Chairman Arlan D. Melendez
Reno-Sparks Indian Colony
34 Reservation Road
Reno, NV 89502

Dear Chairman Melendez,

BLM has reviewed the document entitled, *Thacker Pass/Peehee mu’huh: A Living Monument to Numu History and Culture* (Eligibility Statement), written by the Reno-Sparks Indian Colony and the Summit Lake Paiute Tribe (the Tribes) submitted on February 3, 2023 by Mr. Will Falk. The Eligibility Statement proposes the creation of Thacker Pass Traditional Cultural District (the District) and provides a historical context, descriptions of the significance of the area to the Tribes, and suggests National Register of Historic Places (NRHP) eligibility determinations. Thank you for this documentation, it greatly enhances BLM’s understanding of the religious and cultural importance of the area to your Tribe and the Numu people.

Based on the information in the Eligibility Statement, BLM agrees that the District is eligible for the National Register of Historic Places under Criterion A for its association with events (Peehee mu’huh Massacre and the 1865 Quinn River Massacre) that have made a significant contribution to the broad patterns of Numu history. The Eligibility Statement identifies several specific contributing components to the District, including the pre-European contact Peehee mu’huh Massacre of Numu people (Reno-Sparks Indian Colony and the Summit Lake Paiute Tribe: 25), the Indian camps and the location where the US Army camped prior to the 1865 Quinn River Massacre identified on the map entitled: Land associated with September 12, 1865 Massacre (Reno-Sparks Indian Colony and the Summit Lake Paiute Tribe: 20), and Sentinel Rock (Reno-Sparks Indian Colony and the Summit Lake Paiute Tribe:35). The Eligibility Statement also identified additional, more general areas containing contributing components, such as stone outcroppings and caves in the Montana Mountains where Numu people hid from US Army soldiers and may have buried their dead, traditional dancing areas, as well as locations of medicinal resource gathering activities and traditional hunting grounds. BLM acknowledges that your Tribe
possesses special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to your Tribe and the history of Numu peoples, and thank you for sharing this information with us.

The BLM would like to request additional Government-to-Government Consultation to better define the boundary of the District and the locations of components that contribute to its eligibility under Criterion A. Additionally, BLM would like to understand more about how this District may be eligible under Criterion D. At this time BLM does not have sufficient information to determine whether the District is eligible under Criterion D or to make changes to the Double H/Whitehorse Obsidian Procurement District (CrNV-02-14275/D360), which has already been determined by BLM as eligible under Criterion D with SHPO agreement. Until the eligibility of the District has been finalized, BLM will treat the District and locatable contributing components as eligible under Criterion A and looks forward to working together to resolve the outstanding concerns.

Once BLM has completed compiling the Post-Review Discovery documentation and made a formal eligibility determination, BLM will send the complete package, including this Eligibility Statement, to you, Summit Lake Paiute Tribe, the Nevada State Historic Preservation Office (SHPO), the Advisory Council for Historic Preservation (ACHP), and other consulting parties including Burns Paiute Tribe, Fort McDermitt Paiute-Shoshone Tribe, Pyramid Lake Paiute Tribe, the Winnemucca Indian Colony, and Lithium Nevada, LLC (Proponent) to request consultation on BLM’s eligibility determinations pursuant to 36 CFR 800.13(c). If that consultation results in a disagreement on the BLM’s eligibility determinations, then BLM will forward the Post-Review Discovery package, with a statement from the SHPO, to the Keeper of the National Register following the requirements of 36 CFR 800.4(c)(2) and initiate the process outlined at 36 CFR 63. After consultation on eligibility of the District and contributing components has been completed, BLM will apply the criteria of adverse effect described at 36 CFR 800.5 and make a determination of effect. If an adverse effect is found, BLM will consult further to resolve the adverse effect pursuant to 36 CFR 800.6 as required in 36 CFR 800.13(b)(1).

While these steps are taking place, BLM expects the Proponent to begin permitted construction activities associated with previous authorizations in the area. BLM is required to make reasonable efforts to avoid, minimize, or mitigate adverse effects to a Post-Review Discovery under 36 CFR 800.13(b). These efforts will include continuing consultation efforts with Tribes to identify contributing components to the District. BLM will also consider whether tribal monitoring is necessary and appropriate in areas around components that contribute to the eligibility of the District.

Please contact the BLM by letter, email, or phone call to Shannon Deep, BLM Winnemucca District Native American Coordinator, at (775) 623-1504 or sdeep@blm.gov to discuss arrangements for Government-to-Government consultation.

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