



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific West Region
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IN REPLY REFER TO:

L7615(PWR-JUBA)

Christopher Meyer, Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Mr. Jim Stobaugh, National Project Manager
USDI Bureau of Land Management
BLM Nevada State Office
P.O. Box 12000
1340 Financial Boulevard
Reno, NV 89520-0006

Re: Comments regarding Proposed Imperial Valley Solar Project Draft EIS - Impacts to Anza National Historic Trail (CEC#: 08-AFC-5)

Dear Mr. Meyer and Mr. Stobaugh:

The National Park Service (NPS) respectfully submits the following comments regarding the Draft Environmental Impact Statement (EIS) prepared for the Imperial Valley Solar Project (aka SES Solar Two Project) in Imperial County, California. Our comments primarily address potential impacts to, and mitigation for, the Juan Bautista de Anza National Historic Trail (Anza NHT), due to NPS's responsibility to administer, preserve and enhance this component of the National Trails System. With the exception of the concerns discussed below, we feel that the Draft EIS adequately discloses the project's impacts to the Anza NHT. However, we are concerned that the document does not adequately specify the mitigation needed to offset the project's impacts to the Anza NHT.

NPS is also very concerned about the cumulative effects that this and other planned renewable energy projects will have on the California desert, and specifically, other National Park units. The combined effect of these projects, proposed on vast tracts of relatively undisturbed open land, will result in fundamental changes in how the desert is 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 California desert.

To summarize our concerns regarding the Imperial Valley Solar project, the Yuha Desert is one of the least disturbed landscapes along the entire 1,200 mile length of the Anza NHT. This setting would be irrevocably changed by the proposed project. Because the project would have significant direct and indirect impacts to the Anza NHT, the NPS would prefer that the project not proceed, or that alternatives be considered which avoid impacts to the Anza NHT. However, should the project be approved, NPS requests that its impacts be mitigated to the greatest extent feasible. We recommend that the final EIS incorporate a comprehensive

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approach to mitigating impacts to the Anza NHT, through the preparation of a comprehensive Interpretive Plan and a re-evaluation of the alignment of the Anza Recreational Trail in the area.

At the end of this memo, we identify a suite of mitigation measures that could be implemented to offset the project's impacts to the Anza NHT. We would like to work with you in reviewing each of these measures and determining jointly which measures will be required of the applicant should this project be approved. We make this request as a sister agency within the Department, as a Cooperating Agency for the EIS, and as an Invited Signatory to the Section 106 Programmatic Agreement.

Comments on the Draft EIS

The following comments focus on specific sections of the EIS most relevant to impacts to the Anza NHT.

B.2 - Alternatives

Alterations to the project design as proposed by the Build Alternatives (300 MW Alternative, and Drainage Avoidance Alternatives #1 and #2) would not significantly lessen impacts to the Anza NHT due to the scale and visual impacts of the project. Also, because the historic corridor through the project site is an inferred alignment based on historic journals and maps (between the two historic campsite locations), reducing the project size or shifting its boundaries would not necessarily avoid direct impacts to the historic corridor traveled by the expedition. Furthermore, as noted in the EIS, approval of a project alternative could still ease the approval of other projects in the vicinity, resulting in cumulative impacts to the Anza NHT. This would be facilitated through the installation of infrastructure that would support additional energy generation facilities, changing the land use of the area to one of energy generation, and by degrading the existing landscape such that future projects would be considered a less dramatic change or impact to the environment.

NPS prefers alternatives that would locate the project within or adjacent to existing disturbed lands, either in Imperial County, or closer to metropolitan areas that would consume the energy generated by the project. The merits of such alternatives need to be fully examined in the final EIS. Locating the proposed project on or near existing agricultural or urbanized areas in the vicinity would avoid or minimize impacts to the natural landscape. The Mesquite Lake and Agricultural Lands Alternatives for this project, evaluated under CEQA, would meet some of these criteria and avoid impacts to the historic corridor of the Anza NHT. It should also be noted that the Mesquite Lake and South of Highway 98 Alternatives would be located adjacent to the Auto Tour Route of the Anza NHT (Highways 98 and 86), but these Alternative locations would be preferable to the proposed project site.

B.3 - Cumulative Scenario

Section B.3, Cumulative Scenario, identifies many other past, present, or future projects that could impact the Anza NHT, and the California desert as a whole. Several of the wind projects identified in the EIS, proposed west of the site near Ocotillo, would be visible from the Anza NHT (Wind Zero, Ocotillo Express, TelStar Energies). The analysis does not identify projects underway or anticipated in Arizona near the Anza NHT alignment that could add to cumulative impacts (i.e. cultural, visual, noise, recreational) and further degrade the integrity of the trail. As a result, the cumulative impact analysis needs to be expanded in the final EIS to include such projects and specifically address cumulative impacts to the Anza NHT corridor.

Nonetheless, the cumulative analysis makes clear that the implementation of this and other energy projects would result in significant impacts to many environmental resources in the

California desert and elsewhere in the west. The result will be profound changes to the visitor's experience in these areas. NPS is very concerned about the implications of these long term changes. To ensure that 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 the public lands. We recommend that the final EIS include a section discussing this aspect of cumulative impacts and efforts underway by the Bureau to address landscape level concerns.

C.3 - Cultural Resources

The Cultural Resources section adequately identifies the Anza expedition's place in history and discusses its relationship to the site. The document correctly recognizes the Anza NHT is a cultural resource of national significance, and that the impacts to the trail's integrity must be considered, including the visual impacts of the project on the historic trail corridor. The Draft EIS states:

The Juan Bautista de Anza National Historic Trail is a cultural resource of national significance for its association with important events in our history and its associations with important persons in our early history, as well as for its information potential. Staff believes that the associative values of the resource require Federal and State agencies to more broadly consider the degree of integrity the resource must have in order to convey its significance. This means that, in addition to considering how the proposed action would affect the physical integrity of the spatial relationships among any material remains of the use of the trail, the agencies need to consider whether and how the action would visually degrade the integrity of the setting, feeling, and association of the resource, formal aspects of integrity under both the NRHP and CRHR programs. (Draft EIS p. C.2-132)

On page C.2-146, the EIS concludes that Condition of Certification CUL-1 would reduce all cultural resource impacts to less than significant. CUL-1 requires compliance with the terms of the Programmatic Agreement (PA) being prepared by BLM pursuant to Section 106 of the National Historic Preservation Act. NPS is an Invited Signatory to the PA, which is still under development and does not yet specify mitigation for the Anza NHT. The only provision for mitigation in the draft PA released March 26, 2010 (for review by consulting parties) states: "In consultation with NPS and BLM's National Trail Office, provide a plan for treating effects to the Juan Bautista de Anza National Historic Trail corridor."

NPS does not believe that the impacts to the Anza NHT can be reduced to a less than significant level through mitigation. Implementation of this project will forever change the landscape of this area and irreparably degrade the integrity of the Anza NHT and it will diminish the public's experience and understanding of the historic expedition and the cultural landscape of that period. Potential mitigation measures that should be included in the PA's treatment plan to reduce the project's impacts to the Anza NHT are listed beginning on page 8 below.

C.8 - Land Use and Recreation

With the exception of the reference on page C.8-7 this section does not specifically discuss the Anza NHT as a recreational resource, nor does it identify impacts to the Anza NHT. There is no analysis of impacts to the Anza NHT as a recreational resource. This omission needs to be rectified in the final EIS and the NPS is available to assist the Bureau in doing so.

The Anza Recreational Trail is mapped and identified by BLM through signs on designated routes-of-travel, both south of the project site in the Yuha Desert ACEC and also north of the

project site in the Plaster City OHV area. The gap between these two segments of the Anza Recreational Trail was intended to be connected via the I-8 Dunaway Road overpass to an alignment along Dunaway Road and then north of the site along Evan Hughes Highway. Implementation of the project would interfere with this connection of the existing segments by significantly degrading the quality of the recreational experience along the planned alignment, due to the construction of project related infrastructure and the resulting visual and noise impacts that would be experienced in close proximity to the project.

NPS requests that this significant impact to the Anza NHT be identified in the Final EIS and that appropriate mitigation be provided. At a minimum, NPS recommends that the alignment of the Anza Recreational Trail in the vicinity of the project be re-evaluated re-routed away from the project site to avoid impacts to the recreational users. Refer to the end of this letter for a more detailed discussion of suggested mitigation to address this impact.

C.9 - Noise and Vibration

The Draft EIS states that the primary noise sources would consist of the reciprocating Stirling Engines (including generator, cooling fan and air compressor) utilized on each of the 30,000 Sun Catchers that make up the project. Because each individual Stirling Engine would be a primary noise source, similar noise levels would be generated throughout the entire project site, and the combined noise level would be significantly high in the immediate vicinity.

The analysis does not clearly describe the noise levels on or adjacent to the project site. It only states that "based on the model estimates, operational noise levels within the Project boundary would be similar in magnitude to comparably sized large industrial projects. Noise levels within the Project site were modeled to be below 85 dBA within 10 feet of the substation and amongst several SunCatcher assemblies. . ." which is under the exposure limit for industrial workers. Table A2, Typical Environmental and Industrial Sound Levels, indicates that 85dBA is equivalent to the noise level experienced 50 feet from a freight train.

The EIS does quantify noise levels at distant sensitive receptors (residential uses) located 0.6 mile or more away from the site boundaries, but does not predict noise levels at or adjacent to the site, or from the Anza NHT. Table 8 indicates a 1 dBA increase in noise expected at the closest residences (Painted George, 3,300 feet northwest of the site). However, this appears to contradict page 5.12-20 of the Application for Certification, which says "the calculated increase of ambient sound level, generated by Project operation, is calculated to be +4 dB at the closest of two aforementioned sensitive receptors".

The Solar Energy Programmatic EIS being prepared by the Departments of Energy & Interior for solar projects in the Western U.S. identifies the noise impacts from solar dish engine technologies as more significant than other solar energy technologies. It suggests that a solar dish engine facility such as the proposed project should be sited in locations with higher background noises; for example, such as close to a well-traveled highway where the ambient sounds partially mask the noise from the facility. Those portions of the project site closest to the freeway and the Plaster City Gypsum plant may blend in better with ambient noise environment, but the more distant portions of the 6,500 acre site would experience a significant increase in noise levels.

This high noise level, more common to industrial facilities, is not what recreational visitors expect when traveling to the desert, where the natural soundscape is very quiet. The final EIS should clearly disclose the increase in noise levels that would be generated by the project and experienced adjacent to the site. The final EIS also needs to evaluate the increase in noise levels that would be experienced by persons traveling on segments on the Anza Recreational Trail adjacent to the site boundaries. The noise impacts to the Anza Recreational Trail may

suggest that trail alignment be re-routed further away from site, such as west toward Ocotillo, rather than using Dunaway Road and Evan Hughes Highway to connect the southerly trail segment to the segment north of Plaster City.

In order to adequately disclose the project's noise impacts, the NPS recommends that the following additional information be provided in the final EIS:

- Noise contour maps should be provided documenting ambient and with project noise levels. We expect that these maps would visually demonstrate a significant increase in noise around the project site. The maps would show how the noise from the facility would compare to the primary existing noise sources in the area: the I-8 freeway and the Plaster City gypsum plant.
- Existing ambient sound levels and projected solar project noise levels at specific points along the Anza Recreational Trail in the project vicinity. Some of the same sites used for the Anza NHT visual impact analysis could be used, in addition to locations adjacent to the project site along Dunaway Road and Evan Hughes Highway.

The NPS also requests that additional noise mitigation measures be identified and required should this project be approved. Due to the magnitude of noise from tens of thousands of Stirling dish engines, a combination of noise mitigation measures is probably warranted. Noise control solutions which can be applied to each Stirling engine are desirable, because reduction of Stirling engine noise can translate into a reduction in project noise levels everywhere. Other noise reduction measures that should be considered include siting of noise sources and receivers, such as the Anza Recreational Trail, to take advantage of noise attenuation provided by topography and distance. In addition, construction of engineered sound barriers and/or berms has the potential to reduce some project noise at specific locations.

C.13 - Visual Resources

The EIS identifies that the project would result in significant unavoidable adverse visual impacts:

... the proposed project would substantially degrade the existing visual character and quality of the site and its surroundings, including motorists on Interstate 8, recreational destinations within the Yuha Desert Area of Critical Environmental Concern and portions of the Juan Bautista Anza National Historic Trail, resulting in significant impacts. Because effective, feasible mitigation measures could not be identified by staff, these impacts are considered to be unavoidable. (Draft EIS, p. C.13-1)

The project would also impact the dark night skies of the area, which is another important experience enjoyed by visitors to the desert. The 400-watt high-pressure sodium lights would illuminate the roadways throughout the site, and other infrastructure components would utilize other types of illumination. Condition of Certification VIS-2 is intended to minimize glare and lighting to the extent feasible. While lighting would be shielded to minimize glare and would not project directly in the night sky, reflection off the mirrored SunCatchers as well as the ground surface would still result in significant night sky light pollution. Due to the dark night skies that make up the lightscape of this area of the desert, this should be identified as a significant impact in the EIS. Also, please note that lighting impacts are not addressed the CEQA discussion on pages C.13-29 and 30.

In the event this project is approved, the NPS asks that a provision be included in the approval document that requires mitigation of impacts to night skies to the maximum extent feasible. We would like to work with the Bureau and the project applicant to identify additional mitigation to

lower the impact of the project on night skies. The NPS has national recognized night skies experts on staff.

Glare from the mirrored SunCatchers would also have a detrimental impact on visitors to the area. As identified in the Draft EIS page C.13-46, VIS-6 requires a glare mitigation plan to minimize the visibility of mirror glare to eastbound and westbound traffic on I-8 utilizing a variety of measures which could include 20 foot high fencing or large earth berms. Glare could also affect distant recreational visitors to the area. The glare mitigation plan should also evaluate visual and other impacts resulting from the implementation of these potential mitigation measures, as 20 foot-high fencing and berms have the potential to generate their own environmental impacts. Once again, the NPS would like to work with the Bureau and the project applicant on the measures to be included in the mitigation plan.

At the request of NPS, the applicant prepared a visual impact analysis for the Anza NHT, dated January 21, 2010. Its findings are summarized on pages C.13-18 and 19. The analysis concludes that visual impacts to the Anza Recreational Trail would be significant and that no feasible mitigation exists to eliminate or substantially reduce the visual impacts. Condition of Certification/Mitigation Measure VIS-5 is proposed to mitigate impacts to the Anza NHT:

VIS-5: In order to off-set unavoidable adverse impacts to visitors on the Anza Trail and Yuha Desert ACEC, the project owner shall contribute funds to the National Park Service (NPS) and BLM, specifically to provide improvements to benefit visitors on the Anza Trail. Such improvements could include, but not be limited to, interpretive displays or exhibits, improvements to use areas, mounted telescopes, or other improvements to be determined by the NPS and BLM.

Verification: The project owner shall coordinate closely with the BLM and, NPS, and contribute funds to mitigate for visual impacts to recreational users of the Anza Trail. The funds will be used by the agencies to improve the recreational experience for Anza Trail visitors through such means as interpretive signage, improvements to camping facilities, provision of view scopes at campsites or vista points, or other measures as appropriate. The amount and payment of funds will be determined by the two agencies commensurate with the loss scenic integrity of the Anza Trail experience. The project owner shall provide funds to the two agencies as approved by the Compliance Project Manager (CPM) within 180 days of the start of construction, and specify that the funds would be used for the area affected by the SES Solar Two Project. The project owner shall provide documentation to the CPM that the funds have been paid to the satisfaction of the BLM. (Draft EIS, p.C.13-45)

NPS concurs that funds should be provided by the applicant as mitigation to offset the project's visual impacts if earmarked for a wide range of improvements to the Anza NHT, as outlined in the mitigation section at the end of this letter. The key question and concern to the NPS is the amount of the mitigation fund. A guiding principle for determining the value of mitigation is that there must be a nexus to the impact, and it should be roughly proportional to the impact. Consistent with this, the EIS says "The amount and payment of funds will be determined by the two agencies commensurate with the loss [of] scenic integrity of the Anza Trail experience." NPS has consulted internally and with BLM staff regarding how such a loss of scenic integrity would be valued. One method discussed with BLM would be to determine the cost of purchasing a conservation easement to protect a viewshed equivalent in scale to the area degraded by the project. An appraisal by a land trust or other conservation organization experienced with conservation easements might provide a reasonable valuation. Another

possible methodology would utilize surveys and focus groups to quantify the long term loss in value to visitors of the area. This is similar to the approach used for damage assessments to quantify the value of deliberate or accidental destruction of natural resources. NPS would like to work with the Bureau and the applicant to determine the appropriate methodology for quantifying the value of the mitigation fund.

With regard to the visual impacts from cumulative projects, the Draft EIS raises an important concern about the potential for other energy projects to concentrate in the area once it has been degraded by this project. The additional impacts of future projects would be considered less severe once area is disturbed by the proposed project:

By substantially lowering the prevailing visual quality of its local viewshed, the Yuha Desert/western Salton Trough, the project could have the indirect effect of encouraging additional subsequent development of similar character in the area. Because the relatively intact existing landscape would appear highly compromised after introduction of the SES Solar Two Project, the incremental additional impact of other future projects could appear to be less significant than if they were occurring in the current, intact landscape without the project. (Draft EIS, page C.13-22)

The analysis also raises a very significant concern regarding the potential for cumulative energy projects in the California desert to fundamentally change the character of this vast open landscape.

. . . the potential for profound widespread cumulative impacts to scenic resources within the southern California desert is clear. These cumulative impacts could include a substantial decline in the overall number and extent of scenically intact, undisturbed desert landscapes, and a substantially more urbanized character in the overall southern California desert landscape. (Draft EIS p. C.13-36 and 37)

The scale of the cumulative impacts described above points to the need for federal land managers to comprehensively plan and designate where energy projects should be concentrated and where they should be avoided. Relying on the current application-driven process for reviewing and approving energy projects continues the piecemeal approach to development that degrades the country's remaining open lands. The Solar Energy PEIS is a step in the right direction and provides a comprehensive approach to assessing and mitigating the impacts of solar projects, but stronger policies or legislation is needed to direct and concentrate energy projects into the most appropriate areas. This is a major public policy issue that needs to be addressed upfront prior to giving authorization for the siting of projects.

Mitigation Proposed by NPS

The following is a suite of potential mitigation measures proposed by NPS to offset the project's various impacts to the integrity of the Anza NHT if indeed this project is authorized. Implementation of these mitigation measures would provide enhancements to the Anza NHT in the vicinity of the project site through improved interpretation and recreation resources. We recommend that the final mitigation measures be identified through a comprehensive Interpretive Plan for the area. NPS has had preliminary discussions with BLM staff regarding these proposed mitigation measures. Should this project be approved, the NPS realizes that more in-depth discussions with the Bureau and the project applicant are needed before finalizing these measures.

Interpretive Plan for Anza NHT within EI Centro Field Office Territory

We recommend that the NPS (or BLM in consultation with NPS) prepare an Interpretive Plan for the Anza NHT in western Imperial and San Diego Counties. The plan would identify the existing interpretive sites in the area and make specific recommendations for expanding the

interpretation of the Anza Trail in the area. The mitigation measures below are some specific ideas that might be included in the plan's recommendations.

New Interpretive Facilities

Design, fabricate, and install new interpretive facilities throughout the area, including:

1. *Installation of Yuha Well wayside exhibit.* The BLM has designed an interpretive panel for Yuha Well, but doesn't have the resources to construct and install a permanent kiosk for the panel. Due to the significance of Yuha Well as a critical Anza campsite location, and the more modern historical resources that are extant at the site, installation of a permanent interpretive exhibit is a considered a top priority.
2. *Additional Interpretation at Anza Overlook.* The Anza Overlook, located along the Anza Recreational Trail near Highway 98, contains a large stone monument and plaque placed by BLM in 1990. The site, which is also near a designated camping area and the Yuha Geoglyphs, affords spectacular views of the Yuha Desert. Additional interpretive exhibits at this location, or at the existing kiosk near the Highway 98 turnoff for the Overlook & Anza Recreational Trail (dirt road EC-274), would connect with many visitors to the area and provide more insight to the story of the Anza expedition.
3. *Install Interpretive exhibit at Plaster City OHV Staging Area.* The Plaster City OHV area is a busy off road vehicle area with over 20,000 vehicles per year. The Plaster City OHV staging area is located just west of Plaster City off Evan Hewes Highway. Installation of an interpretive facility at this location would connect with the many OHV visitors to the area and provide more insight to the story of the Anza expedition. The historic Anza expedition Campsite #48 is within the OHV area, and is identified as an interpretive site in the Anza NHT management plan.
4. *Supplement exhibit at Sunbeam Rest Area on I-8.* The Sunbeam Rest Area, located between Forrester & Drew Roads, six miles west of El Centro, was recently renovated by Caltrans. New interpretive panels at the rest area mention the Anza expedition in the context of other early Spanish explorers. The rest area also contains a State historic monument with misleading text that refers to the rest area as the site of Yuha Well. There may be an opportunity to provide supplemental information about the Anza Expedition at the rest area and to correct the record and reach the many visitors who use the facility.

Museum Exhibit

Install an Anza-themed exhibit at a local museum. The recently constructed Imperial Valley College Desert Museum in the town of Ocotillo sits vacant due to the college's lack of funds to install exhibits and to staff the museum. The BLM-El Centro Field Office has a collection of Native American artifacts that need to be properly archived, and this museum was planned as a repository for the collection. Due to its proximity to the project site, the vacant museum building would be a good venue to provide interpretation of the Anza expedition in addition to the original subjects planned for the museum, archaeology and natural resources. The town of Ocotillo is the southwestern access point off Interstate 8 for the Anza-Borrego State Park and the Yuha Desert, and is a good location to connect with visitors and increase tourism to these areas. Additional subjects at the museum could include solar energy technology, the Jacumba Mountains Wilderness and Anza-Borrego State Park. An alternative museum for interpretation of the Anza NHT could be the Imperial Valley Pioneer Museum in Imperial, CA.

Anza NHT Interpretive Brochure

Prepare an interpretive brochure specific to western Imperial and San Diego Counties which describes the Anza Trail and the expeditions' experience through the area.

Increase Accessibility of BLM's Yuha Desert Cultural History Audio Tour

In 2010 the BLM completed an excellent audio tour of the Yuha Desert that interprets the Anza expedition and other cultural history. It discusses Yuha Well, the Anza Overlook, as well as the

nearby Geoglyphs. The audio tour is on the BLM website as a downloadable podcast (http://www.blm.gov/ca/st/en/fo/elcentro/arch_cult/yuha_pc.html) and on CDs distributed from BLM's El Centro office in early 2010. The BLM's audio tour of the Yuha Desert could be made more accessible to visitors to the desert by implementing a phone-in tour or by broadcasting it via low-power radio. Visitors would be notified of the tour through signage at the interpretive sites. The audio tour could also be expanded to discuss other important resources or subjects in the area, such as San Sebastian Marsh, Native American tribes, and even modern uses of the desert, such as the solar project.

Re-evaluate and Complete the Anza Recreational Trail

The Anza Recreational Trail currently extends south of the project site from I-8 and Dunaway Road toward the Anza Overlook, and north of the project site from Plaster City along the U.S. Gypsum rail line. The Recreational Trail connecting these two points was intended to be routed immediately adjacent to the project site via the Dunaway Road I-8 overpass. Due to the project's noise and visual impacts to the Anza Recreational Trail, the trail's existing and planned alignment in the vicinity of the site would need to be re-evaluated. An alternative alignment to more distant and/or shielded terrain should be implemented if it would substantially improve the recreational experience on the trail by minimizing impacts from the proposed project and other cumulative impacts. If the relocated trail route were to cross private property, access easements would need to be obtained. The cost of acquiring such easements could be a mitigation measure required of the project applicant.

Historic Campsite Surveys

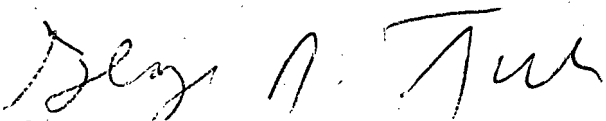
Fund archaeological studies of the Anza Expedition campsites. The historic campsites #47 (Yuha Well) and #48 (north of Plaster City near Coyote Wash), are south and north of the project site, and have not had formal archaeological studies to identify historic artifacts left by the Anza expedition. It should be noted that previous archaeological studies of campsite #49, (San Sebastian Marsh) have identified Spanish artifacts. The trail's management plan calls for NPS to survey campsite locations and prepare record forms for listing on the National Register of Historic Places.

Trail-wide Mitigation Fund

Contribute a fee (amount to be determined) to a mitigation fund for trail-wide projects (in addition to those listed above, and not tied to immediate vicinity of project site), that the Superintendent of the Anza NHT would have discretion to allocate for high priority projects anywhere along the Anza NHT.

As stated above, the mitigation outlined above are conceptual in nature and are intended to facilitate discussions with the Bureau and project applicant. Should this project be approved, the final mitigation measures should be more carefully evaluated in the context of a comprehensive Interpretive Plan for the Anza NHT in area. Feel free to contact Naomi Torres, Superintendent for the Anza NHT (Naomi_torres@nps.gov, 510-817-1438), or Steven Ross (steven_ross@nps.gov, 510-817-1400) Outdoor Recreation Planner, to discuss this letter.

Sincerely,



George J. Turnbull
Acting Regional Director, Pacific West Region