



April 10, 2009
File No. 01030A

SUBJECT: Middle Fork American River Project Relicensing
Final Supplemental Cultural Resources Evaluation Plan –
Public Information

Dear Cultural Resources Technical Working Group Member:

A draft of this letter was distributed for review and comment on February 5, 2009, with comments due on April 6, 2009. No comments were received.

This letter supplements Placer County Water Agency's (PCWA's) Final Cultural Resources Evaluation Plan (CREP), which was distributed on August 28, 2008. Specifically, this letter describes how PCWA will evaluate resources that were identified after the August 2008 CREP was distributed. In addition, it describes how PCWA plans to address four resources that were identified in the August 2008 CREP as potentially being evaluated pending further information.

The reader should refer to August 2008 CREP for an overview of the CUL 1 – Cultural Resources Study objectives, a summary of cultural resources inventory work completed to date, a description of the evaluation study area, a summary of the statutes and regulations pertaining to the eligibility evaluation, and more detailed information about study approach and methods. Additional information about the specific resources identified in the study area, including maps and site records, is also available in the following reports:

- 2006 Cultural Resources Inventory Report (PCWA 2007)
- CUL 1 – Cultural Resources Technical Study Report – 2007 (PCWA 2008)
- Final CUL 1 – Cultural Resources Inventory Report – 2008 (PCWA 2009)

Note that confidential information that may not be released to the general public or posted on the internet has been excluded from this letter. Specifically, this letter does not include two tables that disclose the specific locations of archaeological sites. A confidential version of this letter, including the tables, is being distributed to select Forest Service and Tribal representatives for review and comment.

Background

The Cultural Resources Inventory Study was initiated in 2005 as part of PCWA's early relicensing studies and includes two phases. Phase 1 was initiated in 2005 and focused on retrieving, compiling, and reviewing existing cultural resource information in the vicinity of the MFP. Phase 2, which began in 2006 and continued into 2008, focuses on verifying the location and condition of known cultural resources, and identifying and recording previously unrecorded cultural resources in areas associated with the MFP.

The majority of the study area was surveyed in 2006 and 2007. By the end of 2007, a total of 29 cultural resources had been identified within the study area, which was defined in the CUL 1 – Cultural Resources TSP to include all public and PCWA-owned lands within the existing FERC Project boundary and within a 200-foot area surrounding any: (1) Project facility or feature; (2) Project recreation facility; (3) stakeholder-identified dispersed concentrated use area; and (4) potential Project betterment, including new facilities, roads and trails, staging, and disposal sites. Of the 29 cultural resources identified in the study area, one previously recorded resource (FS-05-17-54-06) could not be relocated. The remaining 28 were either: (1) previously known resources that have been relocated and examined; (2) newly recorded resources found during field surveys; or (3) newly recorded isolated finds that will not be considered further per USDA-FS policy.

During the 2008 field surveys, two previously recorded resources were relocated and examined and two resources that were examined by PCWA field crews in 2007 were re-evaluated. In addition, a total of 14 new cultural resources were identified. These new resources include historic objects and structures, isolated artifacts, and archaeological sites, including a prehistoric rock art site.

Eligibility Studies

The eligibility study involves evaluating specific cultural resources that were identified during surveys conducted in 2006, 2007, and 2008 and that meet one or both of the following two criteria:

1. The resource lies within an area that could be affected by Project operation and maintenance activities; and/or
2. The resource lies within an area that could potentially be affected by the construction, operation and maintenance of Project betterments.

For the purposes of the August 2008 CREP, the various types of resources present in study area were divided into four categories depending upon evaluation approach as follows:

Category 1. These are resources that will not be evaluated for NRHP eligibility because they are situated outside the area affected by Project operation and

maintenance activities, or by the construction, maintenance, or operation of Project betterments. In the August 2008 CREP, nine resources were identified as Category 1.

Category 2. These are resources that will be evaluated for NRHP eligibility because they are situated within areas that could potentially be affected by Project operation and maintenance activities or by the construction, operation and maintenance of Project betterments. In the August 2008, ten resources were identified as Category 2. These ten resources are currently undergoing evaluation for NRHP evaluation.

Category 3. The August 2008 CREP identified four resources that might be evaluated, pending additional information. These resources are situated in the vicinity of the Project but additional information regarding the resource boundaries and/or relationship to the Project was necessary to determine whether the resource could potentially be affected by Project operation and maintenance activities, or by the construction of Project betterments. After further consideration, two of these resources were moved into Category 1 and two were moved into Category 2, as explained later in this letter.

Category 4. These are resources that have previously been evaluated for NRHP eligibility and that lie within the area potentially affected by Project operation and maintenance activities, or by the construction, maintenance, or operation of Project betterments. The August 2008 CREP, four resources were identified as Category 4.

Category 3 Resources Identified in the August 2008 CREP

The August 2008 CREP identified four resources that might be evaluated, pending the development of additional information. The four resources that were previously identified as Category 3 have since been placed into either Category 1 or 2, as explained in the following.

FS-05-03-53-04. This site is located near a sediment disposal area. The site includes a prehistoric habitation component with three bedrock mortar features, and a historic mining component. Previous site records describe concentrations of flaked stone and modified bone but neither was visible during the 2007 surveys conducted by PCWA. The site was reexamined in 2008 with respect to PCWA's operation and maintenance activities associated with the sediment disposal area. Based on the information developed in 2008, wherein it was determined that the resource does not appear to extend into the sediment disposal area, this site is not expected to be affected by PCWA operation and maintenance activities, or by the construction, maintenance, or operation of Project betterments. Accordingly, it is considered a Category 1 resource and will not be evaluated for NRHP eligibility.

FS-05-17-54-468. This resource is located along an existing paved Project road. It was previously recorded as a single bedrock mortar. During 2007 field work it was

thought to be a natural feature. However, re-examination of the feature in 2008 suggests that it may be a shallow bedrock mortar placed in a natural depression on the rock. The field crew cleared forest duff from randomly-placed patches of ground within a 20-foot radius of the mortar rock and found no evidence of cultural deposits. The resource is situated on a small bench of land surrounded by steep slopes, above the road, and the boundaries of the resource are limited to the mortar rock. The resource lies outside of the area that would be affected by road maintenance activities. Accordingly, it is considered a Category 1 resource and will not be evaluated for NRHP eligibility.

FS-05-03-53-375. This site is a shallow bedrock mortar on a granite outcrop located south of a Project road and near a Project water supply line. No associated artifacts were found nearby, but forest duff and snow on the ground precluded close inspection of the ground surface in 2007. Since the boundaries of the site were undefined with respect to the water supply line, the resource was considered Category 3 pending the development of further information. It was determined that shovel probes would be required to assess the boundaries of the site. Because limited excavation activities were required, it was placed on the Category 2 table and assessed for NRHP eligibility. The site was examined in 2008 using shovel probes to search for additional site constituents, and to better define the boundary of the site relative to the Project road and water supply line. This work was performed under an ARPA permit issued by the Eldorado National Forest (ENF).

FS-05-17-54-214. This site is the remains of the Gates Cabin. The site is located adjacent to a Project water supply line and consists of the remains of a cabin, scatter of metal cans, glass bottle shards, and a prehistoric component consisting of a light-density flake scatter. The boundaries of the site were undefined with respect to the Project water supply line so the resource was considered Category 3 pending the development of further information. Because limited excavation activities were required, it was placed on the Category 2 table and assessed for NRHP eligibility. The site was examined in 2008 using shovel probes to search for additional site constituents, and to better define the boundaries of the site relative to the Project water supply line. This work was performed under an ARPA permit issued by the Tahoe National Forest (TNF).

New Resources Identified in 2008

Fourteen new resources were identified during surveys conducted in 2008. In addition, one site that was originally found in 2007 was re-assessed in 2008 (PL-06). As shown on Tables 1 and 2, all of the resources identified in 2008 and PL-06 fall under either Category 1 or 2. Of the 14 new resources identified in 2008, twelve will not be evaluated for NRHP eligibility because they are either outside the area that would be affected by Project operation and maintenance activities, or by Project betterments, or they are isolates, which do not require further evaluation. The remaining two sites will be evaluated by collecting, compiling, reviewing, and assessing background information about each of the resources, and through consultation with either the USDA-FS or Tribes. No excavation activities are proposed.

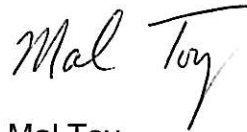
Reporting

The results of the eligibility studies will be documented in a detailed report, a draft of which will be provided to the USDA-FS, Tribes, and the Cultural Resources Technical Working Group (TWG) for review and comment. The report will describe the methods that were used to evaluate each site and the results of the evaluation. In addition, it will identify those sites that were determined to be eligible for inclusion in the NRHP based on specific eligibility criteria. Upon completion, the report and all relevant information will be provided to the State Historic Preservation Officer (SHPO), who will make a determination regarding each resource's eligibility for inclusion in the NRHP. Any eligible resources that are located within the evaluation study area will be addressed in a Historic Properties Management Plan (HPMP), which will be included in PCWA's Application for New License. The HPMP will identify specific measures that PCWA will undertake to protect NRHP eligible resources located within the evaluation study area.

PCWA appreciates your participation in this Project. As always, please feel free to call me if you have any questions or need additional information at (530) 823-4889.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink that reads "Mal Toy". The signature is written in a cursive style with a large, sweeping initial "M" and a long, horizontal stroke extending from the end of the name.

Mal Toy
MFP Relicensing Manager

MT:bb

Attachments: None

CONFIDENTIAL

TABLES

The Tables have been removed from this document because they contain confidential cultural resources information, and are considered "privileged" information. This type of information may not be made available to the public pursuant to the Federal Energy Regulatory Commission's (FERC's) regulations contained in 18 CFR Section 5.2(c) and 18 CFR Section 388.112.