

February 28, 2014

An Open Letter to Elected Officials Concerning Cleanup at Santa Susana Field Laboratory

To: Local, State, and Federal Elected Officials (See specific addressees on final page)

On February 13, 2014, the community participated with NASA in the final meeting of National Historic Preservation Act (NHPA) Section 106 Consultations about historic and cultural preservation at the NASA-administered section of the Santa Susana Field Laboratory. **Our observations and our request for your engagement follow.**

1. Demolition of Rocket Engine Test Stands

The possible loss of the test stands in the Alpha, Bravo and Coca historic districts concerns us.

Three opinions were held by Community members and resource professionals at the Section 106 Consultations.

- I. At least one test stand from each of the three historic districts, Alpha, Bravo and Coca, should be preserved as the physical embodiment of a watershed development in Human History: leaving the earth and traveling to another celestial body. The Santa Ynez Band of Chumash Indians does not support this position for Coca.
- II. One, or at most two, test stands should be preserved as a monument and historical artifact.
- III. These test stands are "...twisted hunks of rusted metal with no historic value."

There should be a public debate on the merits of these differing positions.

a. Coca Test Stands

NASA reported that they will demolish all rocket engine test stands in the Coca complex as soon as they file the Record of Decision (ROD) for their Environmental Impact Statement. Thus, these test stands will be dismantled in the April – August, 2014 time-frame.

NASA is considering parceling out pieces of the test stands to museums or schools that may want them, but does not guarantee that a visitor center for a museum or park at SSFL would be established.

b. Alfa/Bravo Test Stands

NASA will defer demolition of the test stands in the Alfa and Bravo sections of Area II until January 2016 to allow GSA to find a new owner for Area II and determine if the new owner will want the stands to be preserved. If a new owner is not identified by then, or if they do not want them, the Alfa and Bravo test stands too will be demolished.

The potential loss of these test stands concerns us.

It is of great cultural significance that John Glenn orbited the earth because the engines and components on his Atlas Rocket were tested on these stands. Almost every engine on every manned spacecraft was tested on these three sets of stands.

NASA considers the following video to be part of the mitigation for tearing down a monument eligible for the National Historic Register:

<http://www.youtube.com/watch?v=-tSE2eCBtAY>

The Alfa/Bravo/Coca test stands and supporting control rooms are identified as Historic Districts and eligible for the National Register of Historic Places (NRHP, or National Register, for short).

NASA however believes the retention and treatment of the test stands will be too expensive, despite the fact that the excessive clean-up standards in the AOC, as questioned by the Inspector General's Report, have proceeded regardless of the excessive expenses they entail.

2. Archaeological Exceptions

The community has been asking DTSC and the authors of the AOCs to clarify the definition of **archeological exceptions** since November 2010. The community has received complete silence in answer to our inquiries.

The AOCs define the Archaeological Exceptions to the cleanup as “**Native American artifacts that are formally recognized as Cultural Resources.**” The exceptions are not defined as “**Archaeological Sites.**” The definition is vague and inconsistent with how archaeology is defined by CEQA, NEPA, NHPA, and resource professionals who use these laws on a daily basis.

NASA defines archaeological exceptions only as artifacts, not sites, and “Formal Recognition” as inclusion on the National Historic Register. It is of note that the **ONLY** site on the entire SSFL that is on the NHR is VEN-1072, the Burro Flats Cave Complex. NASA says the exception authorizes only “Data Recovery,” not preservation of the integrity of the sites. Public comments on the AOCs in November 2010, asked if this means the sites will be dug up, the artifacts cleaned, catalogued and stored in a warehouse somewhere. Those questions have still not been answered.

To this date DTSC has not clarified the definition to NASA, DOE, the Boeing Company, or the Community. **DTSC must clarify the definition of archaeological exception immediately.**

If NASA's definition is maintained, then it will influence how DOE conducts its cleanup. If DTSC will apply the same standard to Area IV, 20 archaeological sites in Area IV could be dug up and disposed of in a landfill somewhere with no preservation or data recovery at all.

NASA has stated that all recovered “Data” will be curated and stored at the Autry Museum with the rest of the Burro Flats Collection. NASA has only so stated orally **and must confirm it in writing in their Record of Decision.**

This is all in direct contradiction to what DTSC told the community in a PowerPoint presentation in November 2010 at a workgroup meeting in Simi Valley. That PowerPoint presentation identified archaeology as “**Sites/Artifacts**”. The final AOCs states “**Artifacts**” only.

An additional concern is that the AOCs address only Native American artifacts / sites. **Historical sites are completely disregarded**, even though they are regularly recorded as archaeological sites and determined eligible for the NRHP.

DTSC needs to come forward now with clarifications on the treatment of archaeological resources that will govern the cleanup of SSFL by all responsible parties.

A member of a Native American group (who shall remain nameless) has said:

“...Data Recovery! You’re NOT going to dig up my grandmother, clean her femur and give it back to me in a box!”

3. Soil Volume and Backfill

No backfill soil is available.

The cleanup of Area II will involve removal of soils on over 100 acres. In Area IV it will be between 200-300 acres. **There is no back fill soil for use as replacement that is clean enough to meet the requirements of the AOCs.**

NASA has considered over 2 million cubic yards of soil available near Malibu, California, and determined that they are not clean enough to comply with the special cleanup standards at SSFL. This raises an **apparent contradiction** that the residents of Malibu, near and downstream from the soils, are apparently not endangered by the same materials that are not clean enough for remediating the future open space and park land at SSFL.

Some have suggested that the “borrow area” in Area IV could supply enough soil to backfill the cleanup of NASA’s Area II, but there are problems with that idea.

- The borrow area is the habitat of the **Braunton’s Milk Vetch**, a plant on the Endangered Species List that is specifically excluded from the cleanup in the AOCs.
- NASA does not own the property containing the borrow area, so it cannot be committed to NASA without negotiating the property owner’s (Boeing) assent.
- The borrow area does not have enough soil to backfill the removal of over 2 million cu/yds of material for all of SSFL.

NASA will not be returning the land to its original topography.

This is particularly a concern in regard to the designation of the SSFL lands as an **Indian Sacred Site**. To Native American culture, it is not just about the artifacts, or even the sites; it is about the landscape and the interplay of plants, animals, rocks, and soil. There is no way to mitigate the essence of an inter-related landscape. NASA has said that the oak forests in Area II may be able to be saved by removing up to 2 feet of soils from above the roots of the trees, but the soils surrounding those oaks will be excavated away to the depth of 3-5 feet. With no appropriate backfill available, the oaks will be left sitting on top of small mesas, surrounded by pits excavated to bedrock.

Since no appropriate soils are available, the deepest pits will be filled with gravel.

NASA's plans suggest that re-vegetation will be performed superficially by spraying the entire work area with hydro-seed, a slurry of water, peat moss, and native seeds that will depend on winter rains to germinate and water the plants that, hopefully, will grow there. There will be no invasive weed eradication program. Non-native weeds such as Milk Thistle, Italian Thistle and Pampas Grass will inevitably follow the soil disturbance. These invasives out-compete the native plants unless a re-vegetation program is put in place. Three such programs are currently active in the Santa Monica Mountains that could serve as a guide: the Malibu Lagoon, Lower Topanga Creek, and LaJolla Valley Restorations. These programs usually take as long as 6 years to complete.

Some have claimed that the AOCs will return the land to its "Natural State." Not so much.

4. Conclusions

The National Parks Service has spoken publicly and stated in their comments on the NASA DEIS that they look to acquire "**Nationally Significant Properties**." They cannot take contaminated land, but, if all the test stands and archaeology are removed, **the significance of the property disappears** and a multi-year, multi-million dollar weed abatement and re-vegetation project will be needed. NPS will not want the property under those circumstances. **Who will want it?**

The Santa Monica Mountains Conservancy in their **DRAFT** comments on the NASA DEIS stated that the "**unintended consequences**" of SSFL AOCs might be the construction of a series of flat compacted pads, all connected with a new, heavy-duty road. This would save a future developer millions of dollars in infrastructure costs, all paid for by the American Taxpayer. We should all be wary of possible "unintended consequences" of a policy based on abstract values.

The community needs to do several things before January 2016. Since parks agencies are in financial straits, representatives of these agencies ask a common question, "**How will you pay for it?**" Parks in the future will be run on "**Entreprise Model**". No longer will a beneficent government finance park creation and operations just because it's the right thing to do. The parks will need to pay for themselves. We need a \$20 million **endowment** to provide the income to finance continued preservation and maintenance of a post-cleanup parkland at SSFL. The endowment may need to be supplemented by appropriate commercial development, patterned after hotels like the Ahwahnee in Yosemite Valley, Old Faithful Lodge in Yellowstone, or Asilomar Conference Center, owned by California State Parks in Pacific Grove, CA.

The appropriate agency (or agencies) will need to be identified by January 2016, before demolition of the Alfa and Bravo Test Stands. The primary agency so far identified is the **National Park Service**. They will need to step up by either taking ownership of the property or making firm commitments to acquire the property before demolition begins.

5. Our Request

Our community has a year and a half to accomplish those goals. **We need your help.** We need the rest of the community to join us in this important endeavor. Your office can help enormously in that effort.

A recent resolution (<http://www.dpsfv.com/node/73>) by the Democratic Party of the San Fernando Valley points out the need for all members of the community to come together and work toward a common goal that finds reasonable resolution of all issues surrounding the cleanup. Until the community can agree on common goals, both SSFL's cleanup and its eventual preservation will be impossible.

We are committed to clean up, preserve, and protect human health and the environment.

We need your offices to engage in reasoned discourse toward these goals.

Please respond by sending us (mail@ssflcag.net) contact information for the appropriate member(s) of your staff who will engage with us.

Thank you.

John Luker
Chairman, Communications Committee
SSFL Community Advisory Group
Website: ssflcag.net
Email: mail@ssflcag.net

Addressees:

Elected Officials:

Supervisor Michael Antonovich: L.A. County District 5
Councilmember Bob Blumenfield: L.A. City CD3
U.S. Senator Barbara Boxer: CA
Congresswoman Julia Brownley: CA CD26
Congressman Tony Cárdenas: CA CD29
Assemblymember Matthew Dababneh: CA AD45
Councilmember Mitchell Englander: L.A. City CD12
U.S. Senator Dianne Feinstein: CA
Supervisor Peter C. Foy: Ventura County District 4

Assemblymember Jeff Gorell: CA AD44
Supervisor Linda Parks: Ventura County District 3
Senator Fran Pavley: CA SD27
Congressman Adam Schiff: CA CD28
Congressman Brad Sherman: CA CD30
Congressman Henry Waxman: CA CD33
Assemblymember Scott Wilk: CA AD38
Supervisor Zev Yaroslavsky: L.A. County District 3

Organization & Agency Representatives:

Paul Costa: Boeing
David Dassler: Boeing
Allen Elliott: NASA
Merrilee Fellows: NASA
Jennifer Groman: NASA
Stephanie Jennings: DOE
Jon Jones: DOE
Kamara Sams: Boeing
Superintendent David Szymanski: National Park Service
Peter Zorba: NASA