



United States Department of the Interior

NATIONAL PARK SERVICE

CALIFORNIA, MORMON PIONEER, OREGON & PONY EXPRESS NATIONAL HISTORIC TRAILS

Long Distance Trails Office

324 South State Street, Suite 250

Post Office Box 45155

Salt Lake City, Utah 84145-0155

IN REPLY REFER TO:

December 18, 2000

Mark S. Delligatti
Spent Fuel Licensing Section
Licensing and Inspection Directorate
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Delligatti:

We appreciate the opportunity to respond to your letter of December 1st regarding the Private Fuel Storage installation in Skull Valley and on the Goshute Reservation. Our response is on the adverse effects and the draft Memorandum of Agreement.

The determination of adverse effects on the cultural resources identified in the inventory of the project area is noted and we concur with that determination. In our November 10, 2000, response, we raised a concern about the lack of the cultural (historic) landscape and once again wish to call that to your attention. The same adverse effect noted for the archeological resources pertains to the cultural landscape.

Skull Valley holds a significant and critical landscape of the California National Historic Trail. It is part and parcel of the cultural resources and worthy of inclusion as a key element in not only the determination of eligibility, but also one that will be compromised and adversely effected by the Private Fuel Storage installation. It is a resource just as those listed sites with which we concur.

Again, the *Comprehensive Management and Use Plan, Environmental Impact Statement, California National Historic Trail*, (1999) identified, as required, "high potential sites" and "high potential segments" of the trail. One such segment identified in the management plan is that which crosses Skull Valley, and thus is in the project area. It is a section of trail not only historically significant, but meets the criteria of the National Trail System Act (1968), for "high potential segments." The cultural landscape is a key item of the criteria.

The draft Memorandum of Agreement seems appropriate in all respects except the cultural landscape. In the Stipulations section. **I. Development of Treatment Plan (for**

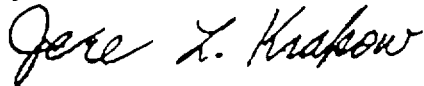
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Eligible Resources), it does not contain any language about the landscape. Several of the individual items pertain to cultural landscape just as they do to archeological resources including data recovery, field analysis, dissemination of the data, schedule of reports, and treatment of the landscape.

As developed above, and in our November 10th letter, the cultural landscape merits inclusion. It is as much a part of the cultural resources of Skull Valley as the archeological resources. We urge you to note them.

Please contact us if we can clarify our comments.

Sincerely,

A handwritten signature in cursive script that reads "Jere L. Krakow".

Jere L. Krakow
Superintendent

cc: Laird Naylor, Salt Lake District Office, Bureau of Land Management
George Ivory, Chairman, Utah Historic Trails Consortium
Utah State Historic Preservation Officer