

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

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July 15, 2010

In Reply Refer To: EPA100603A

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

Re: Santa Susana Field Laboratory Area IV Radiological Testing, Ventura County, California

Dear Mr. Cooper:

Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act, 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 290 acres within Area IV of Santa Susana Field Laboratory (SSFL). Vegetation clearing will cut or trim vegetation to a height of six to 18 inches using a combination 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 3500 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 an adjacent, less sensitive 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 Area IV 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 and maps of June 3, 2010, you have submitted the following documents as evidence of your efforts to identify historic properties in the APE:

- *Cultural Resources Assessment Santa Susana Field Laboratory: Area IV Radiological Study, Ventura County* (Richard Guttenberg and Ray Corbett; John Minch and associates, Inc.: June 2010).
- *Historic Structures/Sites Report for Area IV of the Santa Susana Field Laboratory* (Post/Hazeltine Associates: April 2009).
- *Class III Inventory/Phase I Archaeological Survey of the Santa Susana Field Laboratory Area 4, Ventura County, California* (W & S Consultants: September 2001).

- *Archaeological Survey Report: Southern California Edison Proposed Fiber Optic Moorpark East Copper Cable Replacement Project* (Gwen Romani, Compass Rose Archaeological Inc.: September 2009).

Based on their identification efforts, through research at the South Central Coastal Information Center and previous pedestrian surveys of the APE, the EPA has concluded that there are 263 previously recorded structures and ruins within the APE most of which are modern. All of the structures within the APE have been determined not eligible by the EPA. The EPA has also identified five archaeological sites (CA-VEN-1772, CA-VEN-1773, CA-VEN-1774, CA-VEN-1775, and CA-VEN-1362) within the APE. All five of these sites 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.

The EPA has determined that all of the structures identified within the APE are not eligible for the National Register. Pursuant to CFR 800.4(c), I concur with your finding of not eligible for the 263 historic structures listed in Table 1 of the report: *Historic Structures/Sites Report for Area IV of the Santa Susana Field Laboratory* by Post/Hazeltine Associates (pages 11-17).

The EPA has determined that the appropriate finding of effect for this undertaking is that of No Adverse Effects with the condition of avoiding the five identified archeological sites within the APE (CA-VEN-1772, CA-VEN-1773, CA-VEN-1774, CA-VEN-1775, and CA-VEN-1362).

After reviewing your letter and supporting documentation, pursuant to 36 CFR 800.4(d)(1), I concur with your finding of No Adverse Effect with conditions as long as the previously discussed mitigation measures are followed.

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 for considering historic properties in planning your project. If you require further information, please contact Trevor Pratt of my staff at phone 916-445-7017 or email tpratt@parks.ca.gov.

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

The Office of Historic Preservation will be moving to a new location as of July 14, 2010. The new address for the office will be 1725 23rd Street, Suite 100, Sacramento CA 95816. Please update your records accordingly. The entire office will also be receiving new phone numbers, and those numbers will be posted on our website at www.ohp.parks.ca.gov when they are active.