

In terms of the language in the document itself, the cultural resources planning and mitigation section seem to need some clarification, specifically (Chapter 11.3) regarding the role of Native and Archaeological monitors during planning, preconstruction and construction. The DRECP seems to lack a comprehensive section regarding Archaeological and Tribal monitoring and needs to address these issues at least to the depth specified in the Biological Monitoring Plan contained in the document for it to be considered complete.

We would like to formally request the addition of a clause requiring Native Monitors be present for all Phase 2 surveys, site-recordations, sub-surface testing, artifact collections, excavations and construction-related ground disturbance of in-situ Holocene deposits for any development project that results from the DRECP. Though these requirements may or may not be required on a case-by-case basis on many of the projects, we feel that requesting an overarching and specifically worded requirement for it in whichever of the DRECP alternatives are chosen is necessary to ensure tribal interests throughout the development process.

La Posta would like to recommend the adoption of Alternatives 1, 3 or 4. All of these alternatives have a much less focused impact on the cultural resources of the people of the Southern Imperial County Deserts than The Preferred Alternative. We welcome consultation as to specific compromises that provide less of a focused impact on this very unique cultural region of cultural importance to our tribe.

It should be noted that in reviewing the possible alternatives, the preferred alternative seems to have an overwhelming focus on development of the desert regions in the Imperial County desert. This land, native land of the Kamia Kumeyaay, Cahuilla, Quechan, Cocopah and others, is disproportionately targeted for development in the preferred alternative. There are understandable reasons for this, including a long history of agricultural development in the valley leading to lands already cleared of native sites and natural resources, as well as existing energy infrastructure and lessening overall impact by consolidating production. However, should the preferred alternative be selected an emphasis above and beyond standard cultural preservation should be undertaken to ensure the utmost preservation of a resource that is being disproportionately effected and therefore, is more likely to be lost. We invite consultation on specific measures to consider taking depending on the areas involved and the likelihood and type of resources the area contains.

As such, the La Posta Band of Mission Indians would like to make the following modifications to the DRECP, whichever alternative is selected.

1. The exclusion of the shorelines of the Salton Sea as DFAs. These areas represent the waning shorelines of Lake Cahuilla and house numerous unique archaeological features including everything from beautifully carved obsidian butte to impressively engineered fish traps. Because of the depositional nature of a periodically filled freshwater lake in desert, many of these and other important archaeological resources likely lay on top of and just underneath the surface. Large-scale development of these areas would likely substantially affect cultural resources that may not be visible through pedestrian survey and therefore could be in particular danger of damage from development.

2. The exclusion of the areas to the north and northwest of Blythe as a DFA. While the current plan does appear to protect the well-known existing geoglyphs that Blythe is famous for, literally hundreds of smaller ones exist across the desert floor and the development zone is incredibly close, only a few miles from prominent geoglyphs. Geoglyphs, another easily missed resource on pedestrian survey, are too fragile and unique to risk losing and therefore development should be steered away, not towards these areas.
3. The inclusion of the entire Ocotillo valley south of the Coyote Mountains and extending into the foothills of the southern mountain range as an ACEC because of its unique and abundant cultural resources. Extensive work in the area has revealed a high density of cultural resources and a lengthy occupation period that make the location worthy of special designation and protection.

We welcome any and all consultation regarding cultural resource protection and the further perfections needed to complete the DRECP process.

Bobby Bolger
Assistant Cultural Resources Director,
La Posta Band of Mission Indians