



# QUECHAN INDIAN TRIBE

## *Ft. Yuma Indian Reservation*

P.O. Box 1899  
Yuma, Arizona 85366-1899  
Phone (760) 572-0213  
Fax (760) 572-2102

California Energy Commission

**DOCKETED**  
**11-AFC-4**

TN # 68325

NOV. 02 2012

November 1, 2012

Roger Johnson, Transmission Corridors Program Manager  
California Energy Commission  
Siting, Transmission, & Environmental Protection Division  
1516 9<sup>th</sup> Street (MS-40)  
Sacramento, CA 95814-5512

Re: Preliminary Staff Assessment for Rio Mesa Solar Electric Generating Facility Project

Dear Mr. Johnson,

The Quechan Indian Tribe (Quechan) would like to offer comments on the Preliminary Staff Assessment (PSA) compiled by the California Energy Commission (CEC) for the Rio Mesa Solar Electric Generating Facility Project (RMSEGFP), in Riverside County, CA.

Quechan would like to express the following concerns, in no particular order:

- First, Quechan would like to reiterate the strong cultural concerns Quechan has for the RMSEGFP project area and surrounding landscape. As you know, Mule Mountain, and the surrounding Palo Verde Mesa, is rich in cultural resources and is spiritually and culturally important to Quechan. Some of its importance is derived from this location's relation to the Colorado River, and accompanying flood plain, as well as the Xam Kwatcan/Keruk Trail that travels north through this project area on to Spirit Mountain/Avikwame. To that end, Quechan reasserts that the Palo Verde Mesa, next to Mule Mountain and the Xam Kwatcan Trail, is not an appropriate location for RMSEGFP, or any renewable energy project.
- This proposed project area contains thousands of cultural resources and hundreds of archaeological sites. Whereas Quechan is concerned about not disturbing all of the cultural resources in the RMSEGFP proposed project area, there are many artifacts and features that Quechan is especially concerned about preserving in situ, such as:
  - Cremation/funerary sites
  - Pebble terrace quarries
  - Ceramics and pot drops
  - Sleeping/Dancing/Teaching/Dreaming circles
  - Geoglyphs
  - Petroglyphs
  - Trails
- Quechan is concerned that the Cultural Resource analysis of the PSA is focused primarily or exclusively on describing the evidences of human occupation or habitation (PSA, pg. 4.3-1). Understanding that the RMSEGFP is within a spiritual or cultural landscape,

Quechan is concerned that many of cultural resources within the proposed project area that don't have characteristics of habitation, but do have a strong and ancient spiritual significance, will not be given the attention or recognition it deserves. As an example, the cultural resources at the Genesis Solar Energy Project were plentiful but did not have accompanying evidences of habitation. In that case, the BLM failed to examine the ceremonial importance of Ford Dry Lake until it was too late. Quechan requests that the CEC consult with the relevant Tribal Governments so that the CEC can learn the spiritual interpretation of this landscape and the artifacts and features within this landscape.

- Quechan wanted to verify if the impacts of the proposed RMSEGF would be "adverse" as well (PSA, pg. 4.3-2).
- Quechan would like to reiterate that viewsheds are important to a cultural landscape, and obstructions, such as a solar power tower at RMSEGF, would be very detrimental to this Palo Verde Mesa/Mule Mountain spiritual landscape.
- The description of "Pot drop" (PSA, pg. 4.3-32), should include the ceremonial uses of ceramics, that not all ceramics were purely utilitarian. Additionally and specifically, pot drops are often associated with cremation sites, which Quechan considers to be an extremely sacred cultural resource.
- The description of "Cleared circle" (PSA, pg. 4.3-32), should also mention that these circles are sometimes used as "teaching circles" and/or "dance circles".
- Quechan is concern about the characterization of the proposed RMSEGF project area as being primarily used as area of "stone tool material quarrying" (PSA, pg. 4.3-33). Merely because lithic procurement and/or processing occurs in a spiritual landscape does not make that landscape a purely utilitarian one. There are other cultural resources within the proposed RMSEGF project area that indicate the spiritual importance of the Palo Verde Mesa, such as: cremation sites, petroglyphs, extensive ceramics, and trails. Additionally, there are other examples of lithic processing and procurement districts that are adjacent to a spiritual mountain (e.g. the "Mega site" of the Ocotillo Express Wind Project, near Coyote Mountain, which is mentioned in the Quechan Creation Story). At RMSEGF, the pebble terrace quarries next to Mule Mountain do not necessarily make this proposed project area a non-spiritual/utilitarian landscape. Quechan suggests that the CEC change their characterization of this area and consult with the relevant Tribal Governments to understand the real significance of this spiritual landscape.
- Additionally, Quechan suggests caution when dealing with and characterizing hearth features (PSA, pg. 4.3-33). Some hearth features are in fact cremation sites. However, closer examination of those features would be required.
- Following the comments made previously and above, Quechan urges caution in the categorization of archaeological sites into different categories without the consultation of Native Americans (PSA, pg. 4.3-34). The six categories may in fact be too limiting to accurately describe the area, and how each category is defined and how each archaeological site is assigned to a category can be problematic. Additionally, some archaeological sites may fit into multiple categories. Traditional Native American beliefs don't make strong distinctions between "spiritual" and "utility". The CEC may not have an accurate understanding of this landscape and more consultation with Tribal Governments is needed.
- Quechan is concerned that the discussion on the geoarchaeological research has been created in consultation with "Native American communities" (PSA, pg. 4.3-41), when

Quechan does not feel that has happened. There have been no consultations with Quechan on any of the geoarchaeological research or testing on RMSEGFP.

There are many other concerns that Quechan would like to share with the CEC regarding the proposed RMSEGFP and the PSA. However, for now, Quechan will offer the previous and above mentioned comments. If you have any questions about the above comments, please let me know.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal stroke that tapers to the right.

John Bathke, Historic Preservation Officer  
Quechan Indian Tribe

Cc: Thomas Gates, California Energy Commission  
Beth Bagwell, California Energy Commission  
Mike McGuirt, California Energy Commission  
Doug Bonamici, Colorado River Indian Tribes  
Jill McCormick, Cocopah Indian Tribe  
Linda Otero, Fort Mojave Indian Tribe  
Carol Roland-Nawi, State Historic Preservation Officer  
John Kalish, BLM-South Coast Field Office  
George Kline, BLM-South Coast Field Office