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various springs in the Spring Mountains and Resting Spring west of Emigrant Pass there was no water, no respite from the hot, dry desert. Modern development has been sparse and the visibility of that development is minimal from the project site, as discussed in the **VISUAL RESOURCES** section of the FSA. Conversely, the HHSEGS proposed project would be visible for miles, creating the most significant visual intrusion into the valley to date. Based on the visual simulations and analysis of the visual impacts from the Key Observation Points (KOPs), the proposed project would be visible for at least 30 miles away as can be seen in **Figure 26** of the **VISUAL RESOURCES** section of the **FSA**. (Figure DR37-1 in the AFC demonstrates locations and areas that would have a view of the project.)

The integrity of the setting, feeling, and association of the tracks and traces outside of the HHSEGS project site would thus be significantly impacted by the project, which is within the viewshed of the NRHP-listed OST-MR District in Nevada, discussed above. KOP 2 in the **VISUAL RESOURCES** section of the **FSA** clearly shows that the power towers would be visible from the Stump Springs area. At a minimum the Stump Springs segment of the OST-MR District, as described in the NRHP nomination form, would be impacted, based on the visual simulation at KOP 2. The HHSEGS project would significantly degrade three of the aspects of integrity that contribute to the OST-MR District's significance—setting, feeling, and association.

Visual impact

As discussed above, staff considers the OST-MRNC a historical resource for the purposes of CEQA, and therefore potential impacts resulting from the HHSEGS project must be evaluated. The project would significantly impact the OST-MRNC by erasing potential tracks and traces on-site. Any OST-MRNC tracks and traces on the HHSEGS project site would be destroyed—directly, physically impacted by the project's construction. Destruction of the tracks and traces, and the resulting loss of integrity, is irreversible. Staff has concluded that this impact on the informational values of the OST-MRNC is significant and must be mitigated.

Staff has also concluded that the installation of the proposed power towers and heliostats would result in a significant and unavoidable direct, perceptual impact to the OST-MRNC. The installation of this large number of heliostats and 750plus-foot towers would substantially alter the vast, open landscape that is a character-defining feature of this historical resource. The visual quality of this section of the OST-MR would be permanently damaged by the project's presence, resulting in a substantial adverse change in the significance of a historical resource and a significant and unmitigable impact. This impact cannot be avoided or reduced if the project is constructed as designed and in the proposed location. Given the extended period of both the HHSEGS proposed project's operation (a minimum of at least 30 years) and the physical presence of the proposed project facilities, the impact of the project on the resource must be considered permanent. Staff is unaware of any suite of mitigation measures that would fully mitigate the impacts of the proposed project and reduce the impacts to a less than significant level. The historical significance of the OST-MR in the Pahrump Valley is largely tied to its view of the vast, unobstructed, flat expanse of desert landscape, which would be impeded by any type of screening that might be proposed to attempt to block views of the project, especially the power towers. Eliminating project

elements along the project site boundary would not lessen the visual impact, as the existing views are unobstructed for several miles.

The applicant has proposed no mitigation measures to reduce significant impacts to built-environment resources as they do not believe that significant impacts would occur. As noted above, staff is unaware of any action, short of project relocation or denial that would directly fully mitigate the significant direct impacts that the proposed project would have on the OST-MRNC. As an alternative, staff finds mitigation, identified in Conditions of Certification **CUL-9**, **CUL-10,** and **VIS-6**, to be a means of compensating, in large part, for the permanent loss of the resource's visual and informational values. **CUL-9** addresses both of the HHSEGS project's significant direct impacts: the physical impact on the potential OST-MRNC tracks and traces that may be located on the project site; and the visual impact on the setting of the OST-MRNC. **CUL-10** also addresses the project's significant direct impacts as well as the visual impact on the setting of the OST-MRNC by disseminating the information gathered in **CUL-9** to other cultural resource professionals and the public, so that the history of this significant resource is not lost. First, **CUL-9** would require the HHSEGS project owner, before the start of construction, to fund research by the OSTA to confirm potential OST-MRNC tracks and traces that are located on the project site and to fully record them. Second, **CUL-9** would require the HHSEGS project owner, during construction, to fund research by a qualified historian to gather information and verify existing data specific to the location, history, condition, and significance of the OST-MRNC, as an individually CRHR-eligible resource and an element of the Old Spanish Trail National Historic Trail and/or a possible contributor to the NRHP-listed Old Spanish Trail Historic District. The information resulting from **CUL-9** would be necessary to completing the Interpretive Program recommended in **CUL-10**.

However, even with full implementation of Conditions of Certification **CUL-9, CUL-10, and VIS-6**, the project's impact to the OST-MRNC would remain significant and unmitigable.

MULTI-RESOURCE MITIGATION FOR THE DEGRADATION OF FOUR HISTORICAL RESOURCES

The construction and operation of the proposed project would result in direct physical and visual degradation and cumulative degradation to four historical resources including archaeological, ethnographic, and built-environment landscapes in Pahrump Valley, and may result in indirect physical degradation to them as well. For the analytic details of each of these effects on each respective resource type, please see the *Assessment of Project Impacts to CRHR-Eligible Archaeological Resources and Recommended Mitigation, Analysis of Impacts to Ethnographic Resources,* and *Assessment of Project Impacts to Historic-Period/Built-Environment CRHR-Eligible Resources and Recommended Mitigation* subsections of the present section of this FSA. "CEQA established a duty for public agencies to avoid or minimize environmental damage where feasible." (Cal. Code Regs., tit. 14, § 15021(a))

Staff has modified the original interpretive center concept, the development of which was begun in **CUL-10** of the SSA and conceptually completed subsequent to the publication of the SSA, and offers a related concept that would appear to be consistent

aboriginal lifeways of the Holocene epoch, potentially compromising its CRHR eligibility.

- Staff has not identified, and the applicant has not recommended, any mitigation measures that would reduce the HHSEGS project impacts to the Pahrump Metapatch Mesquite Woodland-Coppice Dune Archaeological Landscape to a less than significant level. Staff recommends the compensatory mitigation identified in Condition of Certification **CUL-11**; however, even with the adoption and implementation of **CUL-11**, the project would still have a significant and unmitigable impact on the Pahrump Metapatch Mesquite Woodland-Coppice Dune Archaeological Landscape and related impacts to affected Native American cultural practices.

- Staff has identified and evaluated three ethnographic landscapes within which the HHSEGS project is located (Salt Song, Pahrump Paiute Home, and Ma-hav Landscapes) and recommends that they be assumed to be historical resources under CEQA, for the purpose of the present siting case, and potentially eligible for listing in the CRHR, under, variously, Criteria 1, 2, 3, and/or 4.

- Staff concludes that the presence and visual impact of the HHSEGS proposed project on these three ethnographic landscapes would significantly impact the setting, feeling, and association aspects of the resources' integrity, aspects critical to the resources' ability to convey their associative, artistic, and information values, potentially compromising their CRHR eligibility.

- Staff concludes, in consultation with Native American Tribes and Salt Song Practitioners, that no level of mitigation is appropriate for mitigating impacts to the Salt Song Trail landscape due to the Salt Song Trail Landscape's importance for Southern Paiute that are responsible for ushering their deceased to the afterlife and in providing relief to grieving families.

- Staff recommends the adoption and implementation of mitigation in Condition of Certification **CUL-10** for the HHSEGS project's impacts on the Pahrump Paiute Home landscape and the Ma-hav landscape. However, even with the adoption and implementation of **CUL-10**, the project would still have significant and unmitigable impacts on the ethnographic landscapes and Native American spiritual practices dependent on these resources.

- Staff has identified a historic trail corridor, within which the HHSEGS project site is located, containing various converging and intermingled tracks and traces that comprise a portion of the Old Spanish Trail-Mormon Road. Staff recommends that this trail corridor be assumed to be a historical resource under CEQA, for the purpose of the present siting case, eligible for the CRHR under Criteria 1 and 4.

- Staff concludes that the HHSEGS project impacts on the Old Spanish Trail-Mormon Road Northern Corridor would be significant and that, even with adoption and full implementation of Conditions of Certification **CUL-9** and **CUL-10**, project impacts to this resource could not be mitigated to a less than significant level.

- Staff recommends that construction and operation of the HHSEGS project, in conjunction with past, present, and reasonably foreseeable projects in the archaeological, ethnographic, and built-environment Project Areas of Analysis, would result in significant and unmitigable cumulative impacts to one archaeological landscape, one ethnographic landscape (Salt Song Trail landscape), and one built-environment historical resource, as identified in this section. Although full implementation of all recommended conditions of certification would reduce the significance of the project-related impacts to some degree, thereby reducing the project's contribution to cumulative impacts to these resources, they would not reduce the cumulative HHSEGS project contribution to the total resource inventory for this project or that of the past, present, and foreseeable future projects in the vicinity to these resources to below the level of significance.

- Staff recommends that full implementation of all Cultural Resources conditions of certification would ensure compliance with all applicable laws, ordinances, regulations, and standards identified in **Cultural Resources Table 1**.

RECOMMENDED CONDITIONS OF CERTIFICATION

CUL-1 Prior to the start of construction-related ground disturbance or grading, boring, and trenching, as defined in the General Conditions for this project; and/or surface grading or subsurface soil work during pre-construction activities or site mobilization, and/or mowing activities and heavy equipment use in loose or sandy soils, at the site and for access roads and linear facilities, the project owner shall obtain the services of a Cultural Resources Specialist (CRS) and one or more Alternate CRS(s). The project owner shall submit the resumes and qualifications for the CRS, CRS alternates, and all technical specialists to the CPM for review and approval.

The CRS shall manage all cultural resources monitoring, mitigation, curation, and reporting activities, and any pre-construction cultural resources activities (e.g., geoarchaeology or data recovery), unless management of these is otherwise provided for in accordance with the cultural resources conditions of certification (Conditions). The CRS may elect to obtain the services of Cultural Resources Monitors (CRMs), Native American Monitors (NAMs), and other technical specialists, if needed, to assist in monitoring, mitigation, and curation activities. The project owner shall ensure that the CRS makes recommendations regarding the eligibility for listing in the California Register of Historical Resources (CRHR) of any cultural resources that are newly discovered or that may be affected in an unanticipated manner.

No construction-related ground disturbance or grading, boring, and trenching, as defined in the General Conditions for this project; and/or surface grading or subsurface soil work during pre-construction activities or site mobilization, and/or mowing activities and heavy equipment use in loose or sandy soils, at the site, access roads, and linear facilities, shall occur prior to Energy