



"Managing a



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Arizona Corporation Commission

August 26, 2008

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In Reply Refer to:

SHPO-2008-1064 (37442)

Public Comments - Survey Required

AUG 28 2008

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John Foreman, Assistant Attorney General
Attorney General's Office
1275 W. Washington Street
Phoenix, AZ 85007

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ARIZONA CORPORATION COMMISSION
SECRET CONTROL

DOCKETED BY [Signature]

Re: Receipt of Notice of Hearing Before the Arizona Power Plant and Transmission Line Siting Committee; and Notice of Amended Hearing Before the Arizona Power Plant and Transmission Line Siting Committee regarding the Applications of Arizona Solar One, LLC for Certificates of Environmental Compatibility Authorizing (1) the Solana Generating Station and (2) the Solana Gen-Tie (Transmission Line).

Janet Napolitano
Governor

State Parks
Board Members

Chair
William C. Scalzo
Phoenix

Arlan Colton
Tucson

Reese Woodling
Tucson

Tracey Westerhausen
Phoenix

William C. Cordasco
Flagstaff

Larry Landry
Phoenix

Mark Winkleman
State Land
Commissioner

Kenneth E. Travous
Executive Director

Arizona State Parks
1300 W. Washington
Phoenix, AZ 85007

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602.542.4180

Director's Office Fax:
602.542.4188

Requirement for Class III Cultural Resources Inventory of Lands Related to Construction of the 280 MW (formerly 250 MW) Solana Solar Power Generating Station and Associated 230 kV Transmission Line (or Alternative) Which Will Originate at the Solana Generating Station and Terminate at the Panda Substation Near Gila Bend, Maricopa County, Arizona (SHPO Project No. SHPO-2008-1064).

Dear Mr. Foreman:

The State Historic Preservation Office (SHPO) has received the Notices of a Public Hearing and comment period for the Solana Generating Station and Solana Gen-Tie (Transmission Line) Project. We are communicating with you as Chairman of the Power Plant and Transmission Line Siting Committee of the Arizona Corporation Commission (ACC), the lead agency for purposes of compliance pursuant to A. R. S. 41-861 through 41-865, A. R. S. 41-841 through 41-844, and other state historic preservation legislation enacted to protect and preserve Arizona's cultural resources. Our advice to a state agency under state statute should not be construed or used in any way to substitute for or limit our advice to a federal agency under federal law. If a federal agency has an undertaking related to the above-referenced project, that agency will need to consult with our office directly under Section 106 of the National Historic Preservation Act.

As you recall, a Class I cultural resource file and records search was performed for this project by J. Moses of Antigua Archaeology, LLC, June 24, 2008 and submitted to our office for review. The purpose of the Class I file and records search was to determine the level of previous archaeological work and assess the need for future archaeological work before a Certificate of Environmental Compatibility (CEC) is issued to project proponents and before ground disturbance begins. The suggested level of cultural resources survey for both the solar generating station 3000-acre parcel and the 20-mi. linear parcel for the transmission line would be a Class III intensive survey. Though much of the 3000-acre parcel has been in agricultural production for years, historic properties, particularly prehistoric archaeological sites, may still exist buried beneath the plow zone, and accessibility to the ground surface will be greatly reduced after the installation of solar collectors and construction of the generating station.

Under Governor Janet Napolitano's Executive Order 2006-14, as Chairman of the Power Plant and Transmission Line Siting Committee of the Arizona Corporation Commission, you should consult on a government-to-government basis with affected tribes associated with this project. The SHPO would appreciate the opportunity to comment on the scope of work and upon the professional cultural resource reports generated for this project before the CEC is issued.

We appreciate consultation with our office regarding the proposed Solana Solar Generating Station and Transmission Line. Thank you for considering Arizona's valuable cultural resources in the planning efforts. If you have any concerns or questions, please contact me at (602) 542-7137 or cgibson@azstateparks.gov.

Sincerely,



Connie Thompson Gibson, RPA
Archaeologist & Compliance Specialist
Arizona State Historic Preservation Office

Cc: Larry Killman, Principal, Tierra Environmental Consultants, LLC