



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Via Express Mail

October 15, 2010

Milford Wayne Donaldson, FAIA – State Historic Preservation Officer  
California Department of Parks and Recreation  
Office of Historic Preservation  
1414 9<sup>th</sup> Street, Room 1442  
P.O. Box 942896  
Sacramento, CA 94296-0001

RE: Santa Susana Field Laboratory Proposed Action

Dear Mr. Donaldson:

The United States (US) Environmental Protection Agency (EPA) has identified a proposed undertaking on the Boeing-owned property of Santa Susana Field Laboratory (SSFL) Northern Undeveloped Lands (NUL), Ventura County, California and is initiating this correspondence in compliance with Section 106 of the NHPA. This undertaking is closely related to the EPA project in the Area IV of the SSFL that was foreshadowed in our previous consultation letter regarding Area IV, dated June 3, 2010 (attached). Please note that the tract of land hereby referred to as the Northern Undeveloped Lands (NUL), was referred to as the Northern Boundary Zone (NBZ) in that document. On July 15, 2010 your office concurred with our finding of No Adverse Effect regarding the undertaking in Area IV, reference # EPA100603A (attached).

The currently proposed undertaking is to conduct a radiological characterization survey of the NUL of the SSFL. The Area of Potential Effect (APE) is 182 acres within the NUL of the SSFL (Figure 1.). A complete description of the project is detailed in the attached document titled *Project Description and Cultural Resources Assessment Santa Susana Field Laboratory Northern Undeveloped Lands Radiological Study, Ventura County, California* (attached).

Section 106 of the National Historic Preservation Act (NHPA) (36 CFR Part 800) requires federal agencies to take into account the effects of their undertakings on historic properties. In accordance with 36 CFR 800.2(c), the EPA requests consultation and concurrence with the California SHPO regarding the proposed undertaking. EPA's SSFL Cultural Resource Specialist (CRS) has reviewed the proposed undertaking and he has determined that the proposed project would have No Adverse Effect on historic properties within the APE.

In anticipation of this and future projects, the US Department of Energy (DOE) commissioned a

survey and assessment of potential historic properties within the NUL in 2010.

Also in preparation for this project a separate record search of the surrounding area was conducted with the South Central Coastal Information Center at the California State University, Fullerton. Archaeological surveys that include all or part of the APE were conducted in 2001, and 2010 survey #s VN-2480, and VN-2889 respectively (attached).

The results of the recently completed survey and assessment of the NUL (attached) determined that there are no existing built structures or developments within the APE (Hogan, et al. 2010:15). The survey identified and recorded a total of three (3) previously unknown prehistoric archaeological sites and five (5) isolated artifacts within the APE for this undertaking. Absent of subsurface testing the authors of the report were unable to determine whether the three (3) new archaeological sites within the APE were eligible or ineligible for inclusion in the National Register of Historic Places (NRHP) (Hogan, et al. 2010:20). However, all archaeological sites within the APE (CA-VEN-1803, CA-VEN-1804, and CA-VEN-1805, site records attached) are hereby considered eligible for inclusion in the NRHP and considered historic properties for the purposes of this undertaking.

The undertaking currently presented proposes a No Adverse Effect on historic properties through a “flag and avoid approach”. The specifics of the methodology are detailed in the document titled, *Cultural Resources Protection Measures, dated September 2010* (attached). These measures are substantially identical to those previously submitted to SHPO during consultation regarding the parallel project in the adjacent Area IV of the SSFL.

These measures were originally derived from the draft *Cultural Resources Management Plan* prepared for the SSFL site by National Aeronautics and Space Administration (NASA) in February 2010 (attached); the draft *Cultural Resources Clearance Survey* prepared by the Department of Energy (DOE) in November 2009(attached); and from formal and ongoing consultations with Native American representatives conducted by the DOE and EPA on December 3, 2009, June 9, 2010, and September 15, 2010. Documentation of Tribal consultation is attached.

In accordance with applicable regulations and policies, the EPA requests concurrence from the California SHPO that No Adverse Effect occurs to historical properties with the proposed undertaking following a “flag and avoid” approach and provided the mitigation measures detailed in the *Cultural Resources Protection Measures, dated September 2010* are employed.

If you have any questions regarding this request for consultation and concurrence, please call Ray Corbett, Ph.D. at 805-682-4711 ext 141. If you would like to contact me, I can be reached at (415) 947-4148.

Sincerely,

  
Craig Cooper  
Project Manager  
Superfund Division