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**To:** [MSFC-SSFL-EIS](#)  
**Subject:** Fwd: Final Comments  
**Date:** Monday, September 30, 2013 7:43:06 PM  
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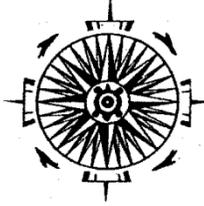
**From:** <[gcompass@earthlink.net](mailto:gcompass@earthlink.net)>  
**Date:** September 30, 2013, 4:39:09 PM EDT  
**To:** "JENNIFER A. (HQ-LD020) GROMAN"  
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Greetings Jennifer,

The final comments for the DEIS and NASA Consultant Meetings by Compass Rose Archaeological, Inc. are attached.

Sincerely,  
Gwen

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## Final comments for the DEIS and NASA Consultant Meetings

Prior to signing the ROD:

The boundaries of the Traditional Cultural Property (TCP), CA-VEN-1072 and CA-VEN-1803, must be determined prior to any soil test excavation or proposal of any mitigation measures. Environmentally Sensitive Areas (ESAs) should be established, including a buffer zone (15m-30m?), around CA-VEN-1072, as well as CA-VEN-1803. According to archaeologist Al Knight, the dividing line between Area II (NASA), Area III (Boeing), and the Southern Undeveloped Area (Boeing) is more-or-less down the middle of the cultural deposit (midden) at CA-VEN-1072. If ownership of CA-VEN-1072 is indeed shared, this further complicates matters in terms of responsibility and will require a functioning cooperation between NASA and Boeing.

Establishing ESAs for CA-VEN-1072 and CA-VEN-1803

In consultation with Native Americans, archaeologists should complete an intensive re-survey of the area, using transects spaced in 5-15 meter intervals. Whichever cultural resource firm is hired, it would be highly advantageous if a few of the archaeologists had rock climbing experience (with credentials?), so that at least some of the normally inaccessible rock shelters, rock crevices, and rock ledges where artifact caches and/or rock art may have been hidden, could be inspected for their presence - particularly in the area of the Coca Test Stands. A sampling strategy of hand controlled excavations (e.g., Surface Scrapes, Excavation Units, and Shovel Test Pits) should be implemented to systematically define the boundaries of CA-VEN-1072 and CA-VEN-1803, and establish the ESAs. Each controlled excavation should be monitored by a local Native American with artifact identification experience. The results of the findings should be catalogued, analyzed, and presented as a written document to be included as part of the 36 CFR 800 compliance process.

Cultural Mitigation Measure #4 and 36 CFR 800

If Cultural Mitigation Measure #4 depends solely on the current knowledge of local archaeologists and anthropologists, then it must be considered inadequate. As part of 36

CFR 800, CA-VEN-1072 must be properly evaluated. Minimally, a complete evaluation needs to include all the information available about the site. Currently, NASA has chosen to ignore the potential information contained in the prior excavations completed in 1953, 1954, 1959, and 1960 at the site midden component. Although incomplete to date, Compass Rose Archaeological, Inc., Dr. Chester King, and Dr. Louis Tartalia have been conducting volunteer analyses of the collections. However, both NASA and Boeing should contribute monies to complete the analyses of the past collections of CA-VEN-1072 in order to comply with 36 CFR 800. It is the responsibility of the lead agency to know as much as possible about a cultural resource prior to establishing mitigation measures, particularly since CA-VEN-1072 has been listed on the National Register of Historic Places under criterion D - *that have yielded, or may be likely to yield, information important in prehistory or history.*

At this point, and based on the limited available data, it is simply assumed that the activities reflected at the CA-VEN-1072 midden constitute a sacred site. However, the types and/or diversity of activities that occurred in the midden portion of CA-VEN-1072, remain unknown. Greater data sets from CA-VEN-1072 would also allow the relationship to the archaeological sites located in Area IV (Boeing) to be analyzed and comprehended. To complete the analyses, monies would be needed to conduct special studies, including C14 dating, obsidian hydration and sourcing, botanical studies, as well as report write-up. This, however, would not constitute a complete mitigation. The Burro Flats collections of the 1950s and 1960 were excavated under different circumstances. Both the excavation and artifact identifications were conducted by relatively inexperienced students and volunteers. Screening of the excavated soils, when it occurred, was done in the field using relatively large-meshed screens (i.e. ¼ inch mesh) Units were not necessarily completed to sterile soil or bedrock; some were probably stopped at the end of the field class. Units were excavated in different sized levels, some were 12” thick and others were 6” thick.

In addition to completing the analyses of the prior collections, control samples should be taken from previously excavated areas to determine the types and diversity of small artifacts missed during the earlier collections. Further, samples should be obtained from the oven features at CA-VEN-1072 to determine what was processed and during what time periods. The establishment of the ESA and the completion of the additional work in the previously excavated areas of CA-VEN-1072, should also be part of the 36 CFR 800 compliance process.

The fact that the land containing CA-VEN-1072 is owned by NASA (Area II) and Boeing (Area III and the Southern Undeveloped Area), makes them both equally responsible for 36 CFR 800 compliance. Therefore, both NASA and Boeing should be jointly responsible for the costs incurred for completing the part of 36 CFR 800 compliance described above. This work should be completed prior to any further soil test excavations or proposal of any mitigation measures.

## Implementation of the ROD

Following the methods instituted by the cultural resource management company, JMA (2012:15-22) in Area IV for Boeing, all vegetation removal around each individual or group of soil test sample(s) within the ESAs should be monitored by a qualified archaeologist and a local Native American, who has artifact identification experience. Each soil test hole in the ESAs should then be monitored by a qualified archaeologist and local Native American. It should be noted that the JMA method of monitoring of vegetation removal led to the recordation of numerous new archaeological sites during the soil testing that were missed during the previous surveys of Area IV.

Minimally, in areas outside the ESAs, all soil test holes should be monitored by a local Native American with artifact identification experience, after the vegetation removal is monitored by a qualified archaeologist and a local Native American. A predetermined area around demolition of any rocket test stands (minimally, the Coca Test Stands) and any associated soil test holes, should first be surveyed and then monitored during vegetation removal by a qualified archaeologist and a local Native American. Finally, each test hole should be monitored by a local Native with artifact identification experience, since the test stands exist on the same landform as the Summer Solstice sunrise notch, which was undoubtedly sacred to the local Native Americans.

The use of such terms as “minor” impacts in the Draft EIS is considered to be highly inappropriate to both the Native Americans and archaeologists. If a 4.5 to 8 inch hole was drilled through a sacred artifact or human bone, these impacts would not be considered “minor” to a Native American or an archaeologist, especially within a sacred site. The areas within and outside the ESAs where all “minor” earth disturbing activities, will be conducted, such as drilling holes, creating fences, etc., should be surveyed first, then monitored as described above.

Further, to describe archaeological negative effects as “local,” may not be correct. It was hypothesized by John Romani in his MA thesis (1981) that CA-VEN-1072 was the “private” viewing area for religious practitioners during the Winter and Summer Solstices. The site may also have been used to prepare the cerebral and physical necessities for at least the “public” Winter Solstice (and possibly the fall *Hutash* Festival) ceremonies held at the village of *Huwam/Jucjauybit* (CA-LAN-413), located several miles downstream in lower Bell Canyon. Therefore, if this hypothesis is correct, any archaeological negative effect has the potential to be more “regional,” and not merely “local.”

The 1967 revised Calabasas USGS topographic map depicts Bell Creek as a “blue-line” stream that flows next to (within 100 feet) or through CA-VEN-1072, depending on the outcome of the boundary investigations, thereby requiring a Section 404 Permit as issued by the Army Corps of Engineers. From the consultants meetings to date, it does not appear that the Army Corps of Engineers has even been considered as a consulting party, a point brought up by the SHPO in their comments on the Draft EIS on September 25. This may be considered quite egregious, since in fact the Army Corp should be a

cooperating, or even a responsible federal agency. Under any circumstance, their participation would assure an additional voice in the protection of the cultural resources on the SSFL. This is a grievous error and omission in the NEPA and Section 106 process so far, as well as in the Draft EIS.

#### Rocket Test Stands at the SSFL

Ideally, Compass Rose would like to see all nine of the test stands preserved, since, as understood, they are the least contaminated of the structures since they are located on or within bedrock. Most of the other contaminated structures (control buildings, pill boxes, etc.) can be demolished, with the preservation of at least single examples of the least contaminated of each). The Coca Stands may be the most important to our history of space flight, since they are associated with engine testing of both the Apollo and the Space Shuttle rockets. Unfortunately, they are the most contaminated and were also subjected to many structural changes. Nonetheless, Compass Rose would like to see the Coca Test Stands preserved for their association with the advancement of space travel. The Chumash Native Americans from the Santa Ynez Reservation would like to see them demolished, since they claim there is an effect on the sense of place within the Sacred Site (CA-VEN-1072) below. However, based on our experience while monitoring the Winter and Summer solstice events, the only structure visible from CA-VEN-1072 is a single tank (possibly Vessel V 100, LH2 tank or Vessel V 99, GH2 tank). If this structure is demolished, then no structures associated any with any of the nine test stands will be visible from CA-VEN-1072.

#### General comments on the environmental process for the SSFL clean-up

It is the opinion of Compass Rose that from the very beginning, the environmental process for the SSFL clean-up has proceeded incorrectly. There never should have been two entirely separate processes, CEQA for Boeing and NEPA for NASA, along with the completely different scheduling. The SSFL consists of a continuous landform with a continuous prehistory and a continuous history.

Furthermore, the presence of two “blueline” streams (one being Bell Creek) that extends through the entire SSFL – thereby crossing both the NASA and the Boeing properties - means that a Section 404 permit is required by the Army Corps of Engineers, a federal agency. Since Bell Creek extends next to or through CA-VEN-1072, means that the Army Corps should have been involved in the process from the beginning as a responsible or at least, a cooperating agency. Since Bell Creek crosses both NASA and Boeing land and a Section 404 permit is required by the Army Corps, this would seem to tie both agencies/entities together at the federal level! Also, a series of easements called “outgrants,” allow NASA and Boeing to cross each other’s land. There are also outgrants for water, utilities, etc., without which Boeing would not be able to operate. The easements (outgrants) were granted to Boeing (originally Rockwell International) by the U.S. government. Even though the outgrants were granted prior to any of the present environmental laws, this would still seem to tie the two entities together at the federal level. Furthermore, the fact, according to archaeologist Al Knight, that both NASA and

Boeing have land within the archaeological site, CA-VEN-1072, should have made them share responsibility for the cultural resources within the entire SSFL, or minimally, for all of Area II. Again, the Army Corps of Engineers should be a cooperating or responsible agency (minimally a consultant) under NEPA and the Section 106 process.

Based on the arguments above, NASA should have been the lead agency, Boeing a cooperating agency, and the Army Corps of Engineers a responsible or cooperating agency under NEPA, with all subject to Section 106, since NEPA tends to supersede State law (CEQA). In the worst case, this entire undertaking of the entire SSFL clean-up should have been subjected to a single, combined, EIR/EIS, subject to one schedule and one set of mitigation measures and procedures. As a result, the entire SSFL should be nominated as a single archaeological district. I believe that a complete analysis of the prior collections at CA-VEN-1072 will greatly help in defining the relationship with the sites in Area IV, which are owned by Boeing. This proposal is supported by the fact that there is a newly recorded rock art site in Area IV, and rock art is virtually always sacred to the local Native Americans. Furthermore, the archaeological district should also encompass the site complex in lower Bell Canyon that includes the village of *Huwam/Jucjauybit*, Bats Cave (the cave of Munits), Castle Peak (a shrine mountain), and several other sites. Compass Rose and the late John Romani, believe that the area of the entire SSFL was a “private” viewing site for the solstices and preparation area for the “public” ceremonies held downstream at the village of *Huwam/Jucjauybit* and Castle Peak, for the Winter Solstice and possibly for the fall Hutash Festival).

The tie between upper (SSFL) and lower Bell Canyon is also supported on a more practical level. Groundwater chemical contamination has been found in test wells in lower Bell Canyon as a result of NASA rocket engine testing activities, as stated by NASA in a previous consultation meeting. Thus, the entire SSFL and lower Bell Canyon site complex should be considered as a single discontinuous archaeological district.

Finally, although the environmental process completed thus far for the SSFL clean-up is totally inadequate and inappropriate by combining Federal and State and with different completion schedules, the overly strict requirements of the 2010 A.O.C. is probably the main underlying problem. The 2017 deadline for the total completion of the SSFL clean-up is unrealistic given the inadequacies in the Draft EIS and the NEPA and Section 106 process so far. The deadline must be extended so that at least most of these major problems can be resolved.

Furthermore, as supporters of cultural resource protection, both Native American and historic, the strict clean-up guidelines to “background” levels in the 2010 A.O.C. are inappropriate for proper protection of the historic properties within Area II. The clean-up should have been to the “residential” level, thereby taking into account the possible contamination in the surrounding communities, since the involved parties, NASA and Boeing, seem to want the entire SSFL to become some form of parkland.

Sincerely,  
Dan Larson, Gwen Romani, and George Toren