

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES
EVALUATION/RETURN SHEET

Requested Action:

Property Name:

Multiple Name:

State & County:

Date Received: 9/2/2020 Date of Pending List: 9/17/2020 Date of 16th Day: 10/2/2020 Date of 45th Day: 10/19/2020 Date of Weekly List:

Reference number:

Nominator:

Reason For Review:

- | | | |
|---------------------------------------|--|--|
| <input type="checkbox"/> Appeal | <input type="checkbox"/> PDIL | <input type="checkbox"/> Text/Data Issue |
| <input type="checkbox"/> SHPO Request | <input type="checkbox"/> Landscape | <input type="checkbox"/> Photo |
| <input type="checkbox"/> Waiver | <input type="checkbox"/> National | <input checked="" type="checkbox"/> Map/Boundary |
| <input type="checkbox"/> Resubmission | <input type="checkbox"/> Mobile Resource | <input type="checkbox"/> Period |
| <input type="checkbox"/> Other | <input type="checkbox"/> TCP | <input type="checkbox"/> Less than 50 years |
| | <input type="checkbox"/> CLG | |

Accept Return Reject 10/19/2020 Date

Abstract/Summary
Comments:

Return
See Attached Comments

Recommendation/
Criteria RETURN

Reviewer Paul Lusignan Discipline Historian

Telephone (202)354-2229 Date 10/19/2020

DOCUMENTATION: see attached comments : **Yes** see attached SLR : No

If a nomination is returned to the nomination authority, the nomination is no longer under consideration by the National Park Service.

BURRO FLATS CULTURAL DISTRICT

Ventura County, CA

National Register of Historic Places Return Comments

The National Park Service has completed its review of the National Register of Historic Places nomination for the Burro Flats Cultural District submitted as a concurrent nomination by the California State Historic Preservation Officer and the National Aeronautics and Space Administration (NASA) Federal Preservation Officer. The current nomination is being returned for technical revision. The documentation as written appears to identify an eligible historic district reflecting a significant traditional cultural landscape directly associated with several southern California tribes. Before final consideration, however, the nomination needs to address several technical deficiencies.

Description

The documentation, while addressing the significant cultural resources extant within the boundaries of the area, fails to adequately address the full character of the current physical environment. Most obviously, nowhere in the nomination and its integrity discussion, in particular, is there consideration, discussion, and assessment of the acknowledged contamination of the Santa Susanna Field Laboratory (SSFL). While not necessarily visible on the landscape, the contamination may nevertheless have a direct impact on the integrity of the historic district and its existence cannot be arbitrarily omitted from the discussion. A detailed discussion of the exact makeup of the contamination and its constituent components may not be required, but omission of any mention in the narrative given the high profile of the project area seems inappropriate. The omission of any discussion of the extant contamination renders the discussion of the historic integrity of the site incomplete.

Use of the term cultural materials is preferred and is more appropriate than the use of the term “artifacts” when discussing the contributing resources of the nomination. This distinction is further supported by the fact the district is not nominated under Criterion D, where one might expect to see discussion of archeology and artifacts.

The current discussion of the integrity of the areas within the proposed district boundaries needs to be expanded with a more complete discussion of the impacts of the 80-year development of the area by the SSFL. While we acknowledge that the evaluation of integrity for traditional cultural properties is significantly informed by the perspective of the traditional communities that ascribe value to the area, this does not mean that the nomination should dismiss a complete and thorough discussion of the physical condition and integrity of the property. The current integrity discussion in its use of phrasing such as “keeping the area in a state similar to when the consultants’ ancestors used and occupied the area” appears to understate the physical changes to the landscape as a result of the development of the site by the SSFL. The integrity discussion

should address the true scale of the type of development and use of the area by the SSFL as well as the likely loss of potential cultural resources from the construction of the over 58 substantial non-contributing resources, including road and site grading efforts and other land uses, e.g., dumps. Figure 3B, for example, showing the location of the recorded non-contributing resources as isolated points does not fully account for the level of apparent disturbance to the natural, historic landscape by the development of the necessary industrial infrastructure. This would also involve a more direct discussion of the contamination aspects of the landscape. It may well be the case that even given the extent of the modern ground disturbance activities associated with the operation of SSFL, large areas of pristine landscape and important cultural resources remain to convey the traditional cultural significance of the area, but the integrity discussion needs to be clear, direct and comprehensive. It is important that a revision include assessments of the impact of these intrusive elements when considering the particular character of the contributing resources. Does the assessment of integrity differ among the various contributing resource types, e.g., lithic scatters, caves and rockshelters, rock art, and ceremonial areas?

A significant part of the current integrity discussion focuses on the condition of the individually listed Burro Flats Painted Cave, clearly the prime cultural loci, but the integrity of the remaining areas of the nominated district are less well articulated.

Boundary

The current verbal boundary description and boundary justification need to be augmented with a more direct discussion of the basis for their selection. Modern ownership parcels are not always the most appropriate criteria for boundary selection, particularly in the case of traditional cultural places. In cases where such boundaries appear arbitrary, a much more robust boundary discussion is merited. The case presented for the Burro Flats Cultural District is largely based on the extent of known cultural resources currently identified by recent and historic studies and the provision that SSFL management of the area has preserved the historic conditions of the landscape whereas areas outside the boundaries have observed more significant development. This characterization of the boundaries and the immediate areas surrounding the nomination property seem questionable.

If the basis for the proposed boundaries is the extent of the area recently subjected to intensive survey and the location of currently known contributing resources that should be so noted, including how that fully coincides with the legal bounds. Are there additional topographical or physiological elements involved in the boundary selection? If the bounds of the traditional cultural property might be expanded to include areas outside of the current boundaries based on similar landforms, additionally identified resources or cultural associations, that should also be noted along with a justification for the exclusion of these areas from the current district. Much of the background information provided in the nomination discusses a broader area of cultural association with the regional tribal communities. It may be acceptable for a nominated property to include only the “known” portion of what might be a potentially expanded (but as yet unknown, or undocumented) area, but such considerations should be clearly outlined in the nomination’s boundary discussion.

While the inclusion of individual site inventory or evaluation forms for the contributing resources is not a requirement of the nomination, their inclusion might assist in the justification of the identified boundaries or definition of alternative boundaries, particularly where the forms might provide information on the unique character of the contributing resources and their support of appropriate boundaries. Such considerations can be particularly important when evaluating future management alternatives for the nominated property and its surrounding area.

Reconsideration of the nomination upon completion of revisions addressing the noted technical concerns will be welcomed by the National Park Service.

If there are any questions regarding these comments, please contact our office.

A handwritten signature in black ink, appearing to read "PLusignan", with a long horizontal line extending to the right. To the right of the signature, the date "10/19/2020" is handwritten.

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National Register of Historic Places
National Park Service

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