



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

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May 2, 2019

In reply refer to: FERC\_2016\_0701\_001

Mr. Brad Arnold  
General Manager/Secretary  
South Sutter Water District  
2464 Pacific Avenue  
Trowbridge, CA 95659

Re: Camp Far West Hydroelectric Relicensing Project (FERC NO. 2997-031), Cultural Resources Study Report and Tribal Interests Study

Dear Mr. Arnold:

The State Historic Preservation Officer (SHPO) received two submittals from the South Sutter Water District (SSWD) continuing consultation regarding the above referenced project to comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation found at 36 CFR Part 800. SSWD has been delegated Section 106 consultation authority by the Federal Energy Regulatory Commission (FERC), pursuant to FERC's May 13, 2016 Notice of Intent to File License Application, Filing of Pre-Application Document, Approving Use of the Traditional Licensing Process for the Camp Far West Hydroelectric Project (project).

The project is located on the Bear River in Yuba, Nevada, and Placer counties. It includes a 170-foot high dam, which creates a 93,740 acre-foot reservoir, the Camp Far West Reservoir, covering approximately 2,863.7 acres. A powerhouse is located at the base of the dam. The FERC license for the project expires on June 30, 2021, thus SSWD is in the process of seeking a new license from FERC (undertaking).

To identify historic properties eligible for listing in the National Register of Historic Places (NRHP) and consider effects from this undertaking to them, the SSWD completed the following: archival research, records search, literature review, intensive pedestrian survey of the Area of Potential Effects (APE), sacred lands search at the Native American Heritage Commission, and informal consultation with local Native American Indian Tribes, persons, groups, and organizations. Comments received from tribes were considered and addressed.

In support of its findings, SSWD has provided the following documents for review:

- *Tribal Interests Study For the Camp Far West Hydroelectric Project FERC Project No. 2997 Nevada, Placer, and Yuba Counties, California (HDR & Albion, March 2019)*
- *Cultural Resources Study Report; A Cultural Resources Inventory for the Camp Far West Hydroelectric Project FERC Project No. 2997 Nevada, Placer, and Yuba Counties, California (HDR, April 2019.)*

Historic property identification efforts led to the identification of 188 archaeological and built environment resources. This includes one historic district comprised of precontact archaeological sites, 90 archaeological sites, 11 built environment resources, and 86 isolated finds. Of the 188 cultural resources, 152 have been previously determined or are newly evaluated as ineligible for inclusion in the NRHP. All 86 isolated finds have been evaluated as not eligible for inclusion in the NRHP. Of the 90 archaeological sites identified within the Area of Potential Effects (APE), 55 have been previously determined or are evaluated as ineligible for listing in the NRHP, 30 are unevaluated, and five have been determined as eligible for listing (see tables 1 and 3 attached to this letter).

In addition, SSWD on behalf of FERC has determined that one historic district comprised of pre-contact archaeological sites, the Kumin Seyo (Middle Bear River) is eligible for listing in the NRHP under Criterion D. The discontinuous district is comprised of all prehistoric sites and prehistoric components of the multi-component sites within the APE for a total of 51 district elements. Of the 51 district elements, six have been evaluated as contributing, 22 have been evaluated as non-contributing, and 23 remain unevaluated (see table 2 attached to this letter). The Kumin Seyo (Middle Bear River) historic district can provide a significant amount of substantive data for furthering research objectives related to prehistoric chronology, settlement, subsistence, demography, social organization, and trade and exchange.

At this time, SSWD, on behalf of FERC is seeking:

- SHPO comments pursuant to 36 CFR 800.4(b) on the adequacy of historic property identification efforts for this undertaking;
- SHPO concurrence pursuant to 36 CFR 800.4(c) on NRHP eligibility evaluations for cultural resources located within the Area of Potential Effects;
- SHPO comments pursuant to 36 CFR 800.5) on its assessment of adverse effects.

Following staff review of the supporting documentation, the SHPO provides the following comments:

- Pursuant to 36 CFR 800.4(b), I am unable at this time to comment on the adequacy of historic property identification efforts for this undertaking. Please

submit the comments received from tribes with an explanation of how SSWD considered, responded to, and incorporated them into the final supporting documentation.

- Pursuant to 36 CFR 800.5, the SHPO withholds consultation on NRHP eligibility evaluations until the above requested information is received.
- Pursuant to 36 CFR 800.4(c), the SHPO withholds consultation the assessment of adverse effects until the above requested information is received.
- As consideration of all qualifying characteristics of historic properties is necessary in order to assess adverse effects, the SHPO recommends evaluating eligibility for listing in the NRHP all resources that could be potentially affected from changes to the FERC boundary and construction-related activities prior to assessing adverse effects. This should be done in consultation with Indian Tribes, the public, and other consulting parties prior to submitting a finding of effect for SHPO review. As these project activities are known and planned, evaluation should be completed now and not be deferred and performed under the Historic Properties Management Plan.

If you have any questions, please contact Brendon Greenaway at (916) 445-7036 or [Brendon.Greenaway@parks.ca.gov](mailto:Brendon.Greenaway@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julianne Polanco', with a long horizontal line extending to the right.

Julianne Polanco  
State Historic Preservation Officer