



October 18, 2021

Tiffany Arend, District Archaeologist
Bureau of Land Management - CA Desert District Office
1201 Bird Center Drive
Palm Springs, CA 92262

RE: Review of the Draft Amendment to the Programmatic Agreement for the Desert Renewable Energy Conservation Plan

Dear Ms. Arend,

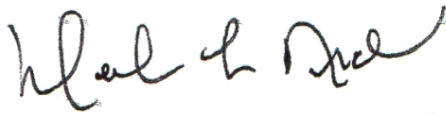
The Society for American Archaeology (SAA) appreciates the opportunity to review and comment on the draft Amendment to the Programmatic Agreement (PA) for the Desert Renewable Energy Conservation Plan (DRECP), which was received on September 17, 2021. Upon review of the draft Amendment, the SAA has the following comments:

1. It is stated that a Committee of Consulting Parties has been established to begin development of the process for the Cultural Resources Sensitivity Analysis (Appendix F) and the Cumulative and Indirect Effects Mitigation (Appendix G). Further, it is stated that said Committee has met three (3) times to review drafts of Appendix G. However, the BLM responded to a comment in July 2021 stating the list of Committee participants will be revisited after work required under Appendices F and G moves forward, effectively noting that the Committee is not currently active. As it is stated in the draft Amendment that the Committee is an established body, it is vital that the BLM (1) finalizes the Committee roster prior to adoption of the Amendment and (2) that the list of participants, past and present, as well as the selection process for participants, be provided to the SAA and any other requesting parties.
2. It is the understanding of the SAA that the one-year requirement for the Cultural Resources Sensitivity Analysis (Appendix F) and six-month requirement for the Cumulative and Indirect Effects Mitigation (Appendix G) outlined in the draft Amendment mirrors the original requirements in the PA. However, while the SAA appreciates the BLM taking the time to create robust and effective processes, there is concern with the high number of projects that will come forth for permitting prior to the adoption of the resulting sensitivity analysis and mitigation fees in an effort to avoid high costs. This will cause a hardship for both the Agency and Consulting Parties, who will be required to consider and consult on projects individually, and the

SAA strongly encourages the BLM to move swiftly to satisfy the requirements associated with these appendices.

Overall, the SAA continues to encourage quick and thoughtful action by the BLM in support of cultural resource preservation efforts required under the PA for the DRECP. The SAA appreciates the opportunity to provide comments to the BLM regarding the draft Amendment to the PA and looks forward to continued participation in efforts on this subject.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah L. Nichols". The signature is fluid and cursive, with the first name being the most prominent.

Deborah L. Nichols, PhD, RPA
President