DATE: August 29, 2020

FROM: Santa Ynez Band of Chumash Indians

RE: Nomination of Burro Flats Cultural District to National Register of Historic Places

Request: Support Nomination of Burro Flats to National Register of Historic Places

We respectfully request your support of the nomination of the Burro Flats Cultural District ("BFCD") to the National Register of Historic Places ("NRHP") as a Traditional Cultural Property ("TCP"), in order to ensure a large number of significant Native American cultural sites are protected.

On August 14, 2020, the California State Historical Resources Commission voted unanimously to support listing of the BFCD. The California State Historical Preservation Officer ("SHPO") has signed the nomination as a cocertifying official, and NASA submitted it to the National Park Service for listing on the NRHP on September 2, 2020.

Burro Flats Cultural District Background

Located within the Santa Susana Field Laboratory ("SSFL") in Southern California, BFCD has been used by Native Americans for at least 7,000 years. Native Americans with ties to the site include the federally recognized Santa Ynez Band of Chumash Indians and several regional Native American groups.

NASA surveyed the entire SSFL pursuant to Section 106 of the National Historic Preservation Act, identifying 118 cultural sites and one cultural object. Among the sites is the Burro Flats Painted Cave, perhaps the best-preserved Native American pictographs west of the Mississippi. The paintings inside the cave align with the Winter Solstice, while the Bedrock Mortar Cupules on the exterior align with the Summer Solstice; both dates are significant in the religion of regional Native Americans. As part of this process, NASA also conducted an ethnographic study, which demonstrated historic and current use by the indigenous peoples of the area.

In modern times, SSFL is better known as an aerospace research site. The property is jointly managed by NASA, the Department of Energy, and The Boeing Company. Thanks to the sensitive nature of the work that was done on the property, and the current contamination, SSFL has been closed to the general public for more than a generation; this has resulted in the BFCD being uniquely preserved.

Impact of Listing as TCP

A Traditional Cultural Site is eligible for listing on the National Register if there is documented historic use and significance by Native Americans that continues to the present day; the studies conducted by NASA, along with the wide array of cultural sites present at BFCD, amply meet this requirement. While these cultural sites are currently protected from development, concern exists that cleanup efforts and post-cleanup development could cause unforeseen negative impacts.

Listing BFCD as a TCP will protect these significant cultural sites by requiring that regional Native Americans with connections to the site are consulted during the cleanup efforts. While listing will protect the site, it will not hamper cleanup: both DOE and NASA have conducted similarly sized remediation efforts while protecting significant historical properties at the Manhattan Project National Historic Park and Hangar One at Ames Research Center, California.