



March 31, 2015

James G. Kenna, State Director
Bureau of Land Management
2800 Cottage Way, Suite W-1623
Sacramento, CA 95825

RE: Desert Renewable Energy Conservation Plan (DRECP)

Dear Mr. Kenna,

The Society for American Archaeology (SAA) supports the goal of expanding the use of renewable energy in order to achieve a cleaner, more sustainable environment for present and future generations. The Desert Renewable Energy Conservation Plan (DRECP) promises to help accomplish this goal for an important part of the country. Given the large scale of the project, and its potential to impact an enormous number of cultural resources over the coming decades, the SAA respectfully requests consulting party status for the National Historic Preservation Act Section 106 undertaking required for the BLM land use plan amendment.

The SAA is an international organization, founded in 1934, dedicated to research, interpretation, and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges, universities, museums, governmental agencies, Native American tribes and communities, and the private sector. SAA has members in every state within the United States, as well as in many other countries around the world.

The DRECP is the result of a multi-year collaboration between the Bureau of Land Management (BLM), the U.S Fish and Wildlife Service (USFWS), the California Energy Commission, and the California Department of Fish and Wildlife. Identifying areas in which renewable energy and transmission development should occur over the next 25 years, and finding ways in which to streamline project permitting, the DRECP is a massive undertaking with the potential to directly impact the natural and cultural resources of more than 20 million acres in Southern California.

In addition to valuable natural resources, the federal lands to be studied contain an enormous number of archaeological, historical, and cultural sites, both known and as-yet undiscovered. They are the physical traces of the cultures who have called this part of North America home over many thousands of years. They tell the story of our past. Once an historic property is disturbed or destroyed, however, the information it contains is lost forever. The federal government has a stewardship responsibility toward the archaeological and cultural resources on its land. Under the National Historic Preservation Act (NHPA) and the National

Environmental Protection Act (NEPA), proposals for undertakings on federal lands, including the DRECP, must take into account the activity's impact on cultural resources, and utilize appropriate mitigation measures if necessary.

The DRECP currently estimates that seven percent of the Plan area has been inventoried for cultural resources. Density calculations suggest well over a half million as yet unknown cultural resources could exist. In each of the six alternatives outlined within the DRECP, including the Preferred Alternative, it is estimated that ground disturbance caused by renewable energy projects would impact thousands of known prehistoric, historic and tribal resources. The SAA believes it could play an important role in assisting federal and state agencies, tribes, and other stakeholders to ensure that valuable cultural resources are adequately considered in development plans. As such, the SAA respectfully requests being granted consulting party status to the Section 106 undertaking involved with amending the BLM's land use plan.

We look forward to working with you on this important project.

Sincerely,

A handwritten signature in blue ink that reads "Jeffrey H. Altschul". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Jeff H. Altschul, Ph.D., RPA
President

Cc: Stephen Overly, California Deputy Preservation Officer, BLM
Kate Winthrop, Archaeologist, Energy and Landscapes, BLM