

COMMENTS REGARDING THE PROPOSED IMPERIAL VALLEY SOLAR PROJECT DRAFT
EIS- IMPACTS TO THE JUAN BAUTISTA DE ANZA NATIONAL HISTORIC TRAIL
(CEC#: 08-AFC-5)

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The Juan Bautista de Anza National Historic T (Anza NHT) is only one of nineteen National Historic Trails in the United States. It was established by an Act of Congress in 1990 to commemorate the 1775-1776 Anza Expedition. National Historic Trails are established to preserve our culture and heritage that is associated with the history of the trail. The Anza NHT constitutes a heritage corridor that depends its setting to create the visitor experience. The viewshed and the landscape are intertwined. with the story of the expedition. The Yuha Desert is one of the few remaining pristine sites along the entire 1200 mile Anza NHT that allows the visitor to connect the landscape with the culture and heritage of the expedition and to relive the experience of the expedition.

A solar plant of the magnitude of the the proposed Imperial Valley Solar Project - approximately ten square miles - is a single or exclusive industrial use of the land. This project would exclude and prevent any use of the Anza NHT for several miles. The totality of the impacts on the physical resource and on the visitor would not merely impact or change the visitor experience, they would completely and permanently destroy the historical sites and the heritage corridor. The visual impact will destroys the viewshed for miles. The constant noise will make it impossible for the visitor to envision the experience of expedition members. The destruction of the night sky will prevent the visitor to experience the setting.

It would be irresponsible and unconscionable to allow this industrial plant to be placed directly on top of the Anza NHT in one of the most significant areas along the trail between two important campsites of the expedition. There is simply no mitigation that could adequately and completely compensate for the loss to the Anza NHT and the public. The project should not be approved or should not be approved for this area. It should be required to be moved at least ten miles from this highly significant pristine area of the trail corridor. Industrial projects with such substantial and permanent impacts should be located in areas already disturbed. Offsite mitigation is unacceptable as compensation for a loss of this magnitude. Mitigation should include among other items, the rerouting of the trail, purchase of easements for that purpose, surveys of the entire El Centro region to clearly identify and establish the trail route and to prevent other such industrial plants from being placed on the trail.

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