



IN REPLY REFER TO:

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

November 10, 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:

Thank you for the opportunity to comment on the inventory of archeological and historic sites identified in the project area of the nuclear storage area and the proposed railroad in Skull Valley Utah.

Our review of the sites related to the California National Historic Trail concurs with your recommendation that the sites are determined eligible for the National Register of Historic Places. One concern remains however, and that is the historic landscape. That aspect was not examined in the inventory, nor given recognition in the assessment. The historic landscape of Skull Valley is a significant and critical element of the Hastings Cutoff Route of the California National Historic Trail. The resources of the historic trail are an ensemble of elements that include the landscape. We believe such to be a key element to the National Register determination.

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 in the nuclear storage project area. It is a section of trail not only historically significant, but meets the criteria of the National Trail System Act (1968, amended 1978) for "high potential segments." The historic landscape is a key item of the criteria.

One notable absence in the documents listed in the bibliography of the report was the trail management plan noted above. It would have provided key information related to the concerns expressed.

NMSSOIRblic

If you have questions, please contact me at (801) 539-4095.

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