

STATE OF CALIFORNIA - THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

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

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October 25, 2005

REPLY TO: NRC040816A

Scott C. Flanders, Director
Environmental and Performance Assessment Directorate
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: Proposed Independent Spent Fuel Storage Installation (ISFSI), Humboldt Bay Power Plant,
Humboldt County

Dear Mr. Flanders,

Thank you for your October 3, 2005 fax continuing our consultation on the above-referenced undertaking in accordance with 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act. PG&E is proposing to construct an Independent Spent Fuel Storage Installation (ISFSI) at their Humboldt Bay Power Plant.

In previous consultation, I had requested additional information on NRC's consultation with Native American groups and individuals and how the project's Area of Potential Effects (APE) was defined. The present submittal explains your efforts to consult with the Wiyot Tribe, the Bear River Band of Rohnerville Rancheria, and the Blue Lake Rancheria. Your fax explains the tribes expressed concerns with the project's potential effects to Humboldt Bay, but did not identify any specific cultural resources concerns within the APE. You explain that, if properties are identified during construction, you will consult with me and the tribes pursuant to 36 CFR 800.13(b). I do not object to this management strategy.

Your fax goes on to explain that the APE was defined in accordance with 36 CFR 16(d). The proposed project is within the current boundaries of the Humboldt Bay Power Plant (HBPP) and construction will be limited to the ISFSI construction site, the extended and widened oil road, and the soils disposal area. The APE includes Unit 3 where the spent fuel is currently stored. Your fax explains that PG&E and NRC consider Unit 3 as potentially eligible to the National Register, but the undertaking will have no effect to the property. You have asked for my concurrence with your finding that "the proposed action does not adversely affect any historical properties." I do not object to a "No Adverse Effect" finding.

Thank you again for seeking our comments on your project. If you have any questions, please contact staff historical archaeologist Anmarie Medin at (916) 651-0304.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Milford Wayne Donaldson'.

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer