

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



June 27, 2011

Reply in Reference To: DOE110427A

Department of Energy
c/o Jim Shearer
Bureau of Land Management
Barstow Field Office
2601 Barstow Road
Barstow, CA 92311

Re: Abengoa Mojave Solar Project and Lockhart Substation Connection and Communication Facilities Upgrade, San Bernardino County, California

Dear Mr. Shearer:

Thank you for seeking my consultation regarding the above noted undertaking. Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act (NHPA), the Department of Energy (DOE) is seeking my comments on the effects the proposed undertaking will have on historic properties.

The project, as I understand it, consists of providing a Federal loan guarantee to Mojave Solar LLC to construct a 250 megawatt solar-thermal solar field in San Bernardino County. The solar thermal field will consist of two parabolic reflector arrays and two central generating towers. The solar field will also require construction of a new substation and four new power poles to connect to SCE power lines. The loan guarantee also includes installing 85 miles of fiber optic line, mostly on existing overhead utility poles and existing underground conduits. The use of existing conduit will not require any excavation to feed the fiber optic lines. The fiber optic line will also require 400 feet of trenching directly adjacent to Harper Lake Road, 1000 feet of trenching within the proposed Lockhart Substation site, 225 feet of trenching underneath State Route 18, and 500 feet of trenching along US Highway 395 at Rancho Road. All trenches will be three feet wide and three feet in depth. Additional power lines will be upgraded on existing poles except for the replacement of seven poles as described in your supplemental description received May 31, 2011. The Area of Potential Effects will include approximately 1765 acres for the solar field and an additional 85 mile long by 300 foot wide corridor for the fiber optic line. The entire 1765 acre solar field portion of the APE will be graded up to ten feet with foundation pads for the reflectors requiring and additional depth of up to ten feet and foundation pads for the towers will be up to ten feet deep. The drainage canals could go as deep as 20 feet. In addition to your letter received April 27, 2011, you have submitted the following document as evidence of your efforts to identify historic properties in the APE:

- *Cultural Resources Class III Survey Report for the Proposed Mojave Solar Project and Lockhart Substation Connection & communication Facilities San Bernardino County, California* (Stacie Wilson et al., AECOM, March 2011)

The DOE has performed a records search at the San Bernardino Archaeological Information Center and through their consultants, performed a pedestrian survey of the APE by way of 15 to 20 meter transects and identified a total of 112 archaeological sites and 19 built environment properties within the APE. Of these, the DOE determined that seven archaeological sites are not eligible, four have previous determinations which will not be revisited for this undertaking and the other 101 archaeological sites and all built environment properties are left unevaluated and assumed eligible for the purposes of this undertaking and will be avoided.

The DOE, through its consultant, has invited the Chemehuevi Tribe, Morongo Band of Mission Indians, the San Manuel Band of Mission Indians, Twenty-Nine Palms Band of Mission Indians, Colorado River Indian Tribes, Fort McDowell Yavapai Nation, Fort Mojave Indian Tribe, Kaibab Band of Paiute Indians, Las Vegas Tribe of Paiute Indians, Moapa Band of Paiute Indians, Paiute Indian Tribe of Utah, and Yavapai-Apache Nation of the Camp into consultation. The DOE's consultant also sent letters to contacts listed by the NAHC. The San Manuel Band of Mission Indians has been actively involved in the project and has voiced concerns regarding formal government-to-government consultation, monitoring, inadvertent discoveries, and a treatment plan for discoveries. The San Manuel Band of Mission Indians has requested the presence of a monitor and to be contacted in the case of discoveries. Additionally, the DOE should continue government-to government consultation with federally recognized tribes as requested throughout project implementation.

The DOE has determined that there will be no adverse effects to historic properties. Based on the documentation submitted I have the following comments:

1. Pursuant to 36 CFR 800.4(c), I concur with the DOE's determination that sites CA-SBR-7429H, -13526H, -13533H, -13538, -13537H, -13539H, and P-36-21099 are not eligible for the National Register of Historic Places.
2. I concur with the DOE's plan to assume eligibility of the other 101 archaeological sites and to avoid the sites. Most of the sites are within the utility upgrade corridor, which will not affect the sites as all use of the corridor will remain in the existing, previously disturbed access route and use existing poles.
3. I concur with the DOE's plan to assume eligibility of the built environment properties, including the transmission line within the APE, and that none of these properties will be adversely affected by the undertaking.
4. Pursuant to 36 CFR 800.5(c), I concur with your finding of No Adverse Effects to historic properties, with the conditions that an archaeological monitor and appropriate Native American monitor be present during ground disturbing phases of construction and the utility upgrade activities and that all equipment in the utility upgrade corridor stay on the existing access road at all times.

If you agree with the conditions that I have proposed, please evidence your agreement by signing the signature block below. Please return the letter to me as soon as possible. Alternatively, you may provide me with a separate letter concurring in the proposed conditions

Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, especially for contamination mitigation if necessary, the DOE may have additional future responsibilities for this undertaking under 36 CFR Part 800. Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Trevor Pratt of my staff at (916) 445-7017 or at email at tpratt@parks.ca.gov.

Sincerely,

Susan K Stratton for

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

AGREED



Jim Shearer, BLM Archaeologist for
Department of Energy

DATE: June 28, 2011