

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

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December 1, 2010

Reply in Reference To: EPA101020A

Craig Cooper
Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Santa Susana Field Laboratory Northern Undeveloped Lands (NUL) Radiological Testing, Ventura County, California

Dear Mr. Cooper:

Thank you for seeking my consultation regarding the above noted undertaking. Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act (NHPA), the Environmental Protection Agency (EPA) is seeking my comments on its determination of effects that the proposed undertaking will have on historic properties.

The undertaking consists of the vegetation clearing, gamma scanning, geophysical survey, soil sampling, water monitoring, and sediment sampling and radiological testing on 182 acres within the NUL of Santa Susana Field Laboratory (SSFL). Vegetation clearing will cut or trim vegetation to a height of six to 18 inches using a combination of hand held mechanical equipment and hand tools. Heavy equipment such as wheel-driven mowers will be operated in previously disturbed areas. Gamma scanning is passive scanning for radiation using hand held, wheel mounted (stroller); mule mounted, and forklift mounted scanners. Geophysical survey will be conducted using ground-penetrating radar and electro-magnetometer to identify potential buried materials. Up to 1500 of each surface and subsurface soil samples will be collected. Sampling will be both targeted and random samples. All samples initially planned in areas of archaeological sensitivity or known historic properties will be relocated to a less sensitive adjacent location. Each borehole will be a maximum of ten feet deep. Water sampling will involve both surface and groundwater samples. All ground water samples will be taken from pre-existing monitoring wells both in and near NUL of SSFL. Surface water and sediment will be sampled from active water locations, mainly drainage pathways within banks in areas of recent deposition. In addition to your letter received October 20, 2010, you have submitted the following documents as evidence of your efforts to identify historic properties in the APE:

- *Project Description and Cultural Resources Assessment Santa Susana Field Laboratory Northern Undeveloped Lands Radiological Study* (Richard Futzenberg and Ray Corbett, JMA, October 2010)
- *Cultural Resources Identification Survey: Northern Undeveloped Land at the Santa Susana Field Laboratory Site* (Michael Hogan and Bai "Tom" Tang, CRM Tech, June 2010)

The EPA has performed a records search at the South Central Coastal Information Center and identified that no previous inventories have been conducted within the APE, however 26 previous inventories have been performed within a one mile radius of the APE. Only three archaeological sites and no historic buildings were identified during a pedestrian survey of the APE. Approximately one third of the APE was not surveyed due to steep and loose terrain. The three historic properties, CA-VEN-1803, -1804, and -1805, have not been formally evaluated and will be treated as eligible for the purposes of this undertaking. The EPA, proposes to prevent adverse effects to these sites by flagging a fifty foot buffer around each site and avoid site disturbance including complete avoidance by vegetation clearing, use of only hand held gamma scanning equipment with the presence of a qualified archaeological monitor within the protected buffer area, and complete avoidance by the geophysical survey and soil sampling programs. Native American consultation was undertaken with letters including an invitation to meet with tribes sent August 20, 2010 and a meeting held with interested individuals including paid Native American monitors on September 15, 2010.

I suggest, for better management, an appropriate testing plan be enacted and the three archaeological sites be evaluated for eligibility for the National Register of Historic Places.

Based on your identification efforts, the EPA has determined that there will be No Adverse Effect to historic properties from this undertaking given the above condition. Pursuant to 36 CFR 800.5(c)(1), I concur with the USN determination of No Adverse Effects with the self-imposed condition of avoiding the three identified archeological sites (CA-VEN-1803, CA-VEN-1804, and CA-VEN-1805) within the APE.

Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, the EPA may have additional 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 Trevor Pratt of my staff at (916) 445-7017 or at email at tpratt@parks.ca.gov.

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer