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Archaeology Task Force,
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW, Suite 809
Washington, DC 20004

November 2, 2005

**Re: Comments on Working Principles for Revising the ACHP Policy Statement
Regarding Treatment of Human Remains and Grave Goods**

Dear Mr. McCulloch:

This letter is timely submitted on behalf of our client, Carmen Lucas, Kwaaymii Laguna Band of Mission Indians. The following comments are based upon our review of Federal Register Notice 52066, Vol. 70, No. 169, dated September 1, 2005.

While we generally agree with the direction of the working principles, as presently stated, Ms. Lucas wanted to go on record that the following three points should be incorporated into and emphasized in the revised principles:

1. That Indians knowledgeable in the pertinent culture be invited as active participants as early as possible in any general planning process and at the beginning of any specific project or undertaking;
2. That a policy of avoidance and preservation in perpetuity always be the number one goal of any action, and for this to be mandated if at all possible. Without such provisions, there will be no certainty for the future;
3. If an ancestral remain, cremated or buried, must be moved, then this individual should be moved in its entirety so that it is kept whole and so the soul is not left to wander. This may require the implementation of certain best practices in the field.

Thank you for the opportunity to comment and please place us on mailing lists to receive future and final drafts of the principles and the policy statement.

Very truly yours,

/S/

Courtney Ann Coyle
Attorney at Law

Cc: Larry Myers, Native American Heritage Commission
Tony Perez, Division Chief, California State Parks
Interested Parties
Client file