

Parks, Jeff@Waterboards

Subject: FW: Cultural Resources Comments Relevant to FERC P-606 (Kilarc) Water Quality Certification

Attachments: 20100329prnP606ShastaHist-5037(23604642).pdf;
20111121P606Sec106Review-5247(26583672).pdf;
20111121prnP606Sec106Review-5247(26583672).pdf

From: Kelly W. Sackheim [<mailto:kelly@kchydro.com>]

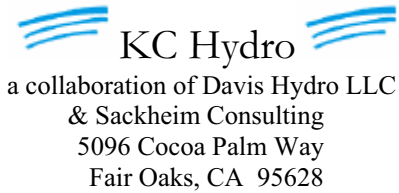
Sent: Friday, April 12, 2013 4:04 PM

To: Parks, Jeff@Waterboards [private]

Cc: [private]

Subject: Cultural Resources Comments Relevant to FERC P-606 (Kilarc) Water Quality Certification

Jeff - Attached are comments prepared in collaboration with Sandy Winters as a representative of the Shasta Historical Society, documenting in FERC Accession Nos. 20111121-5247 and 20100329-5037 that PG&E's analysis accepted by the FERC includes a grossly distorted assessment of the project Cultural Resources to justify a determination of no significant impact from their demolition.



March 26, 2010

Mr. John Fowler
Advisory Council on Historic Preservation
Attn: Cheryl Foster-Curley
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 809
Washington, DC 20004

Milford Wayne Donaldson, SHPO
c/o Susan Stratton
Office of Historic Preservation
1416 9th Street, Room 1442-7
Sacramento, CA 95814

Re: Section 106 consultation; application for surrender of license for the
Kilarc-Cow Creek Project (FERC No. 606)

Dear Messrs. Fowler and Donaldson, Ms. Stratton and Ms. Foster-Curley, and
Representatives of Native American Tribes¹:

We are intervenors in the subject Federal Energy Regulatory Commission (FERC or
Commission) proceeding and have been parties to submission of the attached comments
on the Pacific Gas and Electric Company (PG&E)-sponsored *Cultural Resources
Inventory and Evaluation for the Kilarc-Cow Creek Hydroelectric Decommissioning
Project, FERC No. 606, Shasta County, California*² and Section 106 consultation that has
occurred in this proceeding.

In the attached letter dated April 29, 2008, we requested that “the Commission NOT
designate PG&E as Non-federal representative” identifying that “The justification for
denial of the above requests includes the fact that PG&E has consistently demonstrated a
bias that prejudices the consideration of project alternatives as required under the
National Environmental Policy Act. PG&E has stated repeatedly that “PG&E looks

¹ Native American Tribes to whom the letter from the Federal Energy Regulatory Commission (FERC)
directed an undated letter posted to the FERC eLibrary as Accession No. 20100322-0013 (e.g. 13th
document dated March 22, 2010 per the yyyyymmdd numbering convention) are similarly provided a copy
of this letter as a courtesy, although the authors of this letter do not presume to comment on other than the
referenced non-native issues identified in this letter.

² Referenced excerpts from subject document are also attached.

Messrs. Fowler and Donaldson, Ms. Stratton and Ms. Foster-Curley,
 and Representatives of Native American Tribes
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forward to working with the Commission and other stakeholders on the decommissioning of the Project,” where “decommissioning” is defined by PG&E as DISMANTLING facilities that many stakeholders oppose dismantling. Davis Hydro has promulgated Alternatives to Save Kilarc and Cow Creek Facilities, concurrently with PG&E’s release of a Preliminary Proposed Decommissioning Plan dated September 10, 2007.”

By letter to PG&E dated November 7, 2008,³ the Whitmore Community Stakeholders commented on the version of the Cultural Resources Report found in PG&E’s Draft License Surrender Application, specifically focusing on the analysis pertaining to recordation of the Kilarc hydroelectric system (excluding the powerhouse), including two sequential text pages (unnumbered) and pages 1-30 of the Department of Parks and Recreation Primary Record for Resource Name or #: 482-12-07H, Other Identified: Kilarc Canal, contributing to the finding, supported by the Office of Historic Preservation Determination of Eligibility and Finding of Effect for the Kilarc-Cow Creek Hydroelectric Decommissioning Project (FERC No. 606), by letter dated November 4, 2008⁴, that “the Kilarc and Cow Creek hydroelectric systems (canals, bridges, dams, flumes, siphons, tunnels, spillways berms, forebays and penstocks) are not eligible individually or as components of historic districts due to their lack of integrity.”

We DISPUTE the concurrence with the PG&E recommendation for a finding of non-eligibility based on the shoddy documentation and biased analysis found in the document preceding the November 2008 determination. PG&E has corrected the errors identified by the Whitmore Community Stakeholders but failed to reconsider its findings. We bring to your attention the following changes and current report contents that begin to reflect the importance and integrity of the Kilarc hydroelectric system, with which we are more familiar, without prejudice against the performance of a similar re-analysis and determination for the Cow Creek system.

First, the report was corrected to reflect that the Kilarc Canal is an historic, NOT an archaeological resource (that happens to continue to serve its original function to this

³ Referenced excerpts from subject letter are also attached.

⁴ Subject letter and PG&E’s transmittal thereof to the FERC are also attached.

Messrs. Fowler and Donaldson, Ms. Stratton and Ms. Foster-Curley,
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day). “A total of 44 features were documented along the canal system between the main diversion dam on Old Cow Creek and the Kilarc Powerhouse.”⁵ The first three features described are significant and from the description would appear to be if not original, still historic construction, which remains serviceable with no identified modifications. “Feature 3 consists of the concrete flume sections that are present at irregular intervals along the Kilarc Canal system en route to the Kilarc forebay. The concrete flume sections are similar in construction, with a squaredoff U-shape in cross-section and are generally 4 to 6 feet wide, 3 feet deep and with 3 to 6 inch thick walls. Each section occurs in varying lengths along the course of the canal.” Please note that Davis Hydro has prepared maps of habitat characteristics of the flumes (and consequently construction materials), while the GANDA historical report minimizes the extent of the concrete and earthen flume sections by combining them in a single brief feature description, while calling out separately (e.g. Features 19 – 21, 23 – 25, 28 and 31) each “section of modern wood and metal flume.” The modern wood and metal flumes exist only where the canal crosses side-canyons and has required a non-concrete construction and more substantive maintenance, while the concrete flume sections have endured.

Feature 4 is the first characterized as a “modern wood and corrugated aluminum rectangular gauging station shack” with no reference as to the date it was installed or upgraded. We assert that, unless documented, it is not unreasonable to presume that this feature is likely to be more than 50 years old and historic. Furthermore:

- Feature 5 “consists of a small wooden ditch tender cabin. Formerly known as Kilarc Shack 2” where “Most of the floor and foundation have rotted away” but there is ample description of historic features and we presume that restoration of this historic cabin would require fewer resources than its destruction.
- Feature 18 is Kilarc Shack 3, in similar condition.
- Features 9 and 10 are a similar Kilarc Shack 1 and the Canyon Creeks siphon that is original to the project. Features 12 – 14 consist of a tunnel with

⁵ Cultural Resources Inventory and Evaluation, Garcia and Associates (GANDA), Kilarc-Cow Creek Hydroelectric Decommissioning Project, March 12, 2009, page 45

Messrs. Fowler and Donaldson, Ms. Stratton and Ms. Foster-Curley,
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wooden entrance and exit works and foot bypass trail, plus an abandoned flume alignment, with no reference to modern features.

- “Feature 16 consists of a large number of metal and concrete constructed drains. These drains occur at irregular intervals along the entire length of the Kilarc canal system.”
- Feature 22 consists of an emergency spillway and associated gate valve that may not have been updated, although no documentation is provided regarding the period of its construction.
- “Feature 27 consists of a small wooden ditch tender cabin. This feature was not previously recorded. [...]The historic-era artifacts observed include but may not be limited to; “Prince Albert” style tobacco tins, folded side-seam sanitary cans and coffee tins, brick fragments and heavy gauge fencing wire bundles. A 6-millimeter heavy gauge steel wire and 1 inch ceramic insulator have been installed above the entry way of the structure to provide electricity or possibly telegraph communications. This wire has been connected to adjacent trees and has been observed at other structures (Features 5, 10, 18) recorded along the Kilarc canal system.”
- Feature 29 consists of a cross flume constructed of wood with concrete footing, possibly partially or wholly of historic-era construction.
- “Feature 32 consists of a section of modern metal flume that is associated with a series of two short tunnels. The tunnels are cut through solid volcanic tufa stone. The tunnels are likely the historic-era feature; the flume itself is made of modern steel construction and materials.”
- Feature 33 consists of a wooden foot bridge/crossing and Features 34 and 35 are Spillway and Gate structures that we presume are all historic, given that none have been highlighted like the others as modern.
- Features 40 and 41 are the original Forebay Spillway and Forebay.
- Feature 43 consists of an historic-era riveted steel penstock and attached (modern/bolted) upright welded penstock vent or surge tower.
- Feature 44 consists of a segment of dry-stacked rock retaining wall.

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We ask you, given the now well-documented descriptions above, to please reverse your determination that these are not valuable historic features “due to their lack of integrity.”

Twenty-three distinct features described above remain in sufficiently good condition to depict the important history of this area.

Twenty-one numbered features (where individual numbers are in fact assigned to similar features,⁶ including numerous short metal flume segments and crossing bridges, plus two minor elements visible in the historic Forebay and on the historic penstock, while the historic features with common characteristics have been combined and assigned only one number) have been modified in recent times.

Unexplored also is the possibility that the first section of the diversion was originally a headrace for a hydraulic mining operation. In the GANDA original report and revision, we never found a discussion of potentially historic features that we brought to the attention of PG&E, as identified in the final attached document. Very old piping found below the diversion works and the large washed faces visible from Old Cow Creek in the general area beyond the first tunnel suggest possible hydraulic mining. Neither of these are definitive as other explanations exist for the piping – such as the extensive gold-era canals on the north side of the Old Cow and earlier siphon piping over to the South and North Canyon drainage.

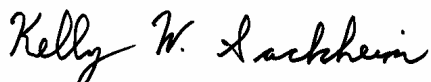
Your input will be invaluable to saving from demolition the facilities licensed to PG&E, because the FERC can, and we believe will, determine that demolition is NOT a necessary condition of PG&E’s license surrender, and in fact would require substantial mitigation. We request that you convey your conclusions based on a revised analysis that takes into consideration the points we have raised when you respond to the FERC’s letter

⁶ Features 6 – 8 and 17 are modern, three metal flumes and a crossing bridge. Features 11, 15, 26, 30, 36, 38 and 39 also consist of modern metal and wood foot bridge/crossings with wood railing noted for the former. Features 19 – 21, 23 – 25, 28 and 31 each consists of a section of modern wood and metal flume. Feature 37 is described as “a modern metal trash collector mechanism or apparatus” – demonstrating the lack of familiarity of the writer with the common “trash rack” and automation technologies used to screen flowing water and keep the screens clear. Feature 42 consists of a modern metal pier (in the Kilarc Forebay Reservoir) and associated water intake.

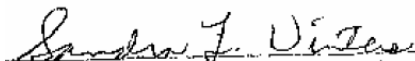
Messrs. Fowler and Donaldson, Ms. Stratton and Ms. Foster-Curley,
and Representatives of Native American Tribes
Re: Section 106 consultation; application for surrender of license for the Kilarc-Cow Creek Project
(FERC No. 606)
March 26, 2010

requesting you review PG&E's application, and provide your comments and
recommendations within 30 days (by approximately April 22, 2010).

Sincerely,



Kelly W. Sackheim, Principal
KC Hydro, a partnership of
Davis Hydro LLC and Sackheim Consulting



Sandra L. Winters, Volunteer
Shasta Historical Society

Attachments

Cc: filed electronically to FERC eLibrary and served to augmented P-606 Service List
Copied to Native American Representatives below:

Redding Rancheria
Attn: Tracy Edwards,
Chief Executive Officer;
and Barbara Murphy, Chair
2000 Redding Rancheria Road
Redding, CA 96001

Madesi Band, Pit River Indians
Attn: Carol Cantrell,
Cultural Resource Representative
P.O. Box 203
Montgomery, CA 96065

Winnemem Wintu Tribe
Attn: Caleen Sisk-Franco,
Tribal Chair
14840 Bear Mountain Road
Redding, CA 96003

Roaring Creek Rancheria
P.O. Box 52
Montgomery, CA 96065

United Tribe of
Northern California, Inc
Attn: Gloria Gomes, Chairperson
20059 Parocast
Redding, CA 96003

Atsugewi Band, Pit River Indians
Attn: Bill George
P.O. Box 114
Hat Creek, CA 96040

Wintu Tribe of Northern California
Attn: Kelli Hayward
3576 Oasis Road
Redding, CA 96003

Pit River Tribe
Environmental Office
Attn: Sharon Elmore,
Cultural Information Officer
37118 State Highway 299 E
Burney, CA 96013

Itsatawi Band, Pit River Indians
Attn: Reitha Amen
18342 Rory Lane
Cottonwood, CA 96002

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing document by first class mail postage prepaid or email upon each person designated on the official service list compiled by the Secretary of the Commission in this proceeding.

Dated at Fair Oaks, CA this 27th day of March 2010.

Kelly W. Sackheim

Kelly W. Sackheim, Principal
Sackheim Consulting
5096 Cocoa Palm Way
Fair Oaks, CA 95628

Davis Hydro, LLC.
27264 Meadowbrook Drive
Davis, California 95618
530 753-8864 Fax 530 753-4707
Email: dick@davishydro.com

April 29, 2008

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 – 1st Street, N.E.
Washington, DC 20426-0001

Filed electronically

Re: Kilarc-Cow Creek Hydroelectric Project, FERC Project No. 606
Request that the Commission NOT designate PG&E as Non-federal representative

Dear Secretary Bose:

With regard to Pacific Gas and Electric Company's (PG&E's) letter to you pertaining to "Non-federal representative designation" for subject project, dated April 23, 2008, stamped as filed April 24, and posted on e-library on April 28, 2008, by this letter, you are requested to deny all requests made in that letter.

Specifically, the Commission is requested

- 1) NOT to authorize PG&E to initiate consultation pursuant to 36 CFR §800.2(c)(4), as described in Section 106 of the National Historic Preservation Act, with the California State Historic Preservation Officer ("SHPO") and others regarding decommissioning of the Kilarc-Cow Creek Hydroelectric Project ("Project"), and
- 2) NOT to designate PG&E as its non-federal representative pursuant to 50 CFR §402.08 to conduct consultation with the National Marine Fisheries Service and the US Fish and Wildlife Service, including preparation of a biological assessment as necessary to comply with Section 7 of the Endangered Species Act.

The justification for denial of the above requests includes the fact that PG&E has consistently demonstrated a bias that prejudices the consideration of project alternatives as required under the National Environmental Policy Act. PG&E has stated repeatedly that "PG&E looks forward to working with the Commission and other stakeholders on the decommissioning of the Project," where "decommissioning" is defined by PG&E as DISMANTLING facilities that many stakeholders oppose dismantling. Davis Hydro has promulgated Alternatives to Save Kilarc and Cow Creek Facilities, concurrently with PG&E's release of a Preliminary Proposed Decommissioning Plan dated September 10, 2007. These Alternatives were re-released for discussion in January 2008. Updated versions of these Alternatives are logged on the www.kilarc.info website, with the latest dated March 26, 2008.

Thomas LoVullo, one of the FERC representatives who came to discuss the P-606 license surrender

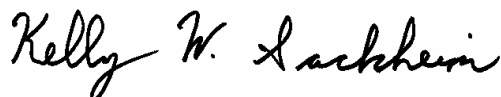
with community stakeholders in January 2008 made it very clear that PG&E is not required to dismantle the project facilities upon license surrender. Davis Hydro, various ranchers, and the community of Whitmore have a vested interest in the future disposition of project facilities. We suggest that there are Alternatives that will both promote anadromous fish restoration and meet community objectives. These Alternatives were not available when PG&E first conducted an evaluation for the disposition of the project. The Alternatives are available now, and should be studied along side the PG&E-proposed Alternative for dismantling.

An objective evaluation of what is best is needed by a disinterested entity. Davis Hydro requests the opportunity to participate in consultation with the resource agencies responsible for preservation of the respective resources under Section 106 of the National Historic Preservation Act and Section 7 of the federal Endangered Species Act.

By letter dated April 24, 2008, addressed to PG&E and copied to the FERC's e-library, Davis Hydro submitted a Statement of Interest in Future Disposition of Kilarc Development Assets following PG&E Surrender of P-606 Hydropower License, by the date requested, in response to both of PG&E's March 10, 2008 Solicitations of Interest for Ownership and Management of Kilarc-Cow Creek Hydroelectric Project (FERC No. 606) property and facilities included in the Kilarc Development.

Davis Hydro continues to develop the Alternatives to PG&E's proposed dismantling plan. Davis Hydro is continuing to develop these plans that will be ready in time for consideration and study against the proposed deconstruction plan. We are gathering preliminary environmental information to support consideration of our plan for approval by the resource agencies. We request that our environmentally preferred Alternative license surrender plan be considered.

Sincerely,



Kelly W. Sackheim
Permitting and Compliance

cc: Rod McInnis
Regional Administrator
National Marine Fisheries Service
501 West Ocean Blvd
Long Beach, CA 90802

Steve Thompson
Regional Director
US Fish and Wildlife Service
2800 Cottage Way
Sacramento, CA 95825

Milford Wayne Donaldson
State Historic Preservation Officer
P.O. Box 942896
Sacramento, CA 94296

FERC P-606 Service List and other parties with whom Davis Hydro is already consulting

Community Stakeholders

info@savekilarc.org

or

c/o Carnley

P.O. Box 177

10471 Blue Mountain Ranch Road

Whitmore, CA 96096

calass@frontiernet.net

November 7, 2008

Stacy Evans, Project Manager

Pacific Gas and Electric Company

Power Generation

Mail Code N11C, PO Box 770000

San Francisco, CA 94117

Re: Written Comments due November 8 for PG&E to revise the DLSA and file the Final License Application with FERC

Dear Ms. Evans:

Members of the Whitmore Community are important stakeholders in the disposition of the Kilarc facilities upon PG&E's license surrender. We have repeatedly been ignored.

Citizen comments and other attachments to this letter demonstrate the significant, unmitigated impacts of your proposed "Decommissioning Plan." The concept for this plan was first introduced to us in March 2007 - after PG&E developed a March 2005 agreement for signature by a group of stakeholders from which the community was excluded. In September 2007, PG&E released a lengthy document describing your plan for review and comment. PG&E then incorporated the same plan, without taking into consideration comments received by the community, into your "Draft License Surrender Application" dated September 4, 2008. The plan, virtually unchanged since it was first conceived by PG&E, would be an unmitigated disaster for the Whitmore Community and is totally unnecessary.

A majority of the community concerns were first raised at your public meeting in March 2007, reiterated in September/October 2007 following the release of your plan to demolish valuable assets at great cost to us ratepayers, and continue to be completely ignored in your latest document.

Our latest comments are cross-referenced to the totally inadequate analysis in your DLSA in the first attachment to this letter. The attachment proves that there would be significant, unmitigated impacts of PG&E's decommissioning plan. These impacts

would be avoided by the feasible alternative to leave all Kilarc facilities in place for future use. Our community, with support from Davis Hydro, is prepared to take responsibility for the facilities PG&E will abandon and fully address in so far as possible the fish issues. The problem remains that PG&E is raising unnecessary obstacles to a win-win future situation.

PG&E states that the net book value of the Project is estimated to be approximately \$5 million – and proposes to spend \$14.5 million of OUR ratepayer money to destroy it. It makes much more sense for PG&E to donate the facilities, and allocate ratepayer funds authorized by the CPUC to foster the success of future project benefits. PG&E should NOT “be entitled to receive its net investment plus severance damages” (DLSA Section D.2 Amount Payable in the Event of Project Takeover). PG&E should not be compensated because it cannot continue to operate the project cost-effectively. PG&E should not be allowed to stand in the way of ratepayer and community interests.

Significant, unmitigated effects of the proposed dismantling plan, that would be addressed by developing and selecting a project alternative as required under NEPA, include:

- ❖ Loss of local recreation that is especially suitable for youth and handicapped
- ❖ Destruction of a historic resource
- ❖ Water supply impacts from loss of groundwater recharge to springs and wells
- ❖ Loss of fire suppression capability puts our community and natural resources at risk
- ❖ Downstream water quality impacts on endangered fish
- ❖ Impacts to wildlife and natural resources, including wetlands and potentially endangered species
- ❖ Potential hazard of dangerous wildlife seeking water on residential and ranch properties
- ❖ Deterioration of local economy and property values with disruption to ecological balance and community benefits that have evolved over 100 years with the project

Steelhead trout would also benefit from the proposed alternative – it is NOT necessary to dismantle the historic Kilarc Diversion, Canal and Reservoir to save this endangered species. The Proposed PG&E solution is based on returning fish to an area where they have never been seen, and will be very difficult to get to or grow in no matter whether there is hydro or not.

PG&E indicated that you would not respond to comments provided verbally when you presented your latest document. Therefore, 14 concerned local citizens attended a community meeting (see attached sign-in sheet) on October 29, 2008 to repeat concerns that we do not believe are adequately addressed in the PG&E document. One participant prepared for our meeting by preparing a written list of Pertinent Studies. A dedicated note-taker summarized the issues as they were raised. These concerns expressed repeatedly by our community are presented in the latter attachments.

Written Comments on DLSA of Whitmore Community Stakeholders
To PG&E

Page 3
November 7, 2008

Please do not ignore the community. A win-win solution can be achieved if PG&E will leave Kilarc facilities in place and support the community even slightly.

Sincerely,



Laura Carnley for
Whitmore Community Stakeholders

Attachments: cross-reference of comments to DLSA statements and omissions, lists of pertinent studies and community concerns raised in October 29, 2008 meeting, sign-in sheet of meeting participants and signatures and comments of stakeholders who concur with this letter

Enclosure: Excerpts from DLSA Appendix L, Cultural Resources Report pertaining to recordation of Kilarc hydroelectric system (excluding the powerhouse), including report cover, two sequential text pages (unnumbered) and pages 1-30 of Department of Parks and Recreation Primary Record for Resource Name or #: 482-12-07H, Other Identified: Kilarc Canal

cc: comments@kilarc-cowcreek.com
"Evans, Stacy" SxEf@pge.com
"Nevares, Steven" SAN3@pge.com

Kilarc-Cow Hydroelectric Project
Draft License Surrender Application Comments
c/o Darcy Kremin
2300 Clayton Road, Suite 200
Concord, CA 94520

Filed to P-606 in FERC e-library

any argument to the contrary. Change to an existing, stable environment may result in POTENTIALLY SIGNIFICANT adverse effects that PG&E has failed to even attempt to acknowledge. PG&E has only surveyed resources for a total of 5 days which is completely insufficient to characterize ecosystems that depend on the project features.

Topics 8 and 9. Historical Resources and Archaeological Resources

The community comments only on the Historical Resource, which is entirely public information. However, PG&E has stymied the assessment of its analysis by mischaracterizing historic resources as archaeological, and restricting release of the entire Cultural Report, presumably because of confidential location information for Native American Resources that has been buried in the same report.

5. The Community Stakeholders request that PG&E revise its license surrender application to address the Historical Resources separately from the Archaeological Resources, specifically releasing ALL non-confidential information in the Cultural Report (Appendix L) and more clearly cross-referencing in a single section of the DLSA (as requested in #3 above under General Comments), the findings and justification of the recorded features.

The DLSA provides a nearly 5-page historical context for the project area, of which 2 pages specifically address hydropower. The community also identified that Kilarc was the third powerhouse established in the region to replace wood-burning smelters – the whole system is historically important to the development of Shasta County. In the 20s through at least 1953, buildings adjacent to the powerhouse that have since been torn down served the local social life – and are not reflected in the short summary of the DLSA. The GANDA Cultural Resources Report (which has NO page numbers on the footers – page referenced is opposite Figure 26; the table of contents indicates Figure 27 is on the following page, but it is not) does identify that “Approximately 21 out of the 27 buildings existing at the site in 1919 had been removed by 1997 (PG&E 1979; Camp, Dresser & McKee 1997:4-1).”

The DLSA identified that “All resources identified within the APE were photographed and mapped with GPS equipment.” (Page E.2-91) and “A total of seven architectural and historical resources were identified within or adjacent to the APE. All were recorded on Department of Parks and Recreation (DPR) standard forms, mapped and photographed. [...] Table E.2.8.2-2 summarizes the architectural and historical resources described in this Draft LSA report.” (Page E.2-92 with tables on Page E.2-166 [labeled only as Page 166 in the footer]; The Cultural Report identified as Appendix L to the DLSA was said to include confidential information and therefore was not released publicly. A single hardcopy of the Cultural Report was provided to the Shasta Historical Society.)

Page E.3-28 identifies the impact threshold criterion as “Cause a substantial adverse change in the significance of architectural and historical resources recommended for

eligibility in the NRHP or the CRHR.” Given that the Kilarc Main Canal does not even appear as one of the seven architectural and historical resources identified in Table E.2.8.2-2, it becomes impossible to evaluate whether the Kilarc Main Canal meets this criteria. Nonetheless, the same criteria applies for archaeological resources (identified on page E.3-29).

A review of Tables E.2.8-2 and E.2.9-2 reveals that the Kilarc Main Canal (Temporary Number 482-12-07H), that presently serves as the active water conveyance structure delivering up to 52 cfs to the powerhouse is listed only in the latter table of *archaeological* resources.

6. The Community Stakeholders request that PG&E explain why a functioning feature integral to its current hydropower generation was characterized as an *archaeological resource*.

A review of section E.2.9 of the DLSA reflects that NO historical context is provided to support the discussion of historic site types in this section, rather than the preceding E.2.8. It is unclear why the Field Survey Results presented on page E.2-97 within section E.2.9 of the DLSA identify by number the features that appear to be indiscriminately assigned to either Table E.2.8-2 (the Kilarc Powerhouse [site 482-12-06H]) or Table E.2.9-2 (the Kilarc Inlet Canal and associated features [site 482-12-07H]) – except that PG&E does not propose to demolish the Powerhouse and would not be able to demolish the Kilarc Inlet Canal and associated features without mitigation if it were correctly characterized as eligible for listing and therefore a SIGNIFICANT adverse effect of the proposed decommissioning plan.

Table E.4.9-1. Recommendations for Archaeological Resources Identified within the APE provides the first indication of which such resources were deemed NRHP/CRHR Eligible – including only the Temporary Number for each resource, without the corresponding Name/Location. The Kilarc Main Canal was identified in Table E.9-2 with Temporary Number 482-12-07H, that was deemed “Not eligible” and nonetheless received a Recommendation for “No mitigation but avoid historic features where possible.” – which appears commendable EXCEPT that PG&E’s proposed plan involves complete removal of ALL features.

The GANDA report was consulted to determine WHY the Kilarc Main Canal was deemed “Not eligible” – one full page of text (across two pages, presented in the enclosure) proceed from “In summary, the Kilarc Powerhouse appears to [sic] eligible for the NRHP under Criteria A and C, and the CRHR under Criteria 1 and 3 at the state and local level.” followed by the header for “Kilarc Hydroelectric System” that begins “The Kilarc hydroelectric system, including canals, dams, ditch tender cabins, bridges, flumes, siphons, tunnels, spillways, berms, a forebay, and a penstock, constructed in 1903-1904 by the Northern California Power Company, represents a local historic resource that provided hydroelectric power from a water diversionary system constructed throughout the Cow Creek watershed.”

NOTE: the text incorrectly refers in the past tense that the LOCAL historic resource PROVIDED hydroelectric power. As described in the DLSA and above, the system is historically important to the development of Shasta County, not simply LOCAL interests (although these local interests clearly merit consideration as well!). And, the system continues to generate hydroelectric power, and according to Davis Hydro and the FERC, has the potential to continue generating following PG&E's license surrender.

The GANDA report concludes that “Although the Kilarc hydroelectric system has important historical associations and engineering significance, the system as a whole lacks integrity, and therefore the Kilarc hydroelectric system does not appear to be eligible to meet the criteria for listing on the NRHP or the CRHR.” The GANDA report argues that the removal of associated buildings that were necessary for the many workers employed prior to the automation of the project, and “numerous” changes made to various components of the system, destroys the “integrity of location, design, setting, materials, workmanship and feeling and association” of the system “from an engineering and technological aspect.” In short, the GANDA report argues that because PG&E has already destroyed important historic resources, PG&E should not be obligated to preserve the remaining features that ARE historic and highly valued by the community.

Why the “removal of associated buildings” detracts from the integrity of the Kilarc Canal “from an engineering and technological aspect” when the Kilarc Powerhouse (that is geographically closer to the associated buildings that no longer exist) is deemed eligible for listing, is a mystery, again – except that PG&E does not propose to demolish the Powerhouse and would not be able to demolish the Kilarc Inlet Canal and associated features without mitigation if it were correctly characterized as eligible for listing and therefore a SIGNIFICANT adverse effect of the proposed decommissioning plan.

7. The community challenges the finding that the remaining Kilarc hydroelectric system, especially including the water conveyance structures, is NOT eligible for listing, as supported by the evidence provided in the corresponding record (scanned copy attached – of 44 features photographed along the 3+ mile canal, only a dozen steel flumes and various bridges over the flume are deemed “modern”). The community requests a comprehensive revision to the analysis in the GANDA report and summary of findings presented in the DLSA to reflect that the Kilarc hydroelectric system, e.g. the Kilarc Canal and Forebay and associated structures, ARE features eligible for listing in the NRHP and the CRHR.

It is similarly unclear why, in the final paragraph on page E.2-97, within section E.2.9 of the DLSA, PG&E states “Site P-45-003241 was briefly recorded as a ditch pouring into the Kilarc Main Canal. It was re-recorded as the North and South Canyon Creek ditch, with a total of eight features.” when the previous recordation number appears in Table E.2.8-1 (the prior section of the report) and a new number has been assigned and the feature identified as 482-12-10H in Table E.2.8-2.



Power Generation

245 Market Street
San Francisco, CA 94105

Mailing Address
Mail Code N11C
P.O. Box 770000
San Francisco, CA 94177

April 20, 2009

The Honorable Kimberly D. Bose, Secretary
THE FEDERAL ENERGY REGULATORY COMMISSION
888 First Street, N.E., Docket Room
Washington, D.C. 20426-001

Re: Submittal of *Determination of Eligibility and Finding of Effect for the Kilarc-Cow Creek Hydroelectric Decommissioning Project (FERC No. 606) Letter*

Dear Secretary Bose:

Enclosed is the requested copy of the November 4, 2008 letter from Mr. Milford Wayne Donaldson, California State Historic Preservation Officer (SHPO) to Ms. Stacy Evans, Pacific Gas & Electric (PG&E) Project Manager, documenting SHPO concurrence on the Determination of National Register of Historic Places Eligibility and Finding of Effect of the identified cultural resources for the Kilarc-Cow Creek Hydroelectric Project (FERC No. 606).

As requested by the Federal Energy Regulatory Commission (FERC), PG&E is submitting this additional filing of the attached letter for the Kilarc-Cow Creek Hydroelectric Project, FERC No. 606, License Surrender Application (LSA).

PG&E looks forward to continually working with FERC and other interested parties in the license surrender process.

If you have any questions regarding the LSA and attached letter, please contact me at (415) 973-4731.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Stacy Evans', is written over a light blue horizontal line.

Stacy Evans
Project Manager
Attachment: November 4, 2008 Letter from SHPO

cc: Carlisa Linton-Peters
Jade Alvin

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

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov



November 4, 2008

In Reply Refer To: FERC050822A/FERC080922A

Stacy Evans
PG&E Project Manager
245 Market Street
P.O. Box 770000
San Francisco, CA 94117

Re: Determination of Eligibility and Finding of Effect for the Kilarc-Cow Creek Hydroelectric Decommissioning Project (FERC No. 606)

Dear Ms. Evans:

You are continuing consultation with me regarding the above referenced project in order to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f) as amended and its implementing regulations codified at 36 CFR 800. Pacific Gas and Electric (PG&E) has been delegated authority to complete Section 106 responsibilities for the Federal Energy Regulatory Commission (FERC). PG&E consulted with my office in March of 2008 and has determined that the decommissioning of the Kilarc-Cow Creek system involves properties that are eligible for the National Register of Historic Places (NRHP). Your recent letter (received in this office (6 October 2008) requests my concurrence with the following items:

- 1) the Kilarc and Cow Creek Powerhouses are eligible to the NRHP ,
- 2) the Kilarc and Cow Creek hydroelectric systems (canals, bridges, dams, flumes, siphons, tunnels, spillways berms, forebays and penstocks) are not eligible individually or as components of historic districts due to their lack of integrity,
- 3) the avoidance of the five unevaluated prehistoric sites is appropriate for the purposes of decommissioning the systems,

To support these findings, you have submitted a report entitled *Cultural Resources Inventory and Evaluation for the Kilarc-Cow Creek Hydroelectric Project, FERC No. 606, Shasta County, California*. Based on the documentation you have provided, I have the following comments:

- I concur with PG&E's determination of eligibility for the Kilarc and Cow Creek Powerhouses.
- I concur that the hydroelectric systems are not eligible individually or as components of historic districts.
- I agree that the avoidance of the five unevaluated sites is appropriate

Further, PG&E has determined that the decommissioning of these systems constitutes an "adverse effect" and proposes to draft a Memorandum of Agreement (MOA) to mitigate these effects. I concur with this finding and agree that an MOA is the appropriate document.

FERC050822A/FERC080922A
Page 2 of 2

I look forward to working with your staff to draft the MOA and addressing the effects of decommissioning activities. If you have any questions, please contact Cheryl Foster-Curley of my staff at (916) 653-9019, or email at ccurley@parks.ca.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Milford Wayne Donaldson".

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

**CULTURAL RESOURCES INVENTORY AND EVALUATION FOR
THE KILARC-COW CREEK HYDROELECTRIC
DECOMMISSIONING PROJECT, FERC NO. 606, SHASTA COUNTY,
CALIFORNIA**



Prepared for:

Pacific Gas and Electric Company

Prepared by:



Barbra Siskin, M.A., RPA, Jennifer Lang, M.S., Bruno Texier, B.A., Cassidy DeBaker, B.A., Amy
McCarthy Reid, B.A.
Garcia and Associates
1 Saunders Avenue
San Anselmo, California 94960

Reviewed by:
ENTRIX, Inc.
Kimberly Demuth, M.S.
David Harvey, M.A.
Lucy Zuccotti, M.A.

March 12, 2009
J482/12.1

other diversion on Mill Creek was also recorded (482-12-09H). P-45-003241 was briefly recorded as a ditch pouring into the Kilarc Canal. It was re-recorded as the North and South Canyon Creek ditch, with a total of eight features. A new site record has been prepared for 482-12-11/H, an older discovery of a prehistoric lithic scatter plotted at the NEIC, and for which no formal record existed.

All DPR forms are provided in Appendix C. Table 2 below summarizes the cultural resources described in this report.

Table 2: New and Updated Cultural Resources

Temporary Number	State Number	Site Type	Property Type	Name/Location	Attributes
482-12-01H	Not Available	Historic	Water systems	S. Cow Creek Powerhouse	Hydroelectric power-generation
482-12-02H	CA-SHA-1764H	Historic	Water systems	S. Cow Creek canal	Diversion, ditch, bridges, forebay, penstock
482-12-03H	None	Historic	Settlement	Cow Creek caretaker's cottage	Housing foundations, utility buildings, landscape, refuse deposits
482-12-04	None	Prehistoric	Lithic scatter	Not for Public Release	Obsidian flake scatter
482-12-05/H	None	Multi-component	Lithic scatter, refuse deposit	Not for Public Release	Obsidian flake scatter, historic artifact scatter
482-12-06H	None	Historic	Water systems	Kilarc Powerhouse	Hydroelectric power-generation
482-12-07H	None	Historic	Water systems	Kilarc canal	Diversion, ditch, bridges, wood shacks, forebay, penstock
482-12-08/H	None	Multi-component	Obsidian flake, refuse deposit	Not for Public Release	Obsidian flake, historic artifact scatter
482-12-09H	None	Historic	Water systems	Mill Creek ditch	Diversion, ditch
482-12-10H	P-45-003241	Historic	Water systems	N. and S. Canyon Creek ditch	Diversion, ditch, siphon
482-12-11/H	<i>No record</i> (Foster report THP #2-89-97-Sha)	Multi-component	Lithic scatter, water systems	Not for Public Release	Obsidian flake scatter, historic improved spring

Site 482-12-01H

This historic resource consists of the South Cow Creek Powerhouse, described at the end of this section.

CA-SHA-1764H-(Site 482-12-02H)

This historic resource consists of the South Cow Creek Canal. It was originally recorded as CA-SHA-1764H by Laurence H. Shoup in 1989 (Shoup 1989). According to Shoup:

“This historic resource consists of a historic timber crib diversion dam and related features. The main dam is the second one known to have been constructed at this location. The original dam was built in 1907 and was a rock dam. The present dam was built in the 1920’s. The main South Cow Creek Diversion Dam is a timber crib dam backed by rock and concrete. Metal plates have been bolted to



Figure 5. Basalt biface platform.

An additional three obsidian flakes were found outside the recorded site boundary at the bottom of the road near the canal. It is likely that these flakes were washed down the road by rainwater from the graded area upslope.

Site 482-12-06H

This historic resource consists of the Kilarc Powerhouse and is described at the end of this section.

Site 482-12-07H

This historic resource consists of the Kilarc Canal system that includes the Kilarc Main Diversion Dam, the approximately 3.65 mile long canal and flume system, the 4-acre Kilarc forebay (reservoir) and the penstock that collects and delivers water to the Kilarc Powerhouse. A total of 44 features were documented along the canal system between the main diversion dam on Old Cow Creek and the Kilarc Powerhouse.

Feature 1 - Kilarc Main Diversion Dam

Feature 1 consists of the main water diversion dam and spillway that diverts water into the Kilarc Canal from Old Cow Creek. The spillway is a 10 foot high and 20 foot wide concrete wall perpendicular to Old Cow Creek that artificially raises the streambed water level. The top of the wall is 2 feet thick. The diversionary structure and dam is a V-shaped concrete structure which serves to divert and control the flow of water from the natural stream bed of Old Cow Creek to the opening of the main flume and aqueduct for the Kilarc water system. The concrete diversion structure is located on the southwestern side of the spillway which acts to force water into the head of the canal system. In this location the water is channeled into an artificial creek bed approximately 12 feet wide, flowing in a torrent towards a secondary spillway and gate valve (Feature 2) and intake into the concrete flume (Feature 3). The mouth of the diversionary structure is a water gate that is actuated by a crank and chain-driven flap. The diversion structure measures 6 feet wide by 10 feet tall.

Feature 2 - Spillway and Diversion

Feature 2 consists of a spillway and dam associated with the main water diversion and located a short distance downstream of the main water diversion (Feature 1). The spillway consists of a concrete dam about 12 feet long by 18 inches wide by approximately 6 feet high and associated retaining wall measuring roughly 15 feet long by 18 inches wide. Incorporated into the spillway is a 6 by 3 feet concrete cistern or water basin. The

mouth of the diversionary structure is a water gate that is actuated by a crank and chain-driven flap. This is the location of the intake into the first concrete flume on the Kilarc canal.

Feature 3 – Concrete Flumes

Feature 3 consists of the concrete flume sections that are present at irregular intervals along the Kilarc Canal system en route to the Kilarc forebay. The concrete flume sections are similar in construction, with a squared-off U-shape in cross-section and are generally 4 to 6 feet wide, 3 feet deep and with 3 to 6 inch thick walls. Each section occurs in varying lengths along the course of the canal.

Feature 4 - Gauging Station

Feature 4 consists of a modern wood and corrugated aluminum rectangular gauging station shack. The structure measures 6 feet (N-S) by 4 feet (E-W) and is 11 feet tall.

Feature 5 - Cabin

Feature 5 consists of a small wooden ditch tender cabin. Formerly known as Kilarc Shack 2, this feature is located approximately 25 feet south and upslope of the main Kilarc aqueduct. The structure measures 10 feet (E-W) by 12 feet (N-S), has a square plan and a gabled roof. The structure is wood framed with single windows on the west and north sides (cross-pattern sash with 6 panes that are no longer intact) that measure 24 inches wide by 18 inches tall. There is an open doorway on the west face that measures 2 feet wide by 6 feet 6 inches high. The walls, roof and floors are made from 1 by 10 inch fir boards. The roof and exterior walls are covered with vertically mounted split cedar shingles. The interior walls are covered with particle board. The roof covering is corrugated steel sheeting. Most of the floor and foundation have rotted away. A framed 2 foot by 2 foot wood stove footing is present on the floor, offset from the center of the structure with a 7-inch diameter stove pipe vent in the roof directly above it. The entire structure is anchored with round-head wire nails. A 6-millimeter heavy gauge steel wire and 1-inch ceramic insulator has been installed above the entry way of the structure to provide electricity or possibly telegraph communications. This wire has been connected to adjacent trees and has been observed at other structures (Features 10, 18, 27) recorded along the Kilarc canal system. No associated artifact scatter was observed, though small sections of 7-inch diameter stove-pipe were observed strewn about the interior and exterior of the structure.

Feature 6 - Crossing Bridge

Feature 6 consists of a modern wood crossing bridge. The bridge is constructed of 2-by-8 and 4-by-4 inch lumber and measures 12 feet long and 9 feet wide.

Feature 7 - Metal Flume

Feature 7 consists of a section of modern metal flume.

Feature 8 - Metal Flume

Feature 8 consists of a section of modern metal flume.

Feature 9 - Riveted Penstock

Feature 9 consists of metal siphon made of a 12-inch diameter riveted steel penstock pipe that delivers water into the Kilarc canal system from the North and South Canyon Creek ditch (see P-45-003241 /482-12-10H, Feature 8). The penstock itself has a deteriorating tar-coating and sits on a stacked stone pedestal where it abuts the concrete flume section of the Kilarc canal. The stacked stone pedestal is concrete mortared in 10 thin courses of local stone and measures 2 feet wide (N-S) by 4 feet wide (E-W) by 3 feet tall.

Feature 10 - Cabin/Supply Shack

Feature 10 consists of a small ditch tender cabin or supply shack. Formerly known as Kilarc Shack 1, this feature is located approximately 25 feet south and upslope of the main Kilarc flume, just above Feature 9. The structure rests on an artificially cut pad cut into the 25 degree slope. The structure measures 7 feet (E-W)

by 8 feet (N-S), has a square plan and an angled or sloping half-gabled profile. The pitch of the roof is approximately 10 degrees. The structure is wood framed with a single north-facing window (cross-pattern sash with 6 panes that are no longer intact) that measure 30 inches wide by 30 inches tall. There is an open doorway (hinges intact) on the east façade that measures 2 feet wide by 6 feet 6 inches high. The walls, roof and floors are made from milled 1 by 10 inch fir boards. The exterior walls are covered with vertically mounted split cedar shingles. The interior walls are covered with particle board. Most of the floor and foundation have rotted away. A framed 2 foot by 2 foot wood stove footing is present on the floor, offset from the center of the structure with a 7 inch diameter stove pipe vent in the roof directly above it. The roof covering is corrugated steel sheeting and split cedar shingles. The entire structure is anchored with round-head wire nails. A 6-millimeter heavy gauge steel wire and 1 inch ceramic insulator have been installed above the entry way of the structure to provide electricity or possibly telegraph communications. This wire has been connected to adjacent trees and has been observed at other structures (Features 5, 18, 27) recorded along the Kilarc canal system. No associated artifact scatter was observed, though small sections of 7-inch diameter stove-pipe were observed strewn about the interior and exterior of the structure.

Feature 11 - Foot Bridge

Feature 11 consists of a modern metal and wood foot bridge/crossing with wood railing.

Feature 12 - Tunnel

Feature 12 consists of a low-ceiling tunnel with a wooden flume running through it. The tunnel opening is approximately 7 feet wide and rises above the water level roughly 3 feet 6 inches. The tunnel has been blasted or bored through solid local bedrock.

Feature 13 - Foot Trail Tunnel Bypass

Feature 13 consists of a tunnel bypass foot trail. This trail is used to navigate over the large bedrock outcrop that Feature 12 goes through. The trail connects the upstream and downstream mouths of the tunneled canal sections. The trail climbs abruptly from the upslope edge of the canal and from the foot bridge Feature 11, proceeding over the crest of the hill and bedrock outcrop then gently contours the slope back to the aqueduct and concrete flume near the downstream mouth of the tunnel (Feature 12).

Feature 14 - Abandoned Flume Alignment

Feature 14 consists of a section of abandoned wood flume alignment. The abandoned alignment consists of a broad contouring 12 foot wide by 7 foot deep cut into the approximately 65 degree slope. A portion of the abandoned alignment displays a large V-cut excavated into the adjacent hillside measuring at least 15 feet deep and 20 feet wide. The abandoned wood flume alignment is heavily overgrown with local vegetation and portions of the alignment have been destroyed by significant erosion and landslide events. A rusted shovel head was found on this old alignment, near the mouth of the tunnel.

Feature 15 - Foot Bridge

Feature 15 consists of a modern metal foot bridge/crossing.

Feature 16 - Drains

Feature 16 consists of a large number of metal and concrete constructed drains. These drains occur at irregular intervals along the entire length of the Kilarc canal system. These drains consist of a 1-foot diameter culvert and associated concrete channel. These structures are designed to drain the water trapped from the upslope side of the concrete flumes. A 1-foot diameter culvert is positioned vertically then travels under the flume to pour into concrete channels down slope.

Feature 17 - Metal Flume

Feature 17 consists of a section of modern wood and metal flume.

Feature 18 - Cabin

Feature 18 consists of a small wooden ditch tender cabin. Formerly known as Kilarc Shack 3, this feature is located approximately 25 feet south and upslope of the main Kilarc aqueduct. The structure measures 12 feet (NE-SW) by 10 feet (NW-SE), and 12 feet high to the peak of the gabled roof. The structure has a square plan and gabled profile. The structure is wood framed with a single north-east facing window opening. The window opening measures 24 inches wide by 18 inches tall. There is an open doorway on the southeast façade that measures 2 feet wide by 6 feet 6 inches high. The walls, roof and floors are made from milled 1 by 10 inch fir boards. The exterior walls are covered with vertically mounted split cedar shingles. The interior walls are covered with particle board. The roof covering is split cedar shingles and corrugated steel sheeting. Most of the floor and foundation have rotted away. A framed 2 foot by 2 foot wood stove footing is present on the floor, offset from the center of the structure with a 7-inch diameter stove pipe vent in the roof directly above it. The entire structure is anchored with round-head wire nails. A 6-millimeter heavy gauge steel wire and 1-inch ceramic insulator has been installed above the entry way of the structure to provide electricity or possibly telegraph communications. This wire has been connected to adjacent trees and has been observed at other structures (Features 5, 10, 27) recorded along the Kilarc canal system. No associated artifact scatter was observed, though small sections of 7-inch diameter stove-pipe were observed strewn about the interior and exterior of the structure.

Feature 19 - Wood and Metal Flume

Feature 19 consists of a section of modern wood and metal flume.

Feature 20 - Wood and Metal Flume

Feature 20 consists of a section of modern wood and metal flume.

Feature 21 - Wood and Metal Flume

Feature 21 consists of a section of modern wood and metal flume.

Feature 22 - Spillway and Gate

Feature 22 consists of an emergency spillway and associated gate valve. The system is also designed to let excess water drain out of the canal system in the event of possible overflow.

Feature 23 - Wood and Metal Flume

Feature 23 consists of a section of modern wood and metal flume.

Feature 24 - Wood and Metal Flume

Feature 24 consists of a section of modern wood and metal flume.

Feature 25 - Wood and Metal Flume

Feature 25 consists of a section of modern wood and metal flume.

Feature 26 - Foot Bridge

Feature 26 consists of a modern metal foot bridge/crossing.

Feature 27 - Cabin

Feature 27 consists of a small wooden ditch tender cabin. This feature was not previously recorded. The structure is located approximately 20 feet west of the main Kilarc aqueduct. This cabin is the first structure to be located on the right bank of the canal. The structure measures 10 feet 6 inches (E-S) by 12 feet (N-S), and 12 feet 6 inches high to the peak of the gabled roof. The walls themselves are 7 feet high. The structure has a

square plan and gabled profile. It is wood framed with a single southeast facing window opening measuring 24 inches wide by 18 inches tall. The window is designed to slide inside the wall of the structure (cross-pattern sash with 6 panes that are no longer intact, mortises and wood peg construction).

There is an open doorway on the southeast façade that measures 2 feet 6 inches wide by 6 feet 6 inches high. The walls, roof and floors are made from milled 1 by 10 inch fir boards. The exterior walls are covered with vertically mounted split cedar shingles. Modern carved graffiti was observed on exterior. The interior walls are covered with particle board. The roof covering is split cedar shingles and corrugated steel sheeting. Most of the floor and foundation have rotted away. A framed 2 foot by 2 foot wood stove platform is present on the floor, offset from the center of the structure with a 7 inch diameter stove pipe vent in the roof directly above it. The entire structure is anchored with round-head wire nails. The cabin has a generally west-facing back porch, an attribute not observed on the other recorded cabins along the canal.

The porch is constructed of milled 2 x 4 and 4 x 4 inch planks and measures approximately 3 feet wide by 14 feet long and stands about 4 above the ground surface. The porch forms an L-shape, beginning at the front entryway, wrapping around the west façade. The support posts for the porch are mounted on roughly 1 by 1 foot stone footings. The floor of the porch is littered with firewood, lumber scraps, at least 2 lead-solder hole-n-top sanitary cans and 1 folded side-seam coffee tin. The cabin is associated with a historic period refuse deposit located adjacent to and on the west-facing down slope of the cabin.

The historic-era artifacts observed include but may not be limited to; “Prince Albert” style tobacco tins, folded side-seam sanitary cans and coffee tins, brick fragments and heavy gauge fencing wire bundles. A 6-millimeter heavy gauge steel wire and 1 inch ceramic insulator have been installed above the entry way of the structure to provide electricity or possibly telegraph communications. This wire has been connected to adjacent trees and has been observed at other structures (Features 5, 10, 18) recorded along the Kilarc canal system.

Feature 28 - Metal Flume

Feature 28 consists of a section of modern metal flume.

Feature 29 - Cross Flume

Feature 29 consists of a cross flume constructed of wood with concrete footing, possibly of historic-era construction. The cross-flume is constructed of milled 2-by-4 inch lumber and measures 2 feet 6 inches wide by 1 foot high (or deep). The upright side walls are 4 inches wide and 2 feet deep.

Feature 30 - Foot Bridge

Feature 30 consists of a modern metal foot bridge.

Feature 31 - Cross Flume

Feature 31 consists of a modern metal cross-flume.

Feature 32 - Metal Flume

Feature 32 consists of a section of modern metal flume that is associated with a series of two short tunnels. The tunnels are cut through solid volcanic tufa stone. The tunnels are likely the historic-era feature; the flume itself is made of modern steel construction and materials.

Feature 33 - Foot Bridge

Feature 33 consists of a wooden foot bridge/crossing.

Feature 34 - Spillway and Gate

Feature 34 consists of an emergency spillway and associated gate valve. The system is also designed to let excess water drain out of the canal system in the event of possible overflow. This feature is located on the main Kilarc flume approximately 4000 feet east of the Kilarc Forebay. The structure measures roughly 10 feet wide with 2-foot sidewalls where it connects with the flume. The outlet width narrows to approximately 4 feet at the tapered northern end, with a corresponding decrease in the height of the sidewalls. The outlet is controlled by a hand-operated crank lever that raises or lowers a tongue-and-groove fixed wood plank that serves as a water gate.

Feature 35 - Spillway

Feature 35 consists of an emergency spillway, associated gate valve and metal foot bridge/crossing. The spillway system is also designed to let excess water drain out of the canal system in the event of possible overflow.

Feature 36 - Foot Bridge

Feature 36 consists of a modern metal and wood foot bridge/crossing with concrete footings.

Feature 37 - Trash Collector

Feature 37 consists of a modern metal trash collector mechanism or apparatus.

Feature 38 - Foot Bridge

Feature 38 consists of a modern metal and wood foot bridge/crossing with concrete footings.

Feature 39 - Foot Bridge

Feature 39 consists of a modern metal and wood foot bridge/crossing with concrete footings.

Feature 40 - Forebay Spillway

Feature 40 consists of the main Kilarc forebay spillway. This feature is designed to evacuate the overflow of the Kilarc forebay.

Feature 41 - Forebay

Feature 41 consists of the Kilarc Forebay, a 4-acre reservoir that collects water before entering the penstock en route to the Kilarc Powerhouse.

Feature 42 - Intake

Feature 42 consists of a modern metal pier and associated water intake. From this location water enters the large historic-era riveted steel penstock intake on its way to the Kilarc Powerhouse down slope.

Feature 43 - Penstock

Feature 43 consists of an historic-era riveted steel penstock and attached (modern/bolted) upright welded penstock vent or surge tower. It is a large rivet, large diameter steel penstock pipe, riveted in 8-foot sections with 1-inch rivets. The Kilarc Penstock is a 4,801-foot long partially buried pipe. It is made of riveted steel with a diameter that varies from 48 inches to 36 inches and a plate thickness varying from 0.19 to 0.25 inches. The maximum flow capacity is 43 cfs.

Feature 44 - Rock Wall in the Kilarc Forebay Dam

Feature 44 consists of a segment of dry-stacked rock retaining wall. This feature is located slightly below the southern edge of the forebay dam. It consists of at least six courses of dry stacked local field stone; it measures 3 to 4 feet in height and is approximately 82 feet long.

State of California — The Resources Agency
 DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary#
 HRI#
 Trinomial:

Page 9 of 31

*Resource Name or #: Kilarc Canal 482-12-07H

*Recorded by: C. Ward and B. Texier

*Date April 15-17, 2008 Continuation Update

Feature 1:

This feature is the Main Water Diversion into the Kilarc Canal from Old Cow Creek. The spillway is a 10 feet high and 20 foot wide concrete wall perpendicular to Old Cow Creek that artificially raises the streambed water level. The top of the wall is 2 feet thick. The diversionary structure and dam is a V-shaped concrete structure which serves to divert and control the flow of water from the natural stream bed of Old Cow Creek to the opening of the main flume and aqueduct for the Kilarc water system. The concrete diversion structure is located on the southwestern side of the spillway that acts to force water into the head of the canal system. In this location the water is channeled into an artificial creek bed approximately 12 feet wide, flowing in a torrent towards a secondary spillway and gate valve (Feature 2) and intake into the concrete flume (Feature 3). The mouth of the diversionary structure is a water gate that is actuated by a crank and chain driven flap. The diversion structure measures 6 feet wide by 10 feet tall. From this point, the diverted water flows approximately 3.65 miles through a system of canals, flumes and penstock to the Kilarc forebay and recreation area.



Feature 1: Kilarc Main Diversion, Gate and Gate Operator. Facing:
 Southeast
 (Photo acc. # 482-12-1-30)



Feature 1: Kilarc Diversion Dam. Facing: Northeast
 (Photo acc. # 482-12-1-31)

State of California — The Resources Agency
 DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary#
 HRI#
 Trinomial:

Page 10 of 31

*Resource Name or #: Kilarc Canal 482-12-07H

*Recorded by: B. Texier and C. Ward

*Date April, 2008

Continuation Update

Feature 2:

Spillway and dam associated with the Main Water diversion located a short distance downstream of the main water diversion (Feature 1). The spillway consists of a concrete dam about 12 feet long by 18 inches wide by approximately 6 feet high with 8 inch thick walls and associated retaining wall (upstream on right bank) measuring roughly 15 feet long by 18 inches wide. Incorporated into the spillway is a 6 by 3 foot concrete cistern or water basin. The mouth of the diversionary structure is a water gate that is actuated by a crank and chain driven flap. This is the location of the intake into the first concrete flume on the Kilarc canal.



Feature 2: Diversion Dam. Facing: Northeast
 (Photo acc. # 482-12-1-39)

Feature 3:

This feature is the concrete flume that is present in intervals along sections of the Kilarc canal system en route to the Kilarc forebay. The concrete flume sections are a squared-off U-shape in cross-section and are generally 4 to 6 feet wide, 3 feet deep with 3 to 6 inch thick walls and occur in varying lengths along the course of the canal.



Feature 3: Concrete Canal. Facing: West
 (Photo acc. # 482-12-2-52)

**State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET**

Primary#
HRI#
Trinomial:

Page 11 of 31

*Resource Name or #: Kilarc Canal 482-12-07H

*Recorded by: B. Texier and C. Ward

*Date April, 2008 Continuation Update

Feature 4:

The feature is a modern wood and corrugated aluminum gabled frame gauging station shack. The structure measures 6 feet (N-S) by 4 feet (E-W) and is 11 feet tall.



Feature 4: Gauging Station structure. Facing: Southwest
(Photo acc. # 482-12-1-42)

Feature 5:

This feature is a small wooden ditch tender cabin. Formerly known as Kilarc Shack 2, this feature is located approximately 25 feet south and upslope of the main Kilarc aqueduct. The structure measures 10 feet (E-W) by 12 feet (N-S), has a square plan and a gabled profile. The structure is wood framed with a single window on the west and north sides (cross-pattern sash with 6 panes that are no longer intact) that measure 24 inches wide by 18 inches tall. There is an open doorway on the west face that measures 2 feet wide by 6 feet 6 inches high. The walls, roof and floors are made from 1 by 10 inch fir boards. The roof and exterior walls are covered with vertically mounted split cedar shingles. The interior walls are covered with particleboard. The roof covering is corrugated steel sheeting. Most of the floor and foundation have rotted away. A framed 2-foot by 2 foot wood stove footing is present on the floor, offset from the center of the structure with a 7-inch diameter stovepipe vent in the roof directly above it. The entire structure is anchored with round-head wire nails. A 6-millimeter heavy gauge steel wire and 1-inch ceramic insulator have been installed above the entryway of the structure to provide electricity or possibly telegraph communications. This wire has been connected to adjacent trees and has been observed at all structures (Features 5, 10, 18, 27) recorded along the Kilarc canal system. No associated artifact scatter was observed, though small sections of 7-inch diameter stovepipe were observed strewn about the interior and exterior of the structure.



Feature 5: "Kilarc Shack 2" Ditch Tender Cabin. Facing: Northeast
(Photo acc. # 482-12-1-60)

Subject: P-606 AIR Item 9-Cultural Resources
From: "Kelly W. Sackheim" <kelly@kchydro.com>
Date: Wed, 25 Nov 2009 08:50:59 -0800
To: "Whitman, Lisa" <LxWt@pge.com>
CC: Richard Ely <dick@davishydro.com>

Lisa - per our telephone conversation the other day, attached is information that Dick provided for me to review and forward to you. Don't hesitate to call if you have any further questions, and have a great holiday.

Kelly
ph: 916/962-2271
fax: 916/880-5597

Whitman, Lisa wrote:
Thank you, Kelly.

Lisa Whitman
Pacific Gas & Electric Company Mail Code N11D
P.O. Box 770000
San Francisco, CA 94177-0001
Phone: 415.973.7465/Fax: 415.973.5121/Cell: 415.265.9971
lxwt@pge.com

AIRinfo9CulturalResources.doc	Content-Type: application/msword Content-Encoding: base64
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Ref: FERC Additional Information Request of PG&E – Accession #20091116-0148

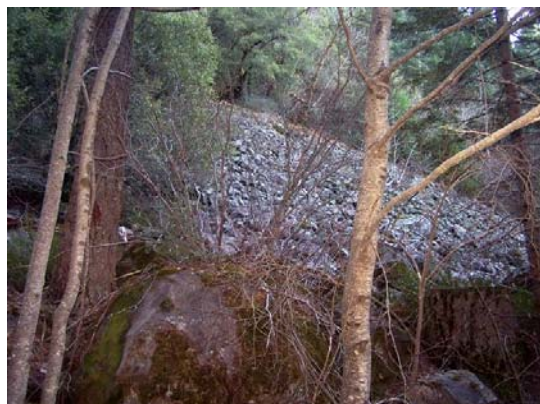
Cultural Resources

9. **Comments filed in response to scoping indicate that the upper portion of the Kilarc canal may have originally been constructed as a hydraulic mining source. While the *Cultural Resources Inventory and Evaluation for the Kilarc-Cow Creek Hydroelectric Decommissioning Project, FERC No. 606, Shasta County, California*, addresses the existence of hydraulic mining water sources in the area prior to construction of the Kilarc facility, it does not specifically address the use of any portion of the Kilarc canal as a mining water source. Also, the Kilarc canal system, with the exception of the powerhouse, has been determined not eligible for listing on the National Register of Historic Places (NRHP) due to the lack of physical historic integrity of the resource. Has use of the canal for mining been specifically explored? If so, was this information part of the analysis and evaluation of the resource for listing on the NRHP?**

The referenced filed comments were made by Davis Hydro (DH) staff.

In the opinion of DH, the upstream section of the Kilarc headrace from the diversion down to the cornice a half mile downstream on the far side of the tunnel in particular may have been used as water for hydraulic face mining on the slope in the area on the downstream side of the tunnel. There are signs of hydraulic mining there.

We do not have good pictures of these faces as the focus of our pictures have been on the spawning gravel and juvenile fish habitats. However, see Photo 100_7542_exposure.JPG, below, for a poor view of one of the areas to which we are referring.



(smaller file-size version inserted at left, all pictures available for download upon request to kelly@davishydro.com)

Photo was taken on 07-DEC-08, 9:48:34AM at N40 41 02.8. W121 49 02.6 at an elevation of 2679 ft.

Features are visible from parts of the Roseburg property.

A second observation is made of extensive, very old piping found in the area that may have either of two explanations:

1. It is the remains of an earlier siphon predating the current one, OR
2. This was part of low pressure hydraulic mining works. See pictures below. These were taken on 07-DEC-08 9:53:00AM at N40 41 01.5 W121 49 04.4 at an elevation of 2662 ft.



The third reference is that Richard Ely and Todd Wroe found residual structures that look exactly like a gold settlement sluice way next to the stream bed. However, we regret for unknown reasons, no notes connect that recollection to any photographs or GIS points.

Finally, there are extensive canaling and unnatural similar erosion on the North side of the Old Cow. For example in the area just west of the "impassable Falls" there are easily seen canal works and extensive un-natural erosion downstream that suggests hydraulic mining. These are not connected in any way to the upstream works possibly fed from the first part of the Kilarc Diversion.

Document Content(s)

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November 21, 2011

Kimberly D. Bose, Secretary
(Attn: CarLisa Linton-Peters, FERC Environmental Coordinator)
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Filed Electronically

Ref: P-606 Kilarc-Cow Creek Hydroelectric Project

Subject: Request that FERC Conclude Appropriate Section 106 Review before Issuing Order Accepting P-606 License Surrender

Dear Ms. Bose:

We have been active participants in the P-606 license surrender process from before the first license surrender kick-off meeting was held in early 2007. The Shasta Historical Society supported the preparation of the Cultural Resources Report found in Pacific Gas and Electric Company's (PG&E's) Draft License Surrender Application by sharing records and answering questions of the document preparers.

By letter dated March 26, 2010 addressed to the Advisory Council on Historic Preservation (ACHP) and the State Historic Preservation Officer (SHPO)¹ assigned FERC Accession No. 20100329-5037, we stated that "We DISPUTE the concurrence² with the PG&E recommendation for a finding of noneligibility based on the shoddy documentation and biased analysis found in the document preceding the November 2008 determination."

We were heartened to learn recently, as documented in the enclosure to this letter, that there is a precedent for the ACHP to intervene, and even lead to the reversal of a FERC Order to irreversibly modify an historic facility, so that an historic hydroelectric facility could be restored to operation. We believe that timely action in collaboration with the


¹ Downloadable directly from http://elibrary.ferc.gov:0/idmws/file_list.asp?document_id=13803516

² Letter from the SHPO to PG&E dated November 4, 2008 with reply reference of FERC0508022A/FERC080922A, a copy of which may be found under FERC Accession No. 20090420-5109 downloadable directly from http://elibrary.ferc.gov:0/idmws/file_list.asp?document_id=13708956

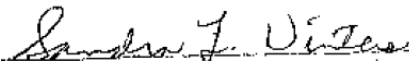
The Honorable Kimberly D. Bose, Secretary
Ref: P-606 Kilarc-Cow Creek Hydroelectric Project
Subject: Request that FERC Conclude Appropriate Section 106 Review before Issuing Order Accepting
P-606 License Surrender
November 21, 2011
Page 2

ACHP, before FERC makes a final determination on the dismantling of the P-606 project as proposed by PG&E, would yield a similarly beneficial result.

Sincerely,


Kelly W. Sackheim, Principal

KC LLC



Sandra L. Winters, Volunteer

Shasta Historical Society

Enclosure

Cc by e-mail to the ACHP: Charlene Dwin Vaughn, assistant director; Kelly Fanizzo, NRCS program analyst/attorney advisor; and Lee A. Webb, Department of Energy liaison of ACHP, and Cheryl Foster-Curley for the SHPO

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing document by email upon each person designated on the official service list compiled by the Secretary of the Commission in these proceedings for receipt in this manner.

Dated at Fair Oaks, CA this 21st day of November 2011.

Kelly W. Sackheim

Kelly W. Sackheim
5096 Cocoa Palm Way
Fair Oaks, CA 95628

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New York: Treatment of the Mechanicville Hydroelectric Plant

Agency: Federal Energy Regulatory Commission

The fate of the Mechanicville Hydroelectric Plant, possibly the only remaining pre-1900 facility with its original equipment intact, is currently being negotiated. In this case, a Federal agency accepted the license surrender from the current owner of this National-Register property prior to concluding Section 106 review—a possible foreclosure because the agency had determined that the proposed surrender would constitute an adverse effect. ACHP took the unprecedented step of filing a motion to intervene in this proceeding.

The Mechanicville Hydroelectric Plant includes a powerhouse, an earth embankment, a concrete non-overflow dam, and a 700-foot-long concrete gravity overflow dam. The plant was listed in the National Register of Historic Places in 1989 for its demonstration of exemplary significance in the fields of industry, architecture, and engineering. It is important in the development of hydroelectric generation because it may be the only remaining pre-1900 facility with its original equipment intact and was the longest continuously operating hydroelectric project in New York until operation ended in 1997.

The joint licensees for the property, Niagara Mohawk Power Corporation, which owns the plant, and Fourth Branch Associates, proposed to surrender their license to the Federal Energy Regulatory Commission (FERC). Niagara Mohawk met with State agencies, including the New York State Historic Preservation Officer (SHPO), regarding disposition and treatment of the historic property, but neither ACHP nor FERC attended the meetings.

In 2000, ACHP took the unprecedented step of filing a motion to intervene in the FERC proceeding. As an intervener, ACHP was ensured of receiving all project documentation during the proceeding, and could, if necessary, file for a rehearing.

In 2001, at FERC's behest, Niagara Mohawk submitted a plan for the short and long term treatment of the project. ACHP, the SHPO, and Fourth Branch Associates provided comments on the plan. Fourth Branch Associates submitted a competing treatment plan for the project. That same year, FERC issued a Draft Environmental Assessment (EA) for review and comment. The draft EA included FERC's finding that surrender of the license would be an adverse effect. The SHPO, ACHP, Niagara Mohawk and FBAM provided comments.

In February 2002, FERC issued an Order Accepting License Surrender for the Mechanicville Project. In the final EA, which was attached to the order, FERC found that surrender of the license would be an adverse

effect. One of the conditions stipulated that Niagara Mohawk must, within 90 days of the order, prepare and file for FERC approval a plan and schedule to document the Mechanicville Project's historic resources per Federal standards. Niagara Mohawk was to prepare the plan after consultation with the SHPO and ACHP.

In April 2002, Niagara Mohawk began consulting with the SHPO regarding the scope and content of the documentation effort in order to comply with FERC's order. ACHP and Fourth Branch Associates filed for rehearing on the basis that Section 106 review has not been appropriately concluded. ACHP declined to participate formally in consultation with Niagara Mohawk because of FERC's failure to correctly conclude Section 106 review.

The company plans to complete these responsibilities by December 2002. That next month, FERC issued an Order Granting Rehearing for Further Consideration for the Mechanicville project. FERC expects to issue an order on the merits of this proceeding soon.

In the meantime, Niagara Mohawk stated that according to the structural analysis that was recently completed for the project, safety is a real concern. A hard winter and the attendant ice could cause the hydroelectric plant's dam to fail. To address this issue, Niagara Mohawk will fill the forebay and tailrace water passages with concrete to maintain and improve the structural stability of the powerhouse.

According to the company, it appears that the New York Canal Corporation will take ownership of the dam. The dam and powerhouse share walls, but the State agency does not want ownership of the powerhouse itself. A local developer is interested in using the former powerhouse as a restaurant and brew pub, and Niagara Mohawk says it is hopeful that information and displays about this historic property can be incorporated into the design.

Staff contact: Laura Henley Dean

Posted June 6, 2002

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New York: Transfer of Ownership of the Mechanicville Hydroelectric Plant

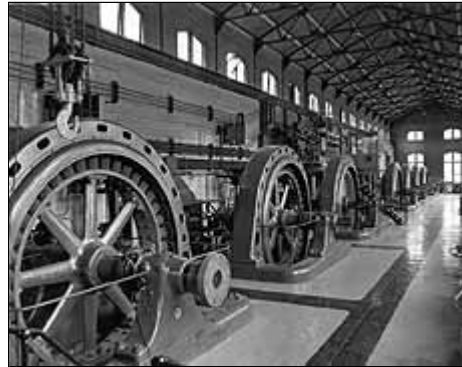
Agency: Federal Energy Regulatory Commission

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As reported in the Spring 2002 *Case Digest*, the Federal Energy Regulatory Commission accepted the surrendered license for a private historic hydroelectric plant before an agreement could be reached on the treatment of the National Register-listed property.

FERC's actions before concluding the Section 106 review process has created significant procedural problems that must be addressed before the plant can be transferred to New York State.

In accordance with FERC's regulations, in April 2002 ACHP requested a rehearing of the case because it did not have evidence that FERC executed an agreement as required by Section 106 of the National Historic Preservation Act. At that time ACHP also requested that FERC consider specific issues regarding mitigation and the involvement of consulting parties and the public, and advise ACHP about how FERC planned to proceed.



Mechanicville Hydroelectric Plant, New York (photo courtesy of Fourth Branch Associates and NY State Office of Parks, Recreation, and Historic Preservation)

In August 2002, FERC denied ACHP's request for a rehearing, asserting that FERC substantially complied with Section 106 review because it had required the plant owner to document the historic property and to use reversible techniques to decommission the plant.

FERC also stated that it terminated consultation through its November 2001 notice requesting review and comments on a Draft Environmental Assessment of the project, even though the notice did not explicitly state that consultation was being terminated. FERC's failure to follow the procedures that are set forth in ACHP's regulations could result in a challenge by parties with an interest in the project.

ACHP is currently evaluating the situation and possible steps to be taken with FERC. For background information on this case, see the Spring 2002 *Case Digest* at www.achp.gov/casesspg02NY2.html.

Staff contact: Laura Henley Dean

Posted November 7, 2002

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 → New York: Transfer of Ownership of the Mechanicville Hydroelectric Plant



New York: Transfer of Ownership of the Mechanicville Hydroelectric Plant

Agency: Federal Energy Regulatory Commission

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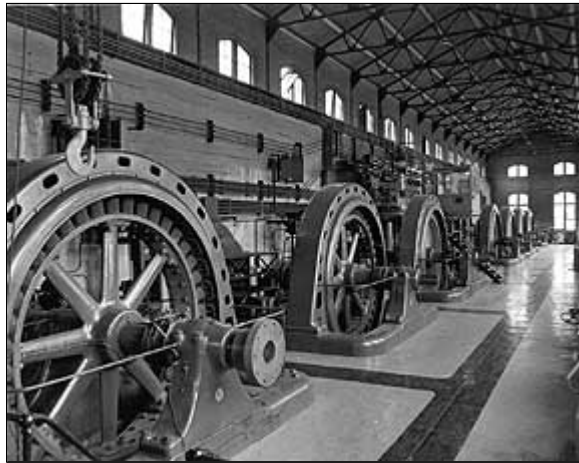
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As reported in the Spring and Fall 2002 *Case Digests*, the Federal Energy Regulatory Commission accepted the surrendered license for a private historic hydroelectric plant before an agreement could be reached on the treatment of the property.

The plant, listed in the National Register for exemplary significance in the fields of industry, architecture, and engineering, may be the only remaining pre-1900 facility with its original equipment intact. Its fate is still being considered.

In fall 2002, after the Federal Energy Regulatory Commission (FERC) denied the ACHP's request for a rehearing of FERC's order accepting the surrendered license for the National Register-listed Mechanicville Hydroelectric Plant, the ACHP filed a request that FERC reconsider the denial.



Mechanicville Hydroelectric Plant, Mechanicville, NY (photo courtesy of Fourth Branch Associates and New York State Office of Parks, Recreation, and Historic Preservation)

In December 2002, FERC held a technical conference to consider alternatives to filling the hydroelectric plant's forebay and tailrace water passages with concrete to maintain and improve the structural stability of the powerhouse.

In February 2003, FERC submitted an agreement to the ACHP and the New York State Historic Preservation Officer that called for recordation of the historic property. Both agencies declined to sign the agreement, and in March 2003, FERC denied the ACHP's request for reconsideration and terminated consultation.

However, through arbitration, the co-licensees for the hydroelectric plant reached a settlement regarding the fate of the project. In the settlement, the licensee that owns the historic property would give the

plant and financial support to the other licensee, which would rehabilitate the plant and resume operation.

This development is very encouraging, but FERC must first accept the terms of the settlement. Careful consideration of the proposed rehabilitation and reuse of the hydroelectric plant will begin in April 2003 with a presentation to FERC and the other consulting parties by the licensee or co-licensees. For background information on this case, see the spring and fall 2002 *Case Digests* at www.achp.gov/casearchive/.

Staff contact: Laura Henley Dean

Posted August 15, 2003

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Closed Case:

**New York: Transfer of Ownership of the
 Mechanicville Hydroelectric Project**

Agency: Federal Energy Regulatory Commission

As reported in previous *Case Digests*, the Federal Energy Regulatory Commission accepted surrender of the license for a privately owned historic hydroelectric project before a proper agreement could be reached on the treatment of the property.

The project, including a powerhouse, is listed in the National Register for exemplary significance in the fields of industry, architecture, and engineering. The ACHP requested that FERC reconsider or stay its acceptance of the license surrender so that consultation to resolve adverse effects could resume.

The first step toward a resolution was reached when the co-licensees, who had been in dispute since the license was issued, reached a settlement in April 2003.

In May 2003, the ACHP chairman made a direct written appeal to the chairman of the Federal Energy Regulatory Commission (FERC), urging that FERC approve the licensees' settlement agreement and withdraw its termination.

Preparations begin for rehabilitation of the Mechanicville Hydroelectric Project, Mechanicville, NY (photo Fourth Branch Associates)



The following month, FERC approved an offer of settlement that would transfer the Mechanicville hydroelectric project from its owner to the project's co-licensee. If the licensee can meet certain conditions such as establishing an escrow account that will cover the cost of safety repairs, then the Mechanicville hydroelectric project will be rehabilitated and resume operation.

FERC and the ACHP agreed that transfer of the project license would not alter the finding of effect when the license was first issued. FERC, however, determined that its approval of rehabilitation and remediation plans is a separate undertaking also requiring Section 106 review.

Accordingly, the ACHP, FERC, and the New York State Historic

Preservation Officer concluded Section 106 review by executing a Memorandum of Agreement in August 2003. For background information on the Mechanicville hydroelectric project case, see the *Case Digest* archive at www.achp.gov/casedigest.html.

Staff contact: Laura Henley Dean

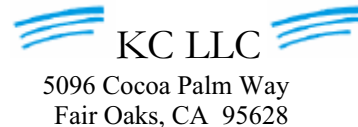
Updated November 20, 2003

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ACHPcase.PDF.....4-11



November 21, 2011

Kimberly D. Bose, Secretary
(Attn: CarLisa Linton-Peters, FERC Environmental Coordinator)
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Filed Electronically

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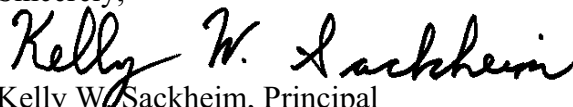
¹ Downloadable directly from http://elibrary.ferc.gov:0/idmws/file_list.asp?document_id=13803516

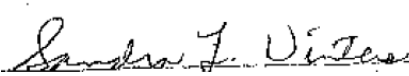
² Letter from the SHPO to PG&E dated November 4, 2008 with reply reference of FERC0508022A/FERC080922A, a copy of which may be found under FERC Accession No. 20090420-5109 downloadable directly from http://elibrary.ferc.gov:0/idmws/file_list.asp?document_id=13708956

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