

Data Submitted (UTC 11): 11/2/2020 10:07:44 PM

First name: Mary-Ellen

Last name: Walsh

Organization:

Title:

Comments: The State Historic Preservation Office (SHPO) has the following comments regarding cultural resources.

(see P. 14 Alternative B, proposed action, 3rd bullet) - The reference to the border wall construction should include some context as this construction is an executive order that is not subject to Section 106 review, and has the potential to adversely effect historic properties without any mitigation. Thus, the statement that border wall construction would have a positive impact on cultural resources is somewhat misleading (although we certainly recognize that current illegal border activity has a negative impact).

(Page 6) Past-present- and reasonably foreseeable actions - temporal bounds is limited to the duration of project implementation. The SHPO recommends that the analysis should consider whether increased travel and roadside camping has the potential to increase access to other known cultural resources, not just the construction or maintenance of the roads. Survey to identify cultural resources should include the roadways and a 100 ft buffer (minimally) either side of the roads.

Page 17 says surveys were completed for this project, which contradicts 1st bullet under Cultural Resources on page 6. If the survey has been completed for this undertaking, what were the results (generally speaking)? Page 8 suggests the roads will be designed to avoid sites and features. More information is needed.