

**Responses to Comments Received by DOE on the
Santa Susana Field Laboratory Cultural Resources Survey**

#	Individual	Comment	Comment Response
1	Barbara Tejada	Areas where buildings have been removed or other remediation activities have taken place since the 2001 W&S survey should be included with the proposed surveys. Previous ground surface visibility limitations should be taken into account if these areas have improved clearing today. This is particularly important, since the Burro Flats proper may have contained prehistoric cultural materials prior to development activities. Archaeological materials may be buried under fill deposits in this area.	During the process of evaluating remedial actions for Area IV, DOE will assess the need for additional cultural resource surveys related to those actions. DOE needs to wait until the completion of EPA's radiological study to scope the additional surveys.
2	Barbara Tejada	Areas of high potential for archaeological resources, i.e. rock outcrops and overhangs, should be field checked to ensure that the 2001 survey did not miss anything, either due to reduced visibility, access or simply non-recognition.	DOE understands the commentor's concern. DOE will conduct additional surveys of Area IV in support of development of alternatives for the EIS. DOE needs the results of EPA's study to support the scope of the additional surveys.
3	Barbara Tejada	The four archaeological sites recorded by W&S should be re-visited in order to assess the previous determinations of eligibility. These determinations were made solely on surface indications; no subsurface testing was performed in order to determine the presence of potentially intact buried archaeological deposits. This is particularly true for site SSFL-4, which despite evidence for previous looting, may retain sufficient integrity for NR eligibility under Section 106 of the NHPA below the looters spoils piles.	DOE agrees and will re-evaluate the conclusions made by the prior investigators. This work will be performed in support of the Area IV EIS.
4	Albert Knight	It is my opinion that the 2001 archaeological survey of Area IV by Whitley and Simon fails to make any provision for major soil disturbances that might occur subsequent to their survey. This is probably for the simple reason that in 2001, with the exception of the excavation of relatively shallow foundations at places where buildings were removed, soil disturbance had been minor, and had occurred at places that had been disturbed during grading for and construction of the former buildings. Therefore Whitley and Simon's 2001 report made no provision for any future major sub-soil disturbances because at the time of their survey no such major disturbances were proposed.	DOE agrees and will re-evaluate the potential for major soil disturbances when alternatives in the EIS are assessed.
5	Albert Knight	In my opinion, given the present situation and the need to collect numerous surface and subsurface samples for the radiological characterization study, across most of Area IV, the chances of unintentionally seriously damaging a buried archaeological deposit are minimal, but the chances of unanticipated discoveries of buried deposits are high. The presence of at least one large and significant archaeological site complex in the immediate proximity of the southern end of Area IV (i.e. CA-VEN-1072, or the Burro Flats site) signals that a large community of Native Americans was utilizing the tops of the Simi Hills, as well as the	DOE has provided this comment to EPA. EPA proposes to have a cultural resource monitor present during its study to prevent damage to buried archaeological resources. DOE will include in the EIS a thorough discussion of the historical aspects of the SSFL area.

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		surrounding foothills, as has long been known. Ethnographic information collected in the early part of the 20th century by noted anthropological scholar John Peabody Harrington, who lived in Simi Valley for part of his life, clearly states that there was a village at Burro Flats.	
6	Albert Knight	Even if Burro Flats/Area IV does not actually have large significant archaeological deposit itself, its proximity to the large and significant Burro Flats site strongly suggests that many small surrounding sites will be present, which were not observed by the 2001 W&S survey because they are not visible at the surface. The large scale sub-soil testing now proposed is a great opportunity to look for these sub-soil deposits, and this can only be successfully achieved if the excavations are monitored by competent archaeologists, who have the ability to visually examine soil samples as they are recovered, and with the power to temporarily halt work if potentially significant archaeology deposits are encountered. One new prehistoric site was discovered (by myself) during off-site project soil testing in Lang Ranch, for example, in an area that had a new road cut through it. The site was adjacent to one corner of the area being sampled and was not disturbed by the testing in any way. The site would not have been discovered if the soil testing was not being monitored.	As indicated in response #5, EPA will have a cultural resource monitor during implementation of its study. DOE will evaluate and incorporate into the EIS measures for protecting resources for remedial actions proposed for Area IV.
7	Albert Knight	I would like to point out that W&S note that Fenenga reported that the main midden area at the Burro Flats site is at least 525 x 215 meters in area and at least in places some 1.5 meters deep (p. 35). During their survey of Area IV, W&S discovered three new prehistoric sites. Their final comments, despite the proximity (~2000 ft.) of the very large Burro Flats site complex, with a deep sub-soil component and the presence of small prehistoric sites in the area around it, were that "The proposed project...will have no effect on cultural resources of any kind within Area IV," and they conclude by saying that "the proposed remediation and closure project is determined to have no effect on significant cultural resources" (p. 45). It is clear from their comments that "the proposed project" they refer to is the "remediation and closure" of the old structures, with whatever minor soil disturbances that may have caused, and not (almost a decade after their survey was finished) a (any) large scale soil sampling program. The 2001 report does not address wide-spread deep soil sampling, or soil disturbance of any kind, which in my opinion should be monitored by competent archaeologists, either previous to or in conjunction and coordination with the soil sampling crews, and only after one or more archaeologists are consulted about the soil sampling project,	As part of evaluation of alternatives in the EIS, DOE will revisit each of these sites. The EIS will also include a thorough discussion of historic usages of the site area. DOE at present has not drawn any conclusions regarding the potential for impacts to cultural resources and will not do so until all information is reviewed and the extent of disturbance resulting from remediation is known. DOE will present this assessment in the EIS.

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8	John Romani	<p>procedures, protocol, in cases of discoveries, etc.</p> <p>All rockshelters and overhangs in Area IV with fire-blackening present, indicate the potential for the presence of Rock Paintings. It is recommended that all the blackened areas be photographed with infrared film to bring out potential pigment. If pigment traces are present, the sites will undoubtedly be considered as sacred places to the Chumash/Tongva Native Americans. It is further recommended that the local Native American groups listed by the Native American Heritage Commission (NAHC) be consulted in these instances.</p>	DOE will incorporate this suggestion when it prepares the scope of its re-evaluation of the sites identified within Area IV.
9	John Romani	<p>When determining the eligibility to the National Register of Historic Places for the four sites already recorded in Area IV, at least two of the rockshelters (SSFL-2 and SSFL-4) should be re-visited. The talus slope associated with SSFL-2 should be re-checked for artifacts and potential midden. The fire-blackened area should be photographed with infrared film to detect any evidence of pigment traces. It has been suggested by Whitley that 75% of the midden at SSFL-4 was destroyed by vandalism. It is recommended that the remaining 25% (if possible) be sampled with at least one hand-excavated control unit to determine the general character of the midden as part of the final mitigation.</p>	DOE agrees that the sites should be re-visited and will do so as it develops the EIS. The issues raised in the comment will be incorporated into the reassessment of eligibility.
10	John Romani	<p>A qualified archaeologist with Hazmat certification should be present to monitor all earth disturbing activities associated with the radiological gamma surveys and soil sampling. This monitor is to detect, and to protect from further damage, any sub-surface cultural resources. Evidence of surface remains will be relatively slight because of past construction, contaminated soil removal, and demolition activities. If sub-surface Native American cultural resources are encountered, an NAHC-recognized Chumash and/or Tongva individual should be contacted immediately.</p>	EPA proposes to use a cultural resource monitor to support its investigation activities within Area IV. This comment has been provided to EPA so that the proper individuals can be contacted should significant cultural resources be encountered during its study.
11	John Romani	<p>Although Area II, where the Burro Flats Rock Art Complex is located, will only be subject to potential indirect impacts, it is recommended that entrance policies to the area be extremely limited, and in various instances, that cultural resource management oversight by a qualified archaeologist be required. Potentially, during the radiological surveys and soil sampling, the roads leading to Area II be temporarily gated and foot-patrolled, and have a strict entrance policy. This is necessary because of the extreme importance of the Burro Flats Rock Art Complex which is already listed on the National Register of Historic Places. Dr. E. C. Krupp,</p>	This comment has been provided to NASA/GSA, who owns the property, and to EPA, who will have contractor personnel conducting the radiological survey. DOE does not have authority to fence or control movement of personnel within Area II.

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		Director of the Griffith Park Observatory, has suggested that the Complex may also be eligible as a World Heritage Site. This serves to underscore the significance of the Burro Flats Rock Art Complex.	

Suggestions Made during the December 2, 2009 Cultural Resource Meeting at Santa Susana Field Laboratory

#	Suggestion	Response
1	People removing debris should be alert to artifacts and leave them in place if/when found	This suggestion has been provided to EPA for its consideration during brush removal. DOE will incorporate this consideration as a mitigation measure in the EIS.
2	Consideration should be given to subsurface deposits that could contain archaeological remains. Operations should be shut down immediately if remains are found and monitoring should be included in the workplan, particularly for sampling below ground surface.	This consideration has been provided to EPA. The consideration will be incorporated into the EIS as a mitigation measure.
3	Known resources (like the Burro Flats complex) should be fenced for protection	This suggestion has been provided to NASA and GSA. DOE does not control access to the Burro Flats complex
4	All equipment should be operated properly to avoid starting a wildfire	During discussions with EPA regarding its radiological survey, EPA has identified equipment-initiated wildfires as a primary safety matter.
5	It would be nice if there could be coordination across the Administrative Areas (Areas I, II, III, and IV) and areas of responsibility (DOE, EPA, NASA, and Boeing).	Coordination amongst the federal agencies and Boeing is ongoing.

Suggestions Made during the December 3, 2009 Cultural Resource Meeting at Santa Susana Field Laboratory

#	Suggestion	Response
1	Make sure the field director/crew chief working on the radiological survey is well trained. This individual should be trained by a local (Southern California) Tribal representative before work begins.	This suggestion has been provided to EPA for its consideration.
2	Local Native Americans should be consulted officially rather than invited to attend public participation events.	DOE agrees, this is one reason that the December 3 meeting only involved Native American representatives
3	Provide funding for Native American monitoring during all stages of the work.	EPA is considering contracting a Native American monitor for its survey work. The requirement for a Native American monitor during remedial activities will be discussed in the EIS.
4	The Most Likely Descendent should be identified. This group would like to be involved in the determination of who that individual is. We don't want to be surprised by who the state identifies.	DOE plans additional meetings with the Native American community during which this issue will be discussed.
5	The information that results from the cultural survey should be shared in a manner that would allow it to be used for other purposes – for example, to help ensure protection in the future. For example, it should be used to assure protection during wildfire suppression. The integrity of the sites should not be compromised.	DOE plans to share all results of cultural surveys with Native American representatives. During subsequent meetings with those representatives, DOE will discuss mechanisms to retain integrity of identified sites.
6	Provide Native American monitoring during any activities that would result in soil disturbance and subsurface disturbance	EPA is considering contracting a Native American monitor for its survey work. The requirement for a Native American monitor during remedial activities will be discussed in the EIS.
7	Consider the formation of a formal mechanism to provide Native American consultation to DOE, NASA, and Boeing. The entire site is significant to Native American people. It has cultural and spiritual meaning for us.	DOE will discuss this issue with Native American representatives during subsequent meetings on this subject.
8	Our interest will continue through the decision of what will happen next with this property. We want it to be protected once DOE and Boeing are done.	DOE will discuss this issue with Native American representatives during subsequent meetings on this subject.
9	We would like to have the results of the prior survey (that identified four sites within Area IV) provided to us.	DOE has provided the prior survey report to the attendees separately from this comment response document.
10	DOE should conduct additional work to determine the “significance” of the sites that have been identified. We are not confident that the four sites are truly not significant.	DOE agrees and will be conducting a re-evaluation of the significance determination for these sites.
11	The most significant site is the Burro Flats cave. It is a very special place, a sacred place. Petroglyphs are located there. It is particularly important as it is a location that is used at Winter Solstice and Summer Solstice. Winter Solstice is very important to Chumash people.	DOE understands the underlining concerns and meanings for the Burro Flats site.
12	Summer Solstice is also very important to all Native Americans	DOE understands the importance.
13	Who will determine whether there should be additional testing? We would like to be involved in decisions about whether testing occurs.	DOE will be making determination of additional testing of sites that would be impacted by DOE cleanup activities. DOE will engage the Native American community in deciding on what testing is necessary.
14	We should also be involved in determining if and how any removals should occur after the investigations have been completed. (The survey will be a non-removal survey. It may be	DOE will engage the Native American community should determinations be made regarding the

	determined appropriate to remove significant remains from the site.)	necessity of removal of any artifacts or features.
15	Any activity that requires brush removal would necessitate Native American monitoring as it could result in soil disturbance and/or exposure of cultural materials.	This suggestion has been provided to EPA.
16	A Native American monitor should be employed for all investigations (not just those resulting in soil disturbances) in the vicinity of all identified sites, including the four sites identified in the prior survey plus any sites identified as a result of the upcoming cultural resource survey.	EPA is considering contracting a Native American monitor for its survey work. The requirement for a Native American monitor during remedial activities will be discussed in the EIS.
17	There needs to be good rapport between the Native American monitor and all contractors conducting investigations.	DOE agrees and will do what it can to ensure that good rapport is maintained.
18	All archaeologists working on this project (during the survey and all subsequent work) should have Southern California experience. This group would like to have the opportunity to provide recommendations of who to use and who not to use.	All archaeologists working on this project will have Southern California experience.
19	We would like to have the opportunity to approve the selection of any archaeologists working on this project.	Unfortunately, federal procurement regulations do not allow third party approvals for contractors.