



United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807



IN REPLY REFER TO:

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DEC 18 2009

DOCKET
08-AFC-5

DATE DEC 18 2009

RECD. DEC 29 2009

Ms. Vicki L. Wood, Field Manager
El Centro Field Office
Bureau of Land Management
US Department of the Interior
1661 South 4th Street
El Centro, CA 92243-4561

Re: CR CA-670-06-07/EIS CA-670-2006-33/CA-47740/ 8100P –
[Response to Invitation to participate in the Section 106 Consultation for the SES Solar Two Project (08-AFC-5), Imperial County, CA]

Dear Ms. Wood:

The National Park Service (NPS) is in receipt of your October 21, 2009 invitation to be an Invited Signatory and consulting party in the development of a Programmatic Agreement (PA) among the El Centro Field Office of the Bureau of Land Management (BLM), as lead Federal Agency, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation (Advisory Council) and other consulting parties for the proposed SES Solar Two project in Imperial County in accordance with 36 CFR 800.14(b)(3). The project is a federal undertaking that will potentially affect historic properties, and therefore under Section 106 of the National Historic Preservation Act (NHPA), the PA will specify how the BLM will take into account and resolve any adverse effects to historic properties.

The NPS has a special interest in ensuring the protection of the historic properties in the area of the proposed Solar Project because the project site includes the Juan Bautista de Anza National Historic Trail. Congress, under the National Trails System Act ([NTSA], 16 USC 1241 et. seq.), established the Juan Bautista de Anza National Historic Trail (Anza NHT) in 1990. The Act states that "National historic trails shall have as their purpose the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment." As the chief steward of the National Trails System, NPS is charged with implementing this vision. Due to the undertaking's potential effects on the Anza NHT, NPS accepts BLM's invitation to become an Invited Signatory to the PA for the proposed SES Solar Two project. NPS staff attended the BLM's Cultural Resources/Programmatic Agreement Information

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Meeting and Site Tour on December 4, 2009, and we intend to continue participating in the development and implementation of the PA.

The Yuha Desert area is one of the least disturbed landscapes along the entire 1,200 mile length of the Anza NHT. As such, the historic trail corridor near the project site retains the integrity to convey historic interpretation and appreciation of the Anza expedition. NPS has special concerns regarding the SES Solar Two project due to its high potential to significantly impair historic character of the trail corridor. In addition, there are historic properties along the trail route that would likely be negatively affected by the project. The Juan Bautista de Anza NHT Comprehensive Management and Use Plan and Final Environmental Impact Statement (EIS), April 1996 (Anza NHT CMP) documents that the project site is within a designated High Potential Route Segment and is located between two historic expedition campsites that may be affected by this project. This segment of the Anza NHT is considered a Federal protection component because it is located on federally owned lands and it meets the national historic trail significance criteria established in the NTSA. The project site is located between the following two historic expedition campsites:

- Identified as a potential Interpretive Site.
- Expedition Camp #47, known as the Wells of Santa Rosa / Yuha Well is a California Registered Historical Landmark No. 1008. The well is located three miles south of the project site and designated as a High Potential Historic Site and Interpretive Site.

Other Anza Expedition – sites in the vicinity include:

- Sunbeam Rest Area on Interstate 8 (east of the project site) contains a historic monument (CRHL No. 1008) which describes the significance of Yuha Well.
- Vista de Anza Historical Monument, located less than four miles to the south, has a plaque describing the expedition and provides expansive views of the Yuha Desert, including Yuha Well, and the project site.

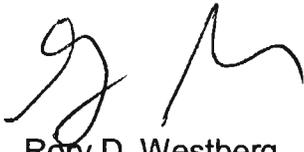
As previously discussed with BLM, the NPS has significant concerns regarding the project's potential direct and indirect effects on the Anza NHT. This is because the project's Area of Potential Effect (APE) includes the historic trail corridor as identified in the Anza NHT CMP. This trail corridor within the project APE has potential to contain historical resources from the Anza expeditions which could be eligible for listing on the National Register. The installation of large solar collectors and related support facilities would significantly alter the landscape of the project site. It would also significantly affect the view sheds in the surrounding area, including views from the historic Anza trail corridor and the Anza recreational trail. The undertaking thus has the potential to degrade the integrity historic character of the trail and its related resources in this area. The project also has the potential to diminish the public's experience and understanding of the historic expedition and the cultural landscape of that period.

With regard to the EIS under preparation for the project pursuant to the National Environmental Policy Act, the BLM has also inquired as to whether the NPS should be

identified as a federal cooperating agency pursuant to 40 C.F.R. 1508.5. The NPS has special expertise with respect to the project's environmental impacts to the Anza NHT, due our statutory responsibility, agency mission, and related experience in administering the Anza NHT as a unit of the National Trails System. Therefore, NPS requests status as a cooperating agency for preparation of the EIS (see the attached letter). Due to the NPS' role as both an Invited Signatory for the PA and a Cooperating Agency for the EIS, we suggest that BLM consolidate project-related requests to NPS to the extent feasible to minimize duplication of effort and to help both agencies cooperate efficiently in evaluating the SES Solar Two project.

Naomi Torres, Superintendent for the Anza NHT, has delegated Steven Ross, Outdoor Recreation Planner for the trail, to work directly with BLM on both the PA and the EIS. You may reach him at (510) 817-1400, or steven_ross@nps.gov. Naomi can be reached at (510) 817-1438, or Naomi_torres@nps.gov.

Sincerely,



Rory D. Westberg
Acting Regional Director, Pacific West Region

Enclosure

cc:

Jim Stobaugh, Project Manager, Bureau of Land Management, BLM Nevada State
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