



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

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

April 22, 2024

VIA EMAIL

In reply refer to: FERC_2024_0417_001

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

Subject: South Yuba Canal Repair (Station 16 + 85 Rockslide), 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 April 17, 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 comments on the appropriateness of the Area of Potential Effects (APE) and concurrence on a finding of *no adverse effect*. Due to the time sensitive nature of the project, PG&E is requesting expedited consultation pursuant to 36 CFR § 800.3(g).

This undertaking is located in Nevada County, California on the South Fork of the Yuba River. A rockslide demolished a section of the South Yuba Canal (SYC) in the vicinity of Lake Spaulding. The SYC is a feature of PG&E's FERC-licensed hydroelectric project known as the Drum Spaulding Hydroelectric Project. PG&E proposes to complete both temporary and permanent repairs to this segment of the canal. The SYC pipe traverses the steep, northwest-facing slope of the South Yuba River canyon and is typically supported by timber "cradles" founded on a narrow bedrock ledge. Where the ledge is too low or not wide enough, the pipe foundations are built up using hand-stacked dry masonry walls, concrete piers, and steel bent structures. A grip-strut walkway and handrail are attached to the top of the pipe to provide access along the alignment. The work is occurring on PG&E property, and although FERC approval is required, no other federal funding, permitting or approvals are needed.

There are two phases to this project: the first phase is a temporary repair which includes installation of temporary piping and supports. The second, more permanent phase will be implemented once pipe is procured for those long-term repairs. As part of the

permanent solution, long-term rock stabilization measures will be installed to prevent this damage from occurring again.

The APE for both phases this project includes all areas of potential vertical and horizontal impacts and consists of the powerhouse and its interior. Although not depicted visually, it also includes the National Register of Historic Places (NRHP) eligible Spaulding Dam Construction Discontiguous Archaeological District. The maximum depth of disturbance will be approximately six feet. Staging will be confined to a variety of surrounding locations and generally crews and materials will reach the repair location either on foot or via helicopter.

Cultural resource inventories and evaluations were completed for relicensing the Drum Spaulding Hydroelectric Project in 2011, which included the APE for this undertaking. Those previous inventory efforts identified the following cultural resources in the project footprint, three of which are considered historic properties:

- The Drum Spaulding Hydroelectric Historic System, eligible for the NRHP (FERC090520A);
- P-29-4069/CA-NEV-2069H, an array of nine foundation features and scattered debris dating to the 1912-1917 construction phase of the dam, not eligible individually but is eligible as a contributor to the Construction Discontinuous Archaeological District (FERC090520A);
- Spaulding Dam Construction Discontinuous Archaeological District, eligible for the NRHP (FERC090520A);
- P-29-004251 Drum Spaulding Bear River Camp, not eligible for the NRHP (FERC090520A);
- Drum Canal, not eligible for the NRHP (FERC090520A); and
- South Yuba Canal, not eligible for the NRHP (FERC090520A).

To support the relicensing of the Drum Spaulding Hydroelectric System, programmatic Tribal consultation was undertaken in cooperation with the FERC and Tahoe National Forest. An inventory of ethnographic places and potential traditional cultural properties was conducted in 2011 and did not identify any significant places in proximity to the current project area or within the current project's APE. Following the comprehensive consultation that 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 this undertaking.

PG&E has applied the criteria of adverse effect to the three historic properties within the APE as has determined that this undertaking will not result in an adverse effect to any of the properties. The current undertaking does not meet the criteria of adverse effect and thus will have no adverse effect on the historic district/system. This conclusion is partially based on the premise that on-going modification and maintenance of a functioning hydroelectric system is necessary to retain the overall integrity of the built-environment resources within the hydroelectric system.

Although staging is proposed within the boundaries of CA-NEV-2069H and therefore also within the boundaries of the Spaulding Dam Construction Discontiguous Archaeological District, there will be no adverse effect to either the archaeological site or the district. Staging for construction temporary bypass will be confined to an existing helicopter pad and the immediate vicinity of the pad, which is situated upslope of the construction location on the south side of the dam. The existing helicopter pad and the adjacent area within CA-NEV-2069H have been in continuous use as landing pad and staging area for maintenance and construction activities for decades, and the helicopter pad does not contain any features or artifacts associated with the archaeological site or district. Also, the proposed utilization of this space as a construction staging location is in keeping with its historic use and character; thus, there will be no adverse effect to CA-NEV-2069H. Because there will be no adverse effect to CA-NEV-2069H, the archaeological district will also not be affected.

Furthermore, buried site sensitivity is considered very low given that the landform upon and within which the APE is situated consists of Mesozoic granitic bedrock.

Based on these findings, the proposed project will neither directly nor indirectly alter the characteristics that qualify historic properties within the APE for inclusion in the NRHP. Therefore, the project will result in *no adverse effect* pursuant to 36 CFR § 800.5(b).

PG&E has requested SHPO review and comment on the delineation of the APE and concurrence on the finding of effect. Following review of the submittal, I offer the following comments:

- Pursuant to 36 CFR § 800.3(g), I agree that expedited consultation is appropriate given the nature and scope of the undertaking;
- 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*, and I have no further comments.

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