

February 23, 2015

Attn: Karen Douglas
California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED
09-RENEW EO-1

TN 75219

FEB 23 2015



RE: Formal Comments to the DRECP

This letter is intended to provide formal comments and recommendations by the Soboba Band of Luiseno Indians concerning the Desert Renewable Energy Conservation Plan.

It is apparent that in regard to the numerous renewable energy projects scheduled for the Southern California Desert, there are a number of issues that are of great concerns to Tribes. This letter is intended to focus only a few of the many concerns of the Soboba Band of Luiseno Indians. It has been presented that intentions of the DRECP are to assist in addressing concerns and provide alternatives to lessen impacts to environmentally sensitive areas and historic properties. I would like clarify that from a traditional tribal view that these components go hand in hand and extend to both to tangible and intangible resources. For example, there is no use for a traditional tool if there is no traditional plant to be worked with it. The same goes for ceremonial objects. If there are no ceremonial plants, animals, or places where the ceremonies can be conducted, then the ceremonies cannot exist.

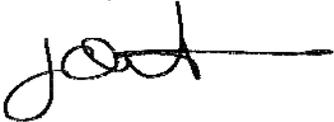
These are key points that I would like to bring to your attention for consideration because very often the only information requested by the agencies of the tribes is for the tangible items such as village sites, artifacts, burial locations, etc. It is vital that special considerations for plant and animal species also be included when consultation with tribes takes place. The impacts of these renewable energy projects on the various bird species are tremendous. These species include both local as well as migratory birds that have inhabited the areas for just about as long as the traditional people. Within traditional tribal custom, there is a strong relationship with all of the animals within our ecosystem. Many of the areas designated for renewable energy in the DRECP are documented directly and indirectly in traditional song and history of the local people. Many of these songs and stories play a key role in the existing ceremonies that are still carried out today. Therefore impacts to the landscapes, prehistoric sites, and plant and animal species will limit the ability to effectively carry out these ceremonies in the future and the tradition will die.

One of the most important items that need to be discussed more in-depth is the opportunity for onsite reburial of artifacts. In many of the meetings that have been conducted with tribes. It is apparent that the tribes would prefer onsite reburial as opposed to the federal requirement for curation. It is understood that in accordance with applicable law, curation at a federally approved curation facility is a requirement. It is

also understood that through the DRECP, agencies are seeking direction from the consulting tribes for mitigation. Many of the tribes may feel that their comments fall on deaf ears and that the consultation process is being carried out only as a formality. This should not be the case, especially since the tribes have provided their most sensitive information during consultation on the DRECP, in hopes that our traditions could be maintained as a result. The DRECP should have a special exemption to the mandate for collection and curation. This exception would include the incorporation of a unanimous treatment plan for all projects located on lands associated with the DRECP. The plan's overall purpose would be to dictate the treatment of Native American historic properties located on DRECP lands and provide a directive for On-Site Reburial as a final disposition.

I would like to discuss the issues presented as well any additional concerns in a face to face meeting in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read 'JOE', with a long horizontal line extending to the right.

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