



Department of Energy

Washington, DC 20585

October 28, 2024

Jaime Loichinger
Director, Office of Federal Agency Programs
Advisory Council on Historic Preservation (ACHP)
401 F Street NW, Suite 308
Washington, DC 20001

SUBJECT: U.S. Department of Energy (DOE) Proposed Loan for the Thacker Pass Project, Humboldt County - Section 106 Process

Dear Ms. Loichinger:

Thank you for your letter to DOE on October 22, 2024. In accordance with 36 CFR § 800.5 (c)(3)(ii)(B), the DOE Loan Programs Office (LPO) is providing a summary that contains DOE's rationale for its decision and evidence of consideration of the Council's opinion; DOE is also providing this summary to the Council, the SHPO, and the consulting parties (see Attachment 1 - DOE Section 106 Letter Distribution list).

History of the Thacker Pass Project

While the history of the Thacker Pass Project (Project) and DOE's rationale for its determination for the Section 106 process is included in the two letters to the Nevada State Historic Preservation Office (NV SHPO) dated July 1, 2024 and August 22, 2024 (Attachments 2 and 3), a brief overview of DOE's involvement in the Project is also included here.

The Project consists of an open pit mine, a sulfuric acid plant, a lithium processing facility as well as supporting infrastructure and facilities on land managed by the U.S. Department of Interior (DOI), Bureau of Land Management (BLM; lead agency).

As part of its review of the Mine Plan and concurrent with the preparation of the Environmental Impact Statement pursuant to the National Environmental Policy Act (NEPA), BLM determined the undertaking was subject to Section 106 of the National Historic Preservation Act (NHPA). BLM, in consultation with the Nevada State Historic Preservation Office (NV SHPO) and the Fort McDermitt Paiute and Shoshone Tribe, Summit Lake Paiute Tribe, and the Winnemucca Indian Colony (collectively known as Tribes or individually by name), defined the area of potential effects (APE) and determined that implementation of the Project would have adverse effects on fifty-seven (57) historic properties eligible for listing in the National Register of Historic Places

(NRHP). In accordance with 36 CFR 800.6, BLM and the NV SHPO prepared a Memorandum of Agreement (MOA) in consultation with the Tribes to resolve the adverse effects, and invited the Fort McDermitt Paiute and Shoshone Tribe, Summit Lake Paiute Tribe, and the Winnemucca Indian Colony to be concurring parties to the MOA. Lithium Nevada, Corp. (LNC) was an invited signatory on the MOA as well. BLM and the NV SHPO executed the MOA in November 2020, before DOE was involved in the Project. A Historic Properties Treatment Plan (HPTP) was included with the MOA as a comprehensive guide for the implementation of cultural resources treatment measures mitigating adverse effects as well as addressing unanticipated discoveries. The MOA is available here: https://shpo.nv.gov/uploads/documents/BLM_-_WN_Lithium_Nevada_Thacker_Pass_Project_MOA.pdf

DOE's undertaking (potential Federal financial support for Phase 1 of the Project) would support the development of the sulfuric acid plant, the lithium processing facility, and associated supporting infrastructure and facilities (e.g. roads, parking areas, utilities). The process will consist of a single production line and include commercially available equipment.

Note that based on the authorities under the LPO's Advanced Technology Vehicles Manufacturing Loan (ATVM) program as authorized under Section 136 of the Energy Independence and Security Act of 2007 (as amended), costs associated with mining are not eligible for the proposed DOE loan; therefore, mining activities are not part of DOE's undertaking. In addition, the DOE loan does not include LNC's Phase 2, which will be a continuation of mining and processing between operational years five to 41 followed by reclamation and closure.

DOE's Section 106 Process for the Project

Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings.¹ DOE recognizes the importance of the Section 106 process as a process for agencies to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other interested parties.² DOE takes its responsibilities under Section 106 seriously and seeks to ensure its decisions to provide financing to projects under the ATVM program appropriately consider the effects of its undertaking on historic properties. DOE's Section 106 process is informed by the robust due diligence that DOE engages in as part of the loan application and underwriting process.

For the Project, DOE engaged in a multi-year application evaluation, due diligence, and negotiation process. As part of this process, DOE undertook a thorough review of the extensive public record associated with the Project, including the public record pertaining to the BLM NEPA and NHPA review conducted in connection with the issuance of the Mine Plan, as well as the records associated with the other site and environmental permits

¹ 36 C.F.R. 800.1

² Id.

associated with the Project. DOE's review included review of the administrative record developed by BLM, the comments and concerns voiced by members of the public and Tribes in connection with the Project, and the filings, motions, and decisions made by parties in the litigation associated with the Project in the United States District Court, District of Nevada and Ninth Circuit Court. The extensive public record associated with the Project provided DOE with clear insight into the potential effects of DOE's undertaking and the views of the public and the Tribes regarding the potential effects of the DOE undertaking.

DOE's consideration of its Section 106 process included regular engagement with BLM and LNC as parties to the MOA. DOE considered the effects of the undertaking identified by the parties to the MOA, the MOA stipulations and HPTP, and the resolution of adverse effects of the undertaking achieved by the MOA and the HPTP, following BLM's finding of adverse effects. DOE also evaluated activities and matters associated with the Project and the APE during the period following the execution of the MOA as part of its due diligence process to understand how the MOA terms and HPTP were implemented by the parties. Finally, DOE engaged with LNC and BLM regarding the BLM-led eligibility review for the two potentially eligible properties that remain subject to the post-review discovery process.

This comprehensive review of the Project and the existing, thorough public record allowed DOE to develop an informed determination of no adverse effect of its undertaking, as explained to the consulting parties in its Section 106 Consultation described in more detail below. DOE's finding is based on its consideration of the criteria provided in 36 C.F.R. 800.5. In making its determination, DOE took into consideration the views of the Tribes and the public that were expressed in the extensive public record for the Project – to include views expressed by Reno-Sparks Indian Colony (RSIC) and the Summit Lake Paiute Tribe (SLPT) in litigation relating to the Project. DOE also determined it was appropriate to account for the resolution of adverse effects resulting from the MOA, HPTP, and BLM post-review discovery process when considering the effects of its undertaking on the APE.

On July 1, 2024, DOE sent a letter to the NV SHPO with a Section 106 Finding of No Adverse Effect for the Proposed Loan for the Thacker Pass Project in accordance with 36 CFR 800.5(b) and (c). See Attachment 2 for a copy of the letter as well as those parties included on the correspondence, to include the ACHP, LNC, BLM, and the Department of Interior's Office of the Solicitor (12 Tribes were also sent individual letters – see note on the next page). In summary, the letter outlined the reasoning for the DOE's determination, which is summarized here:

DOE reviewed the BLM undertaking that was the subject of the Section 106 process and has identified that the scope of the LPO's undertaking (Federal financial support to LNC for a portion of the project) is within the scope of the undertaking reviewed by BLM that resulted in the execution of the MOA that took into account and resolved the adverse effects on 57 Historic Properties within the APE. LPO notes that the MOA also includes a Stipulation on Post-Review Discoveries and Unanticipated

Adverse Effects to Historic Properties to account for any post-review discoveries or any unplanned disturbance to a Historic Property.

Because historic properties were identified within the APE, DOE is corresponding with the consulting parties via this letter and has completed an assessment of adverse effects in accordance with 36 CFR 800.5. DOE determined that the undertaking would not alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Based on the analysis provided above, DOE has determined that no historic properties that are listed, eligible for listing, or assumed eligible for listing in the National Register would be adversely affected by the undertaking (a finding of no adverse effect) pursuant to Section 106 of the NHPA and 36 CFR Part 800. Through this submittal, DOE has provided the documentation specified in 36 CFR 800.11(e) for its determination. In compliance with 36 CFR 800.5(b), DOE has requested concurrence on its finding of no adverse effect from the Nevada Historic Preservation Office.

On July 2, 2024, DOE's finding of no adverse effect determination was also sent to 12 Tribes with potential interest in the Project. See an example letter in Attachment 4.

On July 5, 2024, the NV SHPO asked (via email) for clarification if DOE was requesting an expedited review pursuant to 36 CFR § 800.3(g) and also requested a hard copy submission of the DOE letter. DOE confirmed that it was requesting an expedited review and sent a hard copy. Also on July 5, 2024, the NV SHPO also asked (via email) if the consulting parties and the public have an adequate opportunity to express their views as is provided in 36 CFR § 800.2(d) if an expedited consultation occurs. DOE provided the following response: "Yes - Attachment 2 in the submittal shows all the parties that have been made aware of the Section 106 submittal to NV SHPO (each Tribe was contacted individually). In addition, there is information about the submittal on LPO's NEPA-related public involvement page."

On July 29, 2024, the NV SHPO sent DOE a letter requesting further detail on the post-review discovery process for the two unevaluated and potentially eligible properties identified after the execution of the existing Memorandum of Agreement (MOA) for Section 106 between BLM and the NV SHPO (which was executed before DOE's involvement in the project). See Attachment 5 – LNC, BLM, DOI, and the ACHP were also copied on this correspondence. The NV SHPO also requested a project site map, which was emailed to the SHPO on July 31, 2024. To provide the NV SHPO with further detail on the post-review discovery process, DOE consulted with the BLM, as described below.

On July 30, 2024, DOE received letters from both the Reno-Sparks Indian Colony (RSIC) and the Summit Lake Paiute Tribe (SLPT), disagreeing with DOE's findings and requesting that BLM and DOE consult with them. See Attachments 6 and 7.

On July 31, 2024, at the end of the 30-day review period, NV SHPO had provided follow-up questions but provided no concurrence, comment, or disagreement with DOE's determination. RSIC and SLPT were the only two Tribes that provided objections to DOE's finding of no adverse effect determination.

In response to the letters from the NV SHPO, RSIC, and SLPT, DOE consulted with the BLM to confirm DOE's understanding of BLM's continued engagement in the post-review discovery process for the two unevaluated and potentially eligible properties and provide the most up-to-date information regarding that process as part of DOE's ongoing Section 106 consultation.

On August 14, 2024, BLM provided a response to DOE – see Attachment 8. Relevant excerpt is below:

...the BLM will take the following steps in its Post-Review Discovery process:

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 Reno-Sparks Indian Colony, 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).

On August 22, 2024, DOE sent follow-up letters to outline a path forward to the NV SHPO, RSIC, and SLPT – see letters in Attachments 3, 9, and 10. In addition, the letters to RSIC and SLPT on August 22, 2024, clarified DOE's position with RSIC and SLPT in an attempt to resolve the disagreement. In summary, DOE's letters provided information on BLM's continuing efforts to consult on the eligibility determinations for the two unevaluated and potentially eligible properties. DOE understands that the BLM will continue to engage with Tribes, the ACHP, and NV SHPO under the post-review discovery process. To satisfy the federal government's responsibilities and so as to not

duplicate efforts, DOE will continue to support BLM's efforts as lead agency in its post-review discovery process.

In addition, DOE also clarified its Section 106 findings in the August 22, 2024, letter to the NV SHPO and requested concurrence that DOE has satisfied its responsibilities under Section 106 based on the following:

- *BLM and the NV SHPO executed the Memorandum of Agreement (MOA) that took into account and resolved the adverse effects to 57 Historic Properties within the APE in November 2020, before DOE was involved in the Project. Pursuant to Section 106 of the NHPA and 36 CFR 800.5(b), DOE has determined that its undertaking would not result in an adverse effect on the 57 historic properties within the APE that was not already resolved or accounted for in the MOA or the HPTP.*
- *Going forward, DOE recognizes that BLM is the lead federal agency responsible for the post-review discovery process for the two unevaluated and potentially eligible properties pursuant to 36 CFR 800.13, and DOE will continue to support BLM's efforts as lead agency in its post-review discovery process.*
- *In addition, DOE recognizes that BLM is the lead federal agency responsible for the post-review discovery process for any additional future resources identified as addressed in the MOA and HPTP, and DOE will continue to support BLM's efforts as lead agency in its post-review discovery process.*

To date, DOE has not received any formal correspondence back from the NV SHPO.

On September 10, 2024, RSIC sent a letter to DOE objecting to DOE's attempt to resolve the disagreement and requesting that the ACHP review DOE's findings. The ACHP was copied on this letter. See Attachment 11.

On September 12, 2024, RSIC sent a letter to ACHP requesting they review DOE's findings in accordance with 36 CFR § 800.5(c)(2)(iii). See Attachment 12.

On September 13, 2024, Mr. Bill Marzella (ACHP) responded to RSIC and DOE via email that ACHP is preparing a response to DOE. The ACHP did not respond to RSIC's request.

On October 4, 2024, DOE submitted a request to the ACHP to review the finding pursuant to § 800.5(c)(3).

On October 22, 2024, ACHP sent a letter to DOE with its review of DOE's Section 106 findings - see Attachment 13. The letter recommended that DOE:

- 1) request that the BLM or the Nevada SHPO propose an amendment to its existing MOA to incorporate DOE's involvement in the undertaking; or
- 2) conduct further Section 106 review for the undertaking in a manner that (A) leads to a finding of adverse effect and development of a new Section 106 agreement; or (B) supports a revised finding of no adverse effect and contains an

explanation of what new information, consultation, or research, or proposed changes to the undertaking would substantiate such a finding.

In accordance with 36 CFR § 800.5(c)(3)(ii), DOE is required to take into account ACHP's opinion in reaching a final decision on the undertaking and provide to the ACHP, the SHPO, Tribes, and other consulting parties its rationale and a summary of how this opinion was considered.

DOE Consideration of ACHP's Review of Finding

ACHP's review (October 22, 2024 letter) of DOE's findings states that the effects on potential historic properties within the APE have not been fully assessed and resolved for the proposed undertaking, and the ACHP believes that DOE's finding of no adverse effect for this undertaking is not adequately supported. ACHP also argues that DOE did not conduct a reasonable and good faith consultation effort to reach its finding of no adverse effect.

DOE notes that since the BLM Section 106 MOA was executed in November 2020, several key events have occurred. In addition to the information presented on the previous pages and in previous letters outlining DOE's Section 106 determination, process, and consultations (see Attachments 2 and 3), the following provides additional context on what has occurred with respect to Section 106 and the Project in recent years:

Data Recovery and Ground Mitigation

LNC has completed significant mitigation and construction work since the date of the MOA and since BLM issued their ROD for the Project. Data recovery, ground mitigation work, and proposed treatment has been completed on all historic properties within the Mining APE (which includes 21 of the 57 historic properties). In February 2023, BLM issued a Notice to Proceed with ground disturbing activities at the Project site because mitigation work was completed in the Mining APE. The Mining APE is the portion of the site subject to LPO's potential Federal financial support.

For the remainder of the Historic Properties (36 of the 57) that are still present at the broader Thacker Pass site (in the Exploration area), adverse effects will be resolved for or accounted for through the MOA and the HPTP in an ongoing and as needed basis. Appropriate methods and strategies are presented in the HPTP – avoidance will be the preferred outcome. LPO's potential financing will not be involved in any exploration activities.

DOE recognizes that BLM is the lead federal agency responsible for the implementation of the existing MOA and HPTP, which satisfies the federal government's responsibilities pursuant to Section 106 and avoids duplication of efforts.

Post-Review Discovery Process

In addition, BLM has provided a path for consultation on the two unevaluated and potentially eligible properties, as provided in Attachment 8. Going forward, DOE

recognizes that BLM is the lead federal agency responsible for the post-review discovery process for the two unevaluated and potentially eligible properties pursuant to 36 CFR 800.13, and DOE will continue to support BLM's efforts, as lead agency in its post-review discovery process. As noted previously, BLM will continue to engage with Tribes, the ACHP, and NV SHPO under the post-review discovery process – including RSIC and SLPT.

Tribes' Federal Land Management and Policy Act ("FLMPA") and National Historic Preservation Act ("NHPA") Claims

Tribal engagement has been a part of the Thacker Pass Project before DOE became involved – through the development of the MOA and HPTP, through cultural monitoring at the site, and now through the post-review discovery process. DOE consulted with numerous tribes in July 2024 following years of BLM consultation on the same APE and encompassing all of the effects involved in the BLM Project, a portion of which, would be funded by DOE's undertaking of providing a federal loan in support of a portion of the BLM Project. DOE took into account the years of consultation conducted by the BLM.

There has also been litigation relating to the Project as summarized below.

On February 16, 2023, three Tribes (Summit Lake Paiute Tribe, Reno-Sparks Indian Colony, and Burns Paiute Tribe) filed a complaint against BLM in Federal District Court in Nevada seeking a temporary restraining order and preliminary injunction to block further construction of the Mine. LNC was an intervenor in this challenge.

The Tribes argued that they were entitled to a preliminary order and injunctive relief based on their alleged likelihood of prevailing on the merits with respect to four claims:

- (1) Summit Lake Paiute Tribe's ("SLPT") claim that BLM breached a Memorandum of Agreement (the "MOA") between BLM and the Nevada State Historic Preservation Office;
- (2) SLPT's claim that BLM violated the NHPA in issuing the ROD without first consulting them;
- (3) the three Tribes' claim that BLM violated the FLPMA by authorizing new work plans under LNC's prior authorizations that, according to the Tribes, were superseded by the ROD; and
- (4) the three Tribes' claim that BLM's handling of the "post-review discovery process," which is conducted subsequent to issuance of the ROD, violated the NHPA.

The U.S. District Court for the District of Nevada denied the Tribes' motion for preliminary injunction, finding among other things that the Tribes were not likely "to prevail on the merits of [their] NHPA claim." *Reno-Sparks Indian Colony v. Haaland*, 663 F. Supp. 3d 1188, 1198 (D. Nev. 2023)). Ultimately, the case was dismissed with prejudice on December 12, 2023, and the Tribes did not appeal that order.

DOE considered ACHP's recommendation that DOE enter into an amendment to the existing MOA to incorporate DOE's involvement in the undertaking. While DOE agrees

that this would be an acceptable path, it is not necessary at this stage since DOE has concluded its Section 106 process and intends to remain engaged in and support the post-review discovery process led by BLM.

DOE also considered ACHP's alternative proposal that DOE engage in additional Section 106 consultation with the Nevada SHPO, Tribes, and other consulting parties with respect to the 2 unevaluated historic properties, notwithstanding BLM's post-review discovery process. For the reasons set forth herein, DOE does not believe this is necessary in order for DOE to fulfill its Section 106 responsibility for this undertaking and believes that any such consultation would result in a duplication of the on-going BLM post-review discovery process and the stipulations under the MOA. In considering this recommendation of ACHP, DOE also considered the following facts and circumstances: (1) BLM is better positioned to make determinations regarding the eligibility of these properties for the National Register and the eligibility criteria for which they qualify; and (2) BLM, as the land manager and the agency with regulatory authority over the mine plan of operations, possesses unique authority commit to avoidance, minimization, and mitigation measures for these 2 sites that DOE does not.

In performing its own expedited consultation in accordance with 36 C.F.R. § 800.3(g), DOE has relied on the area of potential effect, identification of historic properties, and other information from the Section 106 process developed and implemented by BLM, and has not sought to unnecessarily repeat work completed by BLM during its consultation, or work that is the subject of ongoing review and consideration by BLM. However, DOE has considered the Memorandum of Agreement (MOA) and Historic Properties Treatment Plan (HPTP) that arose out of BLM's prior consultation. The MOA, executed by BLM, the Nevada SHPO, and LNC, contains stipulations the parties agreed were necessary to take into account the effects of BLM's undertaking on historic properties. The further parties agreed that the HPTP includes measures to "resolve all adverse effects to historic properties anticipated from the Project."³.

DOE believes it should consider the current facts associated with its loan undertaking when conducting its Section 106 review. Although ACHP appears to believe DOE should have reached a finding of adverse effect for the undertaking as BLM did previously, ACHP overlooks the fact that BLM's MOA and HPTP did not exist when BLM made its prior finding. The MOA and HPTP were developed and finalized as part of BLM's subsequent consultation process and court-sanctioned Section 106 review. Through the MOA, BLM made a final, binding commitment confirming that it has sought ways to avoid, minimize, or mitigate all adverse effects to all of the historic properties identified in the APEs for Thacker Pass. All mitigation in the Mine APE was complete before BLM issued a NTP and before DOE issued its Conditional Commitment. In its own Section 106 review, DOE appropriately considered the requirements imposed by the MOA and HPTP and reached a different finding of effect than BLM had previously reached without considering these documents.

³ MOA at 2

Final Decision

In accordance with 36 CFR § 800.5 (c)(3)(ii)(B), and in consideration of ACHP's findings and recommendations, the final decision of the DOE is to affirm the initial finding of no adverse effect and the agency official's responsibilities under Section 106 are fulfilled. DOE's findings are outlined below:

- BLM and the NV SHPO executed the Memorandum of Agreement (MOA) that took into account and resolved the adverse effects to 57 Historic Properties within the APE in November 2020, before DOE was involved in the Project. Pursuant to Section 106 of the NHPA and 36 CFR 800.5(b), DOE has determined that its undertaking would not result in an adverse effect on the 57 historic properties within the APE that was not already resolved or accounted for in the MOA or the HPTP.
- Going forward, DOE recognizes that BLM is the lead federal agency responsible for the post-review discovery process for the two unevaluated and potentially eligible properties pursuant to 36 CFR 800.13, and DOE will continue to support BLM's efforts as lead agency in its post-review discovery process.
- In addition, DOE recognizes that BLM is the lead federal agency responsible for the post-review discovery process for any additional future resources identified as addressed in the MOA and HPTP, and DOE will continue to support BLM's efforts as lead agency in its post-review discovery process.

Should you have any questions or comments please contact me by phone at 240-743-1304 or email at LPO_Environmental@hq.doe.gov.

Respectfully,

Anna Eskridge, Ph.D.
Deputy, Environmental Compliance
Loan Programs Office

Attachments:

Attachment 1 - DOE Section 106 Letter Distribution list

Attachment 2 – DOE Section 106 Letter to NV SHPO – letter #1 (July 1, 2024)

Attachment 3 – DOE Section 106 Letter to NV SHPO – letter #2 (August 22, 2024)

Attachment 4 – DOE Section 106 Letter to Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation (July 2, 2024) (Example sent to 12 Tribes)

Note: the letter sent to Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation on July 2, 2024 is an example of the same letter that was sent to the following Tribes on the same date:

- Burns Paiute Tribe
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Fort McDermitt Paiute and Shoshone Tribe
- Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada
- Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada
- Reno-Sparks Indian Colony, Nevada
- Shoshone-Bannock Tribes of the Fort Hall Reservation
- Summit Lake Paiute Tribe
- Te-Moak Tribe of Western Shoshone Indians of Nevada (Four constituent bands: Battle Mountain Band; Elko Band; South Fork Band and Wells Band)
- Walker River Paiute Tribe of the Walker River Reservation, Nevada
- Winnemucca Indian Colony
- Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada

Attachment 5 – NV SHPO letter to DOE (July 29, 2024)

Attachment 6 – Reno-Sparks Indian Colony (RSIC) letter to DOE (July 30, 2024)

Attachment 7 – Summit Lake Paiute Tribe (SLPT) letter to DOE (July 30, 2024)

Attachment 8 – BLM letter to DOE (August 14, 2024)

Attachment 9 – DOE follow-up letter to RSIC (August 22, 2024)

Attachment 10 – DOE follow-up letter to SLPT (August 22, 2024)

Attachment 11 – RSIC letter to DOE (September 10, 2024)

Attachment 12 – RSIC letter to ACHP (September 12, 2024)

Attachment 13 – ACHP letter to DOE (October 22, 2024)