

From: [GROMAN, JENNIFER A. \(HQ-LD020\)](#)
To: [MSFC-SSFL-EIS](#)
Subject: FW: DEIS for Demolition & Environmental Cleanup for the NASA-Administered portion of the SSFL, Ventura County, CA
Date: Tuesday, October 01, 2013 8:27:51 AM
Attachments: [NASA Santa Susana DEIS cts cdh.docx.pdf](#)

Official comment

Jennifer Groman

Federal Preservation Officer

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From: OFAP [mailto:OFAP2@achp.gov]
Sent: Monday, September 30, 2013 12:47 PM
To: Elliott, Allen (MSFC-AS01)
Cc: Mark.Beason@parks.ca.gov; GROMAN, JENNIFER A. (HQ-LD020)
Subject: DEIS for Demolition & Environmental Cleanup for the NASA-Administered portion of the SSFL, Ventura County, CA

From: Office of Federal Agency Programs

Advisory Council on Historic Preservation

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

If you have any questions concerning our letter, please contact:

Tom McCulloch (202) 606-8554
tmcculloch@achp.gov

Note: Please do not reply to this email.

A free copy of Adobe Acrobat Reader can be downloaded from: www.adobe.com



Preserving America's Heritage

September 30, 2013

Mr. Allen Elliott
SSFL Project Director
Marshall Space Flight Center
MSFC AS01
Building 4494
Huntsville, AL 35812

Ref: Draft Environmental Impact Statement (DEIS) for Demolition and Environmental Cleanup for the NASA-administered portion of the Santa Susana Field Laboratory (SSFL), Ventura County, California

Dear Mr. Elliott:

We have reviewed the DEIS for the referenced undertaking and have the following comments. Our comments are provided to assist the National Aeronautics and Space Administration (NASA) in fulfilling its responsibilities under Section 106 of the National Historic Preservation Act (NHPA) and the Advisory Council on Historic Preservation's regulations (36 CFR Part 800).

Our comments primarily focus on the anticipated effects to historic properties associated with the cleanup of the facility, and with the potential preservation of significant historic properties once the property leaves NASA's jurisdiction. Our overall concern with the DEIS is that critical information to inform NASA's decisions is either not clearly presented, or is missing. Specifically, the document lacks sufficient information on measures to minimize adverse effects and ensure the long-term preservation of historic properties on the parcels to be conveyed to another party (or parties), and the parameters limiting the range of possible preservation outcomes.

First, the DEIS presents little substantive information on the existing cleanup agreements between NASA and the environmental regulatory agencies (e.g. with the California Department of Toxic Substances Control, on pages 4-15 and 4-18). Further information is needed, as these agreements largely direct the efforts and levels needed to remediate the site, which in turn can circumscribe NASA's ability to fully consider alternatives to avoid or lessen adverse effects to historic properties.

For example, the DEIS notes that several cleanup levels were initially considered, but only the preferred alternative meets the letter of the 2010 cleanup agreement. While we understand that the extent and nature of contaminants cannot be fully known until additional testing is undertaken, the final EIS should more fully explain the process by which NASA will make final decisions on the type and extent, of

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remediation(s) to be implemented, the criteria it will use to make decisions, and how the cleanup will take place in light of the agreements prior to conveyance to the General Services Administration (GSA). As you are aware, lack of this information has caused some confusion and redundant discussions in the consulting party meetings that have been held recently.

GSA will handle the disposal of the property once NASA has completed the remediation. The DEIS does not discuss GSA's role in this process, or whether GSA may be amenable to preserving anything on the property. At a recent consultation meeting there appears to have been some confusion about GSA's conditions for accepting the property from NASA. The FEIS should consider reasonably foreseeable effects associated with this undertaking, which we believe include the expected sale of the property or potential neglect of the property (36 CFR § 800.5(a)(1-2)). The FEIS should present information about the role of GSA in disposing of the property—how it identifies potential recipients, how it evaluates offers, and how it considers historic values in the excessing process. GSA's qualified personnel could likely provide helpful input in this area.

An illustrative example of this problem is presented on page 4-25 of the DEIS, where it is stated that protective measures to prevent vandalism at the Burro Flats Painted Cave may need to be removed at the request of GSA. This appears to be the kind of historic preservation issue that needs to be addressed in NASA's FEIS, and will require coordination between NASA and GSA to answer. The document should address the circumstances under which this kind of action could occur, and why. Again, while many of these questions cannot be answered at this time, the parameters of what can be preserved, what GSA will accept and what is conveyed to GSA for ultimate disposal, need to be explored in the FEIS in more detail so that the consulting parties clearly understand the preservation possibilities or opportunities.

Second, the list of mitigation measures proposed in the DEIS (page 4-25) are general and formulaic. The FEIS should contain more detail that reflects the results of the ongoing consultation process. NASA has said it may be possible to preserve (at least) one test stand (Cultural Mitigation Measure 1), depending, among other things, on the character of the contaminants that surround it and may lie beneath it. As noted above, NASA hasn't been clear about whether GSA truly considers retention of a test stand (or other facility) a viable option or not.

In a September 10, 2013 email to the consulting parties, NASA included some rough estimates for the cost to remove asbestos, hydraulic fluids, and other regulated materials from each test stand, and encapsulate their lead paint. The email also included an annual maintenance cost for each stand of perhaps \$25,000. This information should be included in the FEIS discussion regarding mitigation measures, and should include any other available information about the possibility of retaining a test stand. For example, the FEIS should consider whether NASA would be responsible for initially preserving and preparing the structure for interpretation. In addition, the FEIS should address how organizations with an interest in preserving and interpreting such a facility will be identified by GSA and under what criteria (e.g., the need to have sufficient financial resources, etc.) GSA would select a recipient or partner. The document should also include information on the role GSA would play if NASA decides to preserve a test stand; for example, whether NASA would provide an allowance for the annual maintenance of that stand. In the event a test stand cannot be saved, it will be important to explore creative ideas that provide for telling the story of the SSFL and its historic significance. Since there is a link between the SSFL and the development of the Space Shuttles (and the Shuttle *Endeavour* is on display at the nearby California Science Center), perhaps some of the mitigation measures set forth in the 2011 Memorandum of Agreement for retirement of the Space Transportation System could be applied or linked to the SSFL.

Third, the FEIS should provide additional information on the cleanup options (e.g., excavation and offsite disposal, ex- and in-situ onsite treatment, and to what level) and how each will affect the integrity of the significant Burro Flats Site. Again, while the extent and nature of contaminants is incomplete at this time, the manner in which NASA will consider this National Register-listed site's significance and value to living communities needs to be more fully explored in the FEIS, including the process for further consultation by NASA if additional alternatives are identified.

In summary, the FEIS is intended to evidence NASA's compliance with Section 106. In order to fulfill its statutory and regulatory role, the document needs to present more detailed information on how the significant characteristics of the historic properties on NASA land may be affected by the cleanup, what the cleanup criteria and parameters currently are, and the role played by GSA in decisions about what it may be feasible to preserve for future generations and the Native American community. Further, because of the nature of the historic properties on the SSFL (ranging from prehistoric archaeological sites and properties of traditional religious and cultural significance to Indian tribes through mid-20th Century rocket test facilities), the range of consulting parties and interests in the future of the property, and the fact that another federal agency is tasked with disposing of NASA's property (and whose mission and interests are not necessarily in concord with NASA's), we believe NASA should strongly consider embodying the measures agreed upon to avoid, minimize, or mitigate adverse effects to historic properties in a Memorandum of Agreement.

We appreciate the opportunity to review the DEIS. If you have any questions, or would like to discuss these issues, do not hesitate to contact Tom McCulloch at tmcculloch@achp.gov or 202-606-8554.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroline D. Hall". The signature is fluid and cursive, with a large initial "C" and "H".

Caroline D. Hall
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs