

-----Original Message-----

From: sradz@lanl.gov [mailto:sradz@lanl.gov]  
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Subject: Fwd: Cultural Resources SWEIS comments

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>Date: Wed, 14 Dec 2005 15:54:50 -0700  
>To: ewithers@doeal.gov  
>From: Brad Vierra <bvierra@lanl.gov>  
>Subject: Cultural Resources SWEIS comments  
>Cc: sradz@lanl.gov  
>X-PMX-Version: 4.7.1.128075

>  
>Elizabeth:  
>  
>Attached are the Cultural Resources Team comments on the latest version of  
>the SWEIS.

>  
>thanks, Brad  
>  
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**COMMENTS ON THE DRAFT SWEIS II  
ENV-ECO CULTURAL RESOURCES TEAM  
Bradley Vierra ([bvierra@lanl.gov](mailto:bvierra@lanl.gov)) Team Leader**

**General Comments**

Do global searches for the following and correct accordingly:

- 1) “mitigate adverse effects” change to “resolve adverse effects”
- 2) “Heritage Resources” ... change to the correct title of the CRMP
- 3) “Nuclear Energy Period” change to “{Manhattan Project and Cold War Era”

**Chapter 3**

2035: The title of the final CRMP should be *A Plan for the Management of the Cultural Heritage at Los Alamos National Laboratory, New Mexico*, otherwise known as the “Cultural Resources Management Plan for Los Alamos National Laboratory” (i.e, delete “Heritage”).

2038-2039: reword as follows: “could be adversely affected, however, those situated on San Ildefonso tribal lands would be positively effected....”

2196: remove “and stairs”

2200: again remove Heritage from CRMP.

Table 3-21: under cultural resources it should simply state that the historic trail is of undetermined NRHP status. The lithic scatter does not need to be dealt with since it has been determined to be not eligible.

2214: change sentence to ... categorization of the Radiochemistry Building “and other potentially significant buildings as” historic structures.

2217: again remove Heritage from CRMP.

Table 3-22: under cultural resources note that both sites are eligible for the NRHP and that the building is associated with the “Cold War era (1946 to present)” and not the Nuclear Energy Period as listed.

Table 3-23: under cultural resources note that the historic building is potentially significant and that a Memorandum of Agreement may need to be developed to resolve the adverse effect (not “mitigate”).

2235-2236: Also note that the building is potentially significant so that a Memorandum of Agreement may need to be developed to resolve any adverse effects.

Table 3-24: no cultural resources are noted, however, there is at least one historic building (TA-53-3), other potentially significant Cold War era buildings and some archaeological sites in the area.

Table 3-25: no cultural resources are noted, however, there are potentially eligible historic buildings at both TA-55 and TA 8. Relocation, shutdown or vacate are considered adverse effects.

2291-2296: There are two NHRP eligible archaeological sites present in the TA-62 alternative.

Table 3-28: under cultural resources we should note that a buffer area needs to be included between the project location and the proposed Sandia Pueblo and Mortandad Cave Kiva National Historic Landmark area to the immediate south and east. Also, some effort needs to be made to allow the Mortandad Trail to remain open, since DOE and LANL have made a commitment to provide public access to the trail on an annual basis.

Table 3-29: under cultural resources please remove “the mule trail” and simply state that an historic trail (yet to be assessed) in the area would be protected. There also needs to be additional information added relating to the three historic buildings already declared eligible and that a complete inventory of all the eligible buildings has not been conducted yet.

2335-2336: this should be 15 NRHP-eligible historic buildings. Remove “and one potentially eligible building.”

Table 3-30: under cultural resources, make same changes as above. 15 and not “19” etc.

Table 3-32: it is unclear what “mitigative measures would prevent impacts to any cultural resources that may be present” actually refers to. There are no archaeological sites in the immediate area of the domes, however, there are sites located nearby within Area G, Zone 4 that would need to be avoided if possible.

Table 3-34: We have no information on the exact locations of the proposed bridges over Mortandad and Sandia Canyons, so we can not evaluate the statement that “there would be no impact to cultural resources.”

2487: The title of the final CRMP should be *A Plan for the Management of the Cultural Heritage at Los Alamos National Laboratory, New Mexico*.

## **Section 4.8 Cultural Resources**

2940-2942: again remove Heritage from CRMP.

2957: the date of 1890 should be changed to 1942 and delete “including both homestead structures and...” This only consists of LANL buildings and structures.

2969: again remove Heritage from CRMP.

2997: replace “1920” with 1915 (please note that this consists of the total number of archaeological sites [eligible, not eligible and potentially eligible]).

2998: replace “1796” with 1776

2999: replace “124” with 139

3008: reword “including, erosion control, placing protective fencing...”

3014-3020: Should add that protective easements will also be established in Rendija Canyon to protect Traditional Cultural Properties and allow access to these TCPs by San Ildefonso and Santa Clara Pueblos.

3028: replace “536” with 510 (the number has decreased due to D&D)

3029: replace “56” with 31

3030: replace “189” with 179 and “536” with 510

3031: replace “108” with 98

3043: replace “44” with 28

3055-3062: Should add that the remaining standing building at the V-site is currently being stabilized as part of the “Save America Treasures” program.

3097: Replace “several” with seven and add at the end of this sentence, “while an eighth TCP was identified during the Land Conveyance and Transfer Project.

## **Section 5.8 Cultural Resources**

Table 5-19: In No Action alternative for LCT project remove “and unidentified.” Also in the Expanded Alternatives for TA-3 remove lithic scatter and stairs. It should only include the historic trail. Lastly, in the Expanded Alternative for TA-48 you should add “and other potentially historic buildings” to the sentence.

2141-2143: It should be noted that a data recovery plan was written to resolve the adverse effects of the transfer of three tracts cited for development with 49 archaeological sites eligible for the NRHP to the County of Los Alamos (see Vierra et al. 2002, LA –UR-02-1284). The implementation of this data recovery plan is ongoing as of 2005. In addition, 34 archaeological sites are included within 3 protective easements at a single tract to be transferred to the County for recreational purposes.

2185-2189: A data recovery plan was also written to resolve the adverse effect of the construction of a parking lot at the Romero Cabin site (McGehee et al 2005, LA-CP-05-0063). The implementation of this data recovery plan is also ongoing as of 2005.

2224: remove “metal”.

2290-2292: delete “TA-21-1 (West) A-11” which is to be conveyed (rather than “has been”). Then note that the historic buildings in the tract will be effected by the transfer (rather than “not be impacted by demolition activities”).

2487: again remove Heritage from CRMP.

## **Appendix G**

### Center for Weapons Program Research

312: There is a potential historic building issue. One of the buildings (TA-3-28) within the proposed location for the Center for Weapons Programs Research (as shown in Figure G-2 on page G-10) is scheduled to be assessed for its historical significance and eligibility for the NRHP during FY 06. Until it is formally assessed it is considered and managed as an eligible property. Also, a portion of the current Administration Building (TA-3-43) is depicted on G-2 and stated as being in the area of the new Center for Weapons Programs Research. It has been formally declared eligible for the NRHP, and a Memorandum of Agreement has been signed stating the required documentation measures that have to be completed prior to its D&D.

### Replacement Office Buildings

724: It is not anticipated that there will be archaeological site issues however, there is an historic trail in the vicinity, south of the proposed parking lot location for this project, as depicted on Figure G-3. This site has yet to be formally reviewed for NRHP eligibility and therefore must be considered and protected as an eligible site.

912-913: Rewrite the sentence as “two archaeological sites are eligible for listing on the NRHP, 4 are of unknown eligibility and 2 are not eligible for the NRHP.

916: ... near the proposed new complex. Add a discussion that notes the one of the sites with undetermined status, a historic trail, is located to the south in the vicinity of the parking lot. This site must be managed as an NRHP eligible site until formally determined otherwise. Due to its proximity to the proposed project, there could be potential impacts.

928: It is true that there are no NRHP eligible sites in the vicinity, however, there is one site in the vicinity that has not yet been formally evaluated for eligibility status.

### TA-48 Radiological Science Institute

1825-1828: Rewrite as follows: Surveys have identified two archaeological sites within TA-48, both of which are eligible for the NRHP. The prehistoric site is a 1-to -3 room structure, whereas the historic site is a rock/wood enclosure. Additionally, the Radiochemistry Building and a number of other buildings have been determined to be potentially significant historic buildings. However, none of the buildings or structures

have been formally evaluated for NRHP eligibility status, and are therefore, considered eligible and managed as such until a formal assessment determination has been made.

Table G-16:

TA-3 NRHP-eligibility should be “2/2”

TA-18 NRHP-eligibility should be “3/0”

TA-46 NRHP-eligibility should be “9/2”

1836-1838: New construction in the area of the prehistoric or historic sites would require notifying the LANL Cultural Resources Team so that the site boundaries could be marked and the site fenced. Fencing would prevent accidental intrusion and disturbance to the site(s). If either of the two NRHP eligible prehistoric or historic sites could not be avoided by the proposed construction activities and protected by fencing, then a data recovery plan would need to be prepared and site excavation conducted prior to construction by the Cultural Resources Team.

1841-1842: add that ..... a cultural resources assessment could be performed and also any subsequent compliance requiring documentation prior to D&D activities.

Radioactive Waste Treatment Facility Upgrade

2892: The existing Radioactive Liquid Waste Treatment Facility and another building at TA-50 qualify as potentially eligible historic buildings.

2894: replace mitigate with resolve.

2894-2896: add that the Cultural Resources Team should be contacted so that these sites can be marked and avoided should any construction work be conducted in the area.

3074-3075: Rewrite: Any mitigation plans would have to be implemented before the implementation of the project.

Los Alamos Neutron Science Center

3301-3303: You cannot make statement that refurbishment, upgrade and/or replacement of existing structures, systems, or components “would have no impact on land use or other resources including ecological or **cultural resources**”. -- TA-53-3 is a NRHP eligible property, therefore any refurbishment or upgrades to this building have the potential to impact this eligible property. Additionally, there are other potentially significant historic buildings at TA-53, which have yet to be evaluated for NRHP eligibility status. The refurbishment and upgrades, and/or replacement of existing structures, could potentially impact those buildings that are considered to be potential historic buildings until formally assessed. In addition, specific buildings that are proposed to be refurbished, upgraded, and/or replaced have not been identified within this section

3402-3408: This statement is correct with minor word changes versus what is written in lines 3301-3303

3405: change “Nevertheless” to “However”

3406: change “would” to “must”

#### TA-55 Radiography Facility

3678: There are no known archaeological resources within the area of the action alternatives. TA-55-41 is a potentially significant historic building. It has yet to be assessed for NRHP eligibility status. All three of the alternatives would affect this potentially NHRP eligible historic buildings.

3566: TA-55-41 would be D&D alternative 1

3578: Demolition of the “high bay” portion of 55-41 would be alternative 2

3587: Renovate/modify portions of the basement of 55-41 would be alternative 3

3709-3921 (Alternative 1): There should be a Cultural Resources Section because the demolition of building TA-55-41 would be an adverse impact this which is a potentially eligible significant historic building. However, this building has not been yet been evaluated for its NRHP eligibility status. This assessment and any further compliance required documentation measures would have to be conducted prior to any demolition of this facility.

3922-3932 (Hybrid Alternative): Again there should be a Cultural Resources Section because this building is potentially eligible for the NRHP, but has yet to receive a formal eligibility assessment.

3933-3946 (renovation alternative): Again there should be a Cultural Resources Section because this building is potentially eligible for the NRHP, but has yet to receive a formal eligibility assessment.

#### TA-55 Plutonium Facility

4285: Even though no buildings at TA-55 have been assessed for NRHP eligibility many are considered to be potentially eligible historically significant buildings. However, the proposed upgrades to the main TA-55 Plutonium Facility Complex buildings appear to be activities that are exempt under the Programmatic Agreement between the State Historic Preservation Office and the Department of Energy, and therefore most likely would not require any formal compliance consultation.

#### TA-62 Science Complex

5083-5084: Remove the sentence “neither of these two sites has been evaluated for eligibility under NRHP guidelines.” This is incorrect and contrary to the remainder of the paragraph.

5087-5088: Replace “LANAL” with LANL.

After line 5091: A couple of sentences should be added referring back to the statement on lines 4625-4627 “Approximately 155 old and inefficient LANL facilities will be replaced by the two Science Complex buildings. Old facilities will be demolished and all deferred maintenance.....” The Cultural Resources Team has no information on that portion of the project that proposes to demolish these buildings and be replaced by the two new Science Complex buildings. Therefore the Cultural Resources Team is unable to evaluate whether there would be any potential impacts to the historic buildings.

5102-5103: state that if buried cultural deposits are encountered during construction, activities should cease and the Cultural Resources Team contacted.

5424-5425: No archaeological sites are located within the boundaries of the leased Research Park tract. However, there is one NRHP eligible archaeological site in the vicinity of the proposed Research Park Alternative. It is located to the immediate north of the Research Park on no leased land.

#### LANL Warehouse Replacement

6311: Cultural Resources: There currently appears to be some confusion over the exact location of the project. As stated, one footprint potentially affects the three archaeological sites as listed. However, the review of a second footprint of the proposed LANL warehouse location indicates that two archaeological sites are situated within the project boundary. At the northwest corner is a lithic scatter and the southwest corner is a trail segment. Both sites are eligible for inclusion to the NRHP. We would, however, recommend that they be avoided, since they are both located along the edge of the project area. As previously noted in Table 3-28 there also needs to be a buffer area included between the warehouse project location and the proposed Sandia Pueblo and Mortandad Cave Kiva National Historic Landmark area situated to the immediate south and east. Our previous remarks also state that some effort needs to be made to allow the Mortandad Trail to remain open, since DOE and LANL have made a commitment to provide public access to the trail on an annual basis. Lastly, the Sandia Canyon Cave Kiva will be included as a separate National Historic Landmark across the road to the north. It should therefore be noted that the proposed project could potentially affect this area due to an increase in visitation.

## **Appendix H**

TA-18 D&D



823: Replace “cavetes” with cavates

824-825: All three sites have been determined eligible for listing on the NRHP.

827-828: This structure was surrounded by concrete barriers and sandbags to prevent damage from debris carried off by storm-water runoff.

833: These include the Slotin Building (TA-18-1) and two other buildings (TA-18-2 and TA-18-5). Delete reference to “metal”

835-837: Replace with the three archaeological resources sites found at TA-18, a rock shelter, a cavate complex and the Ashley Pond Cabin, have been determined to be eligible for listing on the NRHP.

838-840: Add the word “Only” - “Only three LANL-associated buildings within TA-18 have been identified as ....”

840: Add sentences: “However, there are other potentially significant historic buildings within TA-18 that have yet to be assessed for NRHP eligibility status. A formal eligibility assessment of these buildings must be conducted prior to any demolition activities. Additionally, prior to any demolition activities taking place, DOE in conjunction ...”

#### TA-21 D&D

1169: Delete reference to building TA-21-0001. It was demolished in 2004.

1266-1267: Rewrite sentence “Three buildings, two NRHP eligible buildings, the LANL archives and warehouse, and a portable guardhouse that have been determined not eligible for listing on the NRHP are in the DP Road-4 substract which has yet to be conveyed.

2032: There are “5” sites not “7”

2032: The Pueblo roomblock was excavated and no longer exists (Steen 1977) and therefore it should not be counted or mentioned.

2033-2034: Rewrite sentence: “The five sites are formally declared eligible or potentially eligible for listing on the NRHP through consultations with the SHPO.

2044: Replace with five (not three) National Register of Historic Places – eligible or potentially eligible archaeological sites ....”

2045-2048: Delete the following two sentences because the pueblo roomblock was excavated in 1977 and no longer exists. “However, one site, a Pueblo roomblock, is

located.....demolition activities. The Eco-ENV Cultural Resources Team ....accidental intrusion and disturbance.”

2439: replace “three” with five.

#### New Waste Management Facility

4042-4043: The Cultural Resources Team has not reviewed a listing of the buildings involved that would potentially undergo DD&D activities as stated here.

4115-4116: We have not seen a map showing the proposed site for the Transuranic Waste Consolidation (TWC) Facility so we cannot verify that “neither site is located adjacent to the proposed site of the TWC Facility.”

4118-4129: Of the 22 archaeological sites located within Area G, seven have been excavated within the MDA area and one partially excavated within Zone 4. There are actually nine (and not eight) sites within Zone 4 (8 on the south side and one on the north side). Of the 10 sites located in the vicinity of Area L, one has already been excavated.

4122: Change “Sixteen” to “Fourteen”

4124: Change “6” to “8”

4135: remove Management

4140-4143: Again, we cannot verify that there will not be any impacts at TA-63, because we don’t have a location map to review the relationship between the proposed project site and the location of the two archaeological sites. Additionally, the following sentence doesn’t make sense, “Indirect impacts are also unlikely since cultural resources are either located across Pajarito Road or at least 600 feet from the potential facility sites.” ---TA-63 is all on the north side of Pajarito Road and there are two sites within the TA boundary. – what is meant by “across” Pajarito Road.

#### Table H2-1 corrections

-- Buildings TA-21-0014 and TA-21-46 have been reevaluated and determined Not Eligible for the NRHP

-- Buildings TA-21-0021 , TA-21-0030, and TA-21-0254 have been demolished

-- Building 21-0046 says “Warehouse-slab only,” This is incorrect in that the building is still standing.

Footnote “a” correction: “Of the “19” National Register of Historic Places- Eligible buildings shown in this table “three” have already been demolished resulting in the “16” buildings referred to in the text.

## **Appendix I**

### Technical Area 6

4165: Replace “Ten” with “Twelve”

4167-4168: Correct this sentence to include “Four of the 12 archaeological sites are eligible for the NRHP, 5 (not 3) are of undetermined status and 3 are not eligible for the NRHP.”

#### Technical Area 8

4171-4175: Correct this sentence to include “TA –8 contains 11 (not 10) archaeological sites .....” “Of these sites 4 (not 9) are NRHP-eligible, one is of undetermined eligibility, one is not eligible and five have not been evaluated for eligibility status.” “There are 6 (not 5) historic buildings that are NRHP-eligible located in TA-8, of which three are located near MDA Q.”

#### Technical Area 15

4181: Correct this sentence to include “Of these sites, 13 are NRHP eligible, 4 are not eligible and 14 have yet to be formally assessed for eligibility status.”

4183: Add a new sentence at the end: “However, there are 26 addition potentially significant historic buildings that have yet to be assessed for National Register of Historic Places eligibility.”

#### Technical Area 16

4185: change to “only two are in the vicinity of MDA R and the 260 Outfall.”

4186-4188: Rewrite “One is an archaeological site that has not been formally evaluated for NRHP eligibility, but is considered to be not eligible for listing to the NRHP. However, there is a historic building that is eligible and is situated next to the SWMU. There are also other archaeological sites and NRHP eligible buildings within the TA, but none are in the vicinity of the MDA R or the 160 outfall.”

#### Technical Area 21

4189: Change “Seven” to “Five”

4189-4190: “These sites include a cavate, a rockshelter, trails and/or stairs and rock/wood enclosure.”

4190-4191: “These five sites are eligible for listing on the NRHP.”

4192: Delete sentence “The Pueblo roomblock is near MDAs A and U.” -- This site was excavated in 1977 and no longer exists.

4192: Change “15” to “16”

#### Technical Area 33

4197: change “5” to “3” near MDA K

4199-4200: Correct this sentence to “Four of these sites are NRHP-eligible, 1 is not NRHP eligible and 2 are of undetermined eligibility. Seven NRHP-eligible buildings and structures are located in TA-33. Additionally, there are other potentially significant historic buildings that have not yet received eligibility assessments.”

#### Technical Area 35

4202: Add sentence that there are other potentially significant historic buildings that have not been assessed for NRHP eligibility status yet.

#### Technical Area 36

4206: Rewrite this sentence, “All three sites are eligible for listing on the NRHP.” None of the sites have been formally assessed for NRHP-eligibility status, however one is deemed to be eligible and the other two are deemed to be undetermined eligibility without further evaluation.

4207: Add sentence that states there are other potentially significant historic buildings that have not been reviewed for NRHP eligibility status yet.

#### Technical Area 39

4211-4212: Rewrite the sentence to state that “None of the sites have been formally determined to be eligible for the NRHP, however, they are all deemed as eligible or potentially eligible for listing on the NRHP.”

4212-4213: Rewrite the sentence to state that “Currently there are no formally determined NRHP eligible buildings or structures within TA-39.” However, there are other potentially significant historic buildings that have not yet been reviewed for NRHP eligibility status.

#### Technical Area 49

4218: Rewrite the sentence to state that “Twelve of the 44 cultural resource sites are formally declared eligible or potentially eligible for listing on the NRHP, 1 is not eligible, and 31 are of undetermined NRHP status. Two NRHP-eligible buildings are in TA-49; both are in the general vicinity of MDA AB.”

4220: Add a sentence that states “There is one additional potentially significant historic building that has not yet been assessed for NRHP eligibility status.”

#### Technical Area 50

4221-4223: Rewrite the sentence to state that “TA-50 contained a single archaeological site and historic structure south of MDA C that was eligible for listing on the NRHP. This site has been excavated. Currently there are no buildings or structures in TA-50 that are eligible for listing on the NRHP.” However, there are several potentially significant historic buildings that have yet to be reviewed for NRHP eligibility status.

#### Technical Area 54

4226: Add new sentences: “Of the 22 cultural resource sites near MDA G, seven have been excavated within the MDA area and one partially excavated within Zone 4. Fifteen of the sites are eligible for listing on the NRHP. The three sites near MDA H and the 10 sites near MDA L are also eligible for listing on the NRHP.” Then continue with “Sites include lithic scatters, rock art, rock shelters...”

4228: 28 sites are NRHP eligible.

4230: Rewrite the sentence to state that “No buildings or structures in TA-54 have been evaluated for NRHP eligibility status. There are, however, four potentially significant historic buildings within TA-54.”

#### Technical Area 61

4233: Rewrite the sentence to state that “...eligible, while two are of undetermined eligibility.”

#### Technical Area 73

4236-4241: Nine archaeological sites have been identified within TA-73, including lithic and ceramic scatters, a cavate, .... four of the archaeological sites are eligible for the NRHP, 2 are not eligible, and 3 are of undetermined status. None of the cultural resource sites within TA-73 are in the vicinity of the ashpile. Two historic buildings within TA-73 are eligible for listing on the NHRP. One of these, a storage building, is in the vicinity of the ash pile. There are several other potentially significant historic buildings within TA-73 that have yet to be assessed for NRHP eligibility status.