

Comments from the Quechan Tribe on the *Best Management Practices and Guidance Manual: Desert Renewable Energy Projects* document

Unfortunately, due to the limited amount of time given to review the document, the Quechan Historic Preservation Office was only able to review the Cultural Resources and Visual sections of the document. The Tribe does have concerns regarding biological issues as well.

It is our hope that the comments are given due consideration and that we can work together to resolve the concerns (consultation, viewsheds, cultural landscape) brought forth during the hearings.

Comments:

Page 41 -

- Point 2, I would encourage the use of Native Americans as "experts" in addition to the archaeologist in regards to choosing a site that avoids areas of sensitivity.
- Point 3, why are Native American trails and trail systems not included? There are major trails that while not listed on the NHRP or considered "national trails" are no less important and, in many cases, are more so.
- Point 4, it should be noted that not all "sacred sites" are listed cannot be the only source for this information. This will need to come from the Tribes themselves.
- Point 5, consultation has been one of the biggest issues thus far. I would like to see language encouraging proponents to start consultation very early on as it can take years. Many send out a letter and expect a response within 30 days detailing all concerns so they can move on. They need to think of it as a dialogue in which they are working with and not reacting to the concerns of the Tribes.

Page 42 -

- Point 6, I would encourage the use of Tribal Monitors/Representatives with the surveys, recording of the sites and the evaluation. In order to understand the use of a site or the importance thereof, the Tribes need to be included.

Page 44 -

- Point 1 - I would include Tribal representatives in the development of all plans/agreements including monitoring and mitigation plans/agreements.

Page 45 -

- Point C - I would included notification to Tribes as part of the involved agencies. Sometimes when people think of agencies, they do not include Tribes.
- Point 3 - same comment as Page 44, Point 1.

Page 63 -

- Point 1 - In addition to a landscape architect, I would include Native American representatives on the project planning for visual resources.
- Point 3 - I would add Tribes as one to consult with in regards to choosing key observation points and developing appropriate methods for visual effect.
- Point 5 - Either add the need to consider the cultural landscape through the perspective of the Tribes or add as another bullet point.

Page 64 -

- Point 8 - why are Native American trails and trail systems not included? There are major trails that while not listed on the NHRP or considered "national trails" are no less important and, in many cases, are more so.