

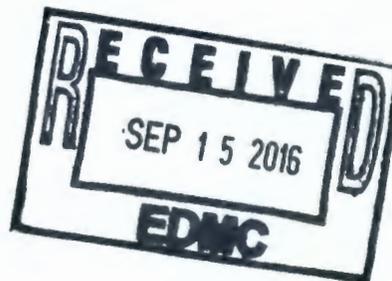


Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

SEP 04 2013

13-OCE-0102

Dr. A. Brooks
 State Historic Preservation Officer
 Department of Archaeology and Historic Preservation
 P.O. Box 48343
 Olympia, Washington 98504



Dear Dr. Brooks:

FINDING FOR 100-H-54 WASTE SITE REMEDIAL ACTIONS IN THE 100 AREA, LOG NO.: 030412-04-DOE

This letter is in response to the Washington State Department of Archaeology and Historic Preservation (DAHP) letter dated May 7, 2013 (Log No. 030412-04-DOE), which indicated DAHP does not concur with the U.S. Department of Energy Richland Operations Office's (RL) finding for this undertaking. DAHP also requested that RL contact the Bonneville Power Administration (BPA) about this project and the Traditional Cultural Properties (TCPs) that BPA identified during their recent transmission line project that crossed the Hanford Site. The area of potential effect (APE) for this waste site is 33 feet in diameter and is located eight miles north of the transmission line. This waste site consists of notably elevated radiological readings (approximately six times local background) identified during a 2004 Global Positioning Environmental Radiological Surveyor survey.

RL contacted the BPA on another project regarding BPA's role in reviewing RL's projects and the TCPs BPA identified. In that response, BPA indicated that BPA is the decision-making agency for BPA undertakings and determinations and RL is the decision-making agency for RL undertakings and determinations.

RL also contacted the Advisory Council on Historic Preservation (ACHP) in June 2013 requesting a review of DAHP's disagreement with RL's finding for two other projects that are distant from the BPA transmission line (borrow pit expansion and waste site remediation). In response to that request, the ACHP reviewed the documentation provided and found "...that consultation with BPA about these TCPs is not pertinent to the issue of whether there are historic properties that may be affected within [...] the APE [...]" (letter dated July 26, 2013). Regarding this project, the same affected Tribes that provided the TCP information to BPA during the transmission project were provided information about the proposed remedial action during RL's section 106 review process. None of the Tribes who have the TCP information they shared with BPA during the transmission project raised concern that this project may affect these TCPs. However, Tribes did submit concerns about the archaeological district boundary which is located on the eastern edge of the APE boundary. The project actions are limited to hand tools and ground disturbing activities will be monitored.

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SEP 04 2013

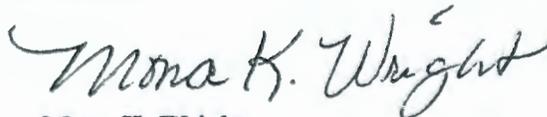
RL is following the "ACHP opinion on the reasonableness of DOE/RL's identification methodology for [...] undertakings" and agrees that a comprehensive site-wide TCP study would helpful yet is not required as part of the Section 106 process (letter dated July 26, 2013). "A federal agency's identification effort can be considered reasonable in scope and carried out in good faith when, in consultation with the DAHP/THPO and others as appropriate, it has considered the factors specified in the Section 106 regulations at 36 CFR 800.4(b)(1) that are used to determine the level of effort it will make—the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the APE" (letter dated July 26, 2013). Pursuant to Section 800.4(c)(1) of the Section 106 regulations, RL fully acknowledges the special expertise Tribes possess in identifying and assessing the National Register eligibility of historic properties that may possess religious and cultural significance to them. The ACHP letter also encourages development of a comprehensive programmatic agreement between all parties for the Hanford Site. RL is considering this guidance and will keep DAHP apprised of this matter as information becomes available.

A summary of the actions taken include, but are not limited to, the following:

- March 1, 2013, APE notification for 10-day review period ending March 14, 2013;
- May 1, 2013, RL electronic message with a finding of "no adverse effect" and report titled "Cultural Resources Review (CRR) For Remedial Actions at the 100-H-54 Waste Site in the 100-H Area, Hanford Site, Benton County, Washington (HCRC # 2013-100-014)" sent to consulting parties for 30-day review ending March 14, 2013; and
- July 26, 2013 ACHP opinion letter sent to RL.

Based on the ACHP opinion and RL's reasonable and good faith effort to identify historic properties, avoid contributing elements of the archaeological district, and monitor ground disturbing activities, we are moving forward with this project under the finding of "no adverse effect to historic properties." If you have any questions, please contact me on (509) 376-4069 or by email at mona.wright@rl.doe.gov.

Sincerely,



Mona K. Wright
Cultural Resources Program Manager

OCE:MKW

Enclosure: Revised Cultural Resource Report for #2013-100-014

cc: See page 3

Dr. A. Brooks
13-OCE-0102

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cc w/encl:

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