



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

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VIA EMAIL

In reply refer to: FERC_2023_1204_001

Matthew Armstrong
Cultural Resource Specialist
Pacific Gas and Electric Company
3580 E California Ave
Fresno, CA 93710

Subject: Section 106 Consultation for FERC Project No. 175 – Balch Hydroelectric Project, Fresno County, California – APE and Identification Efforts

Dear Mr. Armstrong:

The State Historic Preservation Officer (SHPO) is in receipt of a consultation letter dated December 4, 2023, 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 a FERC license for the Balch Hydroelectric Project under FERC Project No. 175 (Project) using the Traditional Licensing Process. PG&E is requesting SHPO review and comment on the determination of the Project's Area of Potential Effects (APE) and the adequacy of the historic property identification efforts.

The current Project license expires on April 30, 2026, and PG&E intends to file a Final Application for a New License (FLA) with FERC prior to this date in order to continue operation and maintenance of the Project under a new license with a proposed license term of 50 years. The issuance of a new license is considered a federal undertaking subject to compliance with Section 106. The Project consists of one development - Balch. The major features of the Project consist of: (1) Black Rock Reservoir and Balch Diversion Dam on the North Fork Kings River; (2) Balch Afterbay and Balch Afterbay Dam on the North Fork Kings River; (3) a tunnel connecting Black Rock Reservoir to the Balch No. 1 and Balch No. 2 penstocks; (4) diversions on Black Rock and Weir creeks that feed water into the tunnel; (5) Balch No. 1 and Balch No. 2 powerhouses; (6) tailraces from Balch No. 1 and Balch No. 2 powerhouses to Balch Afterbay; (5) two recreation areas near Black Rock Reservoir; 6) a primary transmission line; and (7) other appurtenant facilities and features. The development does not include any active borrow or spoils areas.

Along with their letter, PG&E submitted the following documents:

- *Balch Hydroelectric Project, FERC Project No. 175. Archaeological and Historical Built Environment Resources Survey, National Register of Historic Places Evaluation, and Finding of Effects, Fresno County, California. November 2023*
 - *Volume I: Project Overview, Summary of Results, and Recommendations*
 - *Volume II: Archaeological Study Results*
 - *Volume III: Historical Built Environment Study Results*
- *Balch Hydroelectric Project, FERC Project No. 175. Tribal Resources Study Report, Fresno County, California. November 2023.*

The Project APE includes all lands within the proposed Project boundary, as delineated by the known or potential locations of Project operations and maintenance and Project facilities, features, and access roads. For the purposes of this consultation, the APE is presumed to be synonymous with the 694.67-acre FERC Project Boundary. Land ownership within the APE consists of 430.99 acres managed by the Sierra National Forest, 60.51 acres managed by the Sequoia National Forest, and 203.17 acres owned by private landowners.

In support of the relicensing, PG&E developed Cultural and Tribal Resources Study Plans (Study/Studies) in consultation with participating Tribes and the Sierra and Sequoia National Forests. PG&E implemented both Study plans to identify historic and potential historic properties within the proposed APE. Draft technical reports were provided to the land-managing agencies and Tribes for review on November 10, 2023. Identification efforts taken in the preparation of these Studies included a records search at the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historic Resources Information System (CHRIS); a records search of the U.S. Forest Service Data Document Library; a review of the California OHP Built Environment Resources Directory, California Points of Historical Interest, California State Landmarks, California Inventory of Historic Resources, Fresno County Historic Properties Directory, regional geological and mining claim maps, California Department of Transportation Historic Bridge Survey, U.S. Department of Agriculture Web Soil Survey, historic aerials and topographic maps; intensive pedestrian survey; built environment survey; and Native American consultation.

As a result of the identification efforts, PG&E has identified 42 archaeological resources consisting of 19 historic-era sites, 19 precontact sites, two multi-component sites, and one historic-era isolate; 68 built environment resources; and two historic districts with Traditional Cultural Landscape significance, the Mono-Kings River Historic District and the Yokuts-Kings River Historic District.

PG&E's consultant (HDR) conducted a search of the Sacred Lands File (SLF) at the Native American Heritage Commission (NAHC) in September 2020 to obtain a list of Tribes and individual tribal members who may have an interest in the Project and to request a search of the NAHC's files for a list of any known sacred lands that may be within the existing FERC Project boundary and 0.5-mile buffer. The NAHC provided a

list of individuals and groups to contact, and PG&E augmented this list with Tribal contacts previously provided to PG&E by the Sierra National Forest as well as PG&E's internal Native American contact list to generate a master list of potential Tribal participants. PG&E contacted all of these Native American Tribes, Tribal Representatives, and Avocational Groups to participate in the studies, review documents, and participate in general stakeholder meetings. Due to their proximity to the APE and their previous involvement with activity at Balch Camp, PG&E coordinated with the Cold Springs Rancheria, who provided a Tribal member to assist the field team with the cultural survey.

PG&E has requested SHPO review and comment on the determination of the APE and the adequacy of the historic property identification efforts. Following review of the submittal, I offer the following comments:

- Pursuant to 36 CFR § 800.4(a)(1), please clarify the vertical APE for all proposed activities associated with the undertaking;
- Pursuant to 36 CFR § 800.4(b)(1), I recommend that PG&E take additional steps to identify historic properties within the APE, specifically the several major non-Project roads that pass through the APE;
 - PG&E states that they presume that some of these roads may be eligible for inclusion in the National Register of Historic places under Criterion A as integral to the historic development of transportation infrastructure in the southern Sierra Nevada, but that they were not recorded as historic resources because they are subject to effects not limited to PG&E activities and cannot be managed by PG&E.
 - As some of these roads are presumed to be historic properties and are located within the APE, I recommend PG&E take the steps necessary to determine the nature and location of these potential historic properties, as well as the nature and extent of potential effects on them.

If you require further information, please contact Robert Fitzgerald, Associate State Archaeologist, at (916) 503-5496 or Robert.Fitzgerald@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer