



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

Lisa Ann L. Mangat, *Director*

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September 25, 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 additional correspondence on August 28, 2019 regarding previous 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 the 93,740 acre-foot 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).

The current correspondence received responds to SHPO comments made by letter on May 24, 2019 and reiterated on July 22, 2019 and August 1, 2019 on the following documents:

- *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.)

The following comments on the above documents were made by the SHPO in the May 24, 2019, July 22, 2019 and August 1, 2019 letters:

1. Pursuant to 36 CFR 800.4(b), the SHPO finds the historic property identification efforts to be incomplete at this time. The SHPO reiterates comments previously made by letter of August 25, 2016 to FERC Secretary Kimberly D. Bose on the Pre-Application Document: "All cultural resources must be evaluated in order to determine whether there are any potential historic properties...before effects can be identified or assessed...It behooves the applicant to first determine which properties are eligible prior to proceeding with the assessment of effects...Only when this step is complete and historic properties have been adequately identified, may the consultation then proceed to the assessment of effect (36 CFR Part 800.5)...I encourage FERC and SSWD to complete evaluations of all identified cultural resources for both the National Register of Historic Places and the California Register of Historical Resources as part of the identification efforts."
2. Without a complete understanding of the significance of the resources located within the APE and the characteristics that would qualify them for listing in the NRHP, the SHPO cannot consider how project activities may or may not diminish those characteristics and therefore cannot at this time comment on the finding of effect pursuant to 36 CFR 800.5.
3. Pursuant to 36 CFR § 800.5(a)(2)(vii), the transfer of property outside of federal control is a potential adverse effect. Since SSWD is proposing to transfer HDR-CFWH-67 outside of the existing FERC boundary, full evaluation of is required in order to appropriately assess effects.

At this time, SSWD on behalf of FERC is providing the following response to SHPO comments:

1. SSWD plans to complete historic property identification efforts under the HPMP, as needed. SSWD anticipates that FERC will complete Section 106 requirements through the execution of a PA that will require implementation of the HPMP. Of the 188 cultural resources identified within the APE, 158 have been formally evaluated for the NRHP with SHPO concurrence. The remaining

resources require additional work to formally evaluate. SSWD requests SHPO to reconsider previous comments.

2. SSWD plans to complete historic property identification efforts and assessment of adverse effects under the HPMP, as needed. SSWD anticipates that FERC will complete Section 106 requirements through the execution of a PA that will require implementation of the HPMP.
3. SSWD will update the HPMP to include HDR-CFWH-67 and state that it might be adversely affected by removal from the FERC boundary; accordingly, it will be evaluated for NRHP significance in consultation with the SHPO.

At this time, SSWD seek SHPO concurrence that the HPMP will address potential effects on historic properties for the duration of the new Project operating license.

In response to your most recent letter of August 28, 2019, the SHPO offers the following comments:

- The SHPO does not concur that the HPMP will address potential effects on historic properties for the duration of the new Project operating license as the regulations at 36 CFR 800 that implement the National Historic Preservation Act provide no such role for the SHPO. However, the SHPO does not object to SSWD's responses to previous comments and has no further comments at this time.

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

CC: Danielle Risse, Senior Cultural Resources Specialist, HDR, Inc.