

From: [Gary M. Brown](#)
To: [MSFC-SSFL-EIS](#)
Subject: Comments on SSFL DEIS
Date: Monday, September 30, 2013 11:39:22 PM
Attachments: [Gary Brown comments on SSFL DEIS.doc](#)

Please see attached. Thank you for the opportunity to comment.

September 30, 2013

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Ventura, CA 93001

Mr. Allen Elliot
NASA MSFC AS01
Building 4494
Huntsville, Alabama

Re: Draft Environmental Impact Statement, Santa Susana Field Lab, NASA Demolition and Environmental Cleanup.

Dear Mr. Elliot:

After a thorough review of NASA's Draft EIS, I would like to offer some comments. I have provided input already as a National Park Service representative and a participant in the Section 106 Consulting Party, but these are my personal comments as a professional archaeologist and long-time cultural resource expert:

- The EIS is inconsistent about stating whether its purpose and goal are to address disposal of NASA property in addition to structure demolition and environmental cleanup. This is a serious matter since potentially the federal government would relinquish its control over Section 106 compliance if property is transferred to other ownership. The title of the document, for instance, says nothing about property transfer. Discussions with stakeholders have indicated that the latter is GSA responsibility, but this is unclear in the analysis.
- Whatever the case, the result is a huge impact to historic and prehistoric cultural resources. The adverse effects on both historic and prehistoric cultural resources are justified on the basis that prior agreements to cleanup the property to incredibly high standards which were made without NEPA or NHPA consultations. Despite these agreements, failure to consider alternatives is not justifiable because the document itself ("Suggested Mitigations") implies considerable flexibility in whether or not some cultural resources could be spared to "mitigate" the destruction of others.
- The documentation of prehistoric archaeological resources provided in the contractor's report (Appendix C) is far from commensurate with the significance of the National Register site (CA-VEN-1072) and likely NRHP district that is the centerpiece of the prehistoric cultural landscape. There is no evidence that the contractor even consulted the existing NRHP document, outdated as it is. The 1970s nomination form indicates acreage larger than even the 1990s documentation conducted as pure research by Albert Knight on just the NASA portion of the site complex.
- At this stage in the analysis of impacts, determination of archaeological site boundaries (horizontal) and site depth (vertical) should minimally have been performed so that effects would be possible. Yet, no information is provided on these critical parameters or

such basic characteristics as artifact assemblage and integrity. Even significance at CA-VEN-1072 is questionable without current information on such key factors.

- Limited archaeological testing at CA-VEN-1072 has been advised repeatedly during Section 106 Consulting Party discussions, and would have resolved these uncertainties, but not subsurface identification or assessment procedures have been implemented and even current surface documentation is scant.
- The assertions that any areas which might be disturbed by the proposed undertaking at CA-VEN-1072 (and even sites that have yet to be discovered) lack integrity is unfounded. Existing data are limited, but they indicate that the Burro Flats site complex contains deep, stratified, and substantial archaeological deposits including middens that are most likely intact. How existing infrastructure could be removed and environmental cleanups accomplished without directly impacting such deposits is not addressed. Instead, it is assumed that they are already disturbed and don't matter.
- The suggestion that appropriate mitigation measures could be devised through consultation with SHPO and other consulting parties after the Draft EIS is finalized is optimistic, at best. This is true of both Burro Flats and the historic structures which have been better documented through compliance work to date, although impacts and mitigation have also yet to be identified. Instead, the existing analysis assumes the worst (total destruction would be an adverse effect) and that some mitigation is possible.
- The issue of disposition is not adequately addressed. The assumption is made that likely future owners would not find cultural resources to be beneficial, thus removal is desirable. However, past discussions have emphasized the likely transfer to parklands where historic structures and archaeological resources are potential assets. The interconnected nature of these undertakings needs to be considered before either of them can move forward.

My comments are focused specifically on cultural resources. I recognize the need for environmental cleanup at SSFL and the delicate nature of disposition of lands which contain such unique features as those in this project area. The Draft EIS has not succeeded at balancing these needs and considering alternatives to wholesale destruction of world-class cultural resources. I'm quite sure the undertaking can be implemented without such devastating impacts to the national and regional cultural heritage.

I appreciate the opportunity to review and comment on the Draft EIS. I hope that NASA is able to devise better solutions to this situation.

Respectfully,

Gary M. Brown, MA, RPA
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