

Annual Report for the Programmatic Agreement Regarding Santa Susana Field Laboratory, Ventura County, California

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The National Aeronautics and Space Administration (NASA) is pleased to report the following progress pursuant to the Santa Susana Field Laboratory (SSFL) Programmatic Agreement (PA), executed on April 17, 2014 and amended in 2020. The PA stipulates actions to be taken by NASA regarding demolition and soil and groundwater cleanup at SSFL in Ventura County, California, and is attached to this report (Attachment 1).

This memorandum is submitted in accordance with Stipulation VIII of the PA, as amended. The Signatories to the PA are NASA, the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), and the Santa Ynez Band of Chumash Indians (Santa Ynez).

The following text discusses the PA stipulations that have been completed, the stipulations that were active during the reporting period of April 14, 2020 through March 31, 2021, and NASA's actions or activities performed under those stipulations. In some instances, this report includes brief summaries of actions from previous reporting years for context.

The South Central Coastal Information Center of the California Historical Resource Information System (CHRIS) at California State University, Fullerton has been closed since March 2020 because of COVID-19 restrictions. The CHRIS center assigns archeological site numbers and is a repository for reports and archeological site forms. Some reports have been delayed as a result of this closure.

Programmatic Agreement Stipulations

Stipulation I.A.1. Immediate Demolition. In Stipulation I.A.1, NASA agreed to demolish the Coca Test Area Historic District and retain one test stand and affiliated control house in either the Alfa or Bravo Test Area Historic District, provided that retention was consistent with NASA's fiscal and legislative requirements. In 2015 and 2017, NASA agreed to defer demolition of the test stands on the condition that deferring demolition would not impact NASA's overall cleanup responsibilities.

However, in its March 2019 audit report of SSFL, the NASA Office of Inspector General (OIG) recommended that NASA make a decision on whether to preserve or demolish the test stands and control houses before beginning soil remediation activities and to implement that decision. The report identified issues and concerns with deferring the decision, including increased demolition costs, abatement and maintenance costs, and the deteriorating physical condition of the structures. In March 2020, NASA decided to return to its demolition commitments under the PA. For further information, see Stipulation I.B.1.

Attachment 2 contains an updated list of properties within each district.

Stipulation I.A.2. Items for Display. A meeting and site visit with NASA and the consulting parties were held in February 2015 to identify special or representative items for display in the Coca Test Area Historic District. Through this visit, NASA started the process of identifying several representative pieces of the Coca Test Stands for removal and display. During the reporting period, NASA continued to work with the NASA

artifacts officers across the agency on appropriate items for display from the Bravo and Coca Test Area Historic Districts.

Stipulation I.B.1. Retention of Historic Test Stands and Facilities. None of the test stands in the historic districts have been demolished. To address the OIG's concerns and recommendations and in accordance with PA Stipulation I.B.1, NASA will retain the Alfa Test Stand I (Building 2727), Alfa Test Stand III (Building 2729), and the Alfa Control House (Building 2208), all of which are individually eligible for listing on the National Register of Historic Places (NRHP). Although the PA stipulates the retention of only one test stand and control house, NASA has determined it is feasible and desirable to retain these three NRHP-eligible structures within the Alfa Test Area Historic District. NASA plans to move ahead with the demolition of the Coca Test Area Historic District (Stipulation I.A.1) and the remaining structures in the Bravo Test Area Historic District (Stipulation I.B.4). This demolition plan is based on a number of factors, including the financial repercussions of continuing to defer the decision, the long-term maintenance costs of retaining the structures, and the risks presented by the structures to the public's health and safety.

Stipulation I.B.2. Consultation. Consultation during the reporting period focused primarily on the Burro Flats Cultural District Traditional Cultural Property (TCP) NRHP nomination, which is discussed in Stipulation II.C.

Stipulation I.B.3. Hazardous Materials Identification. This stipulation is complete. In 2013, the Great Southern Engineering firm completed a survey at SSFL that evaluated the presence of asbestos, lead-based paint, and other hazardous materials on the individually eligible properties in the three historic districts: two test stands and one control house in each district. The cost estimate to remove asbestos, hydraulic fluids, and other regulated materials and encapsulate the lead paint was also previously completed for these nine structures.

Stipulation I.C.1. Structural Documentation. This stipulation is complete. NASA coordinated with the National Park Service (NPS), which completed Level I, Level II, and Level III Historic American Engineering Record documentation in February 2016. NPS posted this document on its website on May 10, 2016: https://www.nps.gov/hdp/exhibits/ssfl/SSFL_index.htm

Stipulation I.C.2. Photography and Narrative. This stipulation is complete. NPS posted the structural documentation via a virtual tour on its website: https://www.nps.gov/hdp/exhibits/ssfl/SSFL_index.htm

Stipulation I.C.3. National Register Determination of Eligibility. NASA will update the NRHP determination of eligibility for the retained historic structures. There was no activity on this stipulation in this reporting period.

Stipulation I.C.4. Video Documentation. This stipulation is complete. The drawings, photographs, and virtual tour are posted on YouTube at the following links:

Alfa Test Area: https://www.youtube.com/watch?v=cqUQ_peITa0

Bravo Test Area: http://www.youtube.com/watch?v=Uo3f_TiBcol

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

Coca Test Stand 1: <http://www.youtube.com/watch?v=ji2JxVI6npM>

Stipulation I.C.5. Oral Histories. This stipulation is complete. The oral histories are posted on NASA's SSFL website: <https://ssfl.msfc.nasa.gov/cultural/oral-history.aspx>

Stipulation II.A. Native American Advisory Board. With the formation of the Sacred Sites Council (SSC) in 2014, NASA's responsibility under this stipulation is complete. NASA continues to attend SSC meetings when invited.

Stipulation II.B. Ethnographic History. This stipulation is complete. The final *Ethnographic Overview of the Native American Communities in the Simi Hills and Vicinity* was submitted to the SHPO, Santa Ynez, and

ACHP in March 2017. This stipulation required a public version of this document, which was posted on NASA's website on a page with other key documents relating to SSFL: <https://ssfl.msfc.nasa.gov/about/key-documents>. This is the direct link to the pdf: https://ssfl.msfc.nasa.gov/files/documents/local/2017/SSFL_Ethnographic_Overview_public.pdf.

Stipulation II.C. TCP Nomination. During the reporting period, the TCP nomination proceeded through the county, state, Native American, and federal review and approval processes. The NRHP nomination of the Burro Flats Cultural District TCP went before the Ventura County Cultural Heritage Board on June 26, 2020 and at the Ventura County Board of Supervisors Meeting on July 28, 2020. The nomination was next discussed and approved at the California Native American Heritage Commission on August 11, 2020. The TCP nomination was discussed and approved at the August 14, 2020 California State Historical Resources Commission's quarterly meeting. After this approval and the signature of the California SHPO, NASA sent the TCP nomination to the Keeper of the NRHP on September 2, 2020. The nomination was returned to NASA by the Keeper on October 19, 2020 for technical revision, specifically related to the physical description and integrity of the property. NASA revised the text based on these comments and returned the nomination to California SHPO on February 8, 2021.

This stipulation is technically complete, as the PA stipulates the submittal of the nomination to the Keeper of the NRHP; however, NASA intends to continue with the listing process.

Stipulation II.D. Access. This stipulation is ongoing. In accordance with this stipulation and Executive Order 13007, "Indian Sacred Sites," NASA usually provides access to requesting tribal members who wish to enter SSFL for the Summer and Winter Solstices in June and December. However, because of agency, state, and local COVID-19 restrictions, the site was not available for solstice visits in 2020.

Stipulation II.E. Reseeding. This process is ongoing. In areas where structures were demolished and soil remained, NASA used a native seed mix specially formulated for SSFL. The same seed mix is used throughout the site.

Stipulation III.A. Boundary Determination and National Register Nomination. This stipulation is complete. The findings from the Extended Phase I investigations were presented in the final *Archeological Site Boundary Determinations at NASA-administered Areas I and II, Santa Susana Field Laboratory, Ventura County, California*, sent to the SHPO and Santa Ynez on February 2, 2017.

In accordance with the second part of this stipulation, the updated Burro Flats Site NRHP nomination was approved by the State Historical Resources Commission at their quarterly meeting on November 7, 2019, and subsequently submitted by NASA to the Keeper of the NRHP. The Keeper requested some additional information from NASA in January 2020. The Burro Flats Site was re-listed with the updated boundary and additional information on July 2, 2020.

Stipulation III.B. Monitoring. This stipulation is ongoing, as needed by onsite activities. Archeological and local Native American monitors were present during any ground-disturbing activities within the Burro Flats Site and the areas defined by the Environmentally Sensitive Areas Action Plan (ESAAP). Ground-disturbing activities within Area II and Area I LOX are monitored by a Native American Monitor.

Stipulation III.C. Environmentally Sensitive Areas Action Plan. This stipulation is complete. NASA updated the ESAAP after completion of the Extended Phase I investigation. The ESAAP was updated in March 2018. No additional updates were made to the ESAAP during the reporting period.

Stipulation III.D. AOC Exception Consideration. NASA has submitted the Burro Flats Site Complex Boundary, the final Archeological Site Boundary Determinations at NASA-administered Areas I and II, the TCP and Burro Flats nominations, and the Ethnographic Study to DTSC. To date, no decision has been made by DTSC regarding how the "Native American Artifacts" exceptions clause will be defined or used.

Stipulation III.G. Documentation and Curation. This stipulation is complete. In October 2018, NASA executed a curation agreement with the Autry Museum of the American West in Los Angeles.

Stipulation III.H. Protection. This stipulation is complete. This stipulation calls for NASA to update the standard operating procedures in the SSFL Integrated Cultural Resources Management Plan (ICRMP). NASA updated the SSFL ICRMP to include the boundaries of the Burro Flats Site Complex and other new or extended site boundaries.

Stipulation IV.B. Further Archeological Investigation. This stipulation is complete. The findings from the Extended Phase I investigation were reported in the final *Archeological Site Boundary Determinations at NASA-administered Areas I and II, Santa Susana Field Laboratory, Ventura County, California* and include sites outside the Burro Flats Site Complex.

Stipulation IV.C. Archeological Site Discovery and Evaluation. This stipulation is complete. The findings from the Extended Phase I investigation were reported in the final *Archeological Site Boundary Determinations at NASA-administered Areas I and II, Santa Susana Field Laboratory, Ventura County, California* and include evaluations of sites outside the Burro Flats Site Complex. (See Stipulation VII for additional information about unanticipated discoveries.)

Stipulation IV.D. This stipulation is ongoing. In the event the final cleanup footprint includes a portion of an NRHP-eligible archeological site, NASA will consult with DTSC and request that the site be considered part of the “Native American Artifacts” exceptions clause in the 2010 Administrative Order on Consent (AOC). Determinations regarding which sites will be considered under the “Native American Artifacts” exceptions clause in the AOC have not been made.

Stipulation IV.E. ICRMP Updates. This stipulation is complete. During the reporting period, NASA completed an Addendum to the existing ICRMP (*Integrated Cultural Resources Management Plan, Santa Susana Field Laboratory, Ventura County, California 2017-2022*) to update information on the Burro Flats Site and TCP and to add a Standard Operating Procedure for Emergency Actions. Although this stipulation is complete, NASA will continue to update the ICRMP, as needed.

Stipulation IV.G. Training Module. This stipulation is complete. NASA continues to administer the training module to all onsite workers. No updates were made to this training module during the reporting period.

Stipulation V. Consultation and Review. NASA continues to comply with this stipulation regarding review of reports and other PA deliverables.

Stipulation VI. Duration. The duration of the PA was extended via Amendment #1 in April 2020. See the Stipulation XI Amendments section for a discussion on the extension of the duration of the PA.

Stipulation VII. Unanticipated Discoveries. NASA has followed the procedures outlined in the PA and the ICRMP for unanticipated discoveries. There were no cultural resources discoveries during the reporting period. Throughout the life of the PA, no items have been found that are human remains or funerary objects.

Stipulation VIII. Annual Reporting. This summary report is submitted in accordance with Stipulation VIII. NASA will continue to submit annual reports to the Signatories until the PA expires or is terminated. The 2020 Amendment # 1 added an annual meeting with signatories following receipt of the annual report.

Stipulation XI. Amendments. In accordance with this stipulation, Programmatic Agreement Amendment #1 extending the duration of the agreement was executed on April 6, 2020. It is included in Attachment 3.

Other Cultural Resources Activities

Apart from the PA stipulated activities, NASA has developed or completed other cultural resources-related tasks. The following are summaries of those tasks.

Post Woolsey Fire Investigations

The pedestrian archeological survey conducted after the Woolsey Fire in August 2019 assessed the post-fire site conditions of previously identified prehistoric cultural resources and identified and documented 12 previously unidentified and/or unrecorded archeological sites. A copy of the report and site documentation

will be filed with the CHRIS center at California State University, Fullerton, in accordance with the California Office of Historic Preservation's Information Management guidelines. When the CHRIS center reopens, site numbers will be assigned to the newly identified sites and this report will be finalized.

Test Stand Fluid Evacuation

Several years ago NASA discovered some piping that contained residual fluids believed to be associated with the prior operation of the test stands. The objective of the work was to evacuate, collect, store, characterize, and dispose of the fluids from the pipelines to prevent future workers from inadvertently encountering or causing a spill of the operational fluids.

Access to fluids in the pipelines was accomplished using existing openings, valves, couplings, connections, joints, and discharge points, or by disassembling flanges, valves, or other existing openings. NASA committed to follow the Standards for Preservation from *The Secretary of the Interior's Standards for Treatment of Historic Properties* (NPS, 2017); the work did not include cutting, torching, grinding, defacing, modifications, or any action construed as intrusive. The pipelines were not washed, flushed, scrubbed, or inundated with solvent or detergent.

In November 2018, NASA completed the fluid evacuation at the Alfa Test Stands. The same procedures were completed at the Bravo Test Stands in January 2019 and the Coca Test Stands in February 2020.

Archeological District Evaluation

In 2017, NASA completed the first draft NRHP evaluation of a potential archeological district (National Register of Historic Places Eligibility Evaluation, Burro Flats Archeological District, Santa Susana Field Laboratory, Ventura County). NASA met with SHPO in May 2017 to review the draft district evaluation and discuss the proposed boundaries. The evaluation was submitted to the SSC, Santa Ynez, the U.S. Department of Energy, The Boeing Company, and DTSC for review and comment. The updated evaluation was submitted to SHPO, Santa Ynez, and the SSC in February 2018. This evaluation will be finalized in a future reporting period to include new information from the post Woolsey Fire investigation. When the CHRIS center reopens, this evaluation will be updated and finalized.

Attachments

- 1 Programmatic Agreement Regarding Santa Susana Field Laboratory, April 2014
- 2 Status of Structures within Historic Districts
- 3 Programmatic Agreement Amendment #1

View Attachment 1. Programmatic Agreement Regarding Santa Susana Field Laboratory, at: https://www.nasa.gov/sites/default/files/files/SSFL_EIS_ROD.pdf#page=19

View Attachment 3, Programmatic Agreement Amendment #1, at: https://www.nasa.gov/sites/default/files/atoms/files/2020_pa_amendment.pdf

To obtain Attachment 2, Status of Structures within Historic Districts, please email lori.manes@nasa.gov