

EXHIBIT 11

Thacker Pass Lithium Project Draft EIS Appendix G and Table J.1

Table G.11. Nevada Historical GHG Emissions by Sector

Sector	GHG Emissions (millions of metric tons of CO ₂ equivalent)							
	1990	1995	2000	2005	2010	2011	2012	2013
Electricity Generation	16.855	18.267	24.771	26.213	16.858	14.190	14.665	15.144
Transportation	9.807	11.967	15.091	17.226	14.112	13.502	14.057	14.492
Residential, Commercial, and Industrial	4.441	5.848	5.987	6.819	6.880	6.037	6.025	6.807
Industrial Processes	1.214	1.556	2.298	2.573	3.230	3.403	3.425	3.550
Waste Management	0.749	1.003	1.384	1.808	2.144	2.209	2.136	1.751
Agriculture	1.484	1.550	1.642	1.636	1.558	1.570	1.563	1.436
Fossil Fuel Industry	0.412	0.493	0.593	0.739	0.785	0.849	0.855	0.860
Forestry ¹	-5.851	-8.073	-0.635	3.349	-6.121	-2.183	-0.329	-4.788
Total Gross Emissions²	34.962	40.684	51.765	60.362	45.567	41.759	42.726	44.039
Total Net Emissions³	29.110	32.612	51.130	60.362	39.446	39.575	42.397	39.251

Source: NDEP 2016a

¹ Negative values indicate that the sector is a net sink for GHGs (sequesters carbon); positive values indicate that the sector is a net source of GHG emissions.

² Gross emissions are the sum of emissions from all sectors. Gross emissions include the forestry sector only in years when it is a source of GHG emissions.

³ Net emissions are the sum of emissions from all sectors minus emission reductions (sinks). Net emissions include the forestry sector in all years.

G.1.9 Cultural Resources

G.1.9.1 Inventory of Cultural Resources

Cultural resources (e.g., archaeological or built-environment sites or districts) are normally identified and recorded during intensive field inventories. On BLM-administered land, an intensive pedestrian survey using transects spaced no more than 30 meters (approximately 100 feet) apart is considered a Class III inventory. Inventories of this nature meet the data adequacy standard for identifying and recording cultural resources if conditions within the APE allow for suitable inspection and meet or exceed inventory quality standards based on BLM consultation (BLM and Nevada SHPO 2014; BLM 2018). Once an inventory is complete and a technical report submitted, the BLM archaeologist reviews the report containing findings and NRHP eligibility recommendations for identified resources. After the BLM accepts the report and eligibility recommendations, they forward the report to the SHPO for concurrence on NRHP eligibility and project effects (BLM 2014).

A review of previous surveys and reports in the Thacker Pass Lithium Mine Project APEs reveals that 38 inventories have documented cultural resources in the area over the past 48 years (Table J.1, *Previous Cultural Resources Inventories*, Appendix J). The entirety of the Mining and Exploration direct effects APE and portions of the indirect effects APE have been subjected Class III inventory. All Class III studies in the direct effects APEs meet baseline data adequacy

standards. Together, the inventories identified over one thousand cultural resource sites and a large cultural district: the Thacker Pass Component of the Double H/Whitehorse Obsidian Procurement District (DHWOPD). The most recent work in the direct effects APEs occurred in 2019 as part of BLM Report CR2-3402. That inventory provided Class III coverage of 12,963 acres within the direct effects APE and synthesis of previous inventories, including hundreds of cultural resources within an around the Thacker Pass Component of the DHWOPD and covering an area of approximately 18,600 acres (Young et al. 2019). The BLM has accepted Young et al.'s (2019) CR2-3402 report as final and the results from that particularly large dataset are applied in this document.

Most of the documented cultural resources throughout the direct and indirect APEs are prehistoric lithic scatters associated with obsidian toolstone assay and reduction. Temporally diagnostic artifacts indicate the most common association is with the Middle Archaic Period, but the overall prehistoric chronology of the area spans from the Paleoindian Period to the Terminal Prehistoric Period. Although toolstone acquisition is the dominant activity, several sites also contain grinding implements and other indicators of long-term occupation. Historic-era resources and components are comparatively less common and include the residues of Civilian Conservation Corps (CCC) activity in the area, built environment linear features (roads and utility lines), and late nineteenth and early twentieth century ranching and homesteading pursuits (Young et al. 2019).

The recent Young et al. (2019) inventory and preceding works clearly demonstrate that past human activity in the area focused on obsidian toolstone collection and reduction within the Thacker Pass Component of the DHWOPD. The DHWOPD is a dis-contiguous archaeological district extending north and south of the Thacker Pass Project. Besides the Thacker Pass Component, the district includes the Moonshine Canyon, Pretty Moon Rock, Hoppin Spring Complex, Silver Site, and Sod House areas to the south and Jordan Meadows area to the north. Together, these components comprise a roughly 166,346-acre area within and around the McDermitt Caldera complex (Berg et al. 2008; Moore 1993; Young et al. 2008; 2019). The direct and indirect APEs overlap a portion of the Thacker Pass component of the DHWOPD.

Previous inventories identified 1008 resources within the direct and indirect APEs and established an obsidian procurement district that overlaps the APEs. The Mining direct effects APE encompasses 240 resources; the Exploration direct effects APE encompasses 608 resources; and the indirect effects APE encompasses 95 resources. Exceptionally large or linear resources, as well as small resources found along APE boundaries, may fall within multiple APEs. These occur where the two direct APEs intersect 27 resources; the direct APEs and indirect APE intersect 15 resources; and the indirect APE and the Exploration APE intersect 23 resources.

G.1.9.2 Resources Within the Mining Direct Effects APE

The Mining direct effects APE intersects a total of 280 resources. This includes 40 resources overlapping the Exploration direct effects APE and 13 resources overlapping the indirect APE. Of these, 19 are historic properties eligible for the NRHP under Criterion D and rest within the

Thacker Pass Component of the DHWOPD. All 19 historic properties are prehistoric lithic scatters, six (6) of which contain somewhat more complex assemblages with grinding implements and evidence of prolonged occupation, and one (1) of which contains a rock ring. The Exploration direct effects APE overlaps 10 of the historic properties, and the indirect effects APE also intersects three (3) of those. The 19 NRHP-eligible resources contribute to the eligibility of the district. The remainder of the sites are ineligible for listing on the NRHP and do not contribute to the eligibility of the district.

G.1.9.3 Resources Within the Exploration Direct Effects APE

The Exploration direct effects APE intersects a total of 673 resources. This includes 40 resources overlapping the Mining direct effects APE (same overlapping resources noted in the Mining direct effects APE section above) and 38 resources overlapping the indirect APE. Of these, 34 are historic properties eligible for the NRHP under Criteria A and D. This count does not include 11 resources within the overlapping Mining direct effects APE accounted for above. Thirty-two (32) of the resources are prehistoric and two (2) are historic era. The historic-era resources consist of a CCC dump eligible under Criteria A and D (CrNV-21-1220) and the Lamb Homestead eligible under Criterion D (CrNV-02-10145). The remainder of the historic properties are lithic scatters: 21 composed of flaked stone artifacts, seven (7) composed of assemblages with grinding implements and indicators of habitation, and four (4) with a diversity of flaked stone tool artifact classes. The indirect effects APE overlaps five (5) of the historic properties. The 32 NRHP-eligible prehistoric resources contribute to the eligibility of the Thacker Pass Component of the DHWOPD district. The remainder of the resources are ineligible for listing on the NRHP and do not contribute to the eligibility of the district.

G.1.9.4 Resources Within the Indirect Effects APE

The indirect effects APE intersects a total of 133 resources. This includes 14 resources in the overlapping Mining and Exploration direct effects APEs and 24 resources in the overlapping Exploration direct effects APE only (these resources are accounted for in the direct effects APE sections above). Removing the overlapping resources, the indirect effects APE intersects 95 resources, and of those, 15 are NRHP-eligible or have NRHP-eligible components and 14 remain unevaluated for the NRHP. The remainder of the resources are ineligible for listing on the NRHP. The eligible resources include 11 prehistoric resources eligible under Criterion D, three (3) multi-component resources with prehistoric components eligible under Criterion D (2) and historic-era components eligible under Criterion A (1), and one (1) historic-era resource eligible under Criterion A. The two (2) eligible historic-era components are a CCC Wash House (CrNV-21-5414) and a CCC Camp (CrNV-02-10141). The eligible prehistoric components include 10 resources with diverse flaked stone tool assemblages, three (3) habitation assemblages with grinding implements, and one (1) complex habitation assemblage. Three (3) NRHP-eligible prehistoric resources in the indirect effects APE rest within the boundary of the Thacker Pass Component of the DHWOPD and contribute to the eligibility of the district.

The unevaluated resources within the indirect effects APE include 13 prehistoric lithic scatters with flaked stone tools and one multi-component lithic scatter overprinted with historic era refuse and debris. Unevaluated resources are treated as NRHP-eligible until an evaluation of the resource's significance can be completed. Two (2) unevaluated resources within the indirect effects APE also rest within the DHWOPD.

The direct effects APEs intersect four (4) architectural resources. These include a windmill/water tank system (CrNV-02-10160/S2364) and a dugout at the Lamb Homestead (CrNV-02-10145/B18182) in the Exploration direct effects APE (the indirect APE also overlaps the Lamb Homestead), and a transmission line (CrNV-02-10156/S2362) and State Route 293 (CrNV-02-10157/S2363) within both the Mining and Exploration direct effects APEs. The indirect effects APE also overlaps the highway and transmission line. One architectural resource rests solely within the indirect APE: a dam and reservoir (CrNV-02-10147/S2361) at the western end of Thacker Pass. All five (5) of the architectural resources are individually ineligible for the NRHP, however, the dugout (B18182) does contribute to the overall eligibility of the Lamb Homestead (CrNV-02-10145) which is eligible for the NRHP under Criterion D (Young et al. 2019).

The Thacker Pass Obsidian Procurement Area is a 16,030-acre component of the larger DHWOPD straddled by the direct and indirect APEs. The Thacker Pass Component became an NRHP-eligible district through BLM-SHPO consultation in 2009 based on previous research and recommendations (Berg et al. 2008; Moore 1993; Young et al. 2008). The boundaries of the Thacker Pass Component have been revised over time, but the district itself remains a management framework for cultural resources studies in the region (Young et al. 2019: 66-74). During recent work within the Thacker Pass Component, Young et al. (2019) generated an up-to-date district form utilizing previous work and considering all resources located within the district boundary (including resources presented in the direct and indirect APE counts above) and assessing whether or not they contribute to the overall eligibility of the district. The resulting synthesis combined with a records review revealed that the district contains 873 archaeological resources and four (4) architectural resources. Of the 873 archaeological resources, 52 are considered to be contributing the eligibility of the district under NRHP Criterion D, four (4) remain unevaluated, and 817 are considered non-contributing. All cultural resources eligible under Criterion D, having regional data significance, are also contributing elements under Criterion D in the district (Young et al. 2019: 74). All four of the architectural resources are non-contributing to the eligibility of the district (Young et al. 2019).

G.1.10 Social and Economic Conditions

G.1.10.1 Affected Environment

The Project is located in Humboldt County, Nevada, approximately 63 miles north-northwest of the City of Winnemucca, Nevada. Humboldt County encompasses approximately 9,704 square miles and includes the unincorporated communities of Denio, Kings River, McDermitt, Orovada, and Paradise Valley. The closest incorporated city to the Project Area is Winnemucca.

G.2 RESOURCE SUMMARIES

AIR QUALITY SUMMARY

THACKER PASS - LITHIUM NEVADA

REGULATORY FRAMEWORK

FEDERAL CLEAN AIR ACT

The Federal Clean Air Act (CAA) and subsequent Clean Air Act Amendments (CAAA) of 1990 authorized the regulation of air emissions from stationary and mobile sources. Specifically, the CAA and CAAA of 1990 requires the EPA to identify National Ambient Air Quality Standards (NAAQS) to protect public health and welfare, as well as to regulate emissions of hazardous air pollutants.

CRITERIA AIR POLLUTANTS

Based on the CAA and CAAA of 1990, the EPA has established NAAQS for pollutants known as "criteria" pollutants that are harmful to public health or the environment. NAAQS have been set for ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), particulate matter less than 10 and 2.5 microns in diameter (PM₁₀ and PM_{2.5}), and lead (Pb). Air pollutant concentrations that exceed the NAAQS constitute a risk to human health. State specific Ambient Air Quality Standards (AAQS) have also been developed by the Nevada Division of Environmental Protection (NDEP) and are defined in NAC 445B.22097. Table 1 summarizes the currently applicable National and Nevada AAQS standards.

TABLE 1

SUMMARY OF NATIONAL AND NEVADA AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS			
POLLUTANT	AVERAGING PERIOD	NAAQS	NEVADA AAQS
O ₃ (PPB)	8-Hour	70	70
NO ₂ (PPB)	1-Hour	100	100
	Annual	53	53
SO ₂ (PPB)	1-Hour	75	75
	3-Hour	500	500
CO (PPM)	1-Hour	35	35
	8-Hour	9	9
PM ₁₀ (µG/M3)	24-Hour	150	150
PM _{2.5} (µG/M3)	24-Hour	35	35
	Annual	12	12
PB (µG/M3)	3-Month	0.15	0.15
Units of measure for the standards are parts per million (ppm) by volume, parts per billion (ppb) by volume, and micrograms per cubic meter of air (µg/m3).			
Source: USEPA, NAC 445B.22097			

HAZARDOUS AIR POLLUTANTS

In addition to the criteria pollutants listed above, the CAA requires the EPA to regulate toxic air pollutants, or hazardous air pollutants (HAPs), that are known to cause or are suspected to cause cancer or other serious health effects or adverse environmental impacts. The EPA has identified 187 specific chemical substances that are potentially hazardous to human health and set emission standards to regulate the amount of those substances that can be released by individual facilities or by specific industrial sources. The EPA has issued rules covering 80 categories of major industrial sources, as well as categories of smaller sources. Controls are usually required at the source to limit the release of these toxics into the atmosphere.

ATTAINMENT AND NON-ATTAINMENT AREAS

Classifications for geographic regions known as air quality management areas (AQMAS) have been developed by the EPA. Under these classifications, each criteria pollutant within a portion of an AQMA is classified as "in attainment" if the ambient concentrations of the pollutant are below the NAAQS or as "non-attainment" if the levels of ambient air pollution exceed the NAAQS. Each criteria pollutant is monitored separately. For nonattainment areas, state and local governments must develop comprehensive plans to reduce pollutant concentrations below the NAAQS and maintain compliance. AQMAS that do not have enough ambient air monitoring data are designated as "unclassifiable" and are treated as in attainment for regulatory purposes. The region in vicinity of and including the Thacker Pass Project is classified as unclassifiable for all criteria air pollutants.

PREVENTION OF SIGNIFICANT DETERIORATION

¹ Nevada AAQS for 8-hour CO is 6 ppm for areas at or greater than 5000 feet.

AIR QUALITY SUMMARY

THACKER PASS - LITHIUM NEVADA

Prevention of Significant Deterioration (PSD) applies to any new stationary source or major modification to an existing stationary source that emits or has the potential to emit any pollutant regulated under the CAA above the PSD threshold emission rate, typically 250 tons per year (ton/yr), where the source is located in an AQMA classified as in attainment or unclassifiable. PSD requires installation of the best available control technology (BACT), an air quality analysis, an additional impacts analysis, and public involvement.

Because sulfuric acid plants are a listed source category under 40 CFR Part 52.21, PSD would apply to the sulfuric acid plant at the proposed Thacker Pass Project if the emissions of any regulated air pollutant (e.g., SO_2 , NOX, CO, VOC, PM10, PM2.5, H_2SO_4 mist, H_2S) from the sulfuric acid plant exceed 100 ton/yr (as opposed to the typical 250 ton/yr).

NEW SOURCE PERFORMANCE STANDARDS

New Source Performance Standards (NSPS) are standards established by the EPA under authority from the CAA for categories of new or modified stationary sources of air pollution. NSPS include emission standards, equipment specifications, and/or measurement requirements.

NSPS Subpart H includes standards for sulfuric acid plants. The Subpart H emission standards are as follows:

- » *Sulfur dioxide: 2 kg sulfur dioxide per metric ton of acid produced (4 lb per ton), the production being expressed as 100 percent H_2SO_4*
- » *Acid mist: 0.075 kg acid mist, expressed as H_2SO_4 , per metric ton of acid produced (0.15 lb per ton), the production being expressed as 100 percent H_2SO_4*
- » *Opacity: 10 percent opacity*

FEDERAL OPERATING PERMIT

The CAAA of 1990 introduced an operating permit program to ensure compliance with the CAA and enhance the EPA's ability to enforce the Act. The Federal Operating Permit Program, known as the Title V program, requires that major sources of air pollutants obtain a Title V permit. To be classified as a major source, a stationary facility must emit more than 100 tons per year of any pollutant regulated under the CAA, 10 tons per year of any single HAP, or 25 tons per year of any combination of HAPs.

FEDERAL OPERATING PERMIT

The CAA delegates primary responsibility for air pollution control to state governments. State governments, in turn, may delegate this responsibility to local governments or regional organizations. The NDEP has the following thresholds for various air quality permit types:

- » **Class I** – *For facilities that emit more than 100 tons per year of any regulated air pollutant, emit more than 25 tons per year total HAPs, emit more than 10 tons per year of any one HAP, are a PSD source, are a major maximum achievable control technology (MACT) source, or are otherwise subject to Title V*
- » **Class II** – *For facilities that emit less than 100 tons per year of any regulated air pollutant, emit less than 25 tons per year total HAPs, and emit less than 10 tons per year of any one HAP*
- » **SAD** – *For surface area disturbance greater than five acres*

The proposed Thacker Pass Project is anticipated to require a Class II Permit.

AIR QUALITY SUMMARY

AR-042574

TPEIS-0318

THACKER PASS - LITHIUM NEVADA**AFFECTED ENVIRONMENT****LOCAL CLIMATE AND METEOROLOGY**

The Thacker Pass Project area is situated in the north central region of the Basin and Range physiographic province in an area known as Thacker Pass, in terrain roughly 5,000 feet amsl with lower-lying agricultural valleys to the east and west. The Double H Mountains are located directly to the south and the Montana Mountains are located directly to the north. The Thacker Pass Project area straddles the topographic divide separating the Kings River Valley hydrographic area and the Quinn River Valley hydrographic area.

An onsite meteorological station (Thacker Pass station) was installed in August 2011 and has continuously collected data through to the present day. Climatic conditions are arid, high desert with mild-cool winters and hot-dry summers. Average winter temperature is near freezing (32.5°F), with daily temperatures ranging from highs of about 50°F to lows of about 10°F. Summer temperatures range from highs of about 95°F to lows of about 50°F. Air moisture is generally arid, with relative humidity ranging from about 25% during summer to about 65% during winter.

Table 2 summarizes average wind speed, average temperature at ground level, and average temperature at 32.8 feet from January 2012 through December 2018.

Long-term data has been assessed to characterize overall climate conditions. The nearest long-term meteorological measurement station is in Winnemucca, Nevada, located about 60 miles south-southeast of the Project location. Long-term climate data is summarized in Table 3.

TABLE 2

METEOROLOGICAL DATA JAN. 2012 - DEC. 2018 THACKER PASS METEOROLOGICAL STATION			
MONTH	AVERAGE WIND SPEED (MPH)	AVERAGE TEMP. (°F)	AVERAGE TEMP. (°F) 32.8 FT
JANUARY	6.84	32.13	32.80
FEBRUARY	8.18	35.81	36.29
MARCH	8.98	41.98	42.26
APRIL	9.46	47.04	47.15
MAY	7.99	55.68	55.79
JUNE	8.66	67.00	66.87
JULY	9.01	76.82	76.72
AUGUST	8.47	74.43	74.58
SEPTEMBER	8.24	64.81	65.15
OCTOBER	7.51	51.80	52.47
NOVEMBER	7.45	40.15	40.85
DECEMBER	7.48	29.58	30.17

TABLE 3

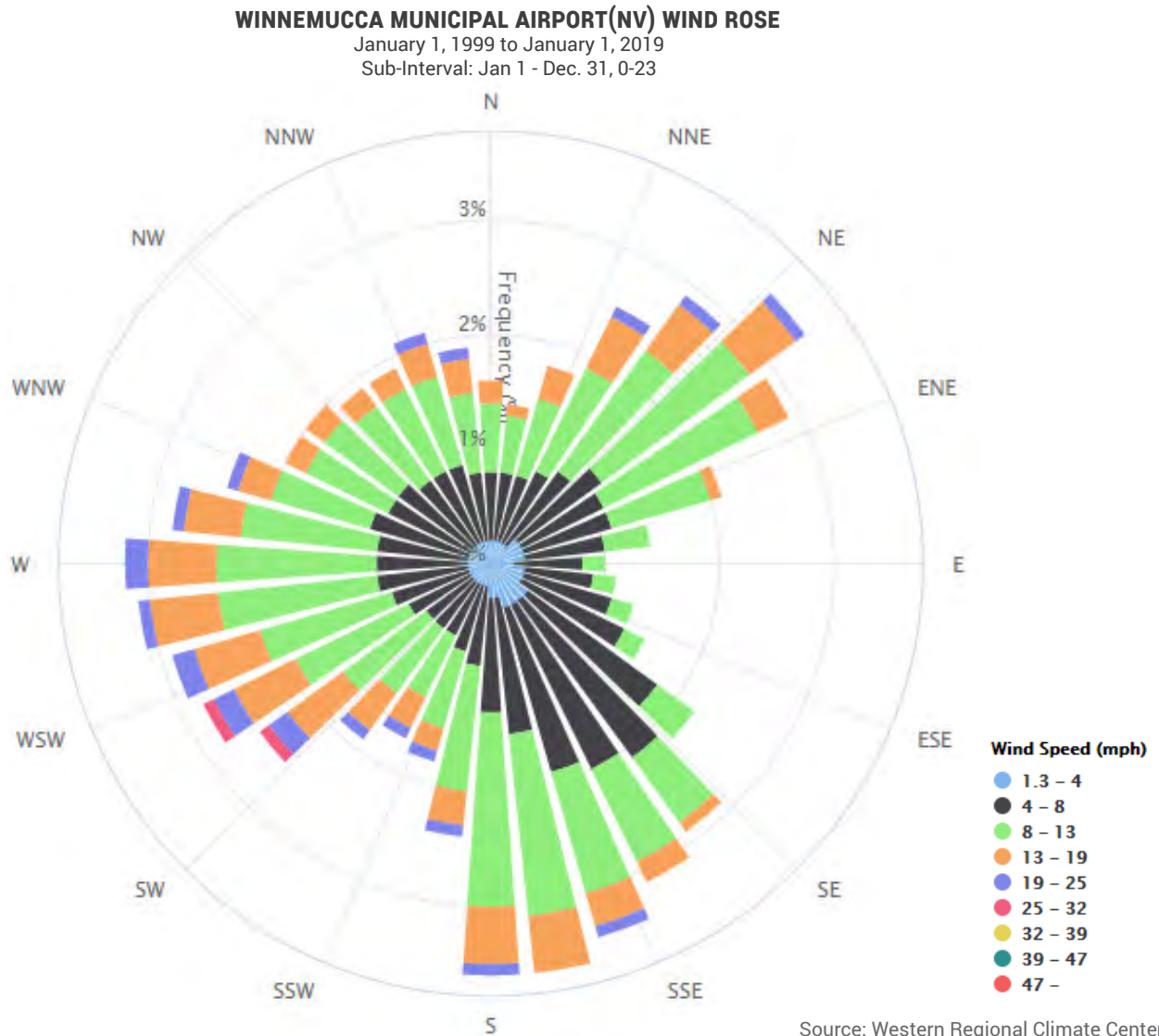
WINNEMUCCA WSO AIRPORT CLIMATE SUMMARY 1/1/1897 TO 12/31/2005	
METEOROLOGICAL PARAMETER	MEASURED VALUE
ANNUAL AVERAGE MAX. TEMPERATURE (°F)	64.8
ANNUAL AVERAGE MIN. TEMPERATURE (°F)	33.1
ANNUAL AVERAGE TOTAL PRECIPITATION (IN.)	8.29
ANNUAL AVERAGE TOTAL SNOWFALL (IN.)	16.5
ANNUAL AVERAGE TOTAL SNOW DEPTH (IN.)	0
Source: Western Regional Climate Center	

AIR QUALITY SUMMARY

THACKER PASS - LITHIUM NEVADA

Figure 1 shows wind speed and direction at the Winnemucca Municipal Airport over a 20-year period, from 1999 to 2019. Wind speed and direction is shown in a wind rose diagram, which defines the wind direction as the direction which the wind is blowing. The length of each bar indicates the frequency of occurrence in each wind direction, and the shading indicates a differentiating wind speed

FIGURE 1



REFERENCES

Summary of the Clean Air Act <https://www.epa.gov/laws-regulations/summary-clean-air-act>
 Criteria Air Pollutants <https://www.epa.gov/criteria-air-pollutants>
 NAAQS Table <https://www.epa.gov/criteria-air-pollutants/naaqs-table>
 Hazardous Air Pollutants <https://www.epa.gov/haps>
 NAAQS Designation Process <https://www.epa.gov/criteria-air-pollutants/naaqs-designations-process>
 Prevention of Significant Deterioration <https://www.epa.gov/nsr/prevention-significant-deterioration-basic-information>
 New Source Performance Standards <https://www.law.cornell.edu/cfr/text/40/part-60>
 Nevada Air Quality Operating Permit <https://ndep.nv.gov/air/permitting>
 Winnemucca WSO Airport Climate Data <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?nvwinn>
 Winnemucca Municipal Airport Wind Rose <https://www.wcc.nrcs.usda.gov/climate/windrose.html>

CULTURAL SUMMARY

AR-042576

TPEIS-0318

THACKER PASS - LITHIUM NEVADA

REGULATORY FRAMEWORK

The National Historic Preservation Act (NHPA) of 1966, as amended, and the Archaeological Resources Protection Act (ARPA) of 1979, as amended, are the primary laws regulating cultural resource preservation. NHPA and ARPA together provide a structure for federal agencies to follow when evaluating effects on Historic Properties listed or eligible for listing in the NRHP.

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on Historic Properties and affords the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings. Project-related actions may adversely affect any site, structure, or object that is, or can be, included in the NRHP. These regulations, codified 36 CFR 60.4, provide criteria to determine if a site is eligible and apply to all federal undertakings and all cultural (archaeological, cultural, and historic) resources.

ARPA provides protection to archaeological resources and sites on public and Indian lands for the present and future benefit of the people. The intent of ARPA is to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources.

AFFECTED ENVIRONMENT

The cultural inventory area for the Thacker Pass Project includes an approximately 18,686-acre area between the Double H and Montana Mountains. In this area, cultural resources (e.g., archaeological or built-environment sites or districts) are identified and recorded during intensive field surveys of the project cultural inventory area. Intensive pedestrian surveys using transects spaced no more than 30 meters (approximately 100 feet) apart is considered a Class III inventory. Inventories of this nature are the standard for identifying and recording cultural resources, if conditions within the cultural inventory area allow for adequate visual inspection (i.e., when ground surface cover, such as snow or vegetation, no longer exceeds 25%; BLM 2012, 2014). Once fieldwork is complete, the BLM archaeologist reviews a technical report presenting inventory findings and NRHP eligibility recommendations for resources identified within the cultural inventory area. After the BLM determines the report is acceptable, they consult with the Nevada State Historic Preservation Office SHPO on BLM's

determination of NRHP eligibility and project effects. (BLM 2014).

The approximately 18,686-acre direct effects cultural inventory area has been subjected to 35 Class III inventories resulting in complete coverage of the entirety of the cultural inventory area. The sequence of work included approximately 5,476 acres of inventory between 1972-2017 (less 160 acres of private land) followed by a large 12,963-acre survey in 2018 which completed the study of the entire Thacker Pass Project cultural inventory area (Table 1). During the most recent iteration of work, Young et al. (2018) summarized all previous cultural resource documentation and evaluations for the 18,686-acre cultural inventory area and generated a full accounting of cultural resource sites and historic properties. Based on the compilation past and current Class III inventory results, 968 prehistoric and historic-era cultural resources (not including categorically ineligible isolated finds) have been documented and evaluated for inclusion on the NRHP (Young et al. 2018: 152). The vast majority of the resources are prehistoric sites comprised of obsidian debitage scatters indicative of local toolstone assay within the Double H/Whitehorse Obsidian Procurement District, a NRHP-eligible district (Berg et al. 2009; McCabe et al. 2012). Other prehistoric sites include assemblages with a relatively small number of flaked and/or ground stone tools evincing a diversity of activity beyond toolstone acquisition. The historic-era resources are mostly comprised of sites related to homesteading/ranching, transportation, or mid-nineteenth-century work by the Civilian Conservation Corps.

Of all the sites documented and evaluated in the 18,686-acre cultural inventory area, 39 are recommended eligible, or were previously determined eligible, for listing on the NRHP (Table 2). Thirty-four of these are NRHP-eligible prehistoric resources recommended or determined eligible under Criterion D, four sites are NRHP-eligible historic-era resources recommended or determined eligible under Criteria A and/or D, and one multi-component resource contains historic-era and prehistoric components each recommended NRHP-eligible under Criterion D. All 35 of the resources with NRHP-eligible prehistoric components are also eligible as contributing elements to the Double H/Whitehorse Obsidian Procurement District; the other prehistoric assemblages are considered non-contributing to the eligibility of the Double H/Whitehorse Obsidian Procurement District.

CULTURAL SUMMARY

AR-042577

TPEIS-0318

THACKER PASS - LITHIUM NEVADA

TABLE 1

PREVIOUS INVENTORIES IN THE THACKER PASS PROJECT AREA – 18,686 ACRES		
AGENCY NO. (CR2-)	DATE	TITLE
0060	1972	ARCHAEOLOGICAL RECONNAISSANCE OF THE BLACK ROCK DESERT
0131	1977	USGS GEOTHERMAL NOTICE OF INTENT #N2-20-77
0215	1978	THACKER PASS FENCELINE
0588	1981	TROUT WELL PIPELINE EXTENSION AND TROUGHS
0592	1981	CROWLEY SHORT FENCE
0641	1981	CONOCO ASSESSMENT WORK, NOTICE OF INTENT MINING CLEARANCE.
0937	1984	CROWLEY CREEK HYDROSTUDY MAINTENANCE
1263	1996	POLE CREEK PIPELINE EXTENSION
1265	1996	TWIN SPRINGS
1280	1996	DOUBLE H WATER DEVELOPMENT PROJECT
1282	-	(NO INFO)
1298	1997	MIDDLE LYLE CREEK DIVISION FENCE
1429	2001	DOUBLE H FIRE REHAB CLASS II
1430	2001	DOUBLE H FIRE REHAB CLASS III
1443	2002	A CLASS III CULTURAL RESOURCES INVENTORY FOR THE PROPOSED PHASE IV OF OREGON-IDAHO UTILITIES COMMUNICATION = SYSTEM, NORTHERN HUMBOLDT COUNTY, NEVADA
1454	2001	WINNEMUCCA GREEN STRIPS GROUPS II AND III, HUMBOLDT COUNTY
1484	2002	CLASS III CULTURAL RESOURCES INVENTORY OF THE BUFFALO AND THACKER PASS GREENSTRIPS PROJECT 2002, HUMBOLDT COUNTY, NEVADA
1519	2004	SENTINEL FIRE REHABILITATION
1561	2006	SENTINEL ROCK PIT
1578	2007	SENTINEL ROCK DIVERSION DITCH ROAD IMPROVEMENTS
2264	1988	BENGOA PIPELINE
2274	-	(NO INFO)
2313	1989	BENGOA PIPELINE EXTENSION
2337	1989	FOUR POTENTIAL MATERIAL PITS IN THE VICINITY OF OROVADA, HUMBOLDT COUNTY, NEVADA
2433	1993	ARCHAEOLOGICAL SURVEY OF SR 293 KINGS RIVER ROAD FROM OROVADA TO KINGS RIVER VALLEY (SR 293 HU 00.00 TO 23.99). NDOT REPORT NO. HU86-078R.
2971	2007	A CULTURAL RESOURCES INVENTORY OF DRILL PADS AND ASSOCIATED ACCESS ROUTES FOR PROPOSED LITHIUM EXPLORATION, THACKER PASS, HUMBOLDT COUNTY, NEVADA
3003	2008	A CLASS III CULTURAL RESOURCES INVENTORY OF 1,230 ACRES FOR THE WESTERN ENERGY DEVELOPMENT CORPORATION THACKER PASS LITHIUM EXPLORATION PROJECT, HUMBOLDT COUNTY, NEVADA
3122	2011	A CLASS III CULTURAL RESOURCE INVENTORY OF THE KINGS VALLEY LITHIUM PROJECT EXPANSION, HUMBOLDT COUNTY, NEVADA
3135	2011	CLASS III CULTURAL RESOURCE INVENTORY FOR THE MONTANA MOUNTAINS FUEL PROJECT, HUMBOLDT COUNTY, NEVADA
3157	2012	A CLASS III INVENTORY OF A 2,256-ACRE PARCEL FOR WESTERN LITHIUM'S KINGS VALLEY LITHIUM PROJECT, HUMBOLDT COUNTY, NEVADA
3196	2012	A CULTURAL RESOURCES INVENTORY OF 5,192 ACRES FOR THE MONTANA MOUNTAINS COOPERATIVE FUELS TREATMENT, HUMBOLDT COUNTY, NEVADA
3283	2015	A CLASS III CULTURAL RESOURCES INVENTORY OF 2,280 ACRES FOR THE MONTANA MOUNTAINS SAGEBRUSH ECOSYSTEM RESTORATION PROJECT, HUMBOLDT COUNTY, NEVADA
3337	2016	A CLASS III INVENTORY OF THE QUINN RIVER VALLEY WATER WELL NOTICE, HUMBOLDT COUNTY
3377	2017	CLASS III CULTURAL RESOURCE INVENTORY OF 500 ACRES FOR THE MONTANA MOUNTAIN FIRE SAGEBRUSH ECOSYSTEM RESTORATION PROJECT, HUMBOLDT COUNTY, NEVADA

CULTURAL SUMMARY

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THACKER PASS - LITHIUM NEVADA

TABLE 2

<i>HISTORIC PROPERTIES OF THE THACKER PASS PROJECT AREA – 18,686 ACRES</i>				
BLM NO. (CRNV-02-)	COMPONENT	SITE TYPE	ELIGIBILITY CRITERION	OBSIDION DISTRICT CONTRIBUTING
1216	PREHISTORIC	SFSA	D	Y
1220	HISTORIC	CCC DUMP	A, D	N
1226	PREHISTORIC	SFSA	D	Y
5412	PREHISTORIC	CHA	D	Y
5414	HISTORIC	CCC WASH HOUSE	A	N
7313	PREHISTORIC	CFSA	D	Y
7315	PREHISTORIC	CFSA	D	Y
7318	PREHISTORIC	SFSA	D	Y
8594	PREHISTORIC	SFSA	D	Y
8595	PREHISTORIC	SFSA	D	Y
8596	PREHISTORIC	SFSA	D	Y
8615	PREHISTORIC	SFSA	D	Y
8645	PREHISTORIC	SFSA	D	Y
10025	PREHISTORIC	SHA	D	Y
10027	PREHISTORIC	SHA	D	Y
10141	HISTORIC	CCC CAMP	A	N
10145	HISTORIC	LAMB HOMESTEAD	D	N
10176	PREHISTORIC	ROCK FEATURES/SFSA	D	Y
10195	PREHISTORIC	SFSA	D	Y
10201	PREHISTORIC	SFSA	D	Y
10250	PREHISTORIC	SHA	D	Y
10289	PREHISTORIC	SFSA	D	Y
10293	PREHISTORIC	CFSA	D	Y
10355	PREHISTORIC	SFSA	D	Y
10409	PREHISTORIC	SFSA	D	Y
10637	PREHISTORIC	SFSA	D	Y
10705	PREHISTORIC	SHA	D	Y
	HISTORIC	JUMP HOMESTEAD	D	N
10745	PREHISTORIC	SFSA	D	Y
10769	PREHISTORIC	SFSA	D	Y
10798	PREHISTORIC	SFSA	D	Y
10799	PREHISTORIC	SFSA	D	Y
10811	PREHISTORIC	CFSA	D	Y
10813	PREHISTORIC	SHA	D	Y
10816	PREHISTORIC	CFSA	D	Y
11544	PREHISTORIC	SHA	D	Y
11546	PREHISTORIC	SHA	D	Y
11568	PREHISTORIC	SHA	D	Y
13080	PREHISTORIC	SHA	D	Y
13357	PREHISTORIC	SFSA	D	Y

NOTES: BLM – BUREAU OF LAND MANAGEMENT
 CCC – CIVILIAN CONSERVATION CORPS
 CFSA – COMPLEX FLAKED STONE ASSEMBLAGE

SFSA – SIMPLE FLAKED STONE ASSEMBLAGE
 CHA – COMPLEX HABITATION ASSEMBLAGE
 SHA – SIMPLE HABITATION ASSEMBLAGE

CULTURAL SUMMARY

THACKER PASS - LITHIUM NEVADA

REFERENCES CITED

- BERG, A., P. BARKER, AND K. MANSKE. 2009. A CLASS III CULTURAL RESOURCES INVENTORY OF 1,230 ACRES FOR THE WESTERN ENERGY DEVELOPMENT CORPORATION, THACKER PASS LITHIUM EXPLORATION PROJECT, HUMBOLDT COUNTY, NEVADA. ASM AFFILIATES, RENO, NEVADA. SUBMITTED TO WINNEMUCCA DISTRICT OFFICE OF THE BLM, WINNEMUCCA, NEVADA.
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- MCCABE, A., S. NEIDIG, S. RICE, AND D. C. YOUNG. 2012. A CLASS III INVENTORY OF A 2,256-ACRE PARCEL FOR WESTERN LITHIUM'S KINGS VALLEY LITHIUM PROJECT, HUMBOLDT COUNTY, NEVADA. FAR WESTERN ANTHROPOLOGICAL RESEARCH GROUP, INC., CARSON CITY, NEVADA. SUBMITTED TO WINNEMUCCA DISTRICT OFFICE OF THE BLM, WINNEMUCCA, NEVADA.
- YOUNG, D. CRAIG, ALBERT GARNER, JEROME KING, ERIK MARTIN, ALLEN MCCABE, ERIC OBERMAYR, AND SHARON WAECHTER. 2018. DRAFT CLASS III INVENTORY OF 12,963 ACRES FOR LITHIUM NEVADA'S THACKER PASS PROJECT, HUMBOLDT COUNTY, NEVADA. FAR WESTERN ANTHROPOLOGICAL RESEARCH GROUP, INC., CARSON CITY, NEVADA. SUBMITTED TO WINNEMUCCA DISTRICT OFFICE OF THE BLM, WINNEMUCCA, NEVADA.

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APPENDIX J. CULTURAL RESOURCE INVENTORY TABLES

Table J.1. Previous Cultural Resources Inventories

NV BLM No. (CR-)	Authors	Date	Document Title	Direct APE (Mining)	Direct APE (Exploration)	Indirect APE
2-00060	Hattori, Eugene	1972	Archaeological Reconnaissance of the Black Rock Desert			x
2-00131	Smith, Gerald	1977	U.S.G.S. Geothermal Notice of Intent #N2-20-77		x	
2-00215	Smith, Regina	1978	Thacker Pass Fenceline	x	x	x
2-00294	Roney, John, and Norman Smyers	1979	Conoco Thacker Pass Uranium Exploration (MPO N2-3-79) – Reconnaissance.			x
2-00588	Pedrick, Kathryn E.	1981	Trout Well Pipeline Extension and Troughs			x
2-00592	Pedrick, Kathryn E.	1981	Crowley Short Fence			x
2-00641	Pedrick, Kathryn E.	1981	Conoco Assessment Work, Notice of Intent Mining Clearance; A 30 Foot Assessment Trench Will Be Dug Using A Bulldozer			x
2-00937	Pedrick, Kathryn E.	1984	Crowley Creek Hydrostudy Maintenance			x
2-01263	Clark, Mike, and Regina Smith	1996	Pole Creek Pipeline Extension	x	x	x
2-01265	Clark, Mike, and Regina Smith	1996	Twin Springs		x	x
2-01280	Scott, Mike	1996	Double H Water Development Project			x
2-01282	Scott, Mike and Regina Smith	1996	Montana Mountain Wildlife Development Project		x	x
2-01293	Regina Smith	1997	Upper Lyle Drift Fence			
2-01298	McCutcheon, Amanda, and Dave Boyles	1997	Middle Lyle Creek Division Fence			x
2-01429	Clay, Vickie	2001	Double H Fire Rehab Class II Results of Investigations: 8084 Acres For the Double H Class II Cultural Inventory		x	x
2-01430	Clay, Vickie	2001	Double H Fire Rehab Class III Results of Investigations: 3030 Acres for the Double H Class III Inventory, Double H Mountains Fire Rehabilitation Project, Humboldt County, Nevada		x	x
2-01443	Young, D. Craig	2002	A Class III Cultural Resources Inventory for the Proposed Phase IV of Oregon-Idaho Utilities Communication System, Northern Humboldt County, Nevada	x	x	x
2-01454	Zerga, Don L.	2001	Winnemucca Green Strips Groups II and III, Humboldt County	x	x	x
2-01456	Smith, Regina	2001	Pole Creek Angular Rock Pit			

NV BLM No. (CR-)	Authors	Date	Document Title	Direct APE (Mining)	Direct APE (Exploration)	Indirect APE
2-01484	Zerga, Don L.	2002	Class III Cultural Resources Inventory of the Buffalo and Thacker Pass Greenstrips Project 2002, Humboldt County, Nevada	x	x	
2-01519	Smith, Regina	2004	Sentinel Fire Rehabilitation		x	x
2-01561	Smith, Regina	2006	Sentinel Rock Pit		x	
2-01578	Smith, Regina	2007	Sentinel Rock Diversion Ditch Road Improvements	x	x	
2-02264	White, Barbara	1988	Bengoa Pipeline			x
2-02274	White, Barbara and Regina Smith	1988	Trap Corral Spring Pipeline			x
2-02313	White, Barbara	1989	Bengoa Pipeline Extension			x
2-02337	Moore, Joseph	1989	Four Potential Material Pits in the Vicinity of Orovada, Humboldt County, Nevada		x	x
2-02433	Moore, Joseph	1993	Archaeological Survey of SR 293 Kings River Road From Orovada to Kings River Valley (SR 293 HU 00.00 to 23.99)	x	x	x
2-02971	Simons, Dwight	2007	A Cultural Resources Inventory of Drill Pads and Associated Access Routes for Proposed Lithium Exploration, Thacker Pass, Humboldt County, Nevada	x	x	
2-03003	Berg, Adam, Pat Barker, and Kelly Manske	2008	A Class III Cultural Resources Inventory of 1,230 Acres for the Western Energy Development Corporation Thacker Pass Lithium Exploration Project, Humboldt County, Nevada	x	x	
2-03122	Chambers Group, Inc.	2011	A Class III Cultural Resource Inventory of the Kings Valley Lithium Project Expansion, Humboldt County, Nevada	x		
2-03135	Nadolski, John	2011	Class III Cultural Resource Inventory for the Montana Mountains Fuel Project, Humboldt County, Nevada	x	x	x
2-03157	McCabe, Allen, Steven Neidig, Sarah Rice, and D. Craig Young	2012	A Class III Inventory of a 2,256-Acre Parcel for Western Lithium's Kings Valley Lithium Project, Humboldt County, Nevada	x	x	
2-03196	Mullins, Danny and Mark Karpinski	2012	A Cultural Resources Inventory of 5,192 Acres for the Montana Mountains Cooperative Fuels Treatment, Humboldt County, Nevada	x	x	x
2-03283	Powell, Chris	2015	A Class III Cultural Resources Inventory of 2,280 Acres for the Montana Mountains Sagebrush Ecosystem Restoration Project, Humboldt County, Nevada	x	x	x
2-03337	Whetstone, Tanner	2016	A Class III Inventory of the Quinn River Valley Water Well Notice, Humboldt County, Nevada	x	x	x

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Appendix J – Cultural Resource Inventory Tables

NV BLM No. (CR-)	Authors	Date	Document Title	Direct APE (Mining)	Direct APE (Exploration)	Indirect APE
2-03377	Brierley, Sheila, Alysia Leon, and Maximilian van Rensselaer	2017	Class III Cultural Resource Inventory of 500 Acres for the Montana Mountain Fire Sagebrush Ecosystem Restoration Project, Humboldt County, Nevada	x	x	x
2-03402	D. Craig Young, Jerome King, Albert Garner, Andrew Hoskins, Erik Martin, Allen McCabe, Erich Obermayr, Sharon Waechter	2019	Class III Inventory of 12,963 Acres for Lithium Nevada's Thacker Pass Project, Humboldt County, Nevada for Lithium Nevada's Thacker Pass Project, Humboldt County, Nevada	x	x	x

Table J.2. List of Historic Properties in the Project Area

Agency Number (CrNV-02- or -21-)	Resource Age	Site Type	NRHP Eligibility	Mining Direct APE	Exploration Direct APE	Indirect APE	Within DHWOPD	Contributing to DHWOPD
486	Prehistoric	SFSA and Rockshelter	Unevaluated			x	Outside	-
489	Prehistoric	Lithic Scatter	Unevaluated			x	Inside	Yes
1216	Prehistoric	SFSA	Eligible (D)	x	x		Inside	Yes
1220	Historic	CCC Dump	Eligible (A, D)		x		Inside	-
1226	Prehistoric	SFSA	Eligible (D)	x	x	x	Inside	Yes
5412	Prehistoric	SHA	Eligible (D)	x	x		Inside	Yes
5413	Prehistoric	SFSA	Eligible (D)			x	Inside	Yes
5414	Historic	CCC Wash House	Eligible (A)			x	Inside	-
7284	Prehistoric	SFSA	Unevaluated			x	Inside	Yes
7287	Prehistoric	SFSA	Unevaluated			x	Outside	-
7288	Prehistoric	SFSA	Unevaluated			x	Outside	-
7289	Prehistoric	SFSA	Unevaluated			x	Outside	-
7290	Prehistoric	SFSA	Unevaluated			x	Outside	-
7291	Multi-component	SFSA; Debris	Unevaluated			x	Outside	-
7292	Prehistoric	SFSA	Unevaluated			x	Outside	-
7293	Prehistoric	SFSA	Unevaluated			x	Outside	-
7294	Prehistoric	Lithic Scatter	Unevaluated			x	Outside	-
7301	Prehistoric	SFSA	Unevaluated			x	Outside	-
7312	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
7313	Prehistoric	CFSA	Eligible (D)		x		Inside	Yes
7315	Prehistoric	CFSA	Eligible (D)		x		Inside	Yes
7318	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
7320	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
7324	Prehistoric	SFSA	Unevaluated			x	Inside	Yes
7413	Prehistoric	SHA	Unevaluated			x	Inside	Yes
8347	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes
8594	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes

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Appendix J – Cultural Resource Inventory Tables

Agency Number (CrNV-02- or -21-)	Resource Age	Site Type	NRHP Eligibility	Mining Direct APE	Exploration Direct APE	Indirect APE	Within DHWOPD	Contributing to DHWOPD
8595	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes
8596	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes
8615	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes
8645	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes
9999	Prehistoric	SFSA	Eligible (D)			x	Inside	Yes
10001	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10025	Prehistoric	SHA	Eligible (D)		x		Inside	Yes
10027	Prehistoric	SHA	Eligible (D)	x	x	x	Inside	Yes
10141	Multi-component	CCC Camp; SFSA	P: Not Eligible; H: Eligible (A)			x	Inside	-
10145	Historic	Lamb Homestead	Eligible (D)		x	x	Inside	-
10176	Prehistoric	Rock Ring/SFSA	Eligible (D)	x	x		Inside	Yes
10177	Prehistoric	SFSA	Eligible (D)		x		Outside	-
10201	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10244	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10250	Prehistoric	SHA	Eligible (D)		x		Inside	Yes
10258	Prehistoric	SHA	Eligible (D)		x		Inside	Yes
10265	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10266	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10289	Prehistoric	SFSA	Eligible (D)			x	Outside	-
10293	Multi-component	CHA; Historic Well and Check Dam, Debris	P: Eligible (D); H: Not Eligible			x	Outside	-
10355	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10409	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10637	Prehistoric	SFSA	Eligible (D)			x	Inside	Yes
10680	Prehistoric	SFSA	Eligible (D)	x	x		Inside	Yes
10690	Prehistoric	SFSA	Eligible (D)	x	x		Inside	Yes
10691	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes

Agency Number (CrNV-02- or -21-)	Resource Age	Site Type	NRHP Eligibility	Mining Direct APE	Exploration Direct APE	Indirect APE	Within DHWOPD	Contributing to DHWOPD
10705	Multi-component	SHA; Jump Homestead	P: Eligible (D); H: Eligible (D)		x		Inside	Yes
10706	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10722	Prehistoric	SHA	Eligible (D)		x		Inside	Yes
10731	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10733	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10745	Prehistoric	SFSA	Eligible (D)			x	Outside	-
10752	Prehistoric	SHA	Eligible (D)	x	x		Inside	Yes
10769	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10779	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10788	Prehistoric	SFSA	Eligible (D)	x	x		Inside	Yes
10797	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10798	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10799	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10808	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
10811	Prehistoric	CFSA	Eligible (D)		x		Inside	Yes
10812	Prehistoric	SHA	Eligible (D)		x		Inside	Yes
10813	Prehistoric	SHA	Eligible (D)		x		Inside	Yes
10816	Prehistoric	CFSA	Eligible (D)		x		Inside	Yes
10818	Prehistoric	SFSA	Eligible (D)		x		Inside	Yes
11544	Prehistoric	SHA	Eligible (D)	x			Inside	Yes
11546	Prehistoric	SHA	Eligible (D)		x		Inside	Yes
11568	Prehistoric	SHA	Eligible (D)	x			Inside	Yes
12865	Prehistoric	SHA	Eligible (D)			x	Outside	-
12869	Prehistoric	SFSA	Unevaluated			x	Outside	-
12872	Prehistoric	SFSA	Eligible (D)			x	Outside	-
12875	Prehistoric	SFSA	Eligible (D)			x	Outside	-
12877	Prehistoric	SFSA	Eligible (D)			x	Outside	-

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Appendix J – Cultural Resource Inventory Tables

Agency Number (CrNV-02- or -21-)	Resource Age	Site Type	NRHP Eligibility	Mining Direct APE	Exploration Direct APE	Indirect APE	Within DHWOPD	Contributing to DHWOPD
12878	Multi-component	SHA; Debris	P: Eligible (D); H: Not Eligible			x	Outside	-
12888	Prehistoric	SFSA	Eligible (D)			x	Outside	-
13080	Prehistoric	SHA	Eligible (D)	x	x	x	Outside	-
13088	Prehistoric	SHA	Eligible (D)			x	Outside	-
13357	Prehistoric	SFSA	Eligible (D)	x			Inside	Yes
14275	Prehistoric	District	Eligible (D)	x	x	x	n/a	n/a

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