



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
333 Bush Street, Suite 515
San Francisco, California, 94104

ER 18/0152
File 9043.1

May 21, 2018

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Subject: COMMENTS and RECOMMENDATIONS – Notice of Preliminary Permit
Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and
Competing Applications for the Sacaton Energy Storage Project - Pinal County,
Arizona, FERC No. 14869-000

Dear Ms. Bose:

Thank you for providing us with information regarding the RAMM Power Group LLC's application for a preliminary permit, proposing to study the feasibility of the Sacaton Energy Storage Project (Sacaton Project or project), a closed-loop pumped storage project to be located in Pinal County, Arizona. Please be aware that Snaketown National Historic Landmark (NHL), which was designated on April 29, 1964, is in Pinal County and may be impacted by the proposed project.

Section 110(f) of the National Historic Preservation Act (NHPA) requires that “prior to the approval of any Federal undertaking, which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.” Moreover, as stated in 36 CFR Part 800.10(c), federal agencies are required to notify the Secretary of the Interior (delegated to the National Park Service) of any consultation involving an undertaking at an NHL and invite the Secretary to participate in the consultation where there may be an adverse effect. Adverse effects are not limited to direct impacts and include visual effects.

Please provide us with more information about the project boundaries and your intended compliance with Section 110(f)/Section 106 of the NHPA. If the project is determined to affect the NHL, we will continue consultation with you to resolve adverse effects and propose appropriate treatments. Ways to avoid, minimize, or mitigate potential harm to Snaketown NHL should be considered during the “earliest stages of project planning” 36 C.F.R. §800.1(a).

If you have any questions, please contact Skylar Bauer, Archeologist, National Park Service, Intermountain Regional Office, 12795 W. Alameda Pkwy., Lakewood, CO 80228, 303-969-2842, skylar_bauer@nps.gov.

In the event this preliminary permit is granted, and before environmental impacts are assessed, please contact this office at the above address; we will provide contacts for DOI Bureaus that, because of their jurisdiction and/or special expertise, will be involved in the necessary environmental impact analysis process. We appreciate the opportunity to review this application and provide these COMMENTS and RECOMMENDATIONS.

Sincerely,

A handwritten signature in blue ink that reads "Stephen R. Spencer". The signature is written in a cursive style and is contained within a thin black rectangular border.

Stephen R. Spencer, Ph.D. for
Janet Whitlock
Regional Environmental Officer

cc: FERC Service List

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Sacaton Energy Storage Project –) FERC No. 14869-000
Pinal County, Arizona)

Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications

Certificate of Service

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in these proceedings.

Dated on this 21st day of May, 2018.



Stephen R. Spencer, Ph.D. for
Janet Whitlock
Regional Environmental Officer
U.S. Department of the Interior
333 Bush Street, Suite 515
San Francisco, California, 94104

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