



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

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November 21, 2024

In reply refer to: FERC_2022_0816_001

Mr. Nicholas Sher
Principal Director
GreenGenStorage

VIA EMAIL/FERC E-File

RE: Continued Section 106 Consultation for the Mokelumne Pumped Storage Project (FERC No. 14796) Amador and Calaveras Counties, California

Dear Mr. Sher,

The State Historic Preservation Officer (SHPO) received your consultation letter dated October 9, 2024, pursuant to Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 300101), as amended, and its implementing regulation found at 36 CFR 800.

GreenGenStorage, LLC (GreenGen) has been designated (by letter filed September 20, 2022) as the non-federal representative for Section 106 consultation for the Federal Energy Regulatory Commission (FERC) and consults on their behalf. The October 9th letter continued consultation to adjust the Area of Potential Effects (APE) which was previously agreed to per the SHPO response letter dated November 7, 2022.

The SHPO November 7th letter found that the APE was sufficiently defined for the undertaking. The APE, as originally defined, included all areas where project operations have the potential to cause direct adverse effects to historic properties, as well as a 100-foot buffer around the proposed project footprint for a total of approximately 3,222 acres. Also included was a 200-foot buffer around the max pool/high water level of all reservoirs. To consider indirect effects, the APE included all areas where project operations had the potential to cause indirect effects to historic properties; this included a 0.25-mile buffer around the direct effects APE, a 0.25-mile buffer around the Salt Springs geologic feature, and a 0.5-mile buffer around the base of the Calaveras Dome geologic formation, for a total of approximately 15,191 acres.

Since that time, the project has been redesigned to add new project features including: four boreholes, a surge shaft, and potential road improvements and to remove the Upper Bear River Reservoir, in response to concerns expressed by Tribal consulting parties regarding effects to historic properties.

In addition to the project redesign, efforts were conducted to determine previous study and survey coverage, to identify known cultural resource locations, and to understand the nature and the quantity of the resources that are present in the area. These efforts consisted of a comprehensive records search and literature review within the 86,690 acres surrounding the

project area and the original APE. Apart from the concerns identified regarding potential effects to historic properties from the use of the Upper Bear River Reservoir, no additional concerns from indirect project effects have been reported by GreenGen. GreenGen therefore proposes reducing the APE by removing the areas initially considered to consider indirect effects.

The modified APE as proposed would now include all areas where the construction of the project, in addition to its operation and maintenance has the potential to cause effects to historic properties. This includes a 100-foot buffer around the proposed FERC boundary, a 200-foot buffer around the maximum pool/high water level of the Lower Bear River and Salt Spring reservoirs, and an area around potential upgrades to Pacific Gas and Electric (PG&E) transmission facilities. The total of the proposed modified APE is approximately 3,170 acres.

Following review of the submitted material, pursuant to 36 CFR § 800.4(a)(1), I find the modified APE to be sufficiently defined for this undertaking. Should any additional concerns regarding effects to historic properties be provided to GreenGen, I request that you reinitiate consultation with the SHPO to resolve those concerns. If you have any questions or concerns, please contact Senior State Archaeologist Brendon Greenaway at Brendon.Greenaway@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer