



National Park Service
U.S. Department of the Interior

Redwood National Park
Date: 07/13/2011

ASSESSMENT OF ACTIONS HAVING AN EFFECT ON CULTURAL RESOURCES

A. DESCRIPTION OF UNDERTAKING

1. **Park:** Redwood National Park

2. **Project Description:**

Project Name: Conduct CERCLA Response at Firearms Range

Prepared by: Karin Grantham **Date Prepared:** 06/28/2011 **Telephone:** 707-465-7710

PEPC Project Number: 35401

Locations:

Describe project and area of potential effects (as defined in 36 CFR 800.2[c])

Evaluate firing range located near Alder Camp Road, Redwood National Park, for lead contaminated soils and waters. Lead bullets used on the range for over 25 years may be contaminating soil and surface waters. Conduct a Preliminary Assessment (PA) and if appropriate, a Site Investigation to identify contamination and successive steps to clean up the site and return it to a natural state.

Lead bullets have been used at the firing range at Alder Camp Road for over 25 years. The range measures roughly 70' by 200', which includes a sloped target area (impact zone) of roughly 70' by 20'. A conservative estimate of total lead deposited in the target area is 2,400 pounds. Although lead is currently used on the range, it is being phased out and will cease prior to assessment and clean-up efforts. Lead is a known health hazard to humans and animals. The area receives an average of over 70 inches of rain annually.

Firing range wastes are regulated under the Resource Conservation and Recovery Act (RCRA) and 40 CFR 260-266. The assessment and clean-up of outdoor firing ranges is regulated under RCRA and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The NPS has the responsibility under CERCLA to determine if potential hazardous substances exist within each unit. Numerous laws and regulations require clean-up of known hazardous waste contamination. The PA is the first step to clean-up of the site. This project complies with NPS's Environmental Management Program (EMP) FY 2009 SCC Guidance and will support achievement of EMP goal 4.1B.

The PA deliverables will consist of three products: Preliminary Hazard Ranking System (HRS) score summary, Sampling and Analysis/Health and Safety Plans, and a Preliminary Assessment report.

The PA will be prepared in accordance with the Guidance for Performing Preliminary Assessments under CERCLA, U.S. Environmental Protection Agency, Office of the Emergency and Remedial Response, EPS/540/G-91/013, September 1991, and the Preliminary Assessment Review Checklist supplement dated 4/28/93 (PB-93-963342, 9345.0-08) and all subsequent revisions and supplements to these documented, as well as the Hazardous Ranking System Final Rule 40 CFR Part 300, December 14, 1990.

Deliverables and guidance for additional clean-up phases will be provide with subsequent funding requests

3. Has the area of potential effects been surveyed to identify cultural resources?

☐ No
☒ Yes

Source or reference: Sloan, K. 2004. Cultural Resource Studies of Alder Camp Road Redwood National and State Parks Moratto, M. 1973. A Survey of Cultural Resources in and Near Redwood National Park.

Check here if no known cultural resources will be affected. (If this is because area has been disturbed, please explain or attach additional information to show the disturbance was so extensive as to preclude intact cultural deposits.)

☒

4. Potentially Affected Resource(s):

The APE for the proposed project is 0.36 acre in size and includes the firing range which is approximately 70 feet x 200 feet in size, plus a cut bank located behind the target range that is 70 feet x 20 feet in size.

According to an email sent to REDW Cultural Resources Program Manager by Geological Services Branch Chief on 5/12/2011 soil sample excavations will be 20 inches deep x 12 inches wide x 12 inches long at the most, if worked is done using a sharpshooter or spade. If a 2 to 3 inch diameter auger is used, then the area of disturbance will be approximately 25 to 50 percent of shovel impacts. Up to 25 holes will be dug at this location.

5. The proposed action will: (check as many as apply)

☐ No **Destroy, remove, or alter features/elements from a historic structure**

☐ No **Replace historic features/elements in kind**

☐ No **Add non-historic features/elements to a historic structure**

☐ No **Alter or remove features/elements of a historic setting or environment (inc. terrain)**

☐ No **Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape**

☐ No **Disturb, destroy, or make archeological resources inaccessible**

☐ No **Disturb, destroy, or make ethnographic resources inaccessible**

☒ Yes **Potentially affect presently unidentified cultural resources**

☐ No **Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources**

☐ No **Involve a real property transaction (exchange, sale, or lease of land or structures)**

☐ **Other (please specify):** _____

6. Supporting Study Data:

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

Background reserach indicates that this location has been used as a firing range by NPS since it acquired the property in 1968. Air photos from 1968 show that the firing range was a logging industry landing and a site visit to the firing range in May 2011 by REDW Cultural Resources and resource Management and Science geological services staff indicate that the area is highly disturbed. The proposed test holes are limited to the area that has been disturbed from

prior logging operations. Prior Cultural Resource inventory was conducted on lands immediately adjacent to the firing range for the Alder Camp Road Rehabilitation Project that repaved Alder Camp Road as well as during a parkwide inventory in 1973. A site visit was also conducted by REDWKarin Grantham, Cultural Resources Program Manager

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

[X] Archeologist

Name: Karin Grantham

Date: 06/28/2011

Check if project does not involve ground disturbance []

Assessment of Effect: ☒ No Historic Properties Affected ☐ No Adverse Effect
☐ Adverse Effect ☒ Streamlined Review

Recommendations for conditions or stipulations: In the event that previously undocumented archeological resources are encountered during soil sampling, work in that location will be immediately suspended until an NPS qualified archeologist or cultural resource specialist has evaluated the find.

Doc Method: Streamlined Review (PA)

Streamlined Activity:

4. Health and Safety Activities

[X] 106 Advisor

Name: Karin Grantham

Date: 06/28/2011

Check if project does not involve ground disturbance []

Assessment of Effect: ☒ No Historic Properties Affected ☐ No Adverse Effect
☐ Adverse Effect ☒ Streamlined Review

Recommendations for conditions or stipulations: In the event that previously undocumented archeological resources are encountered during soil sampling, work in that location will be immediately suspended until an NPS qualified archeologist or cultural resource specialist has evaluated the find.

Doc Method: Streamlined Review (PA)

Streamlined Activity:

4. Health and Safety Activities

No Reviews From: Curator, Historical Architect, Historian, Other Advisor, Anthropologist, Historical Landscape Architect

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:

☒ **No Historic Properties Affected** ☐ **No Adverse Effect** ☐ **Adverse Effect**

2. Documentation Method:

☐ **A. STANDARD 36 CFR PART 800 CONSULTATION**
Further consultation under 36 CFR Part 800 is needed.

☒ **B. STREAMLINED REVIEW UNDER THE 2008 SERVICEWIDE PROGRAMMATIC AGREEMENT (PA)**

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

APPLICABLE STREAMLINED REVIEW Criteria
(Specify 1-16 of the list of streamlined review criteria.)

4. Health and Safety Activities.

Explanation: Background research indicates that the area proposed for soil sampling has been entirely disturbed by logging operations prior to establishment of the park. REDW archeologist visited on site with REDW geologists to discuss the project location and the setting. In addition, consultation with Yurok Tribe culture committee and discussion with the Yurok Tribe THPO have indicated that no sensitivity for this area is known. However, the Tribe is concerned about lead in the environment and would like to know the results of the investigation.

☐ **C. PLAN-RELATED UNDERTAKING**

Consultation and review of the proposed undertaking were completed in the context of a plan review process, in accordance with the 2008 Servicewide PA and 36 CFR Part 800.
Specify plan/EA/EIS:

☐ **D. UNDERTAKING RELATED TO ANOTHER AGREEMENT**

The proposed undertaking is covered for Section 106 purposes under another document such as a statewide agreement established in accord with 36 CFR 800.7 or counterpart regulations.
Specify: _____

☐ **E. COMBINED NEPA/NHPA Document**

Documentation is required for the preparation of an EA/FONSI or an EIS/ROD has been developed and used so as also to meet the requirements of 36 CFR 800.3 through 800.6

☐ **F. No Potential to Cause Effects [800.3(a)(1)]**

☐ **G. Memo to SHPO/THPO**

☐ **H. Memo to ACHP**

3. Additional Consulting Parties Information:

Additional Consulting Parties: No

4. Stipulations and Conditions:

Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects. The results of the soil testing at this locaiton for lead contamination may lead to a project to remediate the site for lead contamination. Remediation in this location has a much greater potential to affect previously undocumented archeological or historic resources in this location. The remediation project will also be subject to Section 106 NHPA.

5. Mitigations/Treatment Measures:

Measures to prevent or minimize loss or impairment of historic/prehistoric properties:
(Remember that setting, location, and use may be relevant.)


No Assessment of Effect mitigations identified.

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

Compliance Specialist:

NHPA Specialist

Karin Grantham



Date:

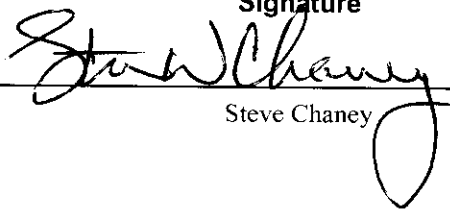
07/18/11

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Signature

Superintendent:


Steve Chaney

Date:

7-18-11