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June 18, 2010

Mr. John Kessler
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California Energy Commission
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Sacramento, CA 95814

Subject: Rice Solar Energy Project (09-AFC-10)
SII (Supplementary Information Item) #3
Draft Historic Property Treatment Plan

Dear Mr. Kessler:

Attached please find one hardcopy of Rice Solar Energy, LLC's SII (Supplementary Information Item) #3 - Draft Historic Property Treatment Plan for the Application for Certification for the Rice Solar Energy Project (09-AFC-10).

If you have any questions about this matter, please contact me at (916) 286-0278 or Sarah Madams at (916) 286-0249.

Sincerely,

CH2M HILL

A handwritten signature in blue ink, appearing to read "Douglas M. Davy".

Douglas M. Davy, Ph.D.
AFC Project Manager

cc: POS List
Project File

DOCKET	
09-AFC-10	
DATE	<u>JUN 18 2010</u>
RECD.	<u>JUN 18 2010</u>

Draft Treatment Plan

Historic Property Treatment Plan

for the

Rice Army Airfield

for the

Rice Solar Energy Project

(09-AFC-10)

Submitted to the:

Western Area Power Administration

and

California Energy Commission

Submitted by:

SOLARRESERVE

With Technical Assistance by:



Sacramento, California

June 2010

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Acronyms and Abbreviations

AFC	Application for Certification
ARPA	Archaeological Resources Protection Act
BLM	Bureau of Land Management
CEC	California Energy Commission
CFR	Code of Federal Regulations
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
CRMMP	Cultural Resources Mitigation and Monitoring Plan
DPR	Department of Parks and Recreation
DTC	Desert Training Center
DTC/CAMA	Desert Training Center/California-Arizona Maneuver Area
GPS	Global Positioning System
HABS/HAER	Historic American Building Survey/Historic American Engineering Record
HPTP	Historic Property Treatment Plan
MWD	Metropolitan Water District
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NRHP	National Register of Historic Places
PRC	Public Resources Code
RAAF	Rice Army Airfield
RPA	Registered Professional Archaeologist
RSE	Rice Solar Energy, LLC
RSEP	Rice Solar Energy Project
USC	United States Code
Western	Western Area Power Administration

1.0 Introduction

Rice Solar Energy, LLC (RSE) proposes to construct the Rice Solar Energy Project (RSEP) (09-AFC-10), a 150 MW solar electrical generating facility located on a private 3,324 acre formerly-disturbed, brownfield site in eastern Riverside County, California. The RSEP is a concentrating solar power project consisting of a 1,410-acre heliostat field with mirrors that reflect the sun's rays to a heat exchanger that is mounted on a central tower. Reflected solar heat from the mirrors heats liquefied salt. The salt stores thermal energy for production of superheated steam that powers a conventional steam turbine generator to generate electricity on demand.

The RSEP is sited on private land that was occupied in the late 1930s by a small municipal airfield near the (now abandoned) town of Rice. During World War II, the United States Army established the 18,000 square mile Desert Training Center/California-Arizona Maneuver Area (DTC/CAMA), a network of several training camps (including at least 13 that each housed an entire division), three airfields, and other facilities to prepare troops for fighting in desert conditions of North Africa as well as for general training. DTC/CAMA operated between September 1942 and April 1944. The DTC/CAMA facilities were spread throughout the southern deserts of California and Arizona and the Army made use of the vast desert landscapes for various kinds of combat training and large-scale maneuvers. An Army training camp called Camp Rice is also one of the DTC/CAMA facilities and is located just east of RAAF. After DTC/CAMA was closed and abandoned, the Rice airfield was disposed by the U.S. government to private ownership in 1947. Eventually, its use as an airfield was discontinued sometime between 1955 and 1958.

RSE is seeking an interconnection with the U.S. Department of Energy Western Area Power Administration's (Western's) Parker to Blythe #2 161 kV transmission line. Western is therefore the co-lead federal agency, together with the United States Bureau of Land Management (BLM), for compliance the National Environmental Policy Act (NEPA). Western is also the co-lead agency (with BLM) for historic preservation compliance under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies to take into consideration the effects of their actions on historic properties. Historic properties are properties (districts, sites, buildings, structures, objects) that meet the eligibility criteria for potential listing in the National Register of Historic Places (NRHP).

RSEP is also subject to certification from the California Energy Commission (CEC) as a solar-thermal power plant with a generating capacity greater than 50 MW. The CEC was created by and receives statutory authority from California's Warren-Alquist State Energy Resources Conservation and Development Act. The CEC's power plant site certification program is certified as a California Environmental Quality Act- (CEQA-) equivalent program and CEC is lead agency in respect to CEQA compliance.

The RAAF and Camp Rice meet the criteria for listing in the NRHP and the California Register of Historical Resources (CRHR) and are historic properties. This historical significance stems from their association with significant historic events (National Register

Criterion A/California Register Criterion 1) and as an embodiment of a distinctive type or period (National Register Criterion C/California Register Criterion 3).

The RSEP was sited at this location because the site is one of the largest privately owned, previously disturbed, brownfield sites in the southern Mojave/Sonoran desert region, rather than state- or federally-owned, previously undeveloped desert habitat or agricultural lands. Construction of the RSEP on this site, however, means that some portion of the remains of RAAF will of necessity be impacted in constructing and operating the solar energy facility. RSE stipulates that removal could be considered an adverse effect on a historic property under the regulations of the Advisory Council on Historic Preservation at 36 CFR Part 800.5, and could require the resolution of adverse effects (36 CFR 800.6). The RSEP will not directly affect the remains at Camp Rice to the east of RAAF, but could have indirect effects on Camp Rice.

This Historic Property Treatment Plan (HPTP) is a plan by which Western may take the RSEP's potentially adverse effects into consideration to satisfy the requirements of Section 106 and 36 CFR Part 800. Similarly, the CEC's Rules of Practice and Procedure (California Code of Regulations, Title 20, Division 2, Appendix B[g][2][E][i]) requires "a discussion of measures proposed to mitigate project impacts to known cultural resources." This document is therefore also designed to serve as a mitigation plan in the CEC proceeding, and will become an attachment to the RSEP Cultural Resources Monitoring and Mitigation Plan (CRMMP) that is a standard CEC Condition of Certification. The CRMMP is a more comprehensive document that describes all of the cultural resources mitigation measures to be followed during project construction and operation, such as procedures for construction monitoring and emergency discovery.

This document briefly summarizes the historic context of the RAAF and the history of the RAAF and Camp Rice, describes the remains of RAAF and their condition, discusses aspects of the significance of these properties, and then presents a treatment plan that is designed to mitigate the RSEP's adverse effects. Fully detailed descriptions of these sites and its historic context are found in other documents and are not repeated here. These include the Application for Certification (AFC) before the CEC (RSE 2009), and Appendix 5.3B of the AFC, which includes a cultural resources inventory report that was filed with the CEC separately from the AFC under a request for confidentiality. The confidential filings have been distributed on a need-to-know basis to the participating agencies (Western, CEC, Bureau of Land Management, State Historic Preservation Office).

2.0 Project Description

2.1 Project Location

The RSEP is one of the largest privately-owned, previously-disturbed, brownfield sites in the Mojave-Sonoran desert which is not on public (either federal or state) land. The RSEP is located in an unincorporated area of eastern Riverside County, California, situated immediately south of State Route (SR) 62 at milepost 109 about 1 mile east of the junction with Rice-Midland Road (Figure 1). The nearest active residence and permanent settlement is Vidal Junction, approximately 15 miles northeast, at the junction of SR 62 and US Route 95. To the west, the nearest residences and permanent settlement is approximately 17 miles away at the Metropolitan Water District's (MWD) Iron Mountain Pumping Plant. The nearest town offering significant services is Parker, Arizona, approximately 32 road miles to the east. Blythe, California is 40 miles to the south via Blythe-Midland Road. Twentynine Palms, California is 75 miles to the west. In addition to SR 62, nearby infrastructure includes the Arizona-California Railroad (ARZC) and the MWD Colorado River Aqueduct, both of which run east-west just north of SR 62 and just north of and within 600 feet of the northern boundary of the RSEP. The ARZC Rice-Ripley line extends south from the main railway about 1 mile to the west of the RSEP site. The expansive Rice Valley Dunes are situated several miles south of RSEP and its generator-tie line.

The RSEP is located within a larger, private holding that is 3,324 acres in size (the ownership property). This holding includes contiguous portions of Section 24 and 25, Township 1 South, Range 20 East; and all of Sections 19, 20, 29 and 30, Township 1 South, Range 21 East, San Bernardino Base and Meridian. There are six assessor's parcel numbers that make up the ownership property: 801-042-004; 801-062-012; 801-070-003; 801-070-004; 801-100-005; 801-100-006.

Within this ownership property, the RSEP is sited within a new square-shaped parcel (the project parcel) that will be created by merging what are currently four different Assessor's parcels, each of them a discrete section (square mile) of land, resulting in a single 2,560-acre parcel. These are Township 1 South, Range 20 East, Sections 19, 20, 29, and 30. The four parcels are APNs 801-070-003; 801-070-004; 801-100-005; 801-100-006.

Within this project parcel will be the 1,504-acre area that will be fenced and will comprise the final project site during project construction, including all construction laydown and worker parking areas. The final, fenced area for project operation will be 1,410 acres in size.

2.2 Project Description

The RSEP will be a 150 MW concentrating solar energy project using a central tower and heliostat surround-field design to produce an annual average of 450,000 MW-hours. This design uses a collection of heliostat mirrors that track the movement of the sun during the day and reflect solar energy onto a solar receiver tower more than 600 feet tall. This highly concentrated solar energy heats a liquefied salt solution (consisting of sodium nitrate and potassium nitrate) from approximately 500°F to 1050 °F. The heated salt is then collected for

energy storage and, when power generation is desired, “hot” salt is conveyed to a series of heat exchangers, where it heats boiler water and generates superheated steam which is used to drive a high-efficiency reheat steam turbine-generator. The steam generation process extracts thermal energy from the liquid salt, cooling it to approximately 500°F. The “cold” salt is returned to a storage tank where it can again be circulated through the solar receiver and on to the “hot” salt tank where it is banked until steam production is desired for power generation.

The conventional turbine generator produces steady electricity that is conveyed over a 10-mile generator tie-line to the grid. After exiting the steam turbine generator, the steam is condensed to water using an air-cooled condenser (large-scale radiator with fans). Because molten salt can be stored with very little heat loss, the facility can generate power throughout the night and on cloudy days.

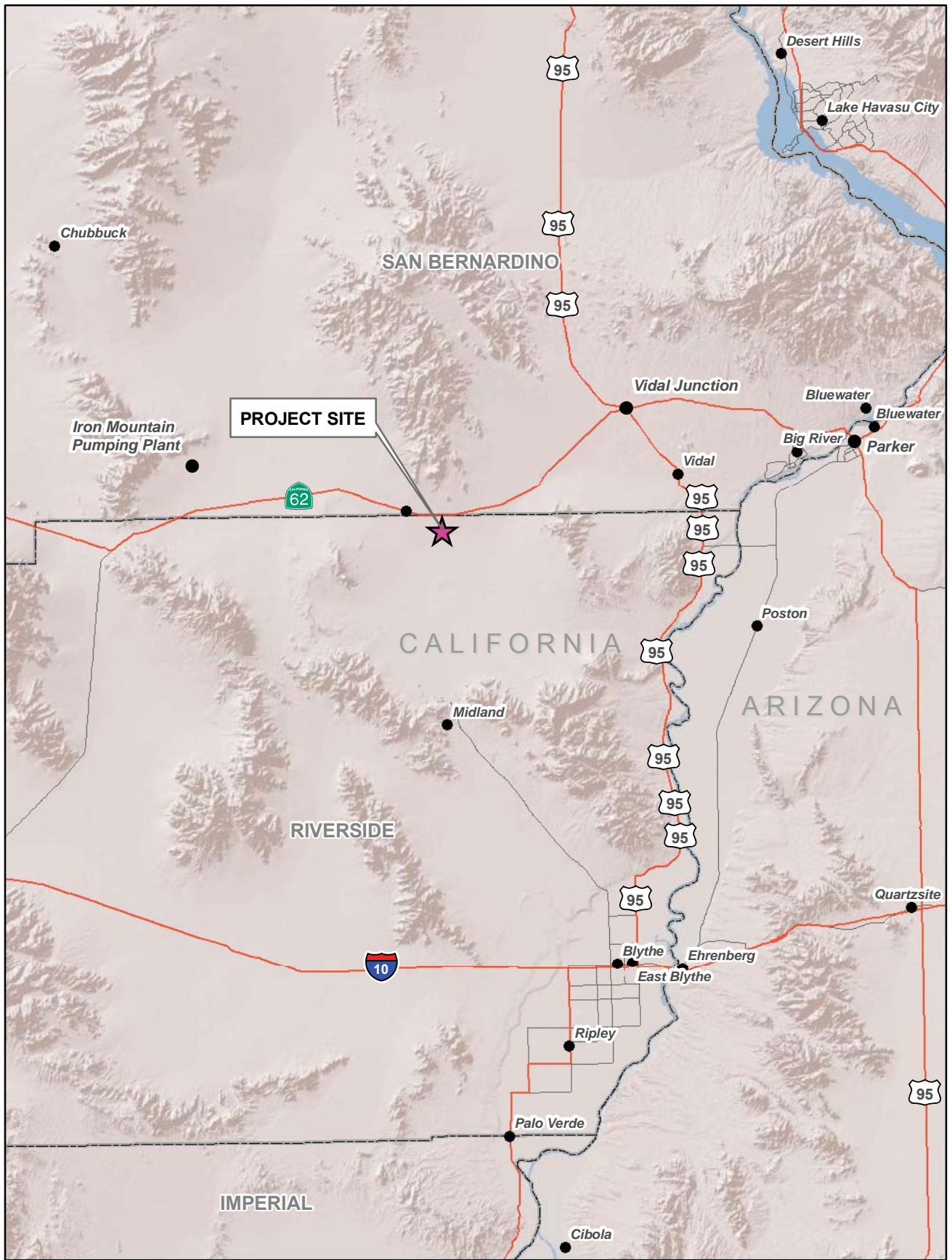
The project will use no fossil fuels for generation of electrical power. It will use propane for initial salt melting during construction. Ultra-low-sulfur diesel fuel will be used for emergency fire pump and emergency diesel generators during loss of power incidents. The source of water for steam-cycle makeup and mirror washing will be treated water from on-site wells. The total annual water use will be approximately 150 acre-feet.

SolarReserve’s molten salt solar generating technology is proprietary and is licensed through the Pratt & Whitney Rocketdyne division of United Technologies Corporation. The technology was developed by Rocketdyne aerospace engineers and tested from 1996 to 1999 at a 10 MW Department of Energy demonstration facility called Solar Two located near Barstow, California. Solar Two met or exceeded all of its testing objectives and was mothballed after testing was complete. Rocketdyne is supplying the technology for the RSEP with engineering improvements derived from the Solar Two results.

As stated, above, the RSEP will be constructed on a new parcel that will be created from consolidation of four existing parcels, within which the final 1,410-acre fenced area will be located. A 10.0-mile-long generator tie-line will be constructed using 85’ steel monopoles to connect the RSEP to the existing 161/230 kV Western Area Power Administration Parker-Blythe #2 transmission line. A new 300’ x 400’ substation would be constructed at the interconnection point of the two transmission lines (9.2 miles of this line are outside of the project parcel). The generator tie-line and the substation are located on lands managed by the BLM Palm Springs-South Coast Field Office with the exception of an approximately one-mile-long segment which crosses two private parcels.

Construction access to the RSEP heliostat field and power generation facilities will be directly off of SR 62. All construction parking, office trailers, and equipment laydown areas, as well as a small recreational vehicle (RV)/trailer parking camp for the construction workforce, will be located at the north end of the heliostat field within the approximately 1,504-acre project area (which includes the final 1,410-acre fenced facility site). Construction power will be obtained via extension of an existing 12 kV electrical distribution line that runs parallel to SR 62; the line will be extended from a location 175 feet east of the project parcel boundary for approximately 1.1 miles to the facility fenceline boundary.

If approved, the construction of the project would begin in the first quarter of 2011 and would continue through the third quarter of 2013, when it would begin operations.



LEGEND

- ★ PROJECT SITE
- COUNTY BOUNDARIES

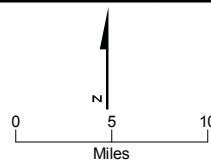


FIGURE 1
PROJECT LOCATION
 RICE SOLAR ENERGY PROJECT
 RIVERSIDE COUNTY, CALIFORNIA

2.3 Regulatory Framework

The foundation of broad legislation for preserving cultural resources is the National Historic Preservation Act of 1966 (Title 36 of the Code of Federal Regulations [CFR] Section 800 [36 CFR 800]). Section 110 of the NHPA requires federal agencies to institute programs to identify and evaluate NRHP-eligible historic properties under their authority. Historic properties are defined under the NHPA as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register.”

Section 106 requires federal agencies, or those applying for a federal permit, or using federal funds, to consider the effects of undertakings on historic properties through a process of consultation. Evaluative studies constitute the mechanism by which inventoried resources are assessed against criteria of the NRHP and upon which all subsequent management actions are based. Regulations in 36 CFR 800 provide a process for satisfying the requirements of Section 106. This process includes resource identification (inventory), significance evaluation, assessment of adverse effects on significant historic properties, and resolution of adverse effects.

1.3.1 Federal Laws and Regulations

1.3.1.1 Archaeological and Historic Resources

Projects that are federally funded, require a federal permit or are considered a federal undertaking are required by law to consider the effect of projects on the quality and character of cultural resources early in the planning process (National Environmental Policy Act ; 42 United States Code [U.S.C.] 4231-4335, Section 101[b][2]). In addition, federal regulations related to the NHPA require that projects avoid cultural resources when possible.

The other federal statute relevant to cultural resources for this study include the Historic Sites Act of 1935 (49 Stat 666; 16 USC 461). The Historic Sites Act declared a national policy to identify and preserve historic sites, buildings, objects and antiquities of national significance. The law authorized the Secretary of the Interior to conduct surveys, collect and preserve data, and acquire historic and archaeological sites. The Historic American Building Survey/Historic American Engineering Survey (HABS/HAER) programs stem from this act, as well as the National Park Service (NPS) program of listing historic properties on the NRHP. Implementing regulations are codified at 36 CFR Part 65.

In addition to the NHPA and the Historic Sites Act, cultural resources are protected by the Archaeological Resources Protection Act of 1979 (ARPA) (16 U.S.C. Sections 469-469c). ARPA describes the requirements that must be met before federal authorities can issue a permit to excavate or remove any archeological resource on federal or Indian lands. Requirements for curation of artifacts, other materials excavated or removed, and the records related to the artifacts and materials are described. The act provides detailed descriptions of prohibited activities including damage, defacement, and unpermitted excavation or removal of cultural resources on federal lands. Selling, purchasing, and other trafficking activities of cultural resources either within the United States or internationally is prohibited. ARPA also identifies stiff penalties that can be levied against convicted violators.

1.3.2 State Laws and Regulations

1.3.2.1 Archaeological and Historic Resources

When an archaeological resource is listed in, or is eligible to be listed in, the California Register of Historical Resources (CRHR), Public Resources Code (PRC) Section 21084.1 requires that any substantial adverse effect to that resource be considered a significant environmental effect. PRC Sections 21083.2 and 21084.1 operate independently to ensure that potential effects on archaeological resources are considered as part of the environmental analysis for a project. Either of these benchmarks may indicate that a proposal may have a potential adverse effect on archaeological resources.

PRC Section 21084.1 states that an historical resource is a resource listed in, or is determined to be eligible for listing in, the CRHR, or listed in a local register of historical resources, or deemed significant pursuant to criteria identified in PRC Section 5024.1(g), unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or is determined not to be eligible for listing in the CRHR, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 does not preclude a lead agency from determining whether the resource may be an historical resource.

PRC Section 21083.2 states that as part of the conditions imposed for mitigation, there may be provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required. Construction work may continue on other parts of the construction site while archaeological mitigation takes place. Other state-level requirements for cultural resources management are written into the California PRC, Chapter 1.7, Section 5097.5 (Archaeological, Paleontological, and Historical Sites).

1.4 Field Inventory

The cultural resources inventory for the RSEP was conducted by CH2M HILL archaeologists and architectural historians. Matt Bischoff, as an independent contractor, provided expertise in historical archaeology. Fieldwork was conducted under CH2M HILL's Bureau of Land Management (BLM) Statewide Cultural Resource Use Permit #CA-07-17 (exp. 3/18/2010), and BLM Palm Springs-South Coast Field Office Fieldwork Authorization #66.24-09-21 (exp. 9/1/2020). Mr. Aaron Fergusson, M.A., RPA, listed as a Principal Investigator on both permits, directly supervised the field surveys, under the direction of Mr. Clint Helton, M.A., RPA. The inventory was conducted in accordance with the latest CEC Rules of Practice and Procedure & Power Plant Site Certification Regulations (CEC 2007) for assessing potential impacts to archaeological and architectural resources. The cultural resources report for the project (AFC Appendix 5.3B) describes the fieldwork methodology.

CH2M HILL archaeologist Clint Helton, M.A., RPA, as the BLM Cultural Resource Use Permit Administrator, supervised the entire project and provided technical support and senior review. Fieldwork was directly supervised by CH2M HILL archaeologist Aaron

Fergusson, M.A., RPA. The field crew consisted of: Humphrey Calicher; Ken Hazlett; Ryan Rolston; and Dan Ewers. Matt Bischoff, as an independent contractor and historical archaeologist, assisted in the field with recording and interpretations of sites and features.

The cultural resources technical report from which much of the information in this HPTP was drawn, was prepared by CH2M HILL archaeologist Aaron Fergusson and CH2M HILL architectural historian Elizabeth Calvit. The historic context was authored by Mr. Bischoff, who also assisted in site forms and interpretations of cultural resources. This HPTP was compiled by Douglas Davy, Ph.D., RPA.

3.0 Historic Properties

As stated in Section 1.0, the Army developed RAAF from a small, municipal airfield as a component of the DTC/CAMA and operated it as one of three combat training airfields in DTC/CAMA between September 1942 and April 1944, after which it was disposed of as surplus. This section briefly describes the physical remains at RAAF as they appear today and also briefly describes Camp Rice and its location with respect to the RSEP. It concludes with a discussion of the National Register eligibility evaluation for this property. AFC section 5.3 and the cultural resources technical report (AFC Appendix 5.3B) contain historic context statements for the site. Figure 2 shows the RAAF and Camp Rice, with the main site areas and RSEP property, project, and parcel boundaries indicated. Figure 3 is the Army's general plan layout map of the RAAF from 1942-1944.

3.1 Rice Army Airfield

The RSEP parcel boundary will cover approximately 4 square miles (~2,500 acres) and measures roughly 2 miles north-south, by 2 miles east-west. The entire RAAF site is located within the broader project ownership property boundary and most of it is within the project parcel. The RSEP fenceline will encompass much, but not all, of the original RAAF site, which consists of three major areas: (1) the RAAF camp area, (2) runways, and (3) dispersal pads. The RAAF camp area is located at the north end of the site, just south of SR 62 and consists of a small road network, with the remains of former buildings, now restricted to concrete slabs and footings. Archival sources have led to their identification as the Headquarters Building, Base Operations Building, Link Trainer Building, Barracks, and Mess buildings, etc. At the southern end of the RAAF camp area, just north of the runway area, is a well-preserved concrete pad or apron 800 feet long and 300 feet wide.

There are two runways at RAAF that are at right angles to one another and are oriented northeast-southwest and northwest-southeast, respectively. The runways themselves are 5,000 feet long and 150 feet wide. The broader, formerly cleared aprons adjacent to and surrounding the runways created a giant V-shaped, cleared area with two legs, each 545 feet wide. Where the legs meet at the 'V', they are 1.07 miles long (short or inner edge) and 1.17 miles long (long or outer edge). The runways are readily visible on aerial photographs, but their locations are not so obvious on the ground. This is because light-colored bursage has recolonized the runways to a density similar with that of the surrounding desert. Darker creosote bush, however, has recolonized only sparsely such that the runways are clearly visible on aerial photographs.

Each runway has a taxiway that parallels it to the south at a distance of about 700 feet. The taxiways are about 60 feet wide. Branching off of the taxiways are taxiway lanes that lead to 30 dispersal pads or 'hard stands', 15 on each taxiway, that are about 50 feet square. The access lanes are of variable length, between 150 and 1,000 feet long, likely to prevent propwash from aircraft on adjacent stands from affecting activities or increasing maintenance problems, due to propeller-blown dirt and dust, at neighboring stands. The distance between the lanes varies between 150 and 500 feet. Six of the dispersal pad lanes

intersect other lanes at an angle, rather than branching directly from and perpendicular to, the main taxiways.

Features— The RSEP field team recorded 128 features associated with the RAAF, including concrete building foundations, stone aerial markers, rock alignments, rock-lined pits, and other various pits. Figures in AFC Appendix 5.3B, Appendix C2 show the locations of these features. The following is a summary of the most numerous types of features:

Pits: There are 48 pit features on the RSEP site. These include a large number of rock-lined pits and rock-lined trenches, wood-lined pits, septic pits, and burned debris pits. Many of the buildings have small (2' x 4'), wood-lined pits located just outside the building.

Concrete pads: There are 27 concrete slabs or pads at the site, representing former buildings (most of the slabs) and a large parade ground. No structures associated with these buildings remain standing. Some of the concrete pads have anchor bolts or pipes sticking up out of the slabs. The largest concrete pad measures 870 x 300 feet and probably served as a parade ground or deck. From the size and features associated with the building foundations, the following building types were identified:

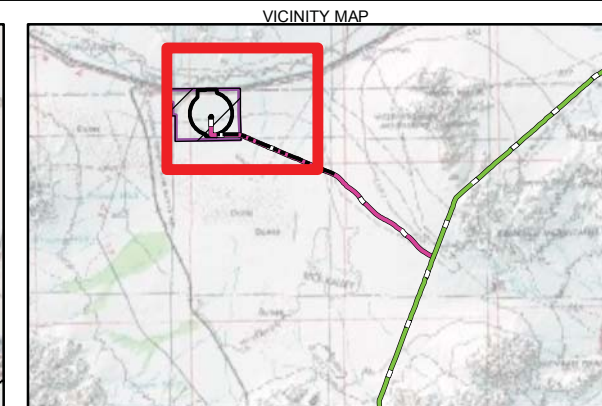
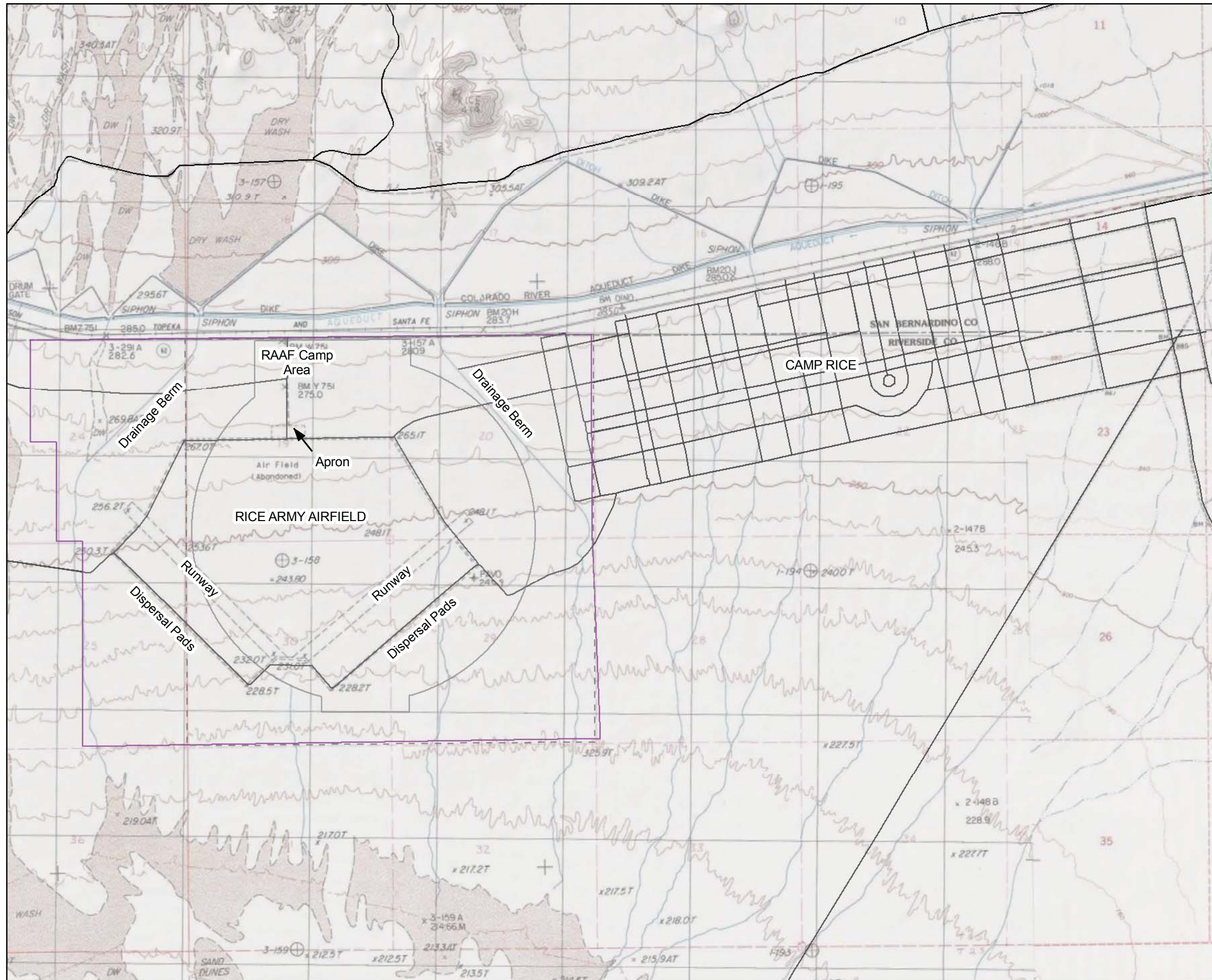
- Base headquarters
- Airfield Operations Building
- Mess hall
- Lavatories
- 700 Series temporary buildings serving as barracks
- Pump motor foundations and fuel storage tanks
- Shower buildings
- Storehouses
- Officer's lavatory and shower building
- Power or pump house

Rock piles: There are 6 rock pile features at RAAF. These are up to 3 meters in diameter and consist of piles of the basalt rocks that are commonly available on site and nearby.

Emplacements: There are 7 features recorded as emplacements. These are generally shallow pits with low embankments from 1 to 14 meters in length and width. Some are square, and open in one direction

Rock alignments: There are 4 features recorded as isolated rock alignments at Rice AAF. Many of the concrete pads also have rock-lined pathways leading from the road to the former building sites, a common practice on military installations. The rocks used are locally obtained basalt. There are two areas of rock alignments that seem to delineate tent areas, likely for unit tents with possibly insignias out of rock.

Airfield marker: Near both runways are large, stone X's made from basalt rocks, likely as an indication that the runways are closed.



- LEGEND**
- OWNERSHIP PROPERTY
 - PROJECT PARCEL BOUNDARY
 - OCTOBER 2009 AFC RSEP FENCELINE
 - PROPOSED SUBSTATION

This map was compiled from various scale source data and maps and is intended for use as only an approximate representation of actual locations.

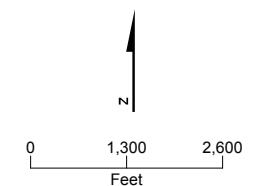


FIGURE 2
RICE ARMY AIRFIELD AND CAMP
RICE AND THE RSEP OWNERSHIP,
PARCEL, AND PROJECT
BOUNDARIES
 RICE SOLAR ENERGY PROJECT
 RIVERSIDE COUNTY, CALIFORNIA



FIGURE 3
RICE ARMY AIRFIELD GENERAL
LAYOUT PLAN, 1942-1944
Rice Solar Energy Project
Riverside County, California

Firing butt: One of the airfield's dispersal pads faces directly into a large mound of dirt and likely served as a firing butt used for light testing of aircraft guns without having to take off. This particular dispersal pad faces away from the dispersal pad network

Concrete Footings: One feature consists of an array of 33 small concrete footings in 3 rows of 11 footings each; these were probably footings for a barracks structure.

Artifact Concentrations – The RSEP field team recorded 39 artifact concentrations within the RAAF site boundary. These concentrations include Army ration can and glass dumps, dumps of burned ration debris, and construction debris. All of these classified as debris scatter, can scatter or burned debris scatter, except for two, which are classed as 'construction debris' and consist of lumber, wire, plumbing, and plaster debris. All of the debris and can scatters contain cans. A few also contain glass debris, batteries, sheet metal, hardware cloth or other metal debris. Some highlights are as follows:

Cans: Types include key-opened meat and fish, C-ration, fuel, brake fluid, paint, hole-in-top condensed milk, sardine, beverage, coffee, fruit and vegetable cans, ammo box lid, and tobacco tins.

Glass: Debris includes clear glass jars and jar fragments, melted glass, amber-colored and green-colored bottles and fragments, ketchup bottles, and Coca-Cola bottles and fragments.

Metal (other than cans): Debris includes metal strapping, nails, sheet metal, hardware cloth, metal poles, buckets, galvanized steel pipe, padlock, light bulb base, automotive leaf spring, wire spool, hose clamp.

Other debris: Includes batteries, rubber hose, ceramic plate fragments, charcoal, plaster.

AFC Appendix 5.3B, the cultural resources technical report, contains an update to the existing DPR-523 site record form for this site.

3.2 Camp Rice

Parts of Camp Rice are located within the RSEP project parcel (though not within the fenced project area and therefore will not be directly affected by the project). The parts that are located within RSEP, however, represent only a small portion of the entirety of Camp Rice, which is 3 miles long and just under a mile wide. The portion recorded for the RSEP survey is an area at the west-southwest portion of Camp Rice, measuring at the widest, about 1,500 feet east to west and about 4,500 feet north to south. Camp Rice was a long, narrow, orderly layout of 20-foot-wide streets, in the peculiar pattern characteristic of most, if not all of the DTC/CAMA camps, of pairs of streets 100 feet apart, separated by larger gaps of about 800 feet (at Camp Rice). Based historic photos, the larger open areas between the streets were spaces for rows of tents cities occupied by the troops. At Camp Rice, like the other camps (including nearby camps Granite and Iron Mountain), there is a central roadway that forms a semi-circle around a headquarters flagpole circle. The portion of Camp Rice on the RSEP property is the extreme western end of the camp.

There are 59 artifact concentrations in the portion of Camp Rice located within the RSEP boundary. Figures in the AFC's Confidential Appendix, submitted show the locations of these artifact concentrations. Some of the concentrations contain burned debris that has been dumped; however, most are simply locations where ration containers were dumped,

often just off the side of roads. These vary in quantity from a few cans to more than 200, with many moderate-sized dumps of 10 to 50 cans and contain cans, glass, metal, and other debris.

The RSEP would not directly affect the part of Camp Rice that contains the tent city streets. The refuse deposits that are located between Camp Rice and RAAF could be attributed to either site. Indirect effects of RSEP on Camp Rice are addressed in a below.

3.3 National/California Register Evaluation

Cultural resources are districts, sites, buildings, structures, landscapes, or objects considered important to a culture or a community. Cultural resources can include archaeological sites, historic architectural and engineering properties, and traditional cultural places. Cultural resources considered significant to our history are listed on the NRHP.

To be listed in the NRHP, a property must have historic significance and integrity, and generally be at least 50 years old. Certain properties are exempt from the 50-year rule if they possess exceptional importance. A property must demonstrate significance in at least one of the following areas, each of which describes an NRHP criterion (National Park Service, 1997a):

- Criterion A: Association with events that have made a significant contribution to the broad patterns of our history
- Criterion B: Association with the lives of persons significant in our past
- Criterion C: Embodiment of the distinctive characteristics of a type, period, or method of construction or representative of the work of a master, or possessing high artistic value, or representative of a significant and distinguishable entity whose components may lack individual distinction
- Criterion D: Yielding, or likely to yield, information important in prehistory or history

To be listed on the NRHP, a property must not only be significant under the criteria, but must also have integrity. The evaluation of integrity is grounded in an understanding of the physical features of a property and how they relate to its significance (NPS, 2007). To retain historic integrity, a property will always possess several, and usually most, of these aspects. A property is evaluated in relation to its integrity of (1) location, (2) design, (3) setting, (4) materials, (5) workmanship, (6) feeling, and (7) association. The retention of specific aspects of integrity is required for a property to convey its significance. Integrity, combined with one or more NRHP criteria, will determine if a property is eligible for the NRHP. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.

The National Register Criteria listed above are the same as the criteria for listing in the California Register of Historical Resources except that the criteria are numbered (1, 2, 3, 4), instead of lettered (A, B, C, D).

3.3.1 Previous Evaluation

The BLM nominated 7 of the original 11 DTC/CAMA camps to the NRHP in 1986. The only remnants of the camps are the roads and walkways, most covered by vegetation or partly washed away by water and wind. The interpretative plan developed to protect the camps describes plans to close areas to vehicular traffic, stabilize areas that have eroded, close areas to artifact collectors, clear away vegetation, erect interpretive plaques and prepare brochures for self-guided tours.

None of the airfields are included in this designation. Of the DTC airfields, only Rice is abandoned. Shavers Summit AAF has been renamed Chiriaco Summit airfield and operates as a small, local airfield. Desert Center AAF is also an active airfield; however, only one of the two air strips is being used; the other has been abandoned and is in disrepair.

The following is an evaluation of Rice Army Airfield and Camp Rice based on contemporary conditions. It assesses these properties in relation to the four National/California Register criteria.

3.3.2 Criterion A/1—Association with Historic Events

RAAF and Camp Rice are both important components to a National Register-eligible cultural landscape district. The Desert Training Center/California-Arizona Maneuver Area (DTC/CAMA) is a historically significant resource at the national level, and was recommended for listing in the NRHP in 2000, as well as in a follow-up report in 2009 (Bischoff). These reports found both sites to be contributing elements to the NRHP-eligible DTC/CAMA. When viewed as integral components of the whole, RAAF and Camp Rice played important roles in the functioning of the DTC/CAMA, and both help to convey the scale, character, and significance of the facility. Furthermore, RAAF and Camp Rice appear to be eligible for listing on the NRHP under Criterion A and C, and the CRHP under Criterion 1 and 3, as contributing resources to a cultural landscape district.

A draft multiple property submission for this cultural landscape district has been submitted to the BLM by Statistical Research, Inc., and is under review. As outlined in the multiple property form, as well as the above mentioned reports, the DTC/CAMA comprises numerous property types, including divisional camps, air facilities, maneuver areas, depots, bivouacs, ranges, among many others. Within the context of the multiple property submission, associated properties can be eligible either individually or as districts. Properties can also be eligible under any of the NRHP Criteria. As a part of previous investigations, Camps Iron Mountain and Ibis were nominated to the NRHP.

As mentioned above, the issue of National Register eligibility requires assessment of the “significance” or scientific importance of the resource in question. To evaluate a resource’s significance, one must first establish appropriate “historic contexts,” which are defined as a body of information about historic properties organized by its basic elements—theme, place, and time. More specifically, historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear (National Park Service, 1995). A comprehensive historic context is provided in Bischoff 2000 and 2009, and as highlighted in section 3, the DTC/CAMA is particularly relevant to several broad, important themes in American history, outlined below (drawn from Bischoff, 2009).

U.S. Preparation for World War II— The DTC/CAMA was the largest training maneuver area in U.S. military history (Gish 1985). Encompassing more than 18,000 square miles, the DTC/CAMA provided critical training for 23 out of the total 85 army divisions that served in World War II (Pew 1985). Over 1 million men were trained at the facility, roughly 10 percent of all U.S. servicemen who served in World War II. The sheer scale of the facility reflects America's commitment to winning the war. The massive undertaking is an indication of the scale of America's home-front preparations for the war. The DTC/CAMA consisted of far more than simply desert maneuvers; it included an incredible amount of material and huge numbers of men and women, all housed in a vast, largely undeveloped territory. Divisional camps spread out over a huge territory are complimented by the incredible diversity of sites that make up the facility, including railroad sidings, airfields, hospitals, depots, maneuver areas, ranges, and others (Bischoff, 2009).

U.S. Military Training— The DTC/CAMA was the U.S. Army's first attempt at desert-warfare training. Although originally designed to train soldiers for the North Africa campaign, the facility proved unique in a variety of other ways. The vast expanses of the desert allowed troops to move across long distances, in realistic preparation for what they would have to face overseas. Because of the isolation of the area, their movements were unencumbered by towns or large numbers of civilians. Live-fire exercises could be conducted without fear of harming nearby citizens. The nature of the DTC/CAMA was dependent upon the territory in which it existed. Without the desert, the facility could not have been as successful as it was (Bischoff, 2009)

The training center remains unprecedented in U.S. military history. Never before had the army attempted training on such a large scale, with such varied units. The DTC/CAMA operated as a theater of operations under combat situations, the first time the army ever attempted such a feat. It not only encompassed a huge expanse of territory, it included every type of unit that would be required in an actual theater of war. Along with the combat units themselves, countless service units took part in the operations. The commanding general of the army, Lt. General Leslie J. McNair (1943), expressed the overall concept:

An underlying idea is to make your organization and experience a guide or yardstick in connections with our many overseas establishments which appear at this distance to involve a tremendous and unwarranted overhead.

The soldiers were taught how to survive the elements, which often were their worst enemies in combat, and several commanders remarked at the top physical condition that the men at the DTC/CAMA were in. The DTC/CAMA also provided unparalleled experience for the top commanders. Almost all of the commanding officers of the facility went on to lead either armies or corps in the European Theater. General Patton maintained that, except for his World War I experience, that the soldier training experience at the DTC/CAMA was unsurpassed. General Walker stated that his training at the DTC/CAMA was the best he ever received (Bischoff 2009).

During the operation of the DTC/CAMA a keen eye was kept on the fighting in North Africa. Lessons learned there were applied to training in the deserts of Arizona and California. Even after the Germans were driven completely out of North Africa in 1943, tactical and strategic lessons learned from the desert war were applied to the DTC/CAMA. These lessons were particularly applied in the conduct of the large-scale maneuvers

(Bischoff 2000). The DTC/CAMA reflected Patton's ideals for tough, realistic training. The facility was built so rapidly that there was little time to construct permanent buildings. Moreover, the Army, particularly Patton, wanted soldiers to be trained in the most realistic conditions and be "hardened" as quickly as possible. Most camp structures were temporary in nature, and consisted of wooden frames. The ephemeral nature was partly based on the limited time the Army had to establish the facility, but also due to the realities of warfare in North Africa (Bischoff, 2009).

As outlined above, the DTC/CAMA is certainly "associated with events that have made a significant contribution to the broad patterns of our history" (NRHP Criterion A and CRHR Criterion 1). The DTC/CAMA was the largest training facility and the only one of its kind in American military history. The massive undertaking illustrates America's huge efforts and commitment to win the war. The tactical, strategic, and logistical doctrines developed and refined during the facility's life were applied overseas and undoubtedly helped to win World War II. The training that these men received in the desert left a lasting impression on them and undoubtedly contributed to the fighting capabilities of American soldiers in World War II (Bischoff, 2009).

The DTC/CAMA is also "associated with the lives of persons significant in our past" (NRHP Criterion B and CRHR Criterion 2). Several preeminent figures in the American army served there and helped mold the facility. General George S. Patton, perhaps one of the best known military figures of the twentieth century, was instrumental in the development of the training center. His recognition of the need for the facility was critical in its establishment. His vision for a facility that would train troops in the toughest of environments, with only the most essential improvements formed the basis for the design of the divisional camps and other installations. He lived at the camps with his men for extended periods of time, and personally took part in training exercises. Though he was present in the center for a matter of months, his mark was clearly upon the concept, design, and flavor of the entire DTC/CAMA.

The DTC/CAMA also embodies distinctive characteristics of a type, period, and method of construction (NRHP Criterion C and CRHR Criterion 3), that of World War II temporary mobilization. The urgency of the war effort, coupled with the need to train troops in a realistic environment all are clearly evident in the design and construction of the DTC/CAMA as a whole, as well as most of the individual camps and facilities. The nature of this mobilization and the exigencies of tough, realistic training are remarkably visible in the remaining resources of the DTC/CAMA.

As discussed above, several property types make up the DTC/C-AMA, two of which are present in the current project: airfields and divisional camps.

Airfields—Because aircraft played a role in the training and operation of the DTC/C-AMA, the associated air facilities are important in reflecting the overall significance of the facility. These air facilities also represent a key time in the emergence of the Army Air Forces from that of small branch of the Army into an independent fighting force. Airfields in the DTC/CAMA were rather more substantial in their construction than the division camps, and they (the airfields) often contained buildings with concrete foundations. Today, many of these facilities have been turned over to private use, altered for other uses, or have been dismantled altogether. In order to be considered potentially eligible for listing in the NRHP,

an airfield must have been an integral part of the DTC/CAMA operation (association). In addition, it must be able to convey this association. This would generally be accomplished through clear patterns on the site, including discernible runways, aircraft utility areas, as well as troop living areas.

In the case of RAAF, the historic context reports (Bischoff, 2000 and 2009) have recommended it as eligible for listing in the NRHP, as a contributing resource to the DTC/CAMA. RAAF played an important role in the training of several air units while they were stationed at the DTC/CAMA. These include the 312th, 339th, 85th, as well as other smaller units. The air units were able to fly extensive missions, largely unencumbered by weather or air traffic. This training proved invaluable in combat overseas. The importance of the field also extended to the support of the many ground units in training in the DTC/CAMA. Close coordination between air and ground units, as well as the creation of a realistic training environment were critical to the success of the DTC/CAMA. RAAF played an integral role in this. It was a multifaceted facility, containing many important interrelated elements. Today, RAAF remains a good example of a DTC/CAMA airfield. It contains elaborate, improved-surface runways that are clearly visible on aerial photos, along with an extensive apron and several airplane parking, taxiways, and dispersal pads. In addition, the airfield contained numerous permanent buildings. Although the buildings are gone today, their foundations remain. Furthermore, spatial patterns are remarkably intact. Individual unit areas, with the remains of their associated barracks, showers, latrines, and offices are clear. Rock-lined walkways delineating these areas, along with rocks outlining plants and former unit symbols are also in place.

Divisional Camps – Divisional camps form some of the most lasting resources from the DTC/CAMA. The camps were extensive in size, and were the locations of the most intensive activities during the life of the training facility. Camps were laid out in orderly, rectangular shapes, generally 3 miles long and 1 mile wide. Roads were bulldozed, and often lined with rocks. Individual unit areas were organized and decorated, with their numbers or symbols often spelled out with rocks. Open air theaters, water supply reservoirs and systems, post-exchanges, latrines, warehouses, and thousands of tents were installed. Relief maps were constructed in at least three of the camps (Iron Mountain, Coxcomb, Rice), and were designed to be a scale representation of the entire training facility. These features contained mounds of earth formed to represent mountain ranges, labeled with small wooden signs. Each map's surface was generally lined with a protectant to keep out the elements. Although the map at Camp Rice has deteriorated, it can still be found today.

Camp Rice, though not occupied as long as some other divisional camps, nevertheless played a key role in the operation of the DTC/CAMA. Several large units, including two full armored divisions, were stationed there while conducting training and participating in large-scale maneuvers. Corps-level maneuvers were also apparently planned and coordinated from the camp, as evidenced by the existence of a relief map there. Though certainly more Spartan and less developed than other camps in the facility, Camp Rice was an integral part of the training of ground troops in the DTC/CAMA.

According to the historic context (Bischoff, 2000; 2009), to be considered eligible for listing in the NRHP, divisional camps must convey their historical associations. More specifically, the basic outlines of the camp should be discernable. This means that rock-lined roads and walkways should still be in existence, along with outlines for tents or other specific activity

areas. Some idea of the size of these camps must also be discernible in order for them to truly convey their significance. Integrity considerations must keep in mind the original design of the camps, which was ephemeral. Much of Camp Rice is still visible today. Many of the camp's streets remain, as do rock-lined walkways and features. The camp is quite clear from the air, and many details can be picked out on the ground. Although short-lived compared to other divisional camps, Camp Rice still represents an important aspect of the DTC/CAMA.

3.3.3 Criterion B/2—Association with Historic Persons

Although the DTC/CAMA as a whole is eligible to the NRHP under Criterion B and the CRHR under Criterion 2, there does not appear to be a strong enough linkage between General Patton and RAAF and Camp Rice. Though Patton designed the facility, and his designs for realistic training and tough living environments pervade the remaining resources, he was not in the center when the two facilities were established, nor did he spend any time at either of them. Therefore RAAF and Camp Rice are not eligible for listing on the NRHP under Criterion B and the CRHR under Criterion 2.

3.3.4 Criterion C/3—Embodiment of a Distinctive Type or Period

Both facilities appear to also be contributors under Criterion C for the NRHP and Criterion 3 for the CRHR, reflecting a distinctive type, period, and method of construction. Each reflects the rapid mobilization to meet the urgency of World War II. They were constructed along standard plans, developed for the DTC/CAMA, as well as the U.S. Army in general. The sites still clearly illustrate the design of World War II era military training facilities, particularly as they relate to the DTC/CAMA. Taken together, these two camps located immediately adjacent to each other are an interesting aspect of the DTC/CAMA. It is unusual in the facility to have a full divisional camp and an airfield next to each other. Located immediately adjacent to the (then) Atchison, Topeka, and Santa Fe Railroad line, the road to Parker (later to become the Parker Highway and State Route 62), the Colorado River Aqueduct, and the small railroad settlement of Rice, Camp Rice, and RAAF were located along a strategic transportation route through the center. This was also the location where numerous units got off the train for the first time in the DTC/CAMA, creating lasting first impressions upon many of the soldiers who trained there.

3.3.5 Criterion D/4—Informational Important in History

Most property types associated with the DTC/CAMA exist today as archaeological resources (e.g., refuse deposits, the "footprints" of runways and landing strips, tank tracks, barracks foundations, foxholes, and bivouacs), many of which have artifactual components. These resources have the potential to be considered significant under any or all of the four criteria. In many cases they would be eligible under Criterion D (CRHR Criterion 4) for their ability to yield information important in history.

There is a large quantity of historic debris (39 artifact concentrations) dating from the period of significance for RAAF (1942–1944). In only the small portion of Camp Rice that is within the RSEP parcel boundary, there are 59 artifact concentrations. In the case of RAAF and that portion of Camp Rice within the RSEP project area, however, the information potential of the sites appears to have been diminished through the deliberate removal and burning of remains, looting over the ensuing 60 years, and general erosion. In addition, research

questions that could be posed to the sites could largely be answered through additional, intensive-level survey and analysis in conjunction with archival research and oral history information. The research potential of the sites can be exhausted through a comprehensive plan of additional analysis, recordation, documentation, and archival research. It appears, therefore, on the basis of information already gathered and reported in the AFC, that RAAF and Camp Rice are not eligible for listing on the NRHP under Criterion D or the CRHR under Criterion 4.

3.3.6 Integrity

The DTC/CAMA was deactivated April 30, 1944. With its deactivation, the War Department dismantled the camps, gathered supplies, materials and equipment and shipped them to other military depots. Currently there are no buildings remaining on any of the training camps, headquarters or airfields, including RAAF. Many features, structures, roads, and other traces remain, however.

The RAAF property was declared surplus under the Surplus Property Act of October 3, 1944 and turned over to the Department of Interior, Bureau of Land Management as disposal agent. The land was ultimately disposed into private ownership by quitclaim deed conveying title to all property and improvements to a private buyer dated July 24, 1947. When the U.S. Army abandoned the RAAF and Camp Rice, they removed all salvageable buildings and materials. There are numerous indications of the burning of materials on site, both the burning of trash and the burning of construction materials, accurate dating of such occurrences is difficult. According to local sources, much of the material remaining on the property after disposal by the U.S. government has been salvaged or removed by its prior owners and the area has likely been picked over by treasure hunters hoping to dig up and find materials left behind by the Army. The looting of the site is obvious with indications of more digging across both Camp Rice and the Rice Army Airfield. Aluminum cans with pull tabs are frequently found in pits that also include historic debris, a likely indication that the pits are a result of camping and exploration in years subsequent to airfield use.

Despite the modern disturbance and the erosion and deposition taking place through natural processes, RAAF and Camp Rice both retain the ability to reflect their significance. Aerial observation and photographs of both sites clearly show the major features on the site, as well as their spatial extent and design. Features are clearly visible from the air, and numerous small details can be seen on the ground. Despite the lack of architecture on the sites, there remains sufficient integrity to reflect the nature of the Army occupation of the desert in WWII. Though integrity of workmanship and materials is diminished by this lack of buildings, the integrity of location, design, setting, feeling, and association with the Army's usage generally convey the significance of both sites.

Clearly, the setting and location of RAAF and Camp Rice remain strong. Virtually no modern improvements or developments since the closure of both facilities remain and many of the towns that dotted the Arizona & California Railroad through this region, including Rice, have all but disappeared. The feelings of being in an isolated, foreboding location, far from the comforts of civilization remains. The design of the airfield and camp are also discernible, particularly in the runways, taxiways, dispersal pads, apron, camp roads, and living areas. These become much clearer from the air, though details can be clearly picked out on the ground. Unit areas, likely representing the base housekeeping units as well as

individual squadrons are also clear in the form of collections of the foundations of barracks, showers, latrines, and offices. Rock-lined walkways delineating these areas, along with rocks outlining plants and former unit symbols, are also in place. Similarly, roads and rock-lined walkways are also clear in the remains of Camp Rice. These elements help to provide a feeling of a military base. The remaining features, together with the largely untouched setting, convey a sense of the properties during the period of significance. The sites retain integrity of association, as these were both important component sites in the DTC/CAMA, clearly associated with the activities of this larger entity. The overall RSEP project parcel overlaps a small marginal area of the original Camp Rice; however, the limits of disturbance for RSEP remain outside of the outermost limits of the camp.

When viewing the extant resources, it is important to keep in mind that, despite its size, the training complex was designed to be temporary. Furthermore, the DTC/CAMA was intended to emulate actual battle conditions and to harden troops to the rigors of combat; being “temporary” was part of its design. Camps as well as other facilities contained only those improvements that were absolutely necessary. In the case of the divisional camps, few buildings were constructed, and most of those were deliberately made for short-term use. The DTC/CAMA was not to be like a regular military post, but instead was to act as a realistic theater of operations. Even RAAF, with its many buildings was described as bare-bones by the troops who served there. The ephemeral nature of the DTC/CAMA, therefore, was deliberately planned by the commanders. These factors must be borne in mind when evaluating DTC/CAMA resources. One cannot use standards applied to typical military installations. Each resource must be evaluated with regard to its historical significance in relationship to the entire facility.

3.3.7 Conclusion

To determine the eligibility of RAAF and Camp Rice, both their historic significance and integrity must be evaluated. These sites can be considered significant to our military history. As part of the larger 18,000 square-mile DTC/CAMA, both RAAF and Camp Rice played a part in a larger mission of training U.S. Army troops for war overseas. The combined training of air and land units was a valuable tool for the Army.

The historic significance of RAAF and Camp Rice is important. However, based on the field investigations, the physical remains of RAAF are well on their way to being reclaimed by the desert and have been impacted by salvage or destruction by prior owners and through fire and looting, leaving the integrity of these sites largely destroyed. There is little left of the built elements of the Rice airfield. The footprint and plan of the runways is visible from the air, but at ground level, the elements are not clear and are covered with heavy sand and vegetation. For comparison sake, of the three airfields used for desert training, Shavers Summit AAF, located at what is now called Chiriaco Summit, retains a high degree of its original design and is still used as an airfield. While one of the two air strips at the Desert Center AAF has been abandoned, the other is still in use. Many of the airfield features comparable to the RAAF remain intact at Desert Center.

This said, despite historic and modern disturbance and the on-going erosion and deposition taking place through natural and cultural processes at these sites, RAAF and Camp Rice are important components to a NRHP-eligible DTC/CAMA cultural landscape district. A draft multiple property submission for this district was submitted, and is awaiting edits for final

approval. The BLM's context report (Bischoff 2000) found these sites eligible for listing in the NRHP because of their association with significant historic events (Criterion A/1). These two sites may be considered as contributing elements to this overall submission for the DTC/CAMA district. When viewed as an important component of the whole, RAAF and Camp Rice both help to convey the significance and scale of the DTC/CAMA. As a result, both the RAAF and Camp Rice should be considered eligible for listing on the NRHP and the CRHP under Criteria A/1 and C/3 as contributing resources to a cultural landscape district.

3.4 Project Effect

Construction of the RSEP as described in the October 2009 AFC would involve wholesale disturbance of many of the remains of the RAAF's airfield, taxiways and dispersal pads. Under the AFC plan, the RSEP's administration and maintenance buildings, heliostat assembly building, construction worker parking and construction laydown areas at the north end of the heliostat field would be located in the former RAAF camp area. This RAAF remains in this area include concrete foundations of the headquarters, officer's quarters, officer's club, enlisted man's mess, enlisted man's barracks, among other concrete foundations, rock alignment pathways, and refuse deposits. Construction of the heliostat field would result in the alteration of the apron and the operations building, link trainer building, and dispensary foundations; some of the unit tent areas and the foundations for their kitchens and bath houses; all of the eastern runway and dispersal pads associated with the eastern runway; and about one third of the western runway. Intact and outside of the heliostat circle and project fenceline would be the taxiway to the western runway, about two-thirds of the western runway, and all of the western dispersal pads and their taxiway.

The result of constructing the RSEP would be that several elements of the facility layout would no longer be visible or apparent, either on the ground or from the air or in aerial photographs. In addition, the concrete foundations and refuse deposits and rock alignments that are located in the camp area would be removed. As a result, these features would not be available to provide information about the layout of the RAAF and would no longer convey the historical significance of the RAAF as a contributing element of a DTC/CAMA National Register historic district.

The effects would be as follows, in relation to the National/California Register Criteria.

3.4.1 Rice Army Airfield

3.4.1.1 Criterion A/1—Association with Historical Events

Construction of the RSEP would not entirely remove the remains of RAAF and would not entirely eliminate its association with the historic events of the DTC/CAMA and World War II. However, it would diminish this site's ability to convey the significance of these events. RAAF would maintain significance, but with integrity of feeling, association, materials, and setting greatly reduced.

3.4.1.2 Criterion B/2—Association with Historic Persons

RAAF is found not eligible for listing under Criterion B/2; therefore, the RSEP would have no effect on this aspect of significance.

3.4.1.3 Criterion C/3—Embodiment of a Distinctive Type or Period

Construction of the RSEP as described in the AFC would remove the property's ability to convey the distinctive characteristics of a type (DTC/CAMA installation) and period (1942-44 World War II) almost entirely because it would remove the remains in the RAAF camp area. These remains, along with the concrete apron, runways, taxiways, and dispersal pads, are the remains capable of conveying this aspect of significance. The runways and taxiways, however, are being reclaimed by the desert vegetation, have lost much of this ability, and would be likely to continue to do so without the RSEP.

Construction of the RSEP would also introduce new elements to the historic setting and diminish its integrity. The heliostat field with its mirrors and the tall central tower will introduce a change to the setting. During the 1942-44 period of significance, soldiers training at Camp Rice were greeted with unobstructed views and an absence of civilization and the feelings of being in an isolated, foreboding location, far from the comforts of home. The RSEP would change this aspect of the setting.

3.4.1.4 Criterion D/4—Informational Important in History

RAAF is found not eligible for listing under Criterion D/4; therefore, the RSEP would have no effect on this aspect of significance. Although numerous refuse dumps and deposits would be removed as part of construction, these deposits are not likely to contribute useful information about DTC/CAMA that is not more readily obtained from archival and other sources.

3.4.2 Camp Rice

Construction of the RSEP, as currently planned, would not directly affect Camp Rice. Areas that have been defined as within the bounds of Camp Rice would not in the current plan be affected.

The RSEP would have an indirect effect on the setting of Camp Rice, however. It would introduce new elements to the setting of Camp Rice; namely, the heliostat field and the central tower. These elements present a significant change to the setting as it relates to the 1942-44 period of significance, as described above. This change is entirely indirect, however. It would diminish the integrity of Camp Rice's setting, but would not remove the site's ability to convey significance through its setting. It is also worth noting that there are several other DTC/CAMA camp remains like Camp Rice (consisting of roadway and archaeological remains) that are located on federal land also and in remote areas. These include Camps Granite and Iron Mountain, among others. The setting of Camp Rice is not, therefore, unique and this reduces the severity of the effect that diminishing Camp Rice's integrity would otherwise have.

4.0 Mitigation Measures

Mitigation of the adverse effects of the RSEP on RAAF and Camp Rice should be based on the qualities of significance of these properties and should seek to compensate for any potential loss of their public interest value as historic properties. Mitigation efforts should be proportional to effects, but should also seek cost-effective ways to exploit opportunities available to enhance the public's understanding of key aspects of our American heritage. This following mitigation plan for RSEP stresses the following key elements:

- Oral history to recover information
- Archival research to increase public knowledge
- Site mapping
- Public education/interpretation
- Avoidance
- Public access

4.1 Oral History

The value of RAAF and Camp Rice as historic resources stems from their ability to convey the significance of the historical events (criterion A/1) and a historical period (Criterion C/3) to the American public. These properties have the potential do so, however, only insofar as information is available to interpret them effectively and accurately to the public. As the living memories of World War II fade with the passing of a generation, interpretation must increasingly depend on archival and oral history sources. At this moment, the most important of these are oral history sources. Men and women who served in World War II are now in their 80s or 90s. We are rapidly losing this important informational resource to illness and death. One of the most effective mitigation measures that could be carried out for RAAF, therefore, is an effort to identify veterans who trained at RAAF and Camp Rice and to record their oral histories using established oral history techniques and conducted by a person trained to collect oral histories. The following would be key elements of this program:

- Contact unit historians for units known to have trained at RAAF and Camp Rice to identify living World War II veterans
- Approach veterans identified to request an oral history interview
- Conduct the oral history interview and record the interview on audio and/or video media
- Transcribe the interview and deposit the transcript and the video material in a records repository such as the General George Patton Museum, the Special Collections Department at the University of California at Riverside, or other qualified repository

It is not certain that many qualified veterans (those who served at RAAF or Camp Rice, and are able to be interviewed) could be located. RSE, however, has identified one veteran who trained at Camp Rice and has conducted an oral history interview as a pilot project for this mitigation measure.

Because of the very high historical and public interpretation value of this historical resource and because the number of eligible veterans is rapidly declining, this mitigation measure should be given the highest priority. It is recommended that up to 10 interviews be conducted, if this many qualified veterans can be located.

4.2 Archival Research

RAAF and Camp Rice are poorly known among the DTC/CAMA installations for reasons that are not clear. Some sources do not even include these installations in lists and maps. Although there is ample historical information to place RAAF and Camp Rice in the historic context of World War II and DTC/CAMA, such as the BLM context statement developed by Matt Bischoff (2000), information that is specific to these two installations is somewhat lacking.

Archival research is an established method for mitigating effects on historic properties. One purpose of this method is to provide background information that will be useful in interpreting the site to the public and thus helping to realize the RAAF's potential for historic site interpretation and thereby compensate for the loss of integrity and significance under Criterion C/3. Another is to make additional information readily available to scholars of military history.

Archival research would involve accessing archives of World War II historical record groups that are housed in the National Archives system (Washington, D.C., Laguna Niguel) and other sources such as the General George Patton Museum, locating records associated with units or persons who trained at RAAF and Camp Rice, and then recording or abstracting from these record groups any information they may contain about the unit or person's training period at DTC/CAMA. Less detailed information would also be collected regarding the subsequent service of the given unit or person during World War II.

Special attention would be paid to locating archival photographs or film footage of RAAF and Camp Rice. This information could be particularly useful in interpreting the sites to the public (see Section 4.4).

The specific goal of the archival research program would be to locate written records from a wide variety of sources, including papers, newspapers, unit histories of the units that trained there, personal recollections, diaries, etc.). The primary goal of this effort would be to document as far as is possible, the history of the facilities, particularly within their historic context as well as the DTC/CAMA itself. It would be carried out by a military historian qualified to conduct archival historical research and meeting the qualifications stated in the Secretary of the Interior's Standards and Guidelines for Historic Preservation, for historic archival research.

The end products of this archival research effort would be as follows: (1) The historian would prepare a summary technical report of the archival research findings that includes a description of the records identified and researched along with and a summary of the

research findings. (2) The historian would prepare a more technical article to convey the report of the archival research findings regarding the DTC/CAMA training at RAAF and Camp Rice for publication in a scholarly journal or (depending on the quality of the new information uncovered in the archival research program) a popular periodical publication. (3) The archival research information would be made available to the public at a qualified repository such as the General George Patton Museum.

4.3 Site Mapping

Although RAAF has been determined not to meet the National Register criteria under Criterion D/4 (Information important in history), proper interpretation of the site depends on an accurate understanding of its extant physical remains. This is particularly important because a portion of the airfield lies within the heliostat field where any intact remains are likely to be disturbed. Existing aerial photographs clearly show the roadways and most of the remains are now overtaken by vegetation and sand. In addition, an April 1944 revision of a December 1942 Army Corps of Engineers plan drawing of the project site identifies buildings by type, but may or may not be a comprehensive mapping of all facilities that were constructed at the installation, given that most of the buildings were designed as temporary facilities. No buildings of above-ground structures are documented south of the apron, only taxiways, dispersal stands and temporary utility ducts and drainage features. It is important, in addition, to have available a more accurate map of the site remains as they are now than is currently available in order to aid in interpretation of the DTC/CAMA. The site map should be prepared in one of the following ways:

- 1) Take low-altitude, high-resolution aerial photographs of the RAAF site, and use the photographs as a base map on which to outline (hand-draw) the remaining physical features, including foundations, refuse pits, stone alignments, and roads. The features should be annotated to indicate the building function as indicated on the 1942/1944 plan view.
- 2) For the camp area (area including the apron and area directly north of the apron), use final engineering design drawings with 1- or 2-foot contours when these are available as base maps on which to draw the remaining physical features, as in method #1.
- 3) Use sub-meter accuracy global positioning system (GPS) devices to record each of the major physical features (listed above) in detail and generate a map using geographical information systems (GIS) on a topographic or aerial photographic base.

The final product of this effort should be a detailed map of the features in the camp area. Existing GPS information collected during the field inventory is sufficient for the other areas.

4.4 Public Education

The oral history interviews, archival research, and site mapping proposed will not realize their potential benefits without a specific program to interpret the RAAF and DTC/CAMA to the public. This can be accomplished in several ways, including the following:

- An internet site administered by SolarReserve or other entity (such as BLM or General George Patton Museum) on which historical summaries, illustrations, and documents

are posted that describe the RAAF and Camp Rice and their historical importance to the public.

- A public interpretation pamphlet featuring a brief summary of the history of DTC/CAMA and RAAF, along with photos and maps that can be made available on site (see section 4.6, at the General George Patton Museum, and in other venues).
- An interpretive kiosk on or near the project site (see section 4.6) with display panels having interpretive text, graphics, and photographs that interpret the DTC/CAMA, RAAF, and Camp Rice.

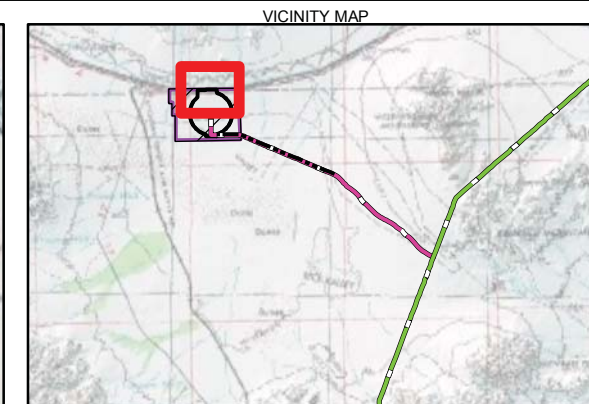
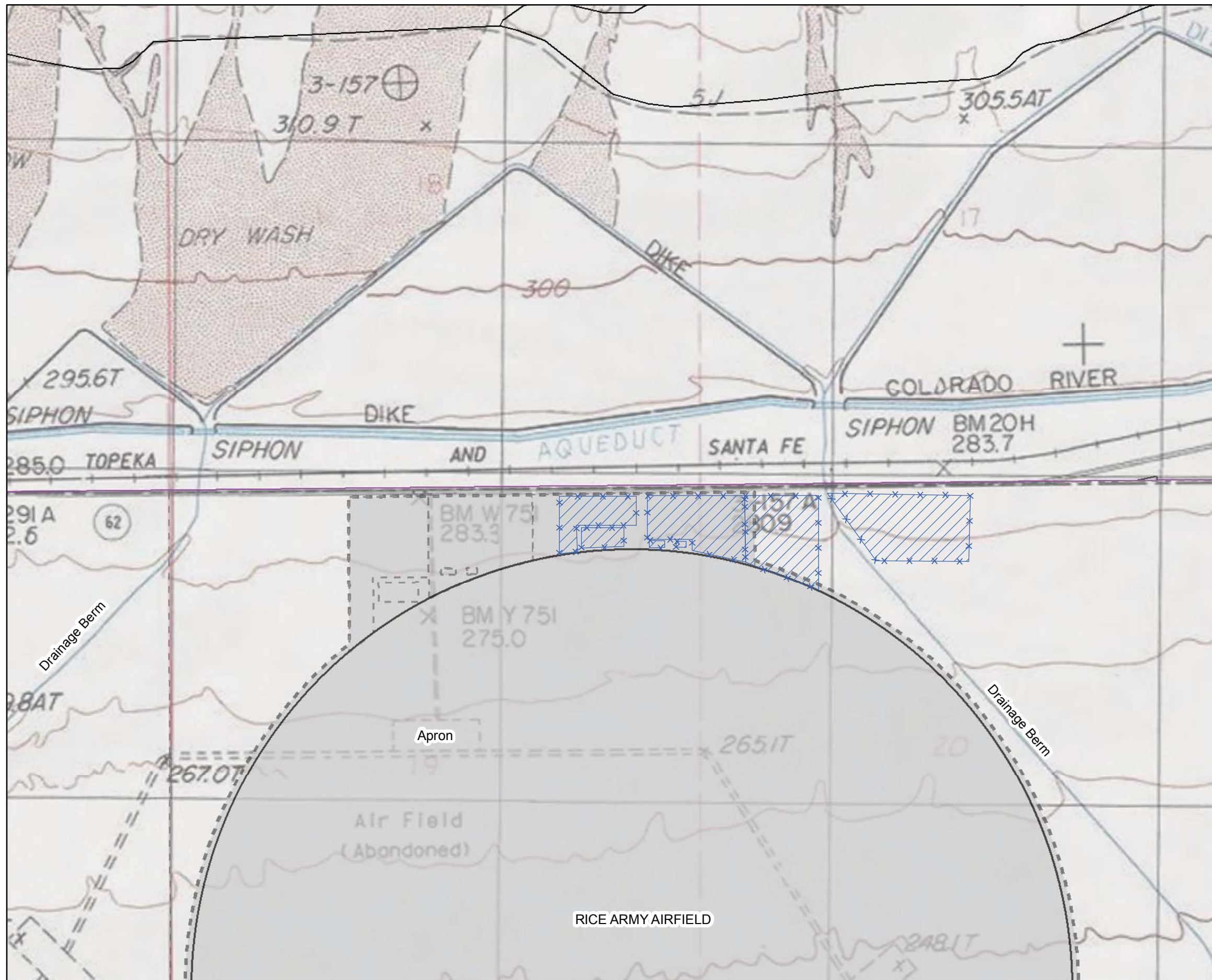
4.5 Avoidance

Avoidance is always the preferred historic property treatment measure. In this case, however, it is not possible to entirely avoid the remains of RAAF. The RSEP site was chosen for solar development because it is: (a) private land, (b) a formerly used, brownfield site that provides less optimal wildlife habitat than surrounding areas, (c) not directly impacted by natural washes or streams, and (d) in relative close proximity to an existing high-voltage transmission corridor. On-site conditions make it unfeasible to move the heliostat field from its current designed location or to reconfigure the heliostat field to avoid all remains.

It is feasible, however, for RSE to move the RSEP design elements that lie outside of heliostat field and at its northern end in the former RAAF camp area. RSE will endeavor to avoid as many of the remains of the structures in the camp area as possible, and proposes a change to the October 2009 AFC design that will move the project's construction and operation features that lie on the north side of the heliostat field into an area that contains no RAAF structural remains or remnant streets or roadways. Under this new proposed design, the RSEP's site access location, administration building, maintenance building, heliostat assembly building, construction worker parking, and construction laydown would be shifted to the east (compared with the AFC design) so that they would be outside of the RAAF camp area. By shifting the locations of these facilities, RSEP construction and project operation can effectively avoid all significant remains in the RAAF camp area that are outside of the heliostat circle. Figures 4 and 5 show this new design, with the RSEP construction facilities moved 1,200 feet to the east and the project entry lane moved from the existing location along the former RAAF entry lane to a position at the top (north) end of the heliostat field. This allows for a significant buffer between the new RSEP entry, construction laydown, and administration area and the RAAF entry and camp area. Figure 5 is a design detail of the newly configured area. Please refer to Figure 3 (in Section 3.0, above), to see where the RAAF camp facilities were located.

The new locations of the RSEP facilities will be entirely within the areas that have been surveyed for cultural, biological, and other applicable resources considered by the CEC under the Warren-Alquist Act and so will not require additional studies for permitting.

Avoiding as many of the RAAF structural remains as possible will reduce the RSEP's effect on their integrity of feeling and association and their ability to convey the historical significance of DTC/CAMA and RAAF.



- LEGEND**
- PROJECT PARCEL BOUNDARY
 - OCTOBER 2009 AFC RSEP FENCELINE
 - OWNERSHIP PROPERTY
 - HELIOSTAT FIELD
 - PROPOSED NEW FENCELINE

This map was compiled from various scale source data and maps and is intended for use as only an approximate representation of actual locations.

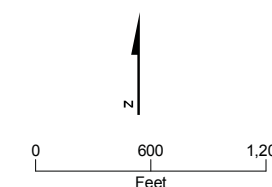
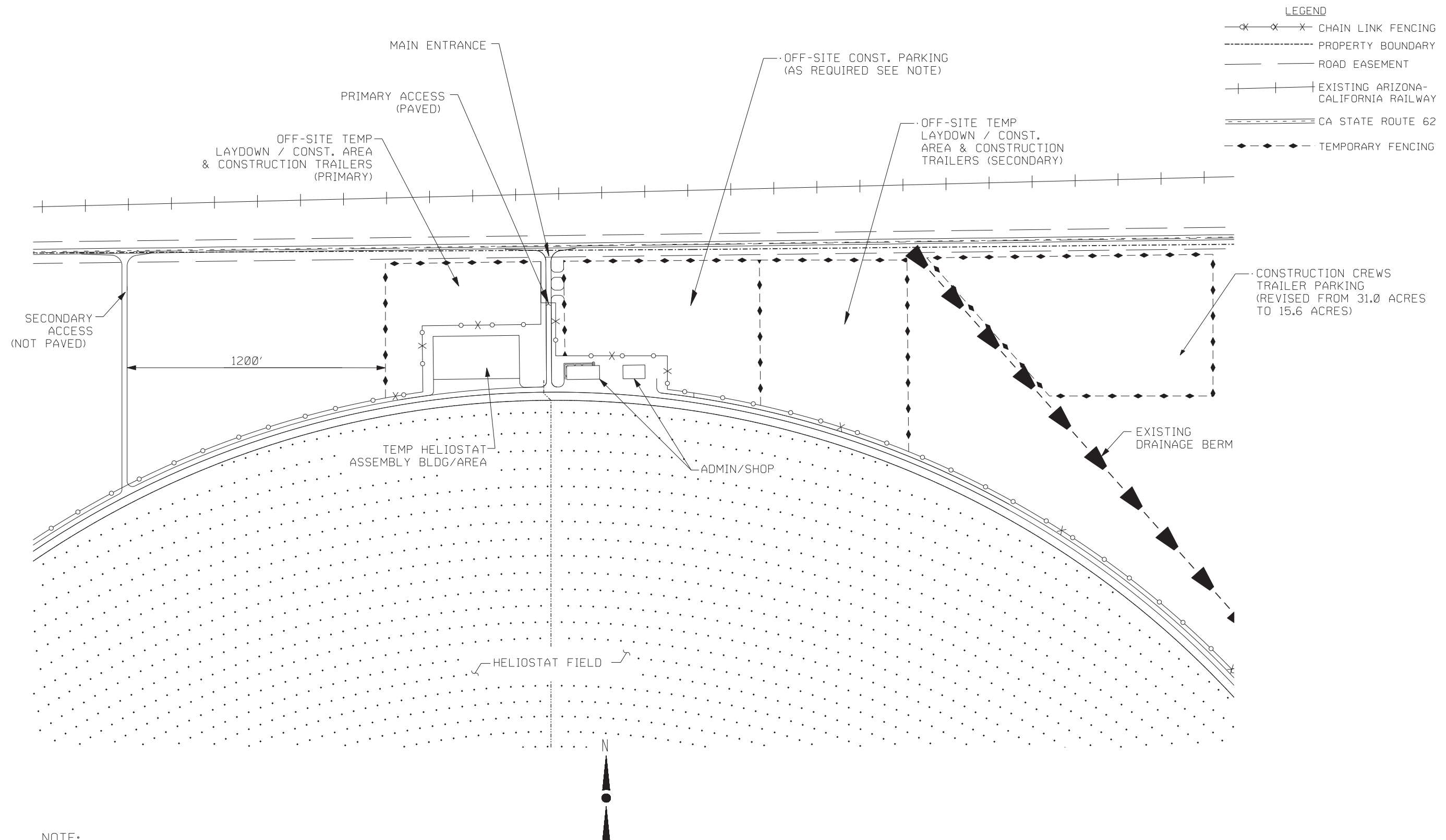


FIGURE 4
RECONFIGURED RSEP ENTRY,
ADMINISTRATION, CONSTRUCTION
LAYDOWN, WORKER PARKING, AND
WORKER CAMP AREAS
 RICE SOLAR ENERGY PROJECT
 RIVERSIDE COUNTY, CALIFORNIA



NOTE:

THE PARKING AND LAYDOWN AREAS SHOWN ARE LABELED "OFF-SITE" BECAUSE THEY ARE LOCATED OUTSIDE THE PERMANENT FENCE LINE AND THE PERMANENT FACILITIES. ADDITIONAL PARKING AND LAYDOWN WILL BE USED WITHIN THE HELIOSTAT FIELD AND POWER BLOCK AREA, BUT ARE NOT SHOWN.

PRELIMINARY
NOT FOR CONSTRUCTION

**FIGURE 5
DETAIL OF THE NEW
PROPOSED CONSTRUCTION
LAYDOWN BOUNDARY**

Rice Solar Energy Project
Riverside County, California

4.5 Public Access

Section 4.4 described a pamphlet and interpretive kiosk as part of a public education program. Avoidance of camp area remains means that these would remain available for public interpretation if the public were to be allowed access to them (they are currently on private land). In addition, there is a provision in the Warren-Alquist Act, the CEC's enabling legislation (California PRC §25529) that states the following:

When a facility is proposed to be located in the coastal zone or any other area with recreational, scenic, or historic value, the commission shall require, as a condition of certification of any facility contained in the application, that an area be established for public use, as determined by the commission.

Although the RSEP is not located in a coast zone or recreational or scenic area, the RAAF and Camp Rice do have historical value. In addition, the mitigation goal of public education is consistent with the goal of providing public access. RSE therefore proposes establishing a public use area adjacent to the RSEP, the purpose of which is to interpret RAAF and Camp Rice. The public use area will have the following elements:

- A turnoff from State Route 62, designed to comply with Caltrans safety requirements
- Parking area for up to 8 vehicles.
- Interpretive kiosk that consists of panels having text and illustrations (photographs, maps, diagrams) that illustrate and interpret RAAF and Camp Rice as components of the larger DTC/CAMA. The interpretive kiosk might be protected by a structure that shades the interpretive panels or such protection as may otherwise be desirable to prevent damage due to long-term exposure to the elements.
- Other interpretive amenities might include, for example, a reconstruction of the large-scale relief map of the Rice Valley area that was created at Camp Rice for training purposes.

4.6 Conclusion

The mitigation program proposed here would take the RSEP's effect on the RAAF and Camp Rice effectively into consideration. This program has the potential to provide significant benefits to the public in the following key ways:

- Collect oral histories of World War II veterans that will otherwise be lost to posterity
- Collect and assemble archival information on RAAF and Camp Rice that would otherwise be unlikely to be collected and assembled for these installations in the near future
- Prepare a detailed map of the remains in the RAAF administration area that can be compared with the archival plan view drawings
- Disseminate this and other information to the public in an educational and easily accessible format such as an interpretive display panel, brochure, or internet site

-
- Provide the public an area that interprets DTC/CAMA and RAAF that will be a recreational resource in this remote location that also satisfies California Energy Commission requirements.

These measures are sufficient to mitigate the otherwise adverse effects of RSEP on the RAAF and Camp Rice.

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**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 *RICE SOLAR ENERGY POWER
PLANT PROJECT***

Docket No. 09-AFC-10

***PROOF OF SERVICE*
(Revised 3/4/2010)**

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DECLARATION OF SERVICE

I, Mary Finn, declare that on June 18, 2010, I served and filed copies of the attached, 09-AFC-10-RSEP SII (Supplementary Information Item #3 – Draft Historic Property Treatment Plan. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [\[http://www.energy.ca.gov/sitingcases/ricesolar\]](http://www.energy.ca.gov/sitingcases/ricesolar).

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

x ____ sent electronically to all email addresses on the Proof of Service list;

____ by personal delivery

____ by delivering on this date for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for the 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 "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

x ____ sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (***preferred method***);

OR

____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 09-AFC-10

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.



Mary Finn