

**OSTA's Public Comment on CEC
Preliminary Staff Assessment of Cultural
Resources, in conjunction with the license
application for Hidden Hills Solar Energy
Generation System (HHSEGS)**

Submitted July 23, 2012



The OSTA Comment and Its Confidential Appendix

The Old Spanish Trail Association submits the following comments regarding the California Energy Commission's Preliminary Staff Assessment (PSA), particularly the section dealing with cultural resources, which was issued on June 15, 2012.

This public comment addresses non-site specific statutory measures providing for the protection of National Historic Trails. These are all matters of public law and administration. Separately, OSTA is submitting a Confidential appendix to this comment--which will be subject to the same confidentiality strictures as the CH2MHill's cultural resources reports. The Confidential appendix addresses specific issues concerning the trail route in and near the HHSEGS site.

OSTA'S Previous Submission to the CEC and the PSA

OSTA's cultural resources report, submitted to the CEC in May, focused on the Old Spanish National Historic Trail/Mormon Road (OSNHT/MR) in and around the Hidden Hills project site. We demonstrated through the use of archival documents, historical maps, and our on-the-ground survey, that portions of the OSNHT mule trace and the later Mormon Road must have passed across the project site.

The Commission's PSA, issued in June, essentially agreed with OSTA's findings. Among the PSA's conclusions on historical cultural resources, we cite the following:

- (quoted from pp. 70-71) "While not all of the traces on the project site have been ground-truthed, it is clear that the project site lies squarely among all of these tracks/traces and, therefore, within the OST-MR Northern Corridor, a regionally and nationally significant travel/trade corridor that aided the exploration and shaped the development of the southwestern United States. Although not formally included in the Act, staff has concluded that these tracks/traces should also be considered part of the Old Spanish National Historic Trail. As such the Corridor is a historical resource for the purposes of the CA Environmental Quality Act and potential impacts resulting from the proposed project must be evaluated. The proposed project has the potential to significantly impact the OST-MR Northern Corridor by erasing traces/trails on site and visually

- impacting traces/tracks off site, which could jeopardize the integrity of the OST-MR segment in the Pahrump Valley."
- (p. 71) "The visual quality of this section of the OST-MR would be permanently damaged, resulting in a substantial adverse change in the significance of a historical resource and a significant and unmitigatable impact..."
 - (p. 72, emphasis added)" *[CEC] staff is unaware of any action, short of project relocation or denial that would directly avoid or substantially minimize the significant effects* that the proposed project would have on the OST-MR Northern Corridor identified in this document."

OSTA's Response to the PSA Findings

In light of previously published research on the Old Spanish National Historic Trail and the Mormon Road, and considering the archeological survey and archival data submitted by OSTA in our Cultural Resources report to the CEC, OSTA is pleased that the PSA essentially upholds our contention that the HHSEGS project will severely impact the OSNHT/MR. In this comment we wish to emphasize several major points and express additional concerns regarding the project and the PSA findings.

1. The integrity of the OSNHT route is high in the project area, regardless of whether the applicant finds no physical traces.

The significance of the OSNHT is evidenced by its inclusion in the National Trails system, an inclusion based upon extensive research in 200 and 2001 (NPS Feasibility Study 2001). The act designating the OSNHT included maps showing the trail route, with a variability factor to account for areas of disturbance, mapping errors, alternative branches, traversal of private property, etc. In some places, the physical remains of the track may have disappeared, particularly in soft soils. This does not negate the trail route, however. Many important historical sites—battlefields, historical river crossings—may have no remaining physical traces. Their location is established through documentation and oral tradition.

In addition, there is the "goes-in-one-side, comes-out-the-other" argument. The OSTA cultural resources report provided abundant archival evidence that springs and forage areas just to the east of the HHSEGS site were used by travelers on the OSNHT/MR. Likewise OSTA has located and recorded "stubs" of the OST mule trace leading directly away from the project site to the west (Prichett 2012:17).

2. Applicant wrongly concludes that trail and road resources that occur within the HHSEGS project site are not eligible for inclusion on the National Register of Historic Places (NRHP) or the California Register of Historic Places. This conclusion is based on a false and prohibitively narrow view of NRHP and CEQA criteria.

Whether or not segments of the OSNHT/MR are still present on the HHSEGS site, it is clear from the historical evidence that the trail must have passed across the Hidden Hills site, as OSTs the CEC's PSA concluded. That being the case, the integrity of the trail route in the project area allows for the application of NHRP and CEQA criteria.

- Applicant's own citing of Applicable Standards (CH2MHill 2012:5-1)) states one criteria for NRHP listing: It [resource] is associated with events that have made a significant contribution to the broad patterns of history (Criterion A). The fact that Congress in 2002 designated the OST as a National Historical Trail is prima facie evidence of the route's historical importance.

Consider these measures of the OSNHT's historical significance: The trail served as a path for American explorers of the far west in the first half of the 19th century. Even before the first mule caravan in 1829, its route—south from Utah, across the Mojave, and down the Cajon Pass into southern California—was followed by mountain men, such as Jedediah Smith and perhaps Pegleg Smith (Hafen and Hafen (1993:109-129 and 136). Later, Col. John C. Fremont left California via the Old Spanish Trail in 1844. Fremont's 1845 report on his expedition of 1843-44—including his establishing the fact that the Great Basin is indeed a basin, with no outlet to the sea—brought broad, new understanding of the geography of the western U.S. ***"This report and the Fremont (Preuss) map which accompanied it, changed the entire picture of the West and made a lasting contribution to cartography,"*** wrote Carl Wheat (1955 2:194; emphasis added).

- Applicant further cites NHRP criterion that: It [resource] is associated with the lives of persons significant to our past (Criterion B). This criterion is clearly met in the case of the OSNHT/MR in and near the project area. We have just mentioned Col. John C. Fremont, who camped within a few miles of the project boundary (Steiner 1999:156-159). Kit Carson traveled the OSNHT more than once, his name being indelibly associated with the Hernandez massacre at Resting Springs, the destination of parties leaving the complex of springs immediately to the east of the project. Immigrants arriving in California over the OSNHT include pioneer George Yount, businessman William Workman, and other key builders of American California.

3. In addition to meeting Criterion A and B, the OSNHT in the project area is likely eligible under the NRHP's category of Rural Historic Landscapes (NRHP 1999).

According to the NRHP a historic landscape is: a geographic area that historically has been used by people, or shaped or modified by human activity, occupancy,

or intervention, and that possesses a significant concentration, linkage, or continuity of areas of land use, vegetation, buildings and structures, roads and waterways, and natural features.” (U.S. Department of the Interior 1999:3).

The Bulletin lists a number of types of rural historic landscapes based upon historic occupation or land use. Two of the categories are transportation systems and migration trails. The OSNHT/MR clearly fits into both these categories. The Bulletin notes: “Because of the overriding presence of land, natural features, and vegetation, the seven qualities of integrity called for in the National Register criteria are applied to rural landscapes in special ways.”

These qualities include Location, Design, Setting, Feeling, Association, Materials, and Workmanship. In the case of a trail, Design, Materials, and Workmanship do not apply. However, the following do:

Setting—the physical environment within and surrounding a property, such as mountains, rock formations and vegetation—has a very strong impact on the integrity of Setting. The majestic, largely unspoiled natural setting of the HHSEGS project site, would meet the NRHP standard. The project’s construction of towers and mirror arrays would violate this standard.

Feeling—although intangible (the Bulletin says) is evoked by the presence of physical characteristics that reflect the historic scene. This relates to the standard of modern-day visitors being able to vicariously enjoy the experience of travelers on the OSNHY/MR. The project’s construction of towers and mirror arrays would violate this standard.

Association—the direct link between a property and the important events or persons that shaped it—is more complicated to assess. However, the definition states that “New technology, practices, and construction, however, often alter a property’s ability to reflect historic associations.” The project’s construction of towers and mirror arrays would violate this standard.

4. Segments of the OSNHT/MR near the Nevada state line and the associated complex of freshwater springs must be considered as having high potential for registration to the National Register of Historical Places.

Stump Spring and the others in the spring complex at the foot of the Spring Mountains (the complex includes Hidden Spring, Le rocher qui pleu, Brown Spring, and Mound Spring), mark a key transition point on the trail route. Las Vegas, with its huge spring and good forage, and the Spring Mountains both supplied good water and animal feed on the way to Stump Spring.

The spring complex at the foot of the mountains, however, marked the beginning of a long desert stretch that only ended with the descent down Cajon Pass into

the Los Angeles basin. From Stump Spring onward the way to Los Angeles became more difficult for men and animals. Steiner notes that the section from Salt Spring to Bitter Spring in California was one of the most difficult passages of the entire OST. "It took at least a day and a half to travel from Salt Spring to Bitter Spring and there was no reliable water source ;in between. Many oxen died on this part of the Trail." At Stump Spring (or others in the complex), travelers knew that this hostile stretch of trail lay ahead.

The significance of Stump is manifest. It appears on nearly every 19th century map showing the OST/MR in this area and it is mentioned in numerous travellers' accounts (Fremont 1845, Pratt cited in Hafen and Hafen 1993, Lorton 1849). Stump and the other nearby springs were key stopping points on the OSNHT/MR. Under the criteria outlined in Sections 1, 2, and 3 above, OSNHT/MR segments and the associated springs must be considered as high-potential candidates for nomination to the NRHP.

5. California's State Historic Preservation Office should have been consulted under provisions of the National Historic Preservation Act.

Applicant's report states that the NHPA and Executive Order 12372 require that potential effects of an undertaking on historic properties are presented to the State Historic Preservation Office (CH2MHILL 2012:5-1).

OSTA wishes to know whether the California SHPO was notified and to see their written response to the notification.

6. The CEC must consider not only the impacts of the HHSEGS plant, but the cumulative effects of HHSEGS with other projects upon the area.

OSTA is concerned about the cumulative effects that the HHSEGS project will have, both on the OSNHT/MR, the adjacent springs, and the surrounding desert environment.

Two other possible solar projects are planned for the area near HHSEGS. As Figure 1 (following page) shows, the Sandy Valley Project and the Element Solar Project both fall partly within a six-mile radius of HHSGES.

The combined effect of these projects, proposed on vast tracts of relatively undisturbed open land, will result in fundamental changes in how the desert and the OSNHT/MR are experienced by the public. The cumulative effects of these projects will also result in substantial impacts to a wide range of environmental resources in the local desert. These include impacts to biological resources and ground water.

To ensure that desert solar projects are sited in appropriate locations, using appropriate technologies to avoid impacts to our nation's natural and cultural heritage, it is imperative that landscape level analyses be conducted to fully

evaluate the implications of the widespread deployment of renewable energy projects and their associated support facilities, on public lands. This is crucial in the case of HHSEGS because:

- the cumulative effects of the three proposed projects would effect BLM-owned lands in Nevada and nearby BLM-owned lands in California.
- the plants' associated support facilities will be substantial. These include dozens of miles of new transmission lines and service roads and a large gas pipeline to supply HHSEGS. The transmission lines and gas pipeline will impact BLM lands in Nevada.

7. The CEC must consider the cumulative effects of HHSEGS and the other projects on visual resources, i.e., the desert landscape and the ability to vicariously experience the OSNHT/MR.

The two towers proposed for HHSEGS are each 750 feet tall. This is nearly three-quarters the height of the Empire State Building. The towers will be visible for miles and will place a strong visible imprint on the Pahrump Valley. Should there be a second phase of the project, or should either of the two nearby proposed projects (Section 6, above) erect towers of similar height, the area from Nevada Highway 160 to Charleston View, California, would become a virtual forest of skyscraper like towers.

Such a collection of huge, industrial structures will destroy the broad desert vistas the area now affords. It will also destroy the historic sense of place in what could be classed a Rural Historic Landscape (Section 3, above).

*** *** ***

Conclusion: HHSEGS Will Do Irreparable Damage to the Old Spanish National Historic Trail and the Later Period Mormon Road; to associated historic sites, particularly springs used for watering and forage; and to largely unspoiled desert landscape.

The Hidden Hills project, if approved, would forever change the landscape of the local area and irreparably degrade the integrity of the OSNHT, both on the project site and closely adjacent areas. These adjacent areas include freshwater springs intimately related to use of historically significant transportation corridor represented by the OSNHT and the Mormon Road, which followed much the same route after 1848.

The damage to the OSNHT/MR and the surrounding landscape will diminish the public's experience and understanding of the historic expeditions (including the Col. John C. Fremont' 1843-44 expedition) that used the trail and impact cultural understanding of the Mexican period (1821-1848) and succeeding American period (1849-ca.1900) in this largely unexploited desert portion of California.

In short, the project area and its surroundings comprise a jewel in California's desert lands. The high peaks of the Spring Mountains form a dramatic backdrop to a vast sweep of visually pure desert extending westward.

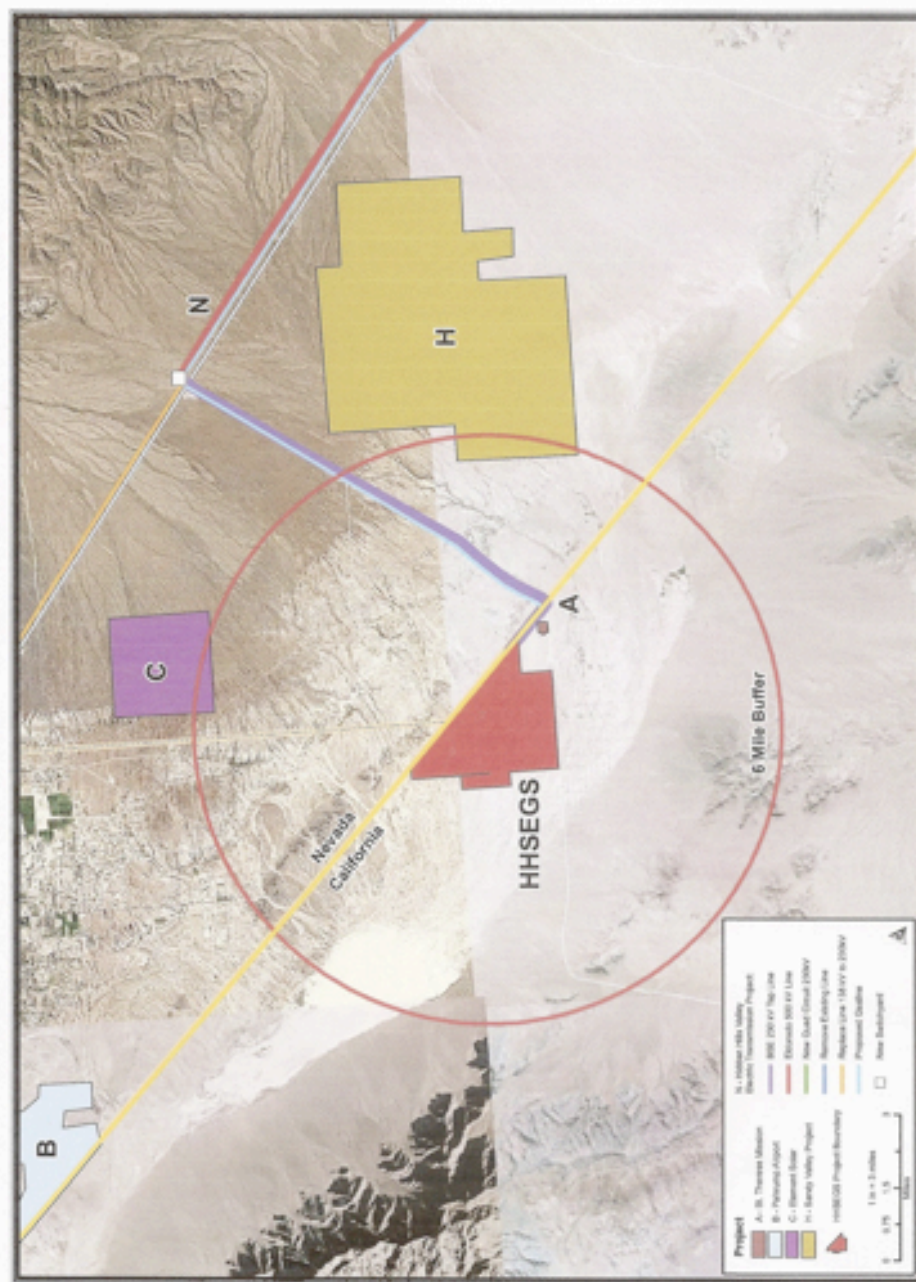
This land at the foot of the mountains has been the site of a well-documented, ancient travel corridor, over which American Indians traded goods in a network that extended from the Pacific Coast well into the Great Basin (Hafen and Hafen 1993, Crampton and Madsen 2007, Myhrer et al 1990, Lyman 2004). The OSNHT/MR adapted that water source-to-water source pathway to their travel needs—creating the mule caravans of the OST and the wagon trains of the American period.

In light of this irreplaceable heritage, a high-potential site for nomination to the National Register of Historic Place, OSTA reiterates its position: HHSEGS is the wrong project in the wrong place. The mitigation measures proposed in the PSA, CUL-9 and CUL-10 are palliative afterthoughts that will do little to compensate for the massive damage done to a historically important transportation corridor and to the desert landscape. Short of sacrificing part of our national heritage, there is no alternative but to relocate the proposed solar project.

###

Figure 1. Map showing proximity of HHSEGS to other potential solar plants

CUMULATIVE PROJECTS - FIGURE 2
Hidden Hills Solar Electric Generating System (HHSEGS) - Cumulative Projects within a Six Mile Buffer of HHSEGS Boundary



Bibliography

Crampton, C. Gregory and Madsen, Steven K., 2007. In search of the Spanish Trail: Santa Fe to Los Angeles 1829-1848. Layton, Utah: Gibbs Smith, Publisher.

Fremont, John C. 1845. Report of the exploring expedition to the Rocky Mountains in the year 1843 and to Oregon and North California in the years 1843-44. Printed by order of the House of Representatives. Washington: Blair and Rives, Printers.

Hafen, Leroy and Hafen, Ann 1993. The Old Spanish Trail. Lincoln, NE, and London: University of Nebraska Bison Books (orig. 1954 by A.H. Clark Co., Glendale, CA, as part of the "Far West and the Rockies historical series.)

Lorton, William B. 1849. *Journal*. Unpublished ms. The Bancroft Library, Univ. of California, Berkeley, Calif. [Note: Lorton was traveling with the San Joaquin Company (often called the Jefferson Hunt Wagon Train).

Lyman, Edward Leo, 2004. The overland journey from Utah to California: Wagon travel from the City of Saints to the City of Angels. Reno & Las Vegas: University of Nevada Press.

Myhrer, Keith, White, William G., and Rolf, Stanton D., 1990. Archaeology of the Old Spanish Trail/Mormon Road from Las Vegas, Nevada to the California border. U.S. Department of the Interior, BLM Contributions to the Study of Cultural Resources: Technical Report 17.

Prichett, Jack, 2012. The Old Spanish National Historic Trail: a report on cultural and visual resources in the near vicinity of the proposed Hidden Hills Solar Energy System plant, Inyo County, California. Report submitted to the California Energy Commission as part of the licensing process for the HHSEGS plant.

Steiner, Harold Austin, 1999. The Old Spanish Trail across the Mojave Desert. Las Vegas, NV: the Haldor Company.

U.S. Dept of the Interior, National Park Service, 1989; revised 1999. Guidelines for evaluating and documenting rural historic landscapes. National Register Bulletin, www.nps.gov/nr/publications/bulletins/pdfs/nrb30.pdf.

U.S. Dept of the Interior, National Park Service, revised for Internet 1995, 2001, 2002. How to apply the national register criteria for evaluation bulletin. National Register Bulletin, www.nps.gov/history/nr/publications/bulletins/nrb15/

Wheat, Carl I., 1955. Mapping the Transmississippi West, 1540-1861, 2 vols.
San Francisco: Institute of Historical Cartography.

DECLARATION OF SERVICE

I, Jack Prichett, declare that on July 23, 2012, I served and filed copies of the attached **Public Comment on CEC Preliminary Staff Assessment of Cultural Resources**, dated July 23, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at:
www.energy.ca.gov/sitingcases/hiddenhills/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- ☒ Served electronically to all e-mail addresses on the Proof of Service list;
- ☐ Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- ☒ by sending an electronic copy to the e-mail address below (preferred method); **OR**
- ☐ by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT

Attn: Docket No. 11-AFC-2
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- ☐ Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.



Jack Prichett, Old Spanish Trail Association-
Tecopa Chapter



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**APPLICATION FOR CERTIFICATION
FOR THE *HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM***

**DOCKET NO. 11-AFC-02
PROOF OF SERVICE
(Revised 6/18/2012)**

APPLICANT

BrightSource Energy
Stephen Wiley
1999 Harrison Street, Suite 2150
Oakland, CA 94612-3500
swiley@brightsourceenergy.com

BrightSource Energy
Bradley Brownlow
Michelle L. Farley
1999 Harrison Street, Suite 2150
Oakland, CA 94612-3500
bbrownlow@brightsourceenergy.com
mfarley@brightsourceenergy.com

BrightSource Energy
Clay Jensen
Gary Kazio
410 South Rampart Blvd., Suite 390
Las Vegas, NV 89145
cjensen@brightsourceenergy.com
gkazio@brightsourceenergy.com

APPLICANTS' CONSULTANTS

Strachan Consulting, LLC
Susan Strachan
P.O. Box 1049
Davis, CA 95617
susan@strachanconsult.com

CH2MHill
John Carrier
2485 Natomas Park Drive, Suite 600
Sacramento, CA 95833-2987
jcarrier@ch2m.com

COUNSEL FOR APPLICANT

Ellison, Schneider and Harris, LLP
Chris Ellison
Jeff Harris
Samantha Pottenger
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816-5905
cte@eslawfirm.com
jdh@eslawfirm.com
sgp@eslawfirm.com

INTERVENORS

Jon William Zellhoefer
P.O. Box 34
Tecopa, CA 92389
jon@zellhoefer.info

Center for Biological Diversity
Lisa T. Belenky, Sr. Attorney
351 California Street, Ste. 600
San Francisco, CA 94104
e-mail service preferred
lbelenky@biologicaldiversity.org

Center for Biological Diversity
Ileene Anderson, Public Lands
Desert Director
PMB 447
8033 Sunset Boulevard
Los Angeles, CA 90046
e-mail service preferred
ianderson@biologicaldiversity.org

Old Spanish Trail Association
Jack Prichett
857 Nowita Place
Venice, CA 90291
jackprichett@ca.rr.com

INTERVENORS (con't.)

Cindy R. MacDonald
3605 Silver Sand Court
N. Las Vegas, NV 89032
e-mail service preferred
sacredintent@centurylink.net

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

Great Basin Unified APCD
Duane Ono
Deputy Air Pollution Control Officer
157 Short Street
Bishop, CA 93514
dono@gbuapcd.org

County of Inyo
Dana Crom
Deputy County Counsel
P.O. Box M
Independence, CA 93526
dcrom@inyocounty.us

Nye County
Lorinda A. Wichman, Chairman
Board of County Supervisors
P.O. Box 153
Tonopah, NV 89049
lawichman@gmail.com

Nye County Water District
L. Darrel Lacy
Interim General Manager
2101 E. Calvada Boulevard
Suite 100
Pahrump, NV 89048
llacy@co.nye.nv.us

INTERESTED AGENCIES (con't.)

National Park Service
Michael L. Elliott
Cultural Resources Specialist
National Trails Intermountain
Region
P.O. Box 728
Santa Fe, NM 87504-0728
e-mail service preferred
Michael_Elliott@nps.gov

**ENERGY COMMISSION –
DECISIONMAKERS**

KAREN DOUGLAS
Commissioner and Presiding Member
e-mail service preferred
karen.douglas@energy.ca.gov

CARLA PETERMAN
Commissioner and Associate Member
carla.peterman@energy.ca.gov

Ken Celli
Hearing Adviser
ken.celli@energy.ca.gov

Galen Lemei
Advisor to Presiding Member
e-mail service preferred
galen.lemei@energy.ca.gov

Jim Bartridge
Advisor to Associate Member
jim.bartridge@energy.ca.gov

**ENERGY COMMISSION –
STAFF**

Mike Monasmith
Senior Project Manager
mike.monasmith@energy.ca.gov

Richard Ratliff
Staff Counsel IV
dick.ratliff@energy.ca.gov

Kerry Willis
Staff Counsel
kerry.willis@energy.ca.gov

**ENERGY COMMISSION –
PUBLIC ADVISER**

Jennifer Jennings
Public Adviser's Office
e-mail service preferred
publicadviser@energy.ca.gov

DECLARATION OF SERVICE

I, _____, declare that on _____ 2012, I served and filed copies of the attached _____, dated _____, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at:
www.energy.ca.gov/sitingcases/hiddenhills/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- ☒ Served electronically to all e-mail addresses on the Proof of Service list;
- ☒ Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- ☒ by sending an electronic copy to the e-mail address below (preferred method); **OR**
- _____ by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT

Attn: Docket No. 11-AFC-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- _____ Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
michael.levy@energy.ca.gov

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Originally Signed

Siting, Transmission and Environmental Protection Division