

Wind Energy Project Policy Rev 2  
Adopted by Santa Fe Trail Association  
Sept 22, 2016

The Santa Fe Trail Association (SFTA) is a non-profit organization of individuals whose goals are to preserve, protect, and promote the history of the Santa Fe Trail. The Santa Fe Trail was designated as a National Historic Trail by the US Congress in 1987 and, as such, is administered by the National Park Service. The National Park Service and the Santa Fe Trail Association have complimentary goals and partner on various projects along the Santa Fe National Historic Trail.

In reviewing projects that could potentially threaten the Santa Fe National Historic Trail (SFNHT), the SFTA's primary goal is to prevent destruction of visible remnants and other cultural resources of the trail. Those visible remnants take the form of curvilinear parallel grooves or depressions across the landscape called swales or ruts. In some cases, there are no depressions, and the visible remnants of the SFNHT appear as curvilinear strips of differing vegetation or soil texture. These features were formed by the passage of tens of thousands of wagons and hundreds of thousands of mules, oxen, and horses from 1821 to 1880. These visible remnants are a national treasure and should be preserved. There are other cultural resources related to the SFNHT that also should be preserved such as (examples only, not an exhaustive list) camping sites, structures, stream crossings, buildings, and other features.

Another goal is to discourage development on any part of the SFNHT because even though trail remnants may not be visible, the trail can often be followed across cultivated ground in aerial photos or during certain farming operations. Additionally, newer technologies such as Lidar and Ground Penetrating Radar can sometimes detect the location of the trail even though it is not visible to the human eye. In some cases, cultural resources such as physical artifacts and altered soil horizons, may be buried.

SFTA also discourages the construction of tall structures close to the trail that could detract from the aesthetics of the SFNHT environment and which detract from the public's enjoyment and appreciation of the experience of the trail in an unbroken or nearly unbroken prairie setting.

For impact on the visual or aesthetic environment, SFTA has been using Federal Communications Commission (FCC) 04-222 rules for telecommunication towers as reasonable guidance to evaluate tall structures near the trail. FCC 04-222 defines an "Area of Potential Effects" for visual impacts as "the geographic area in which the Undertaking [construction or project] has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a Historic Property." We also realize that FCC 04-222 may be overly restrictive for some wind energy projects, and a balance must be achieved between preserving the SFNHT viewshed and recognizing the technical and financial realities (both with respect to power generation and leasor's income potential) of tower location.

SFTA's concerns about the ultimate impact the proposed wind energy development project may have on trail resources are not only for impacts from the wind energy towers themselves but also for impacts from the access roads, buried utilities, construction staging areas, and related activities that accompany such development.

SFTA offers information on, and historic interpretation of SFNHT related resources to developers and their consultants during the planning stage of the project to define and help protect SFNHT resources. SFTA is available to meet on-the-ground with project developers' cultural resources consultants to review trail resources. SFTA also offers information on, and historic interpretation of SFNHT related resources during the construction phase to identify trail features on the ground to help contractors prevent damage to trail resources. SFTA also has developed a considerable amount of factual data about the SFNHT and is willing to share that with developers and/or their consultants. SFTA hopes developers and/or their consultants will avail themselves of this offer, as some commonly available information about the SFNHT can be incorrect.

SFTA wishes to work in a cooperative manner with developers so that the wind energy project can be successful while at the same time protecting the SFNHT and its history and resources. SFTA does not wish to be an obstructionist. SFTA supports free enterprise and personal property rights. SFTA would like to have input in the development process so that development decisions can be made in an informed and thoughtful manner, giving due consideration to the historic resources of the SFNHT.

Protection of the SFNHT to a large extent depends on the good-will of wind energy developers. In some cases, developers' consultations with SFTA will be more formal if there is Federal involvement or "nexus" on the project that would trigger a Nation Environment Protection Act (NEPA) review and bring into play a Section 106 review under the National Historic Preservation Act (NHPA).