

## DOCKETED

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<b>Project Title:</b>	Palen Solar Power Project - Compliance
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# United States Department of the Interior

## NATIONAL PARK SERVICE

Joshua Tree National Park  
74485 National Park Drive  
Twentynine Palms, California 92277-3597

IN REPLY REFER TO:

10.A (JOTR-RM)

(EQ-13/0167)

April 7, 2014

California Energy Commission  
Docket Unit  
Docket number: 09-AFC-07C  
1516 Ninth Street, MS-4  
Sacramento, CA 95614  
Via email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

Re: NPS Cultural and Visual Resource concerns associated with the proposed Palen Solar Electric Generating System

Dear Commissioners:

The National Park Service (NPS) appreciates this opportunity to comment on concerns related to visual and cultural resource impacts that may be associated with the proposed Palen Solar Electricity Generating System (PSEGS) currently under review by the California Energy Commission (CEC). NPS commends the CEC and its staff for their thorough analysis and careful consideration in regards to the construction and operation of a solar power tower project in this location.

NPS anticipates that there will be significant adverse impacts to the visual resources of Joshua Tree National Park and nearby Wilderness Areas should this project be approved. With the proposed height of the PSEGS solar power towers and associated facility lighting, the degree of degradation to visual and night sky resources is largely unknown. Impacts are anticipated to surpass those of other solar projects currently proposed or permitted in the immediate area.

Joshua Tree National Park also lies within the 15-mile area of potential effect (APE) identified for the project site for indirect effects to cultural resources. Throughout the permitting review process there has been a lack of information regarding whether impacts are anticipated at the landscape level, such as to Traditional Cultural Properties or Cultural Landscapes. Additionally, visual impacts resulting from the presence of utility-scale facilities, multiple solar power towers, and related electric transmission infrastructure could adversely affect cultural resources, such as sacred and traditional sites, including burial sites, rock art, traditional trails and routes, and natural features; traditionally used plant and animal resources; and water use and quality. NPS

recommends the lead agencies coordinate regularly with the State Historic Preservation Officer and any Tribal Historic Preservation Officers, as applicable, and ensure government-to-government consultation is occurring with area tribes.

According to a presentation given by Argonne National Laboratories' Environmental Science Division for the Bureau of Indian Affairs in February 2013, common impacts to cultural resources can include the following:

1. Complete destruction of historic properties due to clearing, grading, and excavation of the project area, as well as impacts caused by the construction of facilities and associated infrastructure, if historical properties are located within the footprint of the construction area.
2. Degradation and/or destruction of historic properties located downslope or downstream due to alteration of topography or hydrologic patterns; removal or erosion of soils; runoff into and sedimentation of adjacent areas; and oil or other contaminant spills.
3. Increases in human access and subsequent disturbance (e.g., looting, vandalism, and trampling) of cultural resources could result from establishment of corridors or facilities in otherwise intact and previously inaccessible areas, and increased human access (including Off Highway Vehicle (OHV) use) may expose archaeological sites and historic structures and features to greater probability of impact from a variety of stressors.
4. Visual degradation of settings associated with significant cultural resources could result from the presence of a utility-scale solar energy development and associated land disturbances and ancillary facilities affecting significant cultural resources for which visual integrity is a component of sites' significance, such as sacred sites and landscapes, and historic structures and trails.

Argonne National Laboratories also stated that visual impacts to cultural resources can result from all technologies due to the heights of the different technologies; expanse of the acreage required; and the glare potential of the technology. It is the opinion of NPS that PSEGS, which is an expansive project in terms of height, acreage, and glare, will have negative impacts to visual resources that will subsequently affect cultural resources, especially landscapes, in the vicinity of the project.

NPS supports renewable energy projects on public lands when such projects can be constructed and operated in an environmentally responsible manner that serves the public interest, protects natural and cultural resources, and protects our treasured landscapes. As indicated in the Presiding Member's Proposed Decision (PMPD), there are multiple factors associated with the PSEGS project that will likely have unavoidable and unmitigable impacts. These impacts will alter the landscape and could impact Joshua Tree National Park and the surrounding Wilderness Areas' valuable resources. The NPS supports the PMPD to deny the PSEGS amendment based on the valuation of the entirety of the project's benefits, as compared with the entirety of the anticipated adverse impacts. NPS concurs that "the impacts outweigh the benefits" for this project as currently proposed, but that a project utilizing photovoltaic technology may be appropriate for this site.

Thank you for this opportunity to provide comments on cultural and visual resource concerns associated with the proposed PSEGS project. If you have any questions regarding our comments, please contact the Joshua Tree National Park Superintendent's office at (760)367-5502.

Sincerely,



Andrea Compton  
Acting Superintendent

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