RECLAMATION
Managing Water in the West

Categorical Exclusion Checklist

Land Use Authorization to Western Area Power Administration for Installation of a Telecommunication System at O'Neill Substation

CEC-15-037

Prepared by:

Kelly M. Baker
Natural Resources Specialist
South-Central California Area Office

Date: 8/21/15

Concurred by:

See Attachment A
BranDee Bruce
Architectural Historian
Mid-Pacific Regional Office

Date: See Attachment A

Concurred by:

Shauna McDonald
Wildlife Biologist
South-Central California Area Office

Date: 8/21/15

Concurred by:

Rain L. Emerson
Supervisory Natural Resources Specialist
South-Central California Area Office

Date: 08/21/2015

Approved by:

for
Michael Jackson
Area Manager
South-Central California Area Office

Date: 08/24/2015

Background

The O'Neill Switchyard Pumping Plant (Pumping Plant) is located just west of Santa Nella, CA near the Delta-Mendota Canal and O'Neill Forebay (see Figure 1). The Pumping Plant is owned by the Bureau of Reclamation (Reclamation) and operated pursuant to an operating agreement by Western Area Power Administration (Western). The Pumping Plant consists of an intake channel leading off the Delta-Mendota Canal and six pump-generating units, which lift water from the Delta-Mendota Canal to the O'Neill Forebay. Each unit can discharge 700 cubic feet per second with a rating of 6,000 horsepower and a generating capacity of about 4,200 kilowatts.

In order to provide onsite phone and data services to a service building inside the Western O'Neill substation, AT&T has requested that Western install a telecommunications cable between the Pumping Plant and O'Neill Substation.

Figure 1 Proposed Action Area

Nature of the Action

Reclamation proposes to issue a 25-year land use authorization to Western for the installation of a telecommunications cable between the Pumping Plant and the O'Neill Substation.

As shown in Figure 2, the installation of the new telecommunication cable would extend from the O'Neill Substation and tie into the Pumping Plant's existing telecommunication network (or telephone backboard), located on the second floor. The extension will consist of a 3-inch diameter conduit composed of polyvinyl chloride (PVC) pipe housing optical fiber cables. The PVC pipe will run above ground inside the perimeter fencing of the O'Neill Substation until it reaches the south wall of the Pumping Plant. The PVC pipe will then go through the fencing and continue underground via a hand dug 4 feet 6-inch long by12-inch wide by 18-inch deep trench perpendicular to a narrow walkway between the two buildings (see Figure 3). The trench will be backfilled with native soil and the surface restored with gravel cover. The PVC pipe will be installed through the southeast wall of the Pumping Plant (near the side exit door) through a 3-inch bore hole. The PVC pipe will continue on the outside of the interior wall up to an existing raceway (an enclosed channel of metal designed for holding cables), which runs the length of the garage ceiling. In the garage, the cable will be exposed without the PVC pipe until it reaches the second floor, where it will be attached to the existing one-inch conduit (already attached to the raceway). The conduit and raceway will terminate in a second floor room which holds the telephone backboard and other electrical equipment (Figure 4).

All staging and work will occur in the graveled substation yard and access road. All trench materials will be stockpiled on this road or at an approved staging area. The installation is proposed to start in September 2015 with a project duration of six months.

OUTDOOR CONDUIT PLAN FOR OPTICAL FIBER CABLE

(SKETCH NOT TO SCALE)

Reference Drawings ONE 1700 and 1701

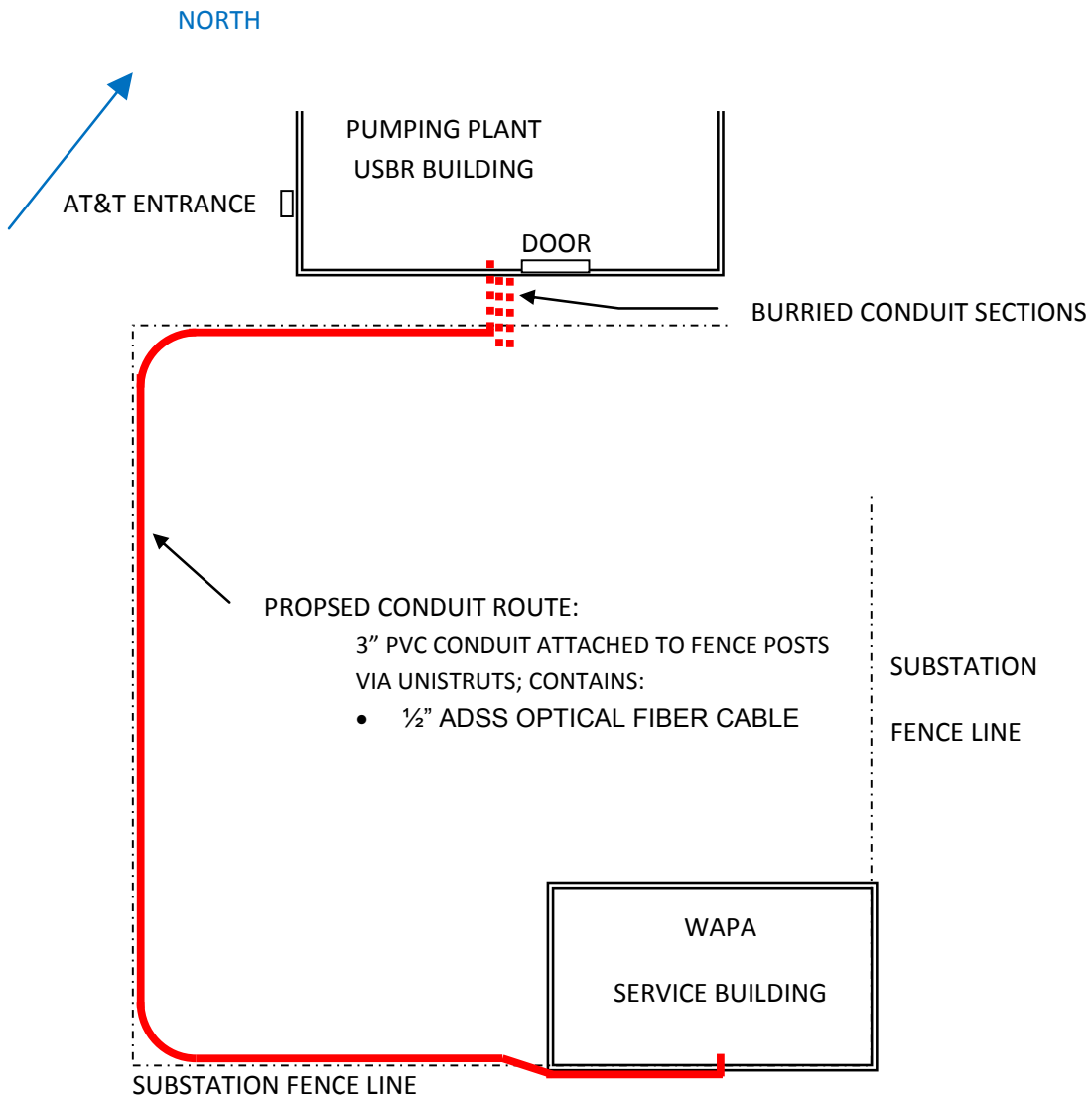

Figure 2 Schematic of Proposed Installation

Figure 3 Proposed Trench Route at O'Neill Substation

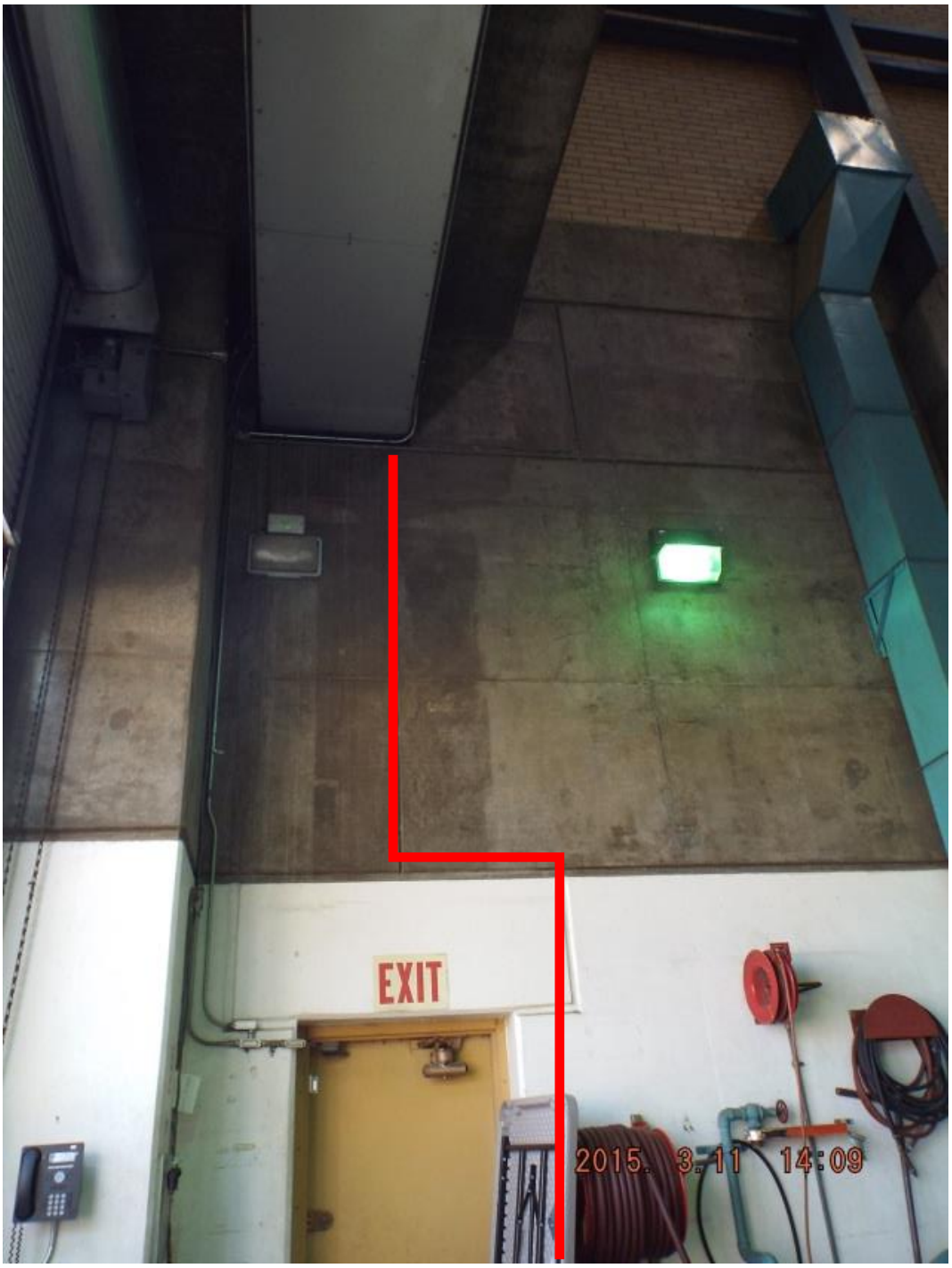

Figure 4 Proposed Installation within O'Neill Substation

Environmental Commitments

Western would implement the following environmental commitments to avoid and/or reduce any environmental consequences associated with the Proposed Action:

a. Western shall restrict all ground disturbing activities to areas that have been previously surveyed for cultural or paleontological resources.

b. Western shall implement a "clean vehicle policy" while entering and leaving construction areas to prevent transport of noxious weed plants and/or seed.

c. Western shall dispose or recycle waste material in accordance with applicable Federal, State and local regulations and ordinances. No waste shall be left on Reclamation property, right-of-way, or easement. Burning or burying of waste material is not permitted.

d. Western shall ensure that construction activities and the operation of equipment meet all applicable regulations for the control of air pollutants.

e. Western shall ensure that surface and ground water is protected from pollution caused by construction activities and comply with applicable regulations and requirements.

f. Western shall restrict all ground disturbing activities to areas that have been surveyed by Western for natural resources.

g. If project activities occur during the bird nesting season, Western will survey the project area for migratory bird nests prior to project activities and establish appropriate buffers around any nests that may be disturbed. If work must be conducted within these buffers, a Western supplied biological monitor will be on site for project activities within the buffers. If the biological monitor determines that activities are likely to cause nest impacts or nest abandonment, then project activities in the area shall be postponed until nestlings have fledged or the nest is no longer active.

h. Prior to project activities a qualified biologist will survey the project area outside the substation and immediate vicinity and mark in the field any sensitive biological resources that must be avoided.

Environmental consequences for environmental resources assumes the measures specified will be fully implemented.

Exclusion Category

516 DM 14.5 D (10). *Issuance of permits, licenses, easements, and crossing agreements which provide right-of-way over Bureau lands where action does not allow for or lead to a major public or private action.*

Evaluation of Criteria for Categorical Exclusion

		No	Uncertain	Yes
1.	This action would have a significant effect on the quality of the human environment (40 CFR 1502.3).	☑	☐	☐
2.	This action would have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA Section 102(2)(E) and 43 CFR 46.215(c)).	☑	☐	☐
3.	This action would have significant impacts on public health or safety (43 CFR 46.215(a)).	☑	☐	☐
4.	This action would have significant impacts on such natural resources and unique geographical characteristics as historic or cultural resources; parks, recreation, and refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); flood plains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas (43 CFR 46.215 (b)).	☑	☐	☐
5.	This action would have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks (43 CFR 46.215(d)).	☑	☐	☐
6.	This action would establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects (43 CFR 46.215 (e)).	☑	☐	☐
7.	This action would have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects (43 CFR 46.215 (f)).	☑	☐	☐

	No	Uncertain	Yes
8. This action would have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by Reclamation (LND 02-01) (43 CFR 46.215 (g)).	☑	☐	☐
9. This action would have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated critical habitat for these species (43 CFR 46.215 (h)).	☑	☐	☐
10. This action would violate a Federal, tribal, State, or local law or requirement imposed for protection of the environment (43 CFR 46.215 (i)).	☑	☐	☐
11. This action would affect ITAs (512 DM 2, Policy Memorandum dated December 15, 1993).	☑	☐	☐
12. This action would have a disproportionately high and adverse effect on low income or minority populations (EO 12898) (43 CFR 46.215 (j)).	☑	☐	☐
13. This action would limit access to, and ceremonial use of, Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007, 43 CFR 46.215 (k), and 512 DM 3)).	☑	☐	☐
14. This action would contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act, EO 13112, and 43 CFR 46.215 (l)).	☑	☐	☐

NEPA Action: Categorical Exclusion

The Proposed Action is covered by the exclusion category and no extraordinary circumstances exist. The Action is excluded from further documentation in an EA or EIS.

Appendix A

Cultural Resources Determination

CULTURAL RESOURCES COMPLIANCE
Division of Environmental Affairs
Cultural Resources Branch (MP-153)

MP-153 Tracking Number: 15-SCAO-160

Project Name: National Historic Preservation Act Compliance for Western Area Power Administration (Western) Installation of a Telecommunications System, O'Neill Substation to the O'Neill Pump-Generating Plant, Merced County, California.

NEPA Document: CEC 15-037

NEPA Contact: Kelly Baker, Natural Resource Specialist

MP 153 Cultural Resources Reviewer: BranDee Bruce, Architectural Historian

Date: August 11, 2015

Western proposes to install a telecommunications cable between O'Neill Substation (Substation) and the O'Neill Pumping Plant (Plant) in Merced County, California. The Plant is part of the San Luis Unit of the Central Valley Project (CVP), which is owned by the Bureau of Reclamation. The Substation is owned by Western. The proposed action constitutes an undertaking with the potential to cause effects to historic properties, assuming such properties are present, requiring compliance with Section 106 of the NHPA as amended. Western was designated lead federal agency to act on behalf of Reclamation for purposes of compliance with Section 106 of the National Historic Preservation Act (NHPA) for this undertaking (see attached email).

Based on historic properties identification efforts conducted by Western, with Reclamation's input, the Plant was treated as an eligible historic property, as a contributing component to the CVP, for the purposes of this undertaking only. Western proposed a finding of no adverse effect to historic properties pursuant to 36 CFR §800.5(b). Western consulted with the State Historic Preservation Officer (SHPO) by sending a consultation package on July 13, 2015. SHPO concurred with all their findings on August 10, 2015 (see attached letters). Reclamation accepts the findings in the letter report and the outcome of the consultation for the proposed activities on Reclamation land.

Consultation correspondence between Western and the SHPO, and Reclamation's email designating Western as lead federal agency has been provided with this cultural resources compliance document for inclusion in the administrative record for this action. This document serves as notification that Section 106 compliance has been completed for this undertaking. Please note that if project activities subsequently change, additional NHPA Section 106 review, including further consultation with the SHPO, may be required.

Attachments:
Email: Reclamation to Western dated July 7, 2014
Letter: Western to SHPO dated July 13, 2015
Letter: SHPO to Western dated August 10, 2015

Bruce, Brandee <bbruce@usbr.gov>

Western Telecommunications Line, Reclamation Tracking 15-SCAO-160

1 message

Bruce, Brandee <bbruce@usbr.gov> Tue, Jul 7, 2015 at 4:32 PM
To: Cherie Johnston-Waldear <WALDEAR@wapa.gov>
Cc: Laureen Perry <lperry@usbr.gov>
Bcc: Kevin Palmer <kpalmer@usbr.gov>, James Collis <jcollis@usbr.gov>

Cherie,

This email concerns the designation of lead Federal agency for the installation of a telecommunications line, proposed in the vicinity of the O'Neill Pumping Plant, a component of the San Luis Unit of the Central Valley Project (CVP), which is located on Reclamation-owned land. Following coordination with your agency, Reclamation hereby designates Western Area Power Administration (Western) as the lead Federal agency to act on behalf of Reclamation for the purposes of compliance with Section 106 of the National Historic Preservation Act (NHPA) for this undertaking.

When Western initiates SHPO consultation under Section 106 of the NHPA, please include a statement indicating that we have designated Western as the lead Federal agency and include a copy of this email, as appropriate.

Please refer to tracking number 15-SCAO-160 in any future correspondence with Reclamation Cultural Resources Branch staff concerning the status of this project.

--
BranDee Bruce
Architectural Historian
2800 Cottage Way
Sacramento, CA. 95825
(916) 978-5039

Department of Energy
Western Area Power Administration
Sierra Nevada Region
114 Parkshore Drive
Folsom, California 95630-4710

JUL 13 2015

Ms. Julianne Polanco
State Historic Preservation Officer
California Office of Historic Preservation
1725 23rd Street
Sacramento, CA 95816

Ms. Julianne Polanco:

The Western Area Power Administration (Western), Sierra Nevada Region (SNR), in cooperation with the U.S. Bureau of Reclamation (Reclamation), is proposing to install a telecommunication system between Western's O'Neill Substation and Reclamation's O'Neill Pump-Generating Plant (O'Neill Pumping Plant), in Merced County (enclosure 1). The proposed telecommunication system will involve boring a 3-inch diameter hole into the side of the O'Neill Pumping Plant. The O'Neill Pumping Plant is part of the water storage and conveying components that comprise the San Luis Unit (SLU) of the Central Valley Project (CVP) and of the State of California Water Plan (SWP). Western in consultation with Reclamation has determined that the O'Neill Pumping Plant is a potential contributing component to the historical significance of the CVP and SWP.

Because the proposed undertaking is required by Western and being conducted on Western's behalf, Western and Reclamation agree that Western is the Lead Federal agency for this undertaking pursuant to 800.2(a)(2) of 36 CFR Part 800 (as amended 8-05-04) (enclosure 2).

At this time we consult with you pursuant to Section 106 of the National Historic Preservation Act regarding the proposed telecommunication installation activities (undertaking) at the O'Neill Pumping Plant. Pursuant to §800.5(b) of 36 CFR Part 800 (as amended 2004), Western has determined that no historic properties will be adversely affected by the proposed undertaking. Pursuant to 800.3(g) of 36 CFR Part 800, Western believes that an expedited review is appropriate for this determination.

1. Description of the Undertaking

The purpose of the proposed undertaking is to provide phone and data services to a service building inside Western's O'Neill Substation. The adjacent O'Neill Pumping Plant has an existing telecommunication network (referred to as a telephone backboard) located inside on the second floor of the Pumping Plant. Western is proposing to install an above ground three (3) inch diameter conduit composed of polyvinyl chloride (PVC pipe) housing optical fiber cables which would connect the service building to the telephone backboard inside the Pumping Plant.

The conduit would be above ground running along the inside perimeter fencing of the O'Neill Substation until it reaches a point nearest the southeast wall of the Pumping Plant. Enclosure 3 is an engineering drawing that shows the conduit routing plan from the service building inside the Substation to the Pumping Plant. There is a narrow walkway between the O'Neill Substation and the Pumping Plant at this point. The conduit would be extended through the fencing and continue underground (enclosure 4). A twelve (12) inch wide by eighteen 18 inch deep trench would be dug by hand perpendicular to the walkway. The trench would extend for four (4) feet six (6) inches. Once the conduit is installed the trench would be backfilled and the surface restored with a gravel cover. A small 3 inch bore hole would be drilled at the bottom of the Pumping Plant's southeast wall next to a side exit door (enclosure 5). The bore hole would penetrate into the interior of the Pumping Plant. The conduit installation would continue on the outside of the interior wall running up the side of the door and continuing up the wall to an existing "raceway" running across the length of the Pumping Plant on the garage ceiling (enclosure 6). A raceway is an enclosed channel of metal designed for holding wires or cables. At this point the fiber optic cable will be exposed without the conduit and would run on the second floor along the raceway. The cable would be attached to an existing one inch conduit which is already attached to the raceway. The conduit would run alongside the raceway which terminates into a room on the second floor housing the telephone backboard as well as other electrical equipment. Enclosure 7 contains photos of the raceway configuration and the existing termination inside the Pumping Plant into the second floor as described above.

2. Area of Potential Effects

The Area of Potential Effects (APE) for the Undertaking is defined in accordance with §800.16(d). For the purposes of §800.4, Western defines the potential direct effects (DE) to be the conduit installation and the 3 inch diameter bore hole into the Pumping Plant. Western defines a vertical APE to a maximum depth of 18 inches during trenching activities to install the conduit.

Potential indirect effects (IE) include visual and noise intrusions that could diminish the historic or aesthetic values of certain types of cultural resources within the purview of the proposed undertaking. However, we have determined that due to the nature and location of the undertaking as described above, there is no indirect effect.

3. Identification of Historic Properties within the Direct APE

The O'Neill Pumping Plant was completed in 1967 as part of the San Luis Unit (SLU) of the California Central Valley Project (CVP) and the State of California Water Plan (SWP). The SLU, a joint Federal/State operation was authorized in 1960 and includes the O'Neill Dam and Forebay, B.F. Sisk San Luis Dam, San Luis Reservoir; William R. Gianelli (San Luis) Pumping-Generating Plant, Dos Amigos Pumping Plant, Los Banos and Little Panoche Reservoirs and San Luis Canal from O'Neill Forebay to Kettleman City with the necessary switchyard facilities. The principal purpose of the Federal portion of the facilities is to furnish approximately 1.25 million acre-feet of water as a supplemental irrigation supply to some 600,000 acres located in the western portion of Fresno, Kings, and Merced Counties. The major portion of San Luis Unit is a combined effort of the Federal and State governments; 55 percent of the total cost is contributed

by the State of California and the remaining 45 percent by the United States. The joint-use facilities are O'Neill Dam and Forebay, B.F. Sisk San Luis Dam, San Luis Reservoir, William R. Gianelli (San Luis) Pumping-Generating Plant, Dos Amigos Pumping Plant, Los Banos and Little Panoche Reservoirs, and San Luis Canal from O'Neill Forebay to Kettleman City, together with the necessary switchyard facilities. The Federal-only portion of the San Luis Unit includes the O'Neill Pumping Plant and Intake Canal, Coalinga Canal, Pleasant Valley Pumping Plant, and the San Luis Drain.

The O'Neill Pumping Plant consists of an intake channel leading off the historic Delta-Mendota Canal (DMC) and six pump-generating units. These pumps lift water from the O'Neill Forebay to the Delta-Mendota Canal, and operate as generators. When operating as pumps and motors, each unit can discharge 700 cubic feet per second (cfs) and has a rating of 6,000 horsepower. When operating as turbines and generators, each unit has a generating capacity of about 4,200 kilowatts.

The historical significance of the CVP and SWP has been well documented. The SLU is just one of many components comprising the CVP and SWP throughout California. For the purposes of this consultation, we will refer to the National Register of Historic Places (NRHP) Multiple Property Listing Form (MPL) for CVP Historic Engineering Features submitted to your office by Reclamation in 2007, and again in 2009. Although your office has reviewed the MPL, no concurrence has been requested or received from your office on determinations of eligibility for properties associated with the MPL, nor has it been listed by the Keeper of the NRHP. Reclamation has, however, conducted extensive consultation with your office over the last several years using the information provided in the MPL and Western assumes for the purpose of this consultation that this MPL is currently on file with the Office of Historic Preservation. Therefore, to reduce voluminous enclosures we have not enclosed another copy of the entire MPL.

Reclamation's MPL for the CVP contains a thorough historic context for CVP through the 1956 authorizations. The MPL describes many of the main engineering features constructed as an integral part of the CVP. These engineering features are considered historic or potentially historic elements that contribute to the significance of the CVP and therefore, could be considered eligible for listing in the NRHP under Criterion A as being associated with a significant historic event. Additionally, there is potential for some of the engineering features to qualify individually under Criterion C for their significance in their physical design or construction and the fact that many features retain their integrity of location, design, setting, materials, workmanship, feeling, and association.

In the MPL, Reclamation does not include the SLU and O'Neill Pumping Plant because the federal authorizations for the SLU and its subsequent features were not made until 1960. As the scope of this project is very small, a full evaluation of the O'Neill Pumping Plant was not completed. However, based on information known about the SLU and the O'Neill Pumping Plant and their role in the CVP, for the purposes of this undertaking, Western is treating them as significant contributing engineering features of the CVP and the SWP, eligible for the NRHP under Criterion A as a historic element that contributes to the significance of the CVP. Although an individual architectural evaluation of the significance of the O'Neill Pumping Plant under Criterion C has not been conducted, Western believes that the O'Neill Pumping Plant could

potentially be eligible under Criterion C for its engineering design; therefore, Western will also treat the O'Neill Pumping Plant as eligible under Criteria C.

Vertical APE-Ground Disturbing Activities

Ground disturbing activities for the proposed undertaking would include the twelve (12) inch wide by eighteen 18 inch deep trench that would be dug by hand. The ground/surface is covered with several inches of yard rock as well as existing concrete foundation and equipment as demonstrated in enclosure 4. No archaeological resources are present within the Substation or on the surface between the Substation and the Pumping Plant. The proposed trench is shallow and it is not likely that any intact sub-surface cultural resources would be present beneath in the proposed conduit area as the entire area has been heavily altered and impacted by the construction of the Pumping Plant, Canal, dams and Forebay (enclosure 8).

Effects Determination

Pursuant to §800.5(b) of 36 CFR Part 800 (as amended 2004), Western has determined that no historic properties will be adversely affected by any of the proposed telecommunication installation activities as described in this consultation for this undertaking. Our determination is based on the following.

The *Secretary of Interior Standards for the Treatment of Historic Properties* recommends taking into account the historical use of a building or structure when applying modifications. The proposed 3 inch hole that would be bored through the exterior wall does not alter the defining feature that contributes to its historical significance and association with the CVP and SWP. The O'Neill Pumping Plant is significant in its function as a generation-pumping plant designed to lift water from the O'Neill Forbay and release it into the Delta Mendota Canal. The proposed undertaking will not alter this historical function. The bore hole proposed in the exterior of the Pumping Plant is very small and will not affect characteristics that make the Pumping Plant eligible for the NRHP under either Criteria A or C. There are numerous small intrusions along the exterior of the plant and this type of modification is consistent with the plants operation and use and is visually small compared to the overall size of the Pumping Plant.

Regarding the ground disturbing activities for the proposed undertaking, Western concludes that there is very little, if any, potential for the proposed trenching activities to impact intact sub-surface cultural resources.

Pursuant to §800.5(b) of 36 CFR Part 800 (as amended 2004), Western has determined that no historic properties will be adversely affected by the proposed undertaking. Pursuant to 800.3(g) of 36 CFR Part 800, Western believes that an expedited review is appropriate for this determination. At this time we seek your comments on Western's No Adverse Effect determination for this undertaking. Please do not hesitate to contact me if you have any questions or concerns during your review. I can be reached at 916-353-4035 or email: waldear@wapa.gov. Your continued assistance and cooperation are appreciated.

Sincerely,

Cherie Johnston-Waldear

Cherie Johnston-Waldear
Regional Preservation Official
Sierra Nevada Region

8 enclosures

cc:

Laureen Perry
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Rain Emerson
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August 10, 2015 Reply in Reference To: WAPA_2015_0714_001

Cherie Johnston-Waldear
Regional Preservation Official
Western Area Power Administration
Sierra Nevada Region
114 Parkshore Dr.
Folsom, CA 95630-4710

RE: Section 106 Consultation for the Installation of a Telecommunications System, O'Neill Substation to O'Neill Pump-Generating Plant, Merced County, California

Dear Ms. Johnston-Waldear:

Thank you for your July 13, 2015, letter initiating consultation with me for the above-referenced project to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 300101), as amended, and its implementing regulation found at 36 CFR § 800. The Western Area Power Administration (WAPA) is seeking my comments regarding the effects that the undertaking described below will have on historic properties, and have requested expedited consultation under 36 CFR § 800.3(g).

WAPA is proposing to install a telecommunications system between the O'Neill Substation (Substation) and the O'Neill Pump-Generating Plant (Pumping Plant). The Pumping Plant is part of the San Luis Unit of the Central Valley Project (CVP) and the California State Water Project (SWP). The CVP is administered by the Bureau of Reclamation (Reclamation), and WAPA and Reclamation have determined that WAPA is the lead federal agency for this undertaking.

WAPA is proposing to install a three-inch conduit connecting fiber optic cable between the Substation and Pumping Plant. The conduit would run along the inside perimeter fencing of the Substation to the southeast wall of the Pumping Plant. The conduit will then continue below ground in a 12-inch-wide by 18-inch-deep trench. The trench would be four and a half feet long. A three-inch bore would be made in the bottom of the Pumping Plant's southeast wall. The cable would continue through the interior of the Pumping Plant, either exposed or in existing raceway, to the second floor of the building until it reaches the telephone backboard.

WAPA has identified the Area of Potential Effects (APE) for the undertaking as the 3-inch borehole in the Pumping Plant and the area of ground disturbance. The vertical APE has been defined as a maximum depth of 18 inches. The APE is shown in the attachments included with your letter.

The Pumping Plant was completed in 1967 as part of the San Luis Unit of the CVP. While it has not been formally evaluated, WAPA and Reclamation are assuming the Pumping Plant as eligible for the purposes of this project only. No additional historic properties were identified. Therefore, WAPA has determined that the undertaking will have no adverse effect to historic properties.

After reviewing the information submitted with your letter, I offer the following comments:

- I concur that the Area of Potential Effect (APE) as represented in the attachments to your letter is appropriate.
- I concur that WAPA's identification and evaluation efforts are sufficient for this undertaking. In the future, please include photographs of the building elevations, in addition to the locations of proposed alterations.
- I concur with your finding and agree that pursuant to 36 CFR § 800.5(b), a Finding of No Adverse Effect is appropriate for the undertaking as described.
- Please be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have future responsibilities for this undertaking under 36 CFR Part 800.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Kathleen Forrest, Historian, at (916) 445-7022 or by email at kathleen.forrest@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Cc: Laureen Perry, Reclamation (via email)