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17 January 2014

Allen Elliott, SSFL Project Director
Marshall Space Flight Center
National Aeronautics and Space Administration
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Huntsville, AL 35812
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**RE: Comments on the Draft Programmatic Agreement Among NASA, the CSHPO,
and the Advisory Council on Historic Preservation**

Dear Mr. Elliot,

On behalf of the Resource Conservation District of the Santa Monica Mountains (RCDSMM), thank you for the opportunity to submit comments on the Draft Programmatic Agreement for the NASA-administered portion of the SSFL. The RCDSMM is a non-regulatory, locally-led Special District of the State of California that fosters the conservation and enhancement of local natural resources through research, watershed and community-based planning, education and on-the-ground restoration, demonstration, landscape-infrastructure and architectural design projects.

As a non-regulatory reviewing and resource agency in the Santa Monica Mountains, as well as portions of the Simi Hills, including the subject property and the Bell Canyon and Chatsworth Reservoir areas, the RCDSMM is actively involved in monitoring resources and local restoration efforts in the area. We prepared the 2011 *Upper Bell Creek Subwatershed Plan* for the Bell Creek Headwaters Council of Bell Canyon, the majority of which subwatershed is SSFL land. Since completion of that plan, RCD staff have continued study of the SSFL property, watersheds, and adjacent lands, including two semesters of upper level undergraduate and graduate studies of potential post-cleanup uses and interpretive design approaches. The RCDSMM is has been please to serve as a Consulting Pary to the Section 106 process for the subject property and appreciates the opportunity to comment here.

We provide the following comments and considerations relative to the Draft PA:

Summary

We request a revision of the Draft PA that defers Demolition of at least the easternmost Coca Test Stand until 2016. The Coca Test Stands are the most

architecturally and historically important modern-era historic artifacts remaining on the site.

From the onset of the Section 106 process, NASA, proposed demolition of the Coca Test Stands, and despite many hours of meeting in which a strong majority of consulting parties expressing the importance retaining of these structures, the administration has maintained this position, now selectively citing comments that extrapolate significantly on the minimal actual commentary that supported NASA's initial position. Once again, we request that NASA reconsider this position, which is not a "compromise" as the cover letter to the draft suggests, but a complete, unwarranted and unmitigated removal of the site's most extraordinary modern artifacts. We note that the Bravo complex and one of the Alfa stands were also proposed by NASA for demolition at the inception of the Section 106 process. If those lesser architectural components merit deferral until 2016, then so should Coca.

Of the remaining test structures, the Coca Stands are the largest, and most completely and dramatically integrated into the landscape. No signage is needed to explain that the Coca structures were built to anchor hundreds of thousands of pounds of thrust to the earth; it is palpable to all of those fortunate enough to have visited the site. In addition, Coca is the only Test Stand that can be viewed from a significant vantage point along Skyline Drive, allowing interpretation without actual contact, and so provides redress to concerns regarding proximity to archeological sites. Architectural significance cannot be reduced to quantitative measurement or some estimate of historic period equivalence. Alfa and Bravo do not equal Coca, not in emotive power and certainly not as "mitigation". Nor does a film- however digitally advanced- mitigate the destruction of such a monument. While Alfa and the Bravo complex elements played a significant historic role in rocket engine development, neither can claim the architectural significance or raw power of Coca, which should be retained and its maintenance endowed as mitigation.

Adequate justification has not been provided in the Draft PA for the rush to demolish this bedrock-anchored monument. Taken in order provided, the Draft PA asserts:

"SYBCI and other State-Listed Tribes have requested that the Coca Test Stands and associated structures be removed..."

We do not recall "other State-Listed Tribes" stating their opposition, and request that we be directed to such comments in the notes of the meetings or subsequent public comment. Nevertheless, attending the last of the Section 106 meetings via teleconference, the SYBCI representative was asked directly if he "felt there was no scenario in which Coca could remain". We recall that he replied that it was not impossible that it could remain, while restating the difficulty due to proximity to significant cultural sites.

"... due to their proximity to important Native American sites"

This is a straw man argument, and it is false to assume that this is an either-or scenario. Nobody would seriously propose that the Burro Flats Site be immediately demolished due to its proximity to the Coca Test Stands, yet the same logic is being proposed as a suitable reason for immediate demolition of another irreplaceable historic artifact. Both artifacts are of incomparable historic value, and moreover, the location of both of these heaven-reaching support structures on the same site is unprecedented in the world. **Both should be retained, of course, not merely for the individual significance of each but also for the mere fact of their proximity, which is an historic and interpretive asset rather than a liability.** The existence of other “retained” stands at Stennis mentioned in the Draft PA cannot be seen as compensation for the destruction of this uncanny correspondence of stellar technology- separated by centuries of time but only hundreds of yard of distance.

However, if the straw man argument is to be entertained, it should be noted that if measured on a radius from the center of the most significant archeological site, the “Burro Flats Site”, that the westernmost edge of the Bravo Complex is not significantly further from the Site than the easternmost Coca stand. And, if visitor access is managed in future use scenario to extend no further south than the Skyline Drive, then a significant distance as well as extreme terrain will provide exceptional buffer to the Site, while retaining one of the most dramatic views of the Coca Test Stand:



Coca Complex from Skyline, with the easternmost Stand on the Left

The Draft PA continues:

“... and NASA’s cost studies have determined it is impractical to retain the Coca Test Stands due to their size and significant contamination.”

We submit that NASA’s overall project cost studies are both incomplete and insufficiently defined, and the end use of the land- and its ultimate steward- too uncertain to determine that Coca is impractical to retain. The vast majority of the proposed cleanup action will be driven by the proximity, quantity, and quality of the replacement soil available, and for which no suitable site has been yet identified, so the relative cost of the Coca retained, or demolished is far from the leading determinant of the project “practicality”. All of the sites are contaminated. But again, if cost and contamination are indeed the significant factors, than we propose the demolition of Bravo complex elements, and all but one stand and control structure at Alfa, rather than demolishing the eastern Coca Test Stand. Mitigation for the destruction of these other eligible structures should be mitigated with not only with the proposed stories, drawings and movies, but with money- an endowment commensurate with the value of the demolished eligible structures in order to provide a funding source for their future public interpretation and maintenance.

In closing, we offer a repeat of comments provided in related comment letters over the past few years:

In our letter of comment at the Feasibility stage of the National Park Service Rim of the Valley study, the RCDSMM noted that:

“As fellow providers of interpretive design and environmental education, the RCDSMM urges NPS to work internally or with the current SSFL landowners to ... conserve the exceptional cultural resources that exist on the SSFL site. These artifacts include not only those of indigenous origin, but also ... modern-era architectural elements such as **the Coca Test Stands remaining on site that are among the most significant remaining historic structures related to the American Space Program....** The connecting link across the centuries between the paleo-astronomical and modern-era exploration of the heavens is an overlay of unprecedented interpretive significance, and an educational resource worthy of conservation within the context of appropriate remediation....”

And from our comments on the DEIS:

“The destruction proposed by the [Draft PA] would forever sever this nationally significant connection between the highest aspirations and technological feats of two historic cultures, and create impacts for which no mitigation may be possible, but certainly for which no adequate mitigation has been proposed in this document.”

“The co-location of ethno-astronomical technology with modern-era technology created in order to explore the heavens presents an extraordinary inspirational value and interpretive opportunity.... We suggest that demolition of most of these historically significant structures can not be mitigated by retaining only one of them. **We ...**

propose that the remaining Coca... structures have the greatest potential for interpretive, educational, and inspirational value at the site.... We suggest that appropriate mitigation for the historically significant structures that are to be demolished not only be 3-dimensional documentation of their pre-destructed state, but also an endowment for the maintenance and interpretation of all of the “structures” both indigenous and modern and the absolutely unique co-location at Hi'im (mystery valley), also known as SSFL.”

And, finally:

“... the removal of up to 100% of the modern era historic structures and protection of only the “artifacts” found within a destroyed context- even that of the Burro Flats Cave site- will limit not only the not only the number, but the type of recipients who will take interest in assuming ownership.... Public open space managers with stressed budgets and very clear missions may be hard-pressed to justify obtaining a 451-acre property with 100 acres of un-restored excavation area, a weed, erosion, and surface water management problem, **stripped of all cultural resource and interpretive value**, with only fragile artifacts remaining without context yet still in need of protection”

In conclusion, **we request that NASA revise the Draft PA to defer Demolition of at least the easternmost Coca Test Stand until 2016.**

Thank you for the opportunity to comment, and for the NASA staff's sincere public engagement efforts and exceptional availability up to this point in the process. If you have any questions about this letter please feel free to contact me at the 818-587-8627, ext. 105.

Respectfully submitted,



Clark Stevens, Architect
Executive Officer