

**Enclosure 4 - National Historic Preservation Act Guidance
Request for Additional Information**

October 2025

*Carbon TerraVault Holdings LLC (CTV) III Project
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY22-5.1-5.6*

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to identify and assess the effects its actions may have on historic properties. Historic properties include, among other things, archaeological sites, structures, historic districts, and cultural landscapes. Under Section 106, agencies must consider the views of the State Historic Preservation Office (SHPO), the Tribal Historic Preservation Office (THPO), and public input before making final decisions. To assist with compliance with the NHPA, we request that CTV submit a draft Archeological Report to EPA for review. The earlier in the permit review process that this material is provided to EPA the better positioned EPA is to meet statutory and regulatory requirements under NHPA and ensure a timely review of permit applications.

The draft Archeological Report should contain the following:

Section I: General Information

- ☐ **Brief Project Background:** Describe the project and its key components.
- ☐ **Identify Undertaking Status:** Indicate if consultation is for a new permit application or an existing permit.
- ☐ **Location Details:** Provide the name of the proposed location of the permitted activity, street address, city, and county. List all cities/counties if applicable.
 - Example: List the county and provide detailed maps showing the project's location in each area.

Section II: Partner Contact Information

- ☐ **Other Federal Agency Roles:** Explain roles and responsibilities of other federal agencies with oversight or permitting roles for the activity.
- ☐ **State Agency Roles:** Provide state agency name and contact details for NHPA-related inquiries.
 - Example: If the California Department of Conservation is involved, provide their contact details related to the UIC program.
- ☐ **NHPA Contact:** Provide state agency and contact details for NHPA-related inquiries.
 - Example: If a project consultant specializing in injection wells is your main contact, provide their complete contact details.

Section III: Description of Undertaking and Area of Potential Effects (APE)

- ☐ **Project Description:** Describe all activities that are likely to occur as a result of the undertaking (i.e. construction and operation of the facility); provide a detailed narrative of the project and related activities, including schedule, purpose, and potential effects on historic properties.
 - Action: Include information about site preparation, drilling activities, and any modifications to existing infrastructure.
 - Example: In addition to the injection well(s), detail any related ground disturbing activity, including any associated facilities such as pipelines or storage tanks.
- ☐ **APE Description and amp:** Provide a narrative and map of the APE. Include:
 - Direct and indirect effects. Direct effects are those resulting from the undertaking with no intervening cause (vibration, noise, land use changes, traffic patterns, public access, views, etc.). Indirect effects are those that occur later in time or farther removed in distance but are still reasonably foreseeable
 - Horizontal and vertical extents of proposed work including ancillary and support locations such as staging and lay down areas, access routes, borrow and disposal areas, and [mitigation bank/parcels](#) (if applicable);
 - Description of the steps taken to identify the APE;
 - A justification for the APE boundaries chosen in accordance with 36 C.F.R. §800.16(d);
 - An associated map that shows the extent of the APE. Ensure the map depicts the undertaking's location within the area and includes all relevant geographic details such as proximity to historical sites;
 - The total acreage of the APE;
 - Note that the APE is not synonymous with the Area of Review.

Section IIIA: Ground-Disturbing Activity

- ☐ **Activity Map:** Provide a map showing potential historic properties in relation to ground-disturbing activities.
 - Example: Ensure the map is of appropriate scale to clearly show the extent and location of ground disturbing activities, such as drilling and potential trenching. Map should include drilling site in addition to proximity to any archeological sites/historical properties.
- ☐ **Activity Description:** Describe the proposed length, width, and depth of ground-disturbing activities.
 - Example: Verify the proposed length, width, and maximum depth of ground disturbing activities, along with current and previous land use and known past disturbances.

- ☐ **Land Use History:** Describe current and previous land use and known ground disturbances.
 - Example: Activity description includes a drilling operation as reaching a depth of 3,000 feet, with a 50-foot radius of surface disturbance, and notes previous agricultural use of the land.

Section IV: Identification of Historic Properties

- ☐ **Archival Research:** Describe archival research conducted to identify historic properties in close proximity to the project site, including the APE.
 - Action: Provide a summary of findings from the California Historical Resources Information System (CHRIS), Native American Heritage Commission (NAHC), and Sacred Lands File (SLF). Make sure to include relevant historical maps showing nearby historical sites. Please provide a list of the identified registry items and include any comments or reports made by an archaeologist, if applicable.
- ☐ **Survey Work Review:** Confirm the completion and adequacy of survey work to identify historical properties.
 - Action: Verify that field surveys, building surveys, and archeological investigations are conducted according to state and federal standards.
 - Example: The applicant provides a report from a pedestrian survey conducted using appropriate transects, detailing the findings and methodology, and includes photographs and maps of surveyed areas.
- ☐ **Historic Property Identification:** List previously recorded historic properties and survey work completed.
- ☐ **List of Tribes:** Please identify which Tribes may have any cultural or historic resources in close proximity to the project site, including within the APE. Additionally, please include Tribes that would have interest in the project area. EPA will offer consultation to federally-recognized Tribes as part of the NHPA process.
 - Action: Obtain a list of Native American contacts from the CHRIS, NAHC, and SLF. Ensure that all known Tribes are included, regardless of federal recognition status. Clearly indicate which Tribes are federally-recognized and which Tribes are non-federally-recognized.

- **Other Consulting Parties:** Detail consultation with other parties and public involvement.
 - Example: Applicant includes copies of correspondence sent to local historical societies and summaries of public meetings held to discuss the potential impacts of the project.
- **Evaluation of Resources:** Apply National Register of Historic Places (NRHP) criteria to evaluate potential historic properties.
 - Action: Provide substantive evidence of Determinations of Eligibility (DOEs) for each property evaluated, using forms such as the DPR 523 or an appropriate agency form.
 - Example: The applicant evaluates an old mining site near the injection well, applying NRHP criteria and addressing aspects of integrity such as location, design, and materials.

Section V: Finding of Effect

- **Effect Determination:** Recommend the finding of effect (No Historic Properties Affected, No Adverse Effect, or Adverse Effect) and justify based on the assessment of effects.
 - Example: For a Class VI project, the applicant determines a “No Adverse Effect” finding because avoidance measures, such as a visual screening and noise reduction, are implemented to protect nearby historical properties.
- **Justification for finding:** Provide a reasonable justification for findings.
 - Action: Assess how the undertaking will affect each historic property in the APE, considering direct, indirect, and cumulative effects. Include any resolution measures that will be implemented.
 - Example: The applicant justifies a “No Adverse Effect” finding by detailing how the projects design adheres to the Secretary of Interiors Standards for the Treatment of Historic Properties, ensuring minimal impact on the visual integrity of a historic property.
 - Note: EPA will make the final effect determination, in consultation with the SHPO and THPO.