



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

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April 16, 2024

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

Dear Mr. Armstrong:

The State Historic Preservation Officer (SHPO) is in receipt of a consultation letter dated February 26, 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 continuing 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 and is requesting SHPO review and comment on the determination of the Project's Area of Potential Effects (APE), the adequacy of the historic property identification efforts, and concurrence on the determinations of eligibility made for resources within the APE.

PG&E initiated consultation for this undertaking with the SHPO on December 4, 2023, requesting SHPO review and comment on the APE and adequacy of their historic property identification efforts. SHPO responded on January 11, 2024, requesting additional information regarding the expected vertical APE for the undertaking and recommended PG&E's identification efforts include the non-Project roads that pass through the APE. SHPO sent a letter to PG&E on March 20, 2024, requesting an additional 30 days to review PG&E's submittal.

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.

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. The Project's vertical APE is defined as the maximum subsurface depth and above ground height of the existing Project components. Existing above ground infrastructure ranges from one- and two-story buildings within Balch Camp to a maximum transmission line tower height of up to 220 feet to the 165-foot-high Balch Afterbay Dam. Maximum below ground depth throughout the Project is generally limited to the Balch-Sanger 115 kV transmission line tower footings. The depth of tower footings is variable, but typically ranges from 25-50 feet below ground surface.

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 has also identified 67 individual Project

or Project-related built environment resources as well as the potential Balch Camp Historic District. A list of these resources is included with this letter.

In addition to these resources, nine major non-Project roads and several minor, unnamed, and unimproved non-Project roads on private lands spatially intersect with the APE. Most of these roads have existed more-or-less in their current alignments since the historic era. These roads were not recorded as they have no potential to be affected by this Project, will not be subject to Project-related effects, are not limited to PG&E activity, are not maintained by PG&E for Project purposes, and their use cannot be restricted or managed by PG&E. Further, PG&E does not maintain any Project-related infrastructure within any of the individual road prisms. For the purposes of this undertaking only, these roads are presumed to be eligible for listing in the National Register of Historic Places (NRHP) under Criterion A as contributing elements to the historic development of transportation infrastructure in the southern Sierra Nevada and southern San Joaquin Valley.

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, the adequacy of the historic property identification efforts, and concurrence on their determinations of eligibility. 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 § 800.4(b)(1), additional information is required to determine if the efforts to identify historic properties are reasonable and in good faith;
  - PG&E has noted that there are several minor, unnamed, and unimproved non-Project roads that intersect the APE. I recommend PG&E take steps to identify the nature and location of these roads that were not included in PG&E's discussion of the nine major non-Project roads that intersect the APE;
- Pursuant to 36 CFR § 800.4(c)(2), additional information is required before I am able to comment on PG&E's determinations of eligibility;

- Several of the determinations of eligibility made in the Cultural and Tribal Resources Study Reports do not provide a discussion of all four NRHP Criteria. Many of these evaluations state that resources are unevaluated pending the completion of the Tribal Resources Study. Given that PG&E has provided a completed Tribal Resources Study, I recommend that PG&E synthesize the two reports to provide clear determinations of eligibility that include assessments of all four NRHP Eligibility Criteria.
- In order for a resource to qualify for inclusion in the NRHP, it must be associated with an important historic context *and* retain integrity of the character defining features necessary to convey its significance. Several of the eligibility determinations made for eligible resources do not include assessments of integrity in enough detail to comment on their eligibility. Please provide evaluations of the aspects of location, design, setting, workmanship, materials, feeling, and association that allow for each resource to convey its significance.
- For all resources determined eligible by PG&E for this undertaking, please provide the Criteria, level, and period of significance under which they were determined eligible for inclusion in the NRHP.

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