DOE will ensure that environmental documents include information on historic properties that may be affected by the proposed action and alternatives. The public will have access to findings made pursuant to this PA consistent with the requirements in the Freedom of Information Act, the NHPA Section 304, the Archaeological Resources Protection Act (ARPA) Section 9(a), and all other applicable laws, regulations, and executive orders.

V. NHPA Section 106 Review Process

A. Categories of Undertakings

1. Establish Undertaking

- a) Consistent with 36 C.F.R. § 800.3(a), DOE will determine whether the proposed activity constitutes an undertaking. DOE will utilize ACHP's *Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities* to assist with undertaking determination (Appendix C). If the activity is not an undertaking, DOE has no further obligations under Section 106 or this PA.
- b) If the activity is an undertaking, DOE will proceed to Stipulation V.A.2.

2. No Potential to Cause Effects

- a) If DOE determines that the undertaking is a type of activity that has no potential to cause effects (36 C.F.R. § 800.3(a)(1)) or involves a property category excluded from Section 106 review as discussed in Stipulation V.A.2.b, DOE has no further obligations under Section 106 or this PA.
- b) Activity and Property Exclusions
 - (1) In consultation with the Idaho SHPO, ACHP, Shoshone-Bannock Tribes, and other consulting parties, DOE identified categories of activities that are excluded from Section 106 review and property types that are excluded from NRHP evaluation. The exclusions are listed in Appendix D.
 - (2) The INL CRMO will determine if an undertaking involves an exclusion identified in Appendix D. If the undertaking falls within an exclusion, no individual review or consultation is required. The undertaking will be documented with a No Historic Properties Affected finding in the Environmental Review Process or other applicable system and reported in the annual report (Stipulation IX). DOE will perform periodic oversight of the CRMO's exclusion determinations to verify exclusions have been appropriately applied, justified, and documented. DOE will document the results of the oversight and report them in the annual report (Stipulation IX).
 - (3) If the undertaking does not fall within an exclusion, DOE will proceed to Stipulation V.B.
 - (4) Signatories to this Agreement, in consultation with the Shoshone-Bannock Tribes, and other consulting parties as described in Stipulation VII.A.2, may propose additions or revisions to the list of exclusions by providing a written proposal to the other Signatories, as appropriate. Appendix D will be amended upon receipt of written concurrence from all Signatories, in accordance with Stipulation XV of this PA.

B. Evaluate Effects to Historic Properties

- 1. Establish the Area of Potential Effects and Identify Historic Properties
 - a) For all undertakings on the INL that have the potential to affect historic properties and do not fall within an exclusion in Appendix D, DOE will apply the definition of an APE according to 36 C.F.R. § 800.16(d).

- b) DOE will involve Idaho SHPO in establishing the APE before field surveys are performed for undertakings that involve large, complex, or controversial projects; projects which will have an APE for visual effects (i.e., the geographic area in which the undertaking has the potential to introduce visual elements that diminish or alter the setting, feeling, and association, including the landscape, where these criteria are character-defining features of a historic property that makes it eligible for listing in the National Register); or projects with other factors that make a mutually agreed upon APE critical to properly performing the Section 106 review. Based on the scope of the undertaking and associated NEPA or CERCLA action, the CRMO will determine the appropriate level of inventory required to identify historic properties within the APE according to the established levels of inventory described in the current version of Idaho SHPO's *Guidelines and Procedures for Cultural Resource Review and Consultation in Idaho*.
- c) In determining if there are historic properties within the APE, DOE will apply the criteria for evaluation found in 36 C.F.R. § 60.4 and National Register Bulletin on How to Apply the National Register Criteria for Evaluation to all cultural resources that may be affected.
- d) Applying the National Register criteria, DOE may make determinations of eligibility without consultation if no project effects will occur to historic properties and no Traditional Cultural Properties (TCPs), Historic Properties of Cultural Significance, or sacred sites are involved. All determinations will be documented, providing justification, detailing DOE's determination, resources consulted in making the determination, and included in the site record and annual report (Stipulation IX). DOE may, and is encouraged to, contact the Idaho SHPO, Shoshone-Bannock Tribes, and interested parties concerning determinations of eligibility when they feel that assistance or additional perspectives related to this decision would be helpful, or, as applicable, and pursuant to 36 CFR § 800.4(d)(1) and 800.4(d)(2).
- e) In limited circumstances, DOE may use a phased approach to identifying and evaluating historic properties as allowed by 36 C.F.R. § 800.4(b)(2). The DOE may pursue the use of a different survey approach within the APE on a project-specific basis. Use of these approaches will be consulted on separately with the Idaho SHPO, Shoshone-Bannock Tribes, and other consulting parties.

2. Results of Identification and Evaluation

a) No Historic Properties Affected.

- (1) No Cultural Resources Identified. If DOE determines no cultural resources are present in the APE or those identified are among the property type exclusions in Appendix D, DOE will make a finding of No

Effect and individual or project-specific consultation with Idaho SHPO will not be required. DOE will report the undertaking in the annual report (Stipulation IX).

- (2) No Eligible Cultural Resources Identified. If cultural resources are present in the APE that are determined to be ineligible, then DOE will make a finding of No Historic Properties Affected and submit justifications for all eligibility determinations and all ASI and/or IHSI forms and data to Idaho SHPO with the annual report (Stipulation IX). No eligibility determination concurrence is needed prior to proceeding with the undertaking and no individual or project-specific consultation with Idaho SHPO will be required. When the first annual report (Stipulation IX) is submitted after execution of this PA, DOE and Idaho SHPO will mutually decide if the schedule for submitting eligibility determinations should be adjusted to quarterly or semi-annually to better manage the timing and volume of reviews.
 - (3) Historic Properties Identified. If historic properties are present in the APE but will be avoided or otherwise not affected by the undertaking, as defined under 36 C.F.R. § 800.16(i), DOE will make a finding of No Historic Properties Affected. DOE will submit a Historic Properties Present Short Report Form (FRM-3006), including a description of effects, avoidance measures, and appropriate ASI and/or IHSI forms and data, to Idaho SHPO no later than sixty (60) calendar days after making the finding. If the undertaking involves Native American historic properties, the same documentation will be submitted to the Shoshone-Bannock Tribes. No eligibility determination concurrence is needed prior to proceeding with the undertaking and no individual or project-specific consultation with Idaho SHPO will be required. DOE will report the undertaking in the annual report (Stipulation IX).
 - (4) If the Idaho SHPO does not concur with the determination of eligibility or effect, DOE will follow the process identified in Stipulation VII.C.4 of this PA.
- b) No Adverse Effect.
- (1) DOE will use FRM-3006 (Historic Properties Present Short Report) to document a No Adverse Effect finding if an undertaking is determined to have no adverse effects to historic properties and meets the following conditions: 1) the Section 106 review is not being coordinated with development of an Environmental Assessment or Environmental Impact Statement, 2) the undertaking has the potential to only affect built environment and/or non-Native American historic properties, and 3) the undertaking does not require a visual effect analysis. DOE will submit

FRM-3006, including a description of effects, minimization or avoidance measures, and appropriate ASI and/or IHSI forms and database, and GIS data (site and survey data), to Idaho SHPO no later than sixty (60) calendar days after making the finding. No eligibility determination concurrence is needed prior to proceeding with the undertaking and no individual or project-specific consultation with Idaho SHPO will be required. DOE can use FRM-3006 to document a No Adverse Effect finding for other undertakings that do not meet the conditions in this paragraph on a case-by-case basis in cooperation with the Idaho SHPO and Shoshone-Bannock Tribes.

- (2) If an undertaking is determined to have no adverse effects to historic properties and does not meet the conditions in Stipulation V.B.2.b.1, DOE will formally consult with the Idaho SHPO, Shoshone-Bannock Tribes, and other consulting parties pursuant to 36 C.F.R. § 800.5(d)(1). DOE will submit a cultural resource survey report, ASI and/or IHSI form(s), and associated database files and GIS data to the Idaho SHPO within thirty (30) calendar days after receipt of the final report from the CRMO, dependent upon satisfactory resolution of DOE's comments and DOE's determination that the report meets standards. Idaho SHPO will provide comments within thirty (30) calendar days of receipt of the report and form(s). If Idaho SHPO does not respond within the agreed-upon timeframe, DOE may assume concurrence with eligibility determinations and effects findings.
- c) Adverse Effect. If an undertaking may have a potential adverse effect on historic properties, DOE will formally consult with the Idaho SHPO, Shoshone-Bannock Tribes, and other consulting parties pursuant to 36 C.F.R. § 800.6(a). DOE will submit a cultural resource survey report, ASI and/or IHSI form(s), and associated database files and GIS data to Idaho SHPO within thirty (30) calendar days after receipt of the final report from the CRMO, dependent upon satisfactory resolution of DOE's comments and DOE's determination that the report meets standards. Idaho SHPO will provide comments within thirty (30) calendar days of receipt of the report and form(s). If Idaho SHPO does not respond within the agreed-upon timeframe, DOE may assume concurrence with eligibility determinations and effects findings. DOE will proceed with the resolution of adverse effects in Stipulation V.C.

C. Resolution of Adverse Effects

1. Adverse effects will be resolved through the NHPA Section 106 process codified in 36 C.F.R. § 800.6. DOE will prepare an MOA with Idaho SHPO, inviting the ACHP and Shoshone-Bannock Tribes to participate as well as other parties who wish to participate in the resolution of adverse effects (36 C.F.R. § 800.6(a)).

2. If development of standard treatments (36 C.F.R. § 800.14(d)) is desired for the resolution of adverse effects, DOE will consult with Idaho SHPO, Shoshone-Bannock Tribes, and other consulting parties that have demonstrated interest. Upon mutual written agreement by DOE, Idaho SHPO, and ACHP, such standard treatments will be appended to this PA. DOE will notify the signatories of this PA in writing. The standard practices may then be followed in lieu of case-by-case consultation for the specified class of properties and should comport with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

VI. Public Involvement

- A. The views of the public are essential to informed Federal decision-making, and DOE will seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties. Pursuant to 36 C.F.R. § 800.2(d)(3), DOE may use its NEPA procedures to involve the public and will advise the public of undertakings in conjunction with NEPA outreach, notification, and scoping. DOE will make it clear to the public that the agency is seeking views on effects to historic properties under this Programmatic Agreement and 36 C.F.R. § 800.2.
- B. DOE will seek out and consider the views of the public when carrying out actions under the terms of this PA. DOE will notify the public of proposed undertakings with potential adverse effects as required by 36 C.F.R. § 800.6(a)(4). DOE may solicit such input through the public participation opportunities afforded by the environmental review processes established under the NEPA, and DOE will consider comments by members of the public that are provided in a timely manner.

VII. Consultation Procedures

A. Consulting Parties

1. In coordination with the Idaho SHPO, DOE will identify consulting parties, invite them to participate in consultation, and consider all written requests of individuals and organizations to participate as consulting parties (36 C.F.R. § 800.3(f)). Such consulting parties will include, but are not limited to, the Shoshone-Bannock Tribes; local governments; applicants for federal assistance, permits, licenses, and other approvals (see 36 C.F.R. § 800.2(c & d)); owners of affected lands; other federal government agencies; certain individuals and organizations with a demonstrated interest in the effects of an undertaking on historic properties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 C.F.R. § 800.2(c)(3-5)); and other parties determined jointly by DOE and the Idaho SHPO.

2. DOE will invite potential consulting parties to participate, or consulting parties may request to participate, in the NHPA Section 106 consultation process if they have a demonstrated interest in a DOE undertaking or its effect on historic properties. A "demonstrated interest" may be indicated by an organization that focuses on historic preservation, as exhibited in their mission statement, charter or bylaws, their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's potential effect on historic properties. Any confidentiality concerns of Tribes, private individuals, and businesses will be addressed.
3. DOE will consider the effects of its undertakings on historic properties significant to the Shoshone-Bannock Tribes, who ascribe cultural affiliation (tribal history, including properties of traditional religious and cultural importance) to INL lands as defined in the applicable documents and data in Stipulation III, and supporting documents for matters pertaining to the NHPA, NEPA, Native American Graves Protection and Repatriation Act (NAGPRA), ARPA, and the American Indian Religious Freedom Act. The scope and framework for government-to-government consultation on cultural resources will be documented in the AIP. While the DOE may initiate consultation under multiple authorities at one time, this PA governs compliance with the NHPA and in no way supersedes the DOE's other treaty, trust, and consultation responsibilities to the Shoshone-Bannock Tribes under other authorities. The parties recognize that the NHPA does not address all tribal concerns regarding cultural resources and cultural values and that Indian tribes are composed of living people with a living and dynamic culture with roots in past practices and past land occupancies who identify and honor spiritual connections to certain places, landscapes, vistas, and objects within those landscapes that may not fit National Register criteria.
4. In accordance with 36 C.F.R. § 800.10(c), DOE agrees that the National Park Service (NPS), as an interested party representing the Secretary of the Interior, and the ACHP per Section 110(f) of the NHPA will be provided an opportunity to comment on proposed undertakings that will affect significant features of the Experimental Breeder Reactor I National Historic Landmark, and DOE will take any such comments into consideration before reaching a final decision on the matter.

B. Informal Consultation

1. Staff-to-Staff: ACHP, DOE, and Idaho SHPO staff-to-staff informal communication is encouraged to build and strengthen an effective and cooperative working relationship to manage cultural resources. The DOE CRC will coordinate

communications with ACHP, Idaho SHPO, and INL CRMO according to DOE regulatory interface protocols.

2. Adverse Effects Notification: DOE has responsibility to provide timely notification to the Idaho SHPO about upcoming projects or undertakings with the potential to adversely affect historic properties. This informal notification may occur by phone to begin discussions, but will be followed up with written formal notification described in Stipulations V.B.2.c and VII.C.1 of this PA. The 30-day review period will start when formal notification is received.
3. Meetings and Other Communication: Idaho SHPO and DOE may meet at any time to discuss reports, specific undertakings, outreach efforts, or other issues related to DOE's management of historic properties. Both parties will make every effort to arrange such meetings in a timely manner and to provide any requested information. Unless a topic falls under the category of formal consultation, communication may be informal via teleconference, videoconference, or email.
4. Special Conditions: Under special conditions, such as staffing shortages, unforeseen events, or non-discretionary actions, specified time frames for Idaho SHPO review may be revised through consultation between DOE and Idaho SHPO.
5. Annual Meeting: DOE and Idaho SHPO will meet annually on a mutually agreed date to discuss implementation of this PA, the INL historic preservation program and, if possible, perform a field tour of INL cultural resource sites of interest, such as those involved in Section 110 research and Section 106 undertakings.

C. Individual Consultation

1. General Approach: The purpose of formal consultation is to afford Idaho SHPO the opportunity to review and make comments and recommendations on DOE undertakings, and for DOE to understand the effects of undertakings in order to make informed decisions on undertakings. Formal consultation between Idaho SHPO and DOE is completed according to Idaho SHPO's *Guidelines and Procedures for Cultural Resource Review and Consultation in Idaho (current version)*. Documents and data will be provided to Idaho SHPO according to the Guidelines and Idaho SHPO's current submittal process. Idaho SHPO's formal response will follow current Idaho SHPO procedures. Formal consultation between the Shoshone-Bannock Tribes and DOE is completed according to the AIP.
2. Conditions Requiring Individual Consultation: DOE will consult on undertakings with a finding of No Adverse Effect as described in Stipulation V.B.2.b.2; undertakings with a finding of Adverse Effect as described in Stipulation V.B.2.c; establishing the APE as described in Stipulation V.B.1.b; eligibility determinations

as described in Stipulation V.B.1.d; and other circumstances necessitating development of an agreement document.

3. Accelerated Reviews: DOE may request an accelerated review (less than 30 calendar days) of APE determinations, eligibility determinations, and effect findings (excluding adverse effect findings) for time-sensitive undertakings. Idaho SHPO will review the request and notify DOE if the request can be accommodated. During implementation of this PA, DOE may negotiate a separate financial agreement for additional Idaho SHPO resources to support committed accelerated reviews of DOE's undertakings. If such an agreement is established, the Signatories will amend this PA according to Stipulation XV.
4. Non-Concurrence on Findings and Determinations: If Idaho SHPO, or a consulting party, does not concur with DOE's finding of effect and determination of eligibility, DOE will continue to consult with the party to attempt to achieve concurrence. If these consultation efforts fail, then the procedures outlined in Stipulation XIII of this PA will be followed.
5. Consolidated Process: DOE at its discretion may use a consolidated consultation process pursuant to 36 C.F.R. § 800.3(g) and provide the Idaho SHPO and Shoshone-Bannock Tribes with documentation and a request for concurrence with findings and determinations that address multiple steps in 36 C.F.R. §§ 800.3-800.5. When using consolidated consultation, DOE will provide documentation in accordance with 36 C.F.R. § 800.11 and applicable Idaho SHPO guidelines.

VIII. NHPA Section 110 Requirements

- A. DOE will follow NHPA Section 110 requirements per the Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act (54 U.S.C. 300101 et seq., formerly 16 U.S.C. § 470 et seq.).
- B. DOE will implement a historic preservation program for successful management of the DOE's archaeological sites and architectural historic properties, as well as the collections and data associated with these resources. INL's Section 110 program elements include active research and partnerships; survey and recordation; preservation and stabilization of historic properties; archives and collections; and public outreach and education.
- C. Progress on DOE's Section 110 activities will be reported in the annual report (Stipulation IX).
- D. DOE will coordinate proposed Section 110 research with the Shoshone-Bannock Tribes according to the terms of the AIP.

IX. Annual Report

- A. With approval of the DOE Manager and DOE ICP Manager, DOE will submit an annual report to the ACHP, Idaho SHPO, and Shoshone-Bannock Tribes by January 15th each year. The annual report will provide Section 106 and Section 110 documentation for the previous 12-month period spanning October 1st through September 30th. The template for the annual report is in Appendix E.
- B. NHPA Section 106 Review will include:
 1. All No Historic Properties Affected and No Adverse Effect (Stipulation V.B.2.b.1) findings for both archaeological and built environment undertakings will be captured in a table containing the following information: project number, project name, description of undertaking, IHSI and/or ASI number, number and identity of sites and buildings within the APE, exclusion used (if any), findings, the date of review, the name of the reviewer, status (complete, pending, in progress, cancelled), remarks, and a confirmation that all pertinent ASI and/or IHSI site documentation (including forms, databases, and GIS data) have been included with the annual report.
 2. A summary of No Adverse Effect (Stipulation V.B.2.b.2) and Adverse Effect findings for which documentation was provided to Idaho SHPO for project-specific consultation for the fiscal year.
 3. A summary of undertakings identified in the table as “in progress” or “pending”, including projected dates for completion.
 4. A summary of the non-undertakings identified in Appendix C.
 5. A summary of all historic properties monitored or updated throughout the year as part of NHPA Section 106 undertakings. ASI and/or IHSI documentation (including new and updated forms, databases, and GIS data) for all cultural and historic properties documented for each undertaking will be included as an attachment to the annual report for Idaho SHPO concurrence. On a project-by-project basis, CRMO staff will assess the need to update the ASI and/or IHSI form during monitoring activities, including time of last recordation. All sites that have not been evaluated for inclusion to the NRHP will be revisited. A new ASI and/or IHSI form will be provided if significant changes have occurred to alter the character or potential National Register eligibility of the site. Updated eligibility determinations will be provided as applicable.
 6. Summary of any post-review discoveries or unanticipated effects.

- C. NHPA Section 110 accomplishments for the year.
1. A short narrative describing NHPA Section 110 projects, including surveys associated with research activities.
 2. A summary of sites/historic properties that were monitored during the fiscal year as part of DOE's NHPA Section 110 obligations. These localities include: 1) Native American properties that are visited on an annual basis and 2) sites that may be vulnerable to vandalism, erosion, or other potential effects.
 3. ASI and IHSI forms for all cultural properties documented within the NHPA Section 110 survey/research area.
 4. A summary of public education and outreach activities (including tours, presentations), professional training, participation in professional conferences, publications, partnerships with academic institutions and staff support for museum exhibits and exhibit development.
- D. Idaho SHPO will review the annual report within sixty (60) days of receipt and provide comments to DOE. DOE will address Idaho SHPO's comments and return a final report to Idaho SHPO by May 1.
- E. Geospatial data compliant with Idaho SHPO Guidelines for all NHPA Section 106 review and survey, NHPA Section 110 investigations, including monitoring activities and documented cultural properties. Spatial and tabular site and survey data will be maintained, and information will be in a compatible format to the ASI and/or ISHI database maintained by Idaho SHPO.
- F. DOE will make the annual report available to the public, with the exception of the GIS data, ASI and/or ISHI forms, and other sensitive information that will be submitted with the annual report. Site locations and other confidential information will be protected and made available only to qualified persons in accordance with applicable laws including the Freedom of Information Act, Section 304 of the NHPA, the ACHP regulations at 36 C.F.R. § 800.11, and Section 9 of the ARPA.
- G. Training and Oversight
1. A summary of cultural resource training completed by DOE and INL contractor personnel.
 2. A summary of contractor assurance activities performed by DOE, INL contractors, and other entities, including the scope, findings, conclusions, and proposed corrective actions if applicable.

X. Curation

- A. DOE will ensure that any archaeological material and associated records collected from INL lands will be permanently curated in accordance with the requirements in 36 C.F.R. Part 79, except as delineated in Stipulations X.B and X.C.
- B. Archaeological material obtained from the ground surface on INL lands in order to exhaust full data potential will not be permanently curated and will be replaced at the original location within 24 hours of obtainment.
- C. DOE will consult with the Shoshone-Bannock Tribes on archaeological materials of religious or cultural significance associated with INL lands with the goal to develop an agreement for disposition of the materials that can serve as an alternative to permanent curation. DOE will consider the alternatives implemented by other federal agencies under similar circumstances and submitted to ACHP for consultation. These alternatives include removal and redeposit as curation-in-place, disposal of materials with insufficient archaeological interest under the ARPA or 36 CFR 79 (as amended), and other options as identified during consultation. NAGPRA-regulated items are excluded.

XI. Training

- A. DOE will ensure DOE leadership and staff responsible for administering INL projects and programs will receive cultural resource and Section 106 training commensurate to their level of responsibility for compliance with Section 106 requirements. The DOE CRC will complete ACHP's Section 106 Essentials, Practitioners, and Agreement Documents courses or equivalents.
- B. DOE will ensure INL contractor staff, including M&O and ICP, receive appropriate training. For CRMO cultural resource professionals, the training will address at a minimum the procedures to be used for meeting DOE's obligations under Section 106 for activities covered in this PA and ACHP's Section 106 Practitioners course or equivalent. Section 106 and cultural resource training for other INL staff will be commensurate to their level of responsibility for compliance with Section 106.
- C. Updates on the training will be provided in the annual report (Stipulation IX).
- D. DOE leadership and staff responsible for administering INL projects and programs, and INL contractor staff, including M&O and ICP, will pursue opportunities to attend training or educational conferences hosted by the Shoshone-Bannock Tribes, such as the Tribal and Treaty Rights Seminar. Furthermore, DOE and INL are encouraged to coordinate with the Shoshone-Bannock Tribes in the development of internal training programs and presentations.

XII. Post-Review Discovery and Inadvertent Discovery

- A. Post-Review Discovery: If historic properties are discovered or unanticipated effects to historic properties are found after the NHPA Section 106 process for a proposed undertaking has been completed, DOE will follow the procedures in 36 C.F.R. § 800.13.
1. If the undertaking has been approved and has commenced, DOE, in consultation with the Idaho SHPO and Shoshone-Bannock Tribes, will evaluate eligibility and resolve any potential adverse effects. DOE will notify the ACHP of the agreed upon strategy and provide them an opportunity to comment.
 2. If no mutually acceptable resolution of adverse effects can be reached between DOE and Idaho SHPO, DOE will follow the dispute resolution procedures outlined in Stipulation XIII of this PA. DOE or Idaho SHPO may ask the ACHP to participate in the consultation and resolution process.
- B. Inadvertent Discovery: Human remains, associated and unassociated funerary objects, and inadvertent discoveries will be managed following the DOE NAGPRA and Inadvertent Discovery Procedure in compliance with NAGPRA (25 U.S.C. § 3001-3013).

XIII. Dispute Resolution

- A. Should any signatory to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented, DOE will consult with such party to resolve the objection. If DOE determines that such objection cannot be resolved, DOE will:
1. Forward documentation relevant to the dispute, including the DOE's proposed resolution, to ACHP. ACHP will provide DOE with its advice on the resolution of the objection within thirty (30) calendar days of receiving adequate documentation. Prior to reaching a final decision on the dispute, DOE will prepare a written response that takes into account any timely advice or comments regarding the dispute from ACHP and/or signatories and provide them with a copy of this written response. DOE will then proceed according to its final decision.
 2. If ACHP does not provide its advice regarding the dispute within the thirty-day (calendar) time period, DOE may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, DOE will prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the PA and provide them and ACHP with a copy of such written response.

3. DOE will refer disputes regarding determinations of eligibility to the Keeper of the National Register in accordance with 36 C.F.R § 800.4(c)(2).
- B. DOE is responsible for carrying out all other actions subject to the terms of this PA. Those actions that are not the subject of the dispute remain unchanged.

XIV. Emergency Actions

- A. When a state of emergency is declared, or immediate threats to life and property are determined by an INL M&O Associate Lab Director or equivalent and concurred on by the DOE Operations and Safety Division Director or the DOE Environment and Sustainability Division Director, DOE will follow 36 C.F.R. § 800.12. DOE will meet its NHPA Section 106 obligations according to Appendix F which outlines the specific measures adopted by INL to avoid, minimize, or mitigate effects to historic properties during emergency actions.
- B. For emergencies such as wildland fire suppression, flooding, or hazardous materials incidents, DOE will notify the Idaho SHPO and Shoshone-Bannock Tribes within seven (7) calendar days of the beginning of an emergency.

XV. Amendment

This PA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date executed by the ACHP.

XVI. Duration

This agreement will be in effect for a period of five (5) years from the date executed by the ACHP, with an option for renewal in 5-year increments with agreement of its signatories.

XVII. Termination

Any signatory to this agreement may terminate it by providing ninety (90) calendar days' notice to the other signatories, provided that the signatories will meet during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, DOE will comply with Section 106 through the process in 36 C.F.R. §§ 800.3 through 800.7, or 36 C.F.R. § 800.8(c), or an applicable program alternative under 36 C.F.R. § 800.14.

XVIII. Anti-Deficiency Act

- A. This PA does not and will not obligate funds of the United States. The DOE's obligations under this PA are subject to the availability of appropriated funds, and the stipulations of this PA are subject to the provisions of the Anti-Deficiency Act. The

DOE will make reasonable and good faith efforts to secure the necessary funds to implement this Agreement in its entirety.

- B. If compliance with the Anti-Deficiency Act alters or impairs the DOE's ability to implement the stipulations of this PA, the DOE will consult in accordance with the amendment and termination procedures found at Stipulations XV and XVII, respectively, of this PA.

AFFIRMATION

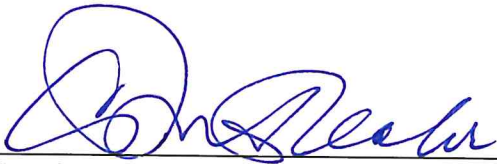
The signatures below represent the affirmation of the Department of Energy that successful execution of this agreement will satisfy DOE's responsibilities under Sections 106 and 110 of the National Historic Preservation Act and that the ACHP has been afforded a reasonable opportunity to comment.



Robert Boston, Manager
Department of Energy, Idaho Operations Office

11/30/2022

Date



Connie M. Flohr, Manager
Department of Energy, Idaho Cleanup Project

11-29-2022

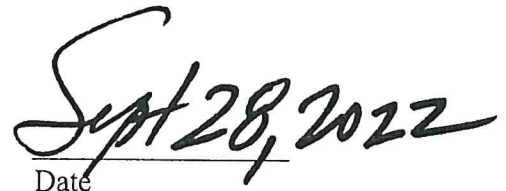
Date

AFFIRMATION

The signature below represents the affirmation of the Idaho State Historic Preservation Office that successful execution of this agreement will satisfy DOE's responsibilities under Sections 106 and 110 of the National Historic Preservation Act and that the ACHP has been afforded a reasonable opportunity to comment.



Janet Gallimore, State Historic Preservation Officer for Idaho
Idaho State Historic Preservation Office



Date

AFFIRMATION

The signature below represents the affirmation of the Advisory Council on Historic Preservation that successful execution of this agreement will satisfy DOE's responsibilities under Sections 106 and 110 of the National Historic Preservation Act and that the ACHP has been afforded a reasonable opportunity to comment.



Sara C. Bronin, Chair
Advisory Council on Historic Preservation

May 8, 2023

Date

APPENDICES

A — DOE and INL Management and Operations Contractor Roles and Relationships

B — INL Maps

C — Non-Undertakings

D — Activity and Property Type Exclusions

E — Annual Report Template

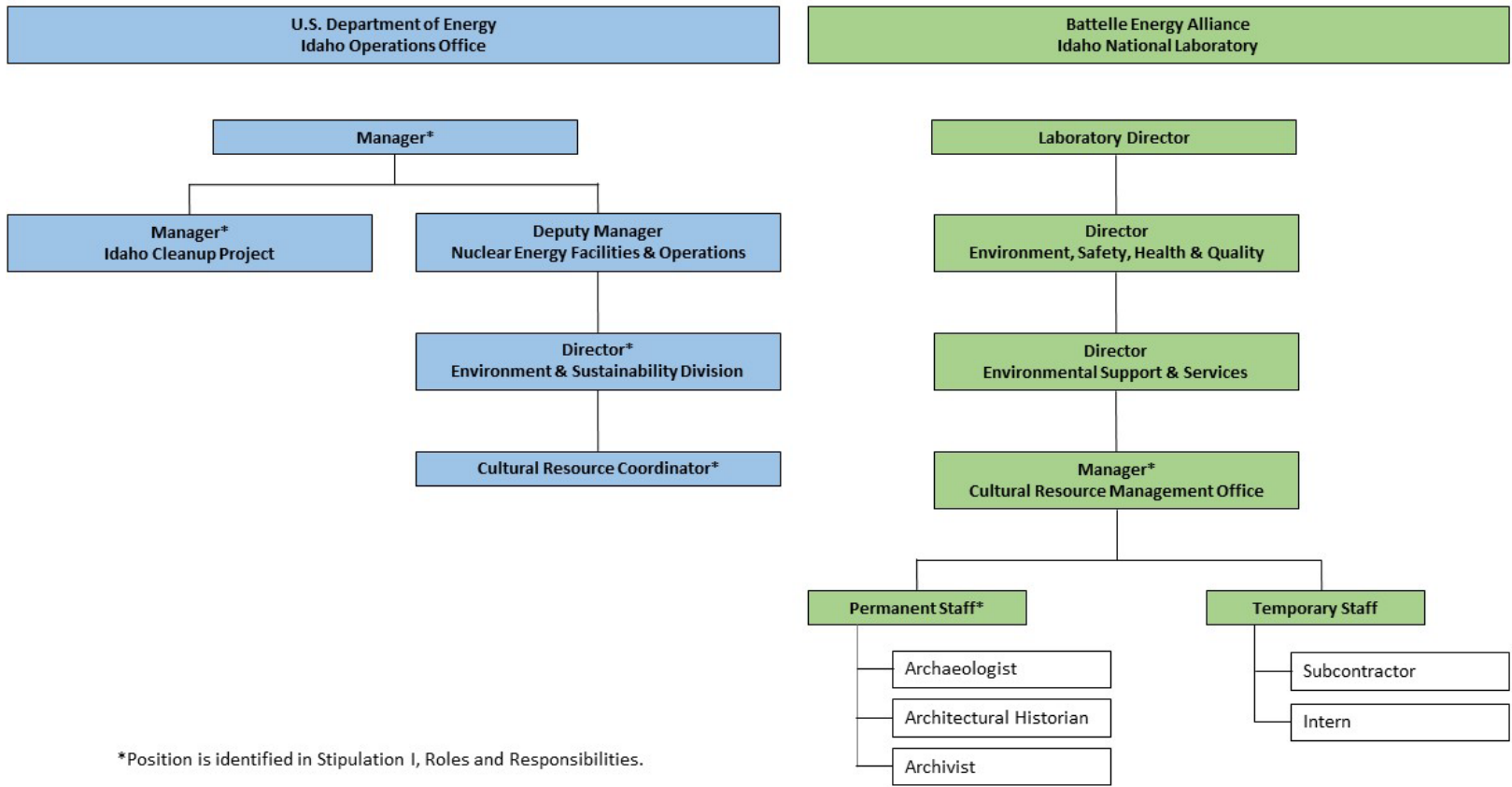
F — INL Section 106 Process for Emergency Actions

G — Acronyms List

APPENDIX A:

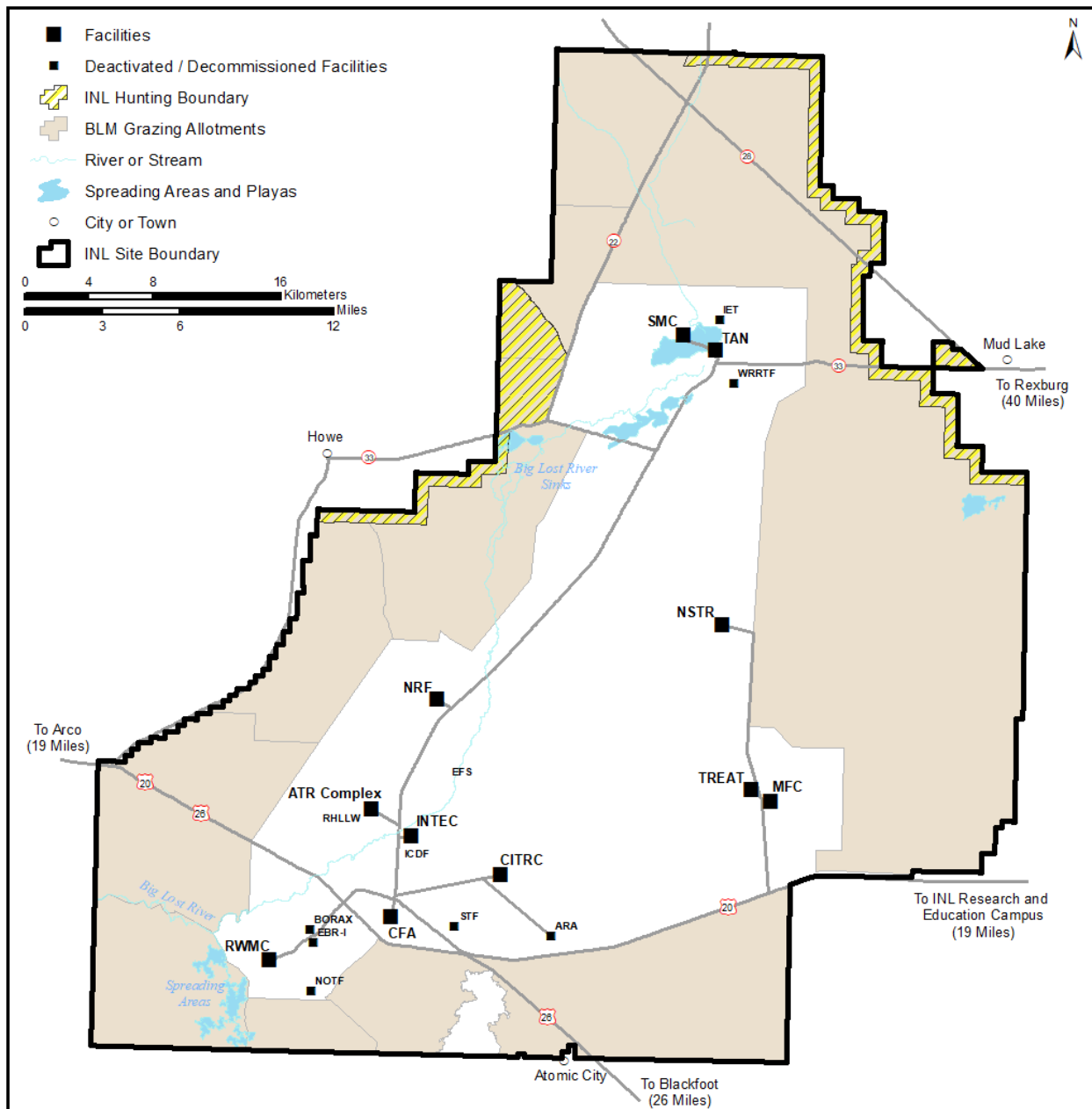
DOE AND INL MANAGEMENT AND OPERATIONS CONTRACTOR ROLES AND RELATIONSHIPS

DOE and INL Management and Operations Contractor Roles and Relationships



*Position is identified in Stipulation I, Roles and Responsibilities.

APPENDIX B:
INL MAPS



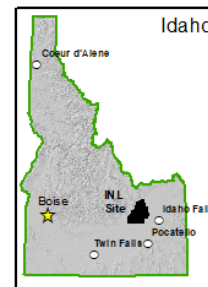
Facilities

- ATR Complex- Advanced Test Reactor Complex
- CFA- Central Facilities Area
- CITRC- Critical Infrastructure Test Range Complex
- EFS- Experimental Field Station
- ICDF- Idaho CERCLA Disposal Facility
- INTEC- Idaho Nuclear Technology & Engineering Center
- MFC- Material and Fuels Complex
- NRF- Naval Reactors Facility
- RHLW- Remote-Handled Low Level Waste Disposal Facility
- RWMC- Radioactive Waste Management Complex
- SMC- Specific Manufacturing Capability
- TAN- Test Area North
- TREAT- Transient Reactor Test Facility
- TSF- Technical Support Facility

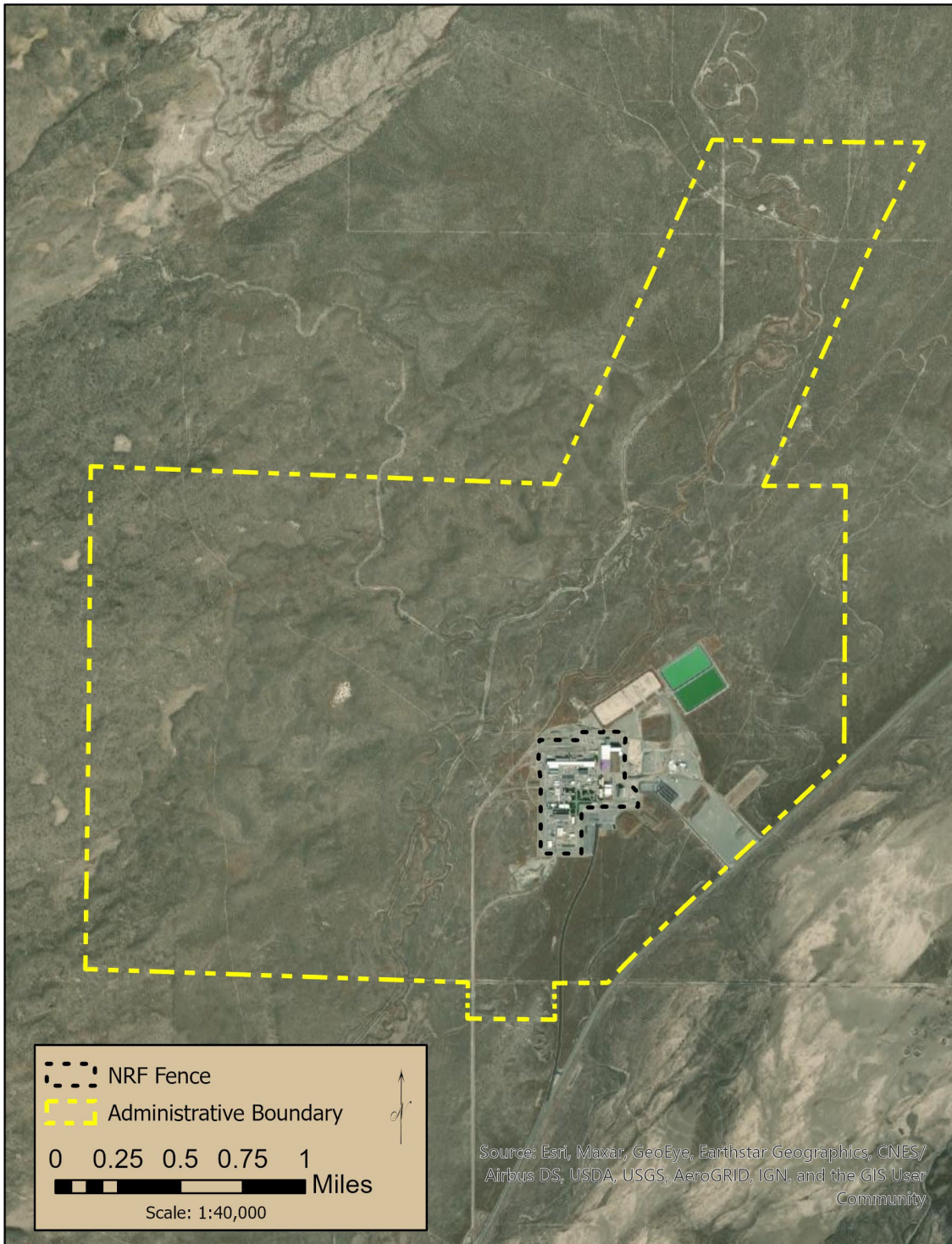
Deactivated / Decommissioned Facilities

- ARA- Auxillary Reactor Area
- BORAX- Boiling Water Reactor Experiment
- EBR-I- Experimental Breeder Reactor- I
- IET- Initial Engine Test Facility
- NOTF- Naval Ordnance Test Facility
- STF- Security Training Facility
- WRRTF- Water Reactor Research Test Facility

GIS Analyst: Jeremy Shive
 Date Drawn: 11/2/22
 Organization: BEA Natural Resource Group



Regional setting of INL showing locations of major facilities.



Naval Reactors Facility Administrative Boundary. This PA does not cover Section 106 compliance for undertakings proposed within the fenced perimeter of the Naval Reactors Facility but does cover Section 106 and 110 within the administrative boundary.

APPENDIX C:
NON-UNDERTAKINGS

Non-Undertakings

The types of actions listed below do not meet the threshold of a federal undertaking with the potential to affect historic properties according to the ACHP's *Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities*. These types of activities may be excluded from CRMO notification; however, some of these activities will require environmental review and therefore prompt CRMO screening and determination that they do not meet the threshold of an undertaking.

1. Computer, 3D, or mathematical modelling.
2. Theoretical computation and modelling.
3. Materials analysis using existing infrastructure.
4. Fuels and materials testing in existing reactors.
5. Materials analysis using existing laboratory equipment in their current state, orientation, and functional capacity.
6. Research performed on firewalls, data security, etc., and only computers, servers, and networks are utilized.
7. All standard operations activities and procedures (i.e., day-to-day use of existing buildings and equipment) which continue to utilize existing infrastructure for their original purposes.
8. Moving or assembly of interior furnishings.
9. Maintaining grounds, such as lawn mowing, grass trimming, and shrub and tree pruning.
10. Maintaining paved areas, including, but not limited to, parking lots, sidewalks, and roads and adding or removing hard surface paving and hardstands on previously paved areas.
11. Applying approved pesticides, herbicides, and rodenticides.
12. Interior cleaning, housekeeping, and janitorial activities.
13. Shoveling, plowing, and removing snow.
14. Routine load testing of lifting equipment.
15. Performing periodic wildlife management activities (e.g., trapping or relocating wildlife, removing or relocating bird nests, sampling, monitoring, etc.).

APPENDIX D:
ACTIVITY AND PROPERTY TYPE
EXCLUSIONS

Activity Exclusion

Included below are Idaho National Laboratory Site (INL) undertakings excluded from project-specific consultation with the Idaho State Historic Preservation Office (SHPO). The following activities or undertakings are excluded from Section 106 review provided they do not affect or have the potential to affect those qualities or settings that make a historic property eligible for the National Register of Historic Places (NRHP). The appropriate INL Cultural Resource Management Office (CRMO) staff will recommend the applicability of these exclusions on a case-by-case basis. CRMO staff will document these undertakings and the basis for applying exclusions in Environmental Review Process or other applicable system and the Department of Energy, Idaho Operations Office (DOE) will perform periodic oversight of these decisions as outlined in Stipulation V.A.2.b.2 of this Programmatic Agreement. Facility maintenance activities that meet any of the following three criteria will require screening by the CRMO: 1) Ground disturbance within, but also outside of fenced facilities, 2) Visual introductions/removals within the fenced facilities over three (3) feet in height; 3) Work conducted within or to an external component of an NRHP eligible building. A list of NRHP eligible buildings is maintained and will be updated after completion of Stipulation III.B.2 of this Programmatic Agreement and thereafter as necessary. All activities under these exclusions are subject to the INL Timeout and Stop Work Authority should cultural resources be unexpectedly encountered at any time. No activities at Experimental Breeder Reactor I are excluded except as noted below in item 7, Ground Disturbances within Facility Fence Perimeters.

1. Routine Maintenance Activities (Interior and Landscaping)

Routine Maintenance Activities in this exclusion include, but are not limited to:

- A. Minor modifications to or removing of components to increase effective use of space (e.g., interior door, ceiling, wall, broken windowpanes, stairs, or platforms and ramp repositioning).
- B. Installation or repair of electrical (including lighting) and plumbing systems.
- C. Routine facility landscaping and maintenance involving minimally disturbing activities such as replacement of existing barriers or signs.
- D. Replenishing of gravel of roads and parking areas when original gravel is not removed.
- E. Cleaning storm water drainage systems (e.g., ditches, catch basins, etc.).
- F. General maintenance of fences.
- G. Grading and repairing drainage and culverts and cleaning up sediment.
- H. Routine revegetation and erosion-control activities.
- I. Routine or preventive operation and maintenance activities outside of fenced areas of INL facilities that do not affect historic structures or previously undisturbed ground.
- J. Calibrating, repairing, and replacing radiation-monitoring equipment, including portal monitors, continuous air monitors, and ambient-air monitoring stations.
- K. Routine decontamination (through such activities as wiping down with rags, using strippable latex, and minor vacuuming, but excluding scabbing) of the surfaces of equipment, rooms, or other interior surfaces.
- L. Establishing storage areas within buildings for maintenance tools, equipment, and supplies.

- M. Handling, storing, and removing or disposing of recyclables, industrial, hazardous, mixed hazardous, and radioactive wastes.
- N. Installing non-skid surfaces on steps, ramps, and other well-traveled areas.
- O. Other routine maintenance and/or custodial activities that do not significantly alter or detract those qualities that make the property eligible for listing in the National Register of Historic Places.

2. Preservation and Replacement in-kind Materials

- A. Mitigation of wear and deterioration of a historic property to protect its exterior condition without altering its historic character (e.g., roof repair/replacement, brick repointing).
- B. Stabilization to protect damaged materials or features from additional damage.
- C. Replacement of fixtures or components of a property with in-kind materials, such as matching paint with existing or similar paint color, refinishing materials with existing or similar colors, or replacing or installing carpeting with water-soluble glue.

3. Energy Conservation Measures

Activities that include, but are not limited to:

- A. Modifications to heating, ventilation, and air conditioning systems.
- B. Insulation to roofs, crawl spaces, walls, and floors.
- C. Caulking and weather stripping that are not visible or do not significantly alter or detract from those qualities that make the property eligible for nomination to the NRHP.
- D. Other energy conservation measures that are not visible or do not alter or detract those qualities that make the property eligible for listing to the NRHP.

4. Security and Safety Systems

- A. Installation, maintenance, or repair of security systems, including computer security, detection, monitoring, surveillance, and alarm systems.
- B. Installation, maintenance, and repair or modification of personnel safety systems and devices within the built environment, such as radiation monitoring devices; emergency exit lighting systems; protective additions to electrical equipment; improvements to walking and working surfaces; and installation of protective railings, guards, or shielding; and any other safety mechanisms or features that are deemed necessary for public and worker safety.

5. Asbestos Abatement

Removing or fixing asbestos for safety and health concerns, including lagging, insulating, painting, pipe and duct work, and panel removal. None of these activities may cause structural modifications or alter character-defining features. Asbestos abatement activities strictly associated with the deactivation, decontamination, and demolition (DD&D) of properties and that result in permanent, significant structural modification or alteration of the property are not included in this exclusion, as they would require individual consultation with Idaho SHPO.

6. Internal Configuration

Changes to the internal configuration of existing facilities within the built environment. Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and internal room configuration), provided that uses of the installed or relocated elements are consistent with the general use of the receiving structure. In some cases, visible external components accompany internal modifications. Under this exclusion, these external components need to be of similar scale to existing external infrastructure with consideration given to visuals on component location. Covered actions include modifications within an existing building and minor external components (if necessary), and do not alter or detract those qualities that make the property eligible for listing in the National Register of Historic Places.

7. Ground Disturbances within Facility Fence Perimeters:

Modifications to the ground surface within existing facilities (Test Area North/Specific Manufacturing Capability, Experimental Breeder Reactor I, Water Reactor Research Test Facility, Advanced Test Reactor Complex, Idaho Nuclear Technology and Engineering Center, Radioactive Waste Management Complex, Materials and Fuels Complex) or within 50 feet of existing buildings in unfenced facility areas (Central Facilities Area, Auxiliary Reactor Area, Boiling Water Reactor Experiment, Research and Education Campus).

8. Vegetation Management

- A. Any revegetation by broadcast seeding that does not involve ground disturbance other than the minor disturbance of placing seeds on the ground, where access is by foot or air.
- B. Manual planting using hand-held augers or planting bars if no known historic properties occur within the planting area.
- C. Hand cutting of young (less than 100 years old) or burned trees, where access is by foot and limbs are hand scattered across the landscape.
- D. Hazard tree removal utilizing chainsaws, woodchippers, and other power and hand tools.
- E. Burning of tree or shrub piles created during fuels management or reduction activities in areas where the potential to affect historic properties is negligible (e.g., no burnable cultural materials or features, structures), where burning will be conducted in a manner designed to minimize potential for sub-surface soil impacts (i.e., low-intensity heat, jackpot burning).
- F. Herbicide application by foot or air where it would be unlikely to affect rock art or traditional Native American plant gathering areas.

9. Road Maintenance/Construction

NOTE: Exclusions apply to the following INL roads:

- *Priority 1 - Emergency Evaluation/Security Roads: Maintained as graded and graveled. Regularly plowed during snowy season. Serves as evacuation and security road and as defensible space for wildland fires.*
 - *Priority 2 – Project Access Road: Maintained as passable; graveled, plowed, and spot-graded as needed. Serves as project access road.*
 - *Priority 3 – Wildland Fire Access: Maintained passable to 4x4 vehicles, not graded, dump and level allowed. Serves as wildland fire access.*
- A. Adding or leveling fill within the constructed prism of existing roads (priority 1, 2, and 3) where no disturbance will occur outside of disturbed prism and no evidence of sites or site elements (as exposed by use and maintenance) occur within the prism (e.g., lithic concentrations, hearths as evidenced by ash/charcoal, features, etc.).
 - B. Installation of road and safety signs where disturbance is limited to post holes.
 - C. Snow removal, resurfacing, blading, or maintenance (including mowing shoulder berms) of existing roads (priority 1, 2, and 3). Disturbance outside the existing constructed prism or tread and existing alignment will not occur. The repair or resurfacing cannot exceed the area of the existing road surface and cannot exceed the depth of existing disturbance.
 - D. Projects such as installation, repair, or replacement of cattle guards, gates, culverts, bridge abutments where the Area of Potential Effect does not extend beyond the vertical and horizontal limits of previous construction or disturbance (e.g., priority 1, 2, and 3 roads).

10. Monitoring/Staging Stations:

- A. Placement of temporary monitoring stations where negligible ground disturbance (i.e., placed on surface with no heavy machinery) is involved (e.g., temporary radio repeaters, wind, and weather stations, portable trailers, temporary vehicles). Temporary means there is a specified end-date for removal.
- B. Replacing or removing equipment in areas that have been previously disturbed due to the installation of that equipment (e.g., gaging stations, well pads, weather stations, etc.).

11. Infrastructure Management

- A. Authorizing new lines on existing overhead structures when there is no change in pole or tower configuration, no off-road vehicle traffic and no new surface disturbance or access road improvements are necessary.
- B. Replacement or repair of existing water lines, buried utility lines, tank replacement of water-collector systems and pipelines or similar underground improvements, in previous locations when no additional ground disturbance occurs (including staging areas).
- C. Emplacement of buried utility lines, pipelines, telephone lines, and similar linear features where disturbance will not extend beyond the vertical and horizontal limits of previous construction or disturbance (e.g., roads).

- D. Use of existing roads, facilities, improvements, or sites for the same or similar purposes for which they were originally constructed where no additional improvements or new ground disturbance is authorized.
- E. Use of existing borrow pits and spreading areas where no horizontal expansion of the pit will occur.
- F. Fence construction and maintenance (where posts are pounded into the ground) and that does not require blading for the fence line or that does not create an area for livestock congregation and heavy trampling and there are no adverse effects to historic properties. Congregation areas will be surveyed.

12. Land Acquisition, Easements, or Transfers

- A. Acquiring lands and easements that do not entail any ground-disturbing activities. Subsequent to acquisition, all future undertakings would be subject to the National Historic Preservation Act Section 106 process.
- B. Transferring lands or interest in lands to other federal agencies where future management will be subject to the National Historic Preservation Act Section 106 process.

13. Ecological and Archaeological Monitoring/Management

- A. One-time pass of off-road vehicles or passenger vehicles for the survey, collection, and tracking of sensitive plant and animal species (may include one-time helicopter/aircraft landings) to only occur when soils are dry.
- B. One-time pass of off-road vehicles or passenger vehicles for herbicide application to only occur when soils are dry.
- C. One-time pass of off-road vehicles or passenger vehicles to convey Shoshone-Bannock Tribal members to otherwise inaccessible important cultural sites to only occur when soils are dry.
- D. Installation of bird nesting deterrents.

14. Cadastral

Conducting cadastral survey, boundary marking and establishment of section corners.

15. Seismic Surveys

Seismic surveys conducted on existing priority 1, 2, and 3 roads will occur and no known standing historic or Pre-Contact structures or rock art sites are within 300 meters. Depending on the type of surface seismic survey (reflection, refraction, Spectral Analysis of Surface Waves, or Multichannel Analysis of Surface Waves), most receivers are placed on the surface, using a spike attached to the receiver to push it into the ground surface for coupling. Most surveys are conducted in straight lines. If along a roadbed, then likely a short distance from the road to avoid slopes if roadbed is built up and to generally make a straight line.

16. Minor Exterior Modifications

To support changing mission needs and/or safe operations, minor modifications that would not substantially alter the exterior appearance of the building or structure may be performed.

Activities would include new equipment installation outside of, or on top of, the building and connections penetrating the exterior of the building.

17. Location Qualified

- A. Interior activity that is limited to 1) the interior of a building or structure that is less than 45 years old and is not potentially eligible under criterion consideration G; and/or 2) a building that has been determined to be ineligible to the NRHP; and/or 3) to a building/structure identified as an excluded property type in Appendix D. These undertakings do not have the potential to cause effects to historic properties.
- B. Types of activities occurring solely on pavement, asphalt, laid gravel areas, within existing road prisms that include but are not limited to: driving on existing roads during tests, experiments, or training exercises; or placing temporary equipment, portable trailers, tents or other temporary shelter, etc. on pavement, asphalt or laid gravel areas. Temporary means not to exceed three years.

Property Type Exclusion

The following property types are excluded from NRHP evaluation during Section 106 review. INL Cultural Resource Management Office (CRMO) Staff will recommend the applicability of these exclusions on a case-by-case basis. CRMO staff will document these undertakings and the basis for applying exclusions in the Environmental Review Process or other applicable system and the Department of Energy, Idaho Operations Office (DOE) will perform periodic oversight of these decisions as outlined in Stipulation V.A.2.b.2 of this Programmatic Agreement. These property types typically do not exhibit significant architectural or engineering features. However, if these properties are associated with a National Register-eligible site or district, the CRMO staff will document the property and submit FRM-3004 and associated Archaeological Survey of Idaho (ASI) and/or Idaho Historic Sites Inventory (IHSI) forms to the CRMO Manager for review, and submit to DOE for concurrence.

Property Type	Description
1. Subsurface structures	These structures have minimal or no visible surface manifestations and include earthen and concrete-lined trenches, French drains, underground tanks, vaults, underground pipelines, sewer lines, wastewater disposal ponds, runoff collection ponds, and buried material disposal areas other structures that are typically located below ground and were never intended to be routinely accessed by people.
2. Storage tanks	These structures include surface and subsurface utility tanks used in routine facility operations. Associated concrete slab foundations, scaffolding, piping, or spill-management retaining walls are also included.
3. Wells and boreholes	These structures include characterization wells, monitoring wells, drinking water wells, industrial water wells, injection wells, and various types of test wells and boreholes. Wells associated with homesteading and other early historic uses of the area are not included.
4. Utility poles and towers	These structures include power lines, microwave towers, meteorological towers, seismic data collection and transmission facilities, and other types of communication towers.
5. Utility structures	These structures provide housing or control of utility equipment or access to underground utility equipment, such as pump houses, electrical substations, transformers, pressure relief valves, condensation traps, boiler tanks, or equipment monitoring shacks.
6. Mobile trailers	These structures are used for temporary office space and/or storage, typically placed in existing parking areas.
7. Safety and Security Barriers	These include roadblocks, security, jersey, radiological, safety, construction barriers.

Property Type	Description
8. Historic artifact scatters	Small (less than 50 items) historic can dumps that are homogeneous and have no other associated historic features, including recent (45 years old) trash. Short-term, mobile camps with no to limited cultural constituents, associated with livestock grazing or recreation that provide no significant information beyond that which is available in written or oral histories. Unassociated historic artifact scatters that cannot be definitively tied to a specific historic theme as defined in the Idaho Comprehensive Historic Preservation Plan. This includes items such as fencing material and piles of barbed wire.
9. Prospects, exploratory pits	Gravel mining prospects that have no other associated historic features, artifacts, or adjacent features with which to date the prospects, including prospects that have been dug by a backhoe.
10. Rock piles, concentrations	Rock piles near agricultural fields that are the obvious result of field clearing, or rock removal associated with recent construction activities.
11. Powerlines, roads, and trails	Power poles and lines that research shows have no historic importance or significant association to a historic event or district. Unnamed roads and trails that do not appear on General Land Office (GLO) plats and for which no information regarding origin is available.
12. Cadastral markers	Brass caps, rock piles or other features constructed by cadastral surveyors to mark section corners.
13. Flood control features	Flood control berms, run-off ditches and ponds, etc.
14. Pre-fabricated structures	Comfort stations, sheds, etc.
15. Concrete pads	Concrete pads used to set equipment, storage items, display items, or other miscellaneous purposes.

APPENDIX E:
ANNUAL REPORT TEMPLATE

Annual Report Outline

NOTE: Some information and data will be submitted with the Annual Report separate from the body of the report to allow for the report to be released to the public.

- Abstract
- Contents
- Figures
- Tables
- Acronyms
- Program Overview: Executive Summary of all Section 106 and 110 responsibilities
- Section 110 Program
 - Inventory for Archaeology
 - Inventory for Built Environment
 - Site Monitoring and Site Stewardship
 - Preservation Projects (if applicable)
 - Research
 - Public Education and Outreach Activities
 - Partnerships
 - Archives
 - Oral History
 - Professional Training/Development
 - Curation
 - National Register Nominations
- Section 106 Summary
 - Summary tables of No Effect Projects for Archaeology and Built Environment
 - Summary tables of all other effect determinations for Archaeology and Built Environment
 - Summary of sites recorded/monitored/entered into database, their eligibility, site type (basic)
 - Summary of ongoing undertakings
 - Summary of non-undertakings
- Contractor Assurance Activities
- Inadvertent and Post-Review Discoveries
- Amendments

Table Formats

Project No.	Project Name	Project Description / Summary	ASI/IHSI No.(s) & NRHP Eligibility	Newly Recorded Property	Exclusion(s)	Findings	Date Reviewed	PI/Reviewer	Remarks	New/Updated ASI/IHSI Form(s)

Project Number	Site Name	Field Number	ASI/IHSI Number

APPENDIX F:

**INL SECTION 106 PROCESS FOR
EMERGENCY ACTIONS**

INL Section 106 Process for Emergency Actions

As part of this programmatic agreement (according to 36 C.F.R. § 800.12(b)), the Department of Energy, Idaho Operations Office (DOE), in consultation with Idaho State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP) and Tribes, will implement, to the extent prudent and feasible, the following measures to avoid or minimize harm to historic properties during emergency actions. In addition, DOE will implement measures to assess effects to historic properties resulting from emergency response and implement rehabilitation plans for affected properties, in consultation with Idaho SHPO and Tribes. This process shall govern DOE's historic preservation responsibilities during any disaster or emergency in lieu of 36 C.F.R. §§ 800.3 through 800.6.

Emergency Actions Subject to Cultural Resource Assessment

For the purposes of this Programmatic Agreement (PA), an emergency action is any undertaking resulting from a declared emergency, activation of the Idaho National Laboratory (INL) Emergency Operations Center (EOC), or any other immediate threat to life or property as determined by an INL M&O Associate Lab Director or equivalent and concurred on by the DOE Operations and Safety Division Director or the DOE Environment and Sustainability Division Director, that has the potential to affect historic properties, both known and unknown. Emergency actions include response to both natural incidents and those resulting from human error. Examples include wildland fire, flooding, earthquakes, and landslides, as well as structure fires, hazardous materials incidents, and structure failures. Response to medical incidents, traffic accidents, small fires (< 99 acres) that do not require use of containment lines, and other emergencies that do not result in significant ground disturbance or the destruction or modification of historic structures are excluded from review under the provisions of this Appendix.

Avoidance and Minimization of Effects

The following provisions outline standard measures to avoid or minimize effects to historic properties during and following an emergency action at the INL. Additional measures may be implemented through coordination between the CRMO and the EOC, as conditions allow, depending on the nature and severity of the incident.

1. The INL CRMO will receive notification of emergency events through INL's emergency notification system. The INL CRMO is staffed with Secretary of Interior-qualified cultural resource professionals who perform the roles and responsibilities identified in Stipulation I.B of this PA and serve as Resource Advisors during emergency events.
2. The appropriate CRMO Resource Advisor (CRMO-RA) will consult with the EOC on areas to avoid or protect. The CRMO-RA will identify these areas by reviewing CRMO records to identify known historic properties, including archaeological sites, historic structures, homesteads, historic trails, and canals in the area affected by emergency response.
3. The CRMO-RA will inform the EOC of any culturally sensitive areas in the vicinity of the incident that should be avoided or protected if possible. If the affected area has not been subject to previous survey, the CRMO-RA may provide the EOC information on areas of

potential sensitivity identified in cultural resource predictive models for the region (Plager et al. 2004; Henrikson 2002). The EOC will relay this information to incident commanders who may weigh it against other tactical decisions in efforts to preserve life and property.

4. The CRMO-RA will notify DOE of the emergency to facilitate notification of Idaho SHPO and Tribes. The CRMO-RA will provide specific information on the nature, location, and extent of the emergency, as well as methods of emergency response (e.g., fire suppression tactics) and steps taken to avoid or minimize effects to historic properties.
5. If emergency stabilization (such as post-fire stabilization and re-seeding of containment lines) is judged necessary, the CRMO-RA will coordinate with incident command to avoid or minimize effects to known historic properties through monitoring and avoidance. If conditions allow, and the affected area has not been subject to previous survey, the CRMO-RA may conduct a preliminary reconnaissance level survey of areas with a high potential for cultural resources to identify additional areas to avoid during emergency stabilization.

Notification of Emergency Action

For any emergency action on the INL with potential to affect cultural resources or historic properties, DOE will notify Idaho SHPO and Tribes based on information provided by the CRMO-RA. This initial notification will include specific information on (1) the nature, location, and spatial extent of the incident; (2) emergency response measures taken; (3) emergency stabilization measures, if applicable; and (4) steps taken to avoid or minimize effects to historic properties during emergency response and stabilization efforts.

Cultural Resource Assessments for Emergency Actions

DOE will provide Idaho SHPO and Tribes an Emergency Action Assessment Plan (EAAP) outlining measures to assess effects to historic properties, both known and unknown, potentially affected by the emergency response. The EAAP will be prepared by the CRMO-RA within seven (7) calendar days of the emergency and sent to DOE for review. At a minimum, the EAAP will contain the following information:

1. A description of the nature, location, and extent of the emergency, as well as emergency response measures and steps taken to avoid or minimize effects to historic properties during emergency response and stabilization;
2. A description of the area of potential effect (APE), including the location and extent of ground disturbance associated with emergency response efforts;
3. A list of known archaeological sites, historic structures, historic trails, canals, and homesteads that may have been affected during the emergency response;
4. A plan to identify and assess effects to both previously recorded and as yet undiscovered cultural resources within the APE; and
5. A site protection and stabilization plan for all historic properties, known and unknown, within the APE.

Upon receipt of the EAAP, Idaho SHPO and Tribes will have up to thirty (30) calendar days to comment on proposed methods of cultural resource assessment and mitigation. In coordination

with DOE, the CRMO will arrange participation of tribal representatives in both assessments of effects to tribal cultural resources and monitoring of mitigation or stabilization activities through consultation with Tribes.

Results of all Emergency Action Assessments will be reported to Idaho SHPO and Tribes within one year of the emergency action in a report that meets Idaho SHPO guidelines for National Historic Preservation Act (NHPA) Section 106 reports as well as standards outlined in this PA. This report will: (1) document all previously recorded and newly discovered cultural resources; (2) make eligibility and effects recommendations for all resources based on the effects of emergency response; and (3) make recommendations to mitigate or protect historic properties during rehabilitation, stabilization, or reconstruction efforts, if applicable.

Emergency Action Assessments for wildland fire suppression may be reported on an annual basis in a single report covering emergency response to all fires impacting INL lands each year. Emergency actions that are determined to have no effect to historic properties following the Emergency Action Assessment may be documented in a Cultural Resource Review (CRR) and reported in the regular annual report to Idaho SHPO.

If required, and in coordination with DOE, the CRMO will prepare plans for mitigation of adverse effects and conduct or oversee completion of work in consultation with the Idaho SHPO and Tribes. Results of mitigation may be reported in a supplemental report to the Emergency Action Assessment.

APPENDIX G:
ACRONYMS LIST

Acronyms List

3D	three dimensional
ACHP	Advisory Council on Historic Preservation
AEC	Atomic Energy Commission
AIP	Agreement in Principle
APE	Area of Potential Effect
ARPA	Archaeological Resources Protection Act
ASI	Archaeological Survey of Idaho
C.F.R.	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRC	Cultural Resource Coordinator
CRMO	Cultural Resource Management Office
CRMO-RA	Cultural Resource Management Office-Resource Advisor
CRMP	Cultural Resource Management Plan
CRR	Cultural Resource Review
DD&D	deactivation, decontamination, and demolition
DOE	Department of Energy, Idaho Operations Office
EAAP	Emergency Action Assessment Plan
EOC	Emergency Operations Center
ERP	Environmental Review Process
ESD	Environment and Sustainability Division
FR	Federal Register
FRM	Form
GIS	Geographic Information System
GLO	General Land Office
ICP	Idaho Cleanup Project
IHSI	Idaho Historic Site Inventory
INL	Idaho National Laboratory
M&O	Management and Operations
MOA	Memorandum(a) of Agreement
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NRF	Naval Reactors Facility
NRLFO/IBO	Naval Reactors Laboratory Field Office/Idaho Branch Office
NRHP	National Register of Historic Places
PA	Programmatic Agreement
SHPO	State Historic Preservation Office
Stat	Statute
U.S.C.	United States Code

