

**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

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April 2, 2024

VIA EMAIL

In reply refer to: FERC_2024_0329_002

Leslie Sakowicz
Senior Cultural Resource Specialist
Pacific Gas and Electric Company
2730 Gateway Oaks, Suite 220
Sacramento, CA 95833

Subject: Spaulding No. 1 Powerhouse Repair of Collapsed Columns, Drum Spaulding
Hydroelectric Project (FERC License No. 2310)

Dear Ms. Sakowicz:

The State Historic Preservation Officer (SHPO) is in receipt of a consultation letter dated March 29, 2024, from the Pacific Gas and Electric Company (PG&E) for the above referenced undertaking. PG&E, under the authority of the Federal Energy Regulatory Commission (FERC), is initiating consultation with the SHPO to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulation at 36 CFR 800. PG&E is seeking SHPO review and comment on the appropriateness of the Area of Potential Effects (APE), as well as concurrence on the defining features of the Spaulding No. 1 Powerhouse and on PG&E's finding of *no adverse effect* to historic properties.

The Spaulding No. 1 Powerhouse is located in Nevada County, California on the South Fork of the Yuba River, and is a feature of PG&E's FERC-licensed Drum Spaulding Hydroelectric Project (FERC #2310). During inspections of the Spaulding No. 1 Powerhouse, it was observed that two columns in the discharge pit were completely destroyed and had fallen to the ground. The columns supported the powerhouse floor level and are normally not visible. The discharge pit is normally below water from turbine and flow and requires special conditions to obtain access.

PG&E proposes to replace the failed columns in the underbelly of the Spaulding No. 1 Powerhouse. Because the columns have failed, PG&E has already installed temporary bracing in the pit to support the loads from above. The detailed design for the permanent replacement columns is still underway but new columns will be similar design under modern design standards. PG&E will include additional improvements such as adding steel cladding to the exterior of the columns to prevent erosion, as well as installing a stainless steel/concrete training wall across the area bound by the two previously existing columns. The area behind this training wall will be filled with reinforced concrete. Four steel columns

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will be installed that extend from the top of that concrete fill to the beam that was previously attached to the two failed concrete columns in order to keep the two new columns out of the water flow and armor the wall to prevent erosion.

The APE for this project includes all areas of potential vertical and horizontal impacts and consists of the powerhouse and its interior. This APE will also include the Drum Spaulding Hydroelectric System. The maximum depth of disturbance will be approximately one foot below the existing ground surface. Staging will be confined to the immediate vicinity of the powerhouse.

Cultural resource inventories and evaluations were previously completed for relicensing the Drum Spaulding Hydroelectric Project. Those previous inventory efforts identified two historic properties within the APE for the current undertaking:

- The Drum Spaulding Hydroelectric Historic System, which is eligible for listing on the National Register of Historic Places (NRHP) (FERC090520A);
- The Spaulding No. 1 Powerhouse, which was determined eligible for listing on the NRHP both individually and as a contributor to the Drum Spaulding Hydroelectric Historic System (FERC090520A);

No other unevaluated cultural resources or historic properties are located within the project footprint. Additionally, buried site sensitivity within the APE is considered very low given that the landform upon and within which the APE is situated consists of Mesozoic granitic bedrock.

The Spaulding No. 1 Powerhouse is significant under Criterion C for its unique architectural and engineering design, and it is also a contributing element of the Drum-Spaulding Hydroelectric Historic System. Although the powerhouse is similar in architectural design to powerhouses 2 and 3, it is the best example of the three. It is also unique as an adit powerhouse, carved directly into the cliff face. The old (1917) and new (1928) sections are distinctive; when standing inside the powerhouse, the construction of these two sections is obvious. The sections provide a sense of the expansion of the system through time. The character-defining features of the powerhouse for the purposes of this project are assumed to be the functionality and integration with the system as a whole, as well as the following features: the massing (reinforced steel structure); the flat roof (with concrete gabled parapets); the fenestration (windows symmetrically placed and consisting of industrial metal sash multi-pane lites); the floorplan; the location (inset into a cavern in a cliff); and the associated covered stairway and tramway.

Programmatic Tribal consultation has been undertaken in cooperation with the FERC and the Tahoe National Forest (TNF) over a period of many years in support of the Drum Spaulding relicensing efforts. An inventory of ethnographic places and potential traditional cultural properties was conducted in 2011 and did not identify any significant places within or adjacent to the APE. As comprehensive consultation has already occurred and given the absence of Native American resources within the current project's APE, no new Native American consultation was initiated for the present project.

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The failure of the columns potentially affects the powerhouse's ability to convey its significance given the structural risks associated with this issue. The collapsed columns are neither character-defining nor contributing features to the powerhouse or to the district. The columns will be replaced in kind to allow for continued operations and allow the powerhouse and the system to continue functioning and thus convey significance. Given that this powerhouse is an integral link in the chain within a functioning system, the repair allows for continued use as both have historically been used, and it allows for functionality in the same manner as when first established. Preservation of use, especially a system, is an important means for assuring long-term preservation of the resource. The on-going modification and maintenance of a functioning hydroelectric system are necessary to retain the overall integrity of the built-environment resources within the system. Furthermore, the type of modification and maintenance proposed by PG&E follows the Secretary of the Interior's Standards for Rehabilitation (36 CFR Part 67).

The repairs proposed by PG&E consist of a rehabilitation activity that will not alter the integrity of either the powerhouse or the district and will not affect their ability to convey their significance. Therefore, PG&E presents a finding of *no adverse effect* to historic properties pursuant to 36 CFR § 800.5(b).

PG&E has requested SHPO review and comment on the appropriateness of the APE, concurrence on the defining features of the powerhouse, and concurrence on PG&E's finding of effect. Following review of the submittal, I offer the following comments:

- Pursuant to 36 CFR § 800.4(a)(1), I do not object to the APE as defined;
- Pursuant to 36 CFR § 800.5(b), **I do not object** to a finding of *no adverse effect* to historic properties and I have no further comments on this undertaking.
- Given the absence of documentation of the proposed character defining features of the Spaulding No. 1 Powerhouse and in consideration of the urgent nature of the repairs, I recommend that PG&E consult on the defining features for any future undertakings;
- For future consultations, I recommend that PG&E provide representative photographs of all resources subject to the undertaking and all other documentation required by 36 CFR § 800.11;

Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, PG&E may have additional future responsibilities for this undertaking under 36 CFR 800. If you require further information, please contact Robert Fitzgerald, Associate State Archaeologist, at (916) 894-5496 or Robert.Fitzgerald@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

Document Content(s)

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