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Subject: ACME Comments for SSFL NASA DEIS
Date: Tuesday, October 01, 2013 1:27:47 PM
Attachments: [ACME to NASA Draft EIS October 1 of 2013.pdf](#)

Hello,

Please confirm that the attached comments on the NASA DEIS will be entered into the record.

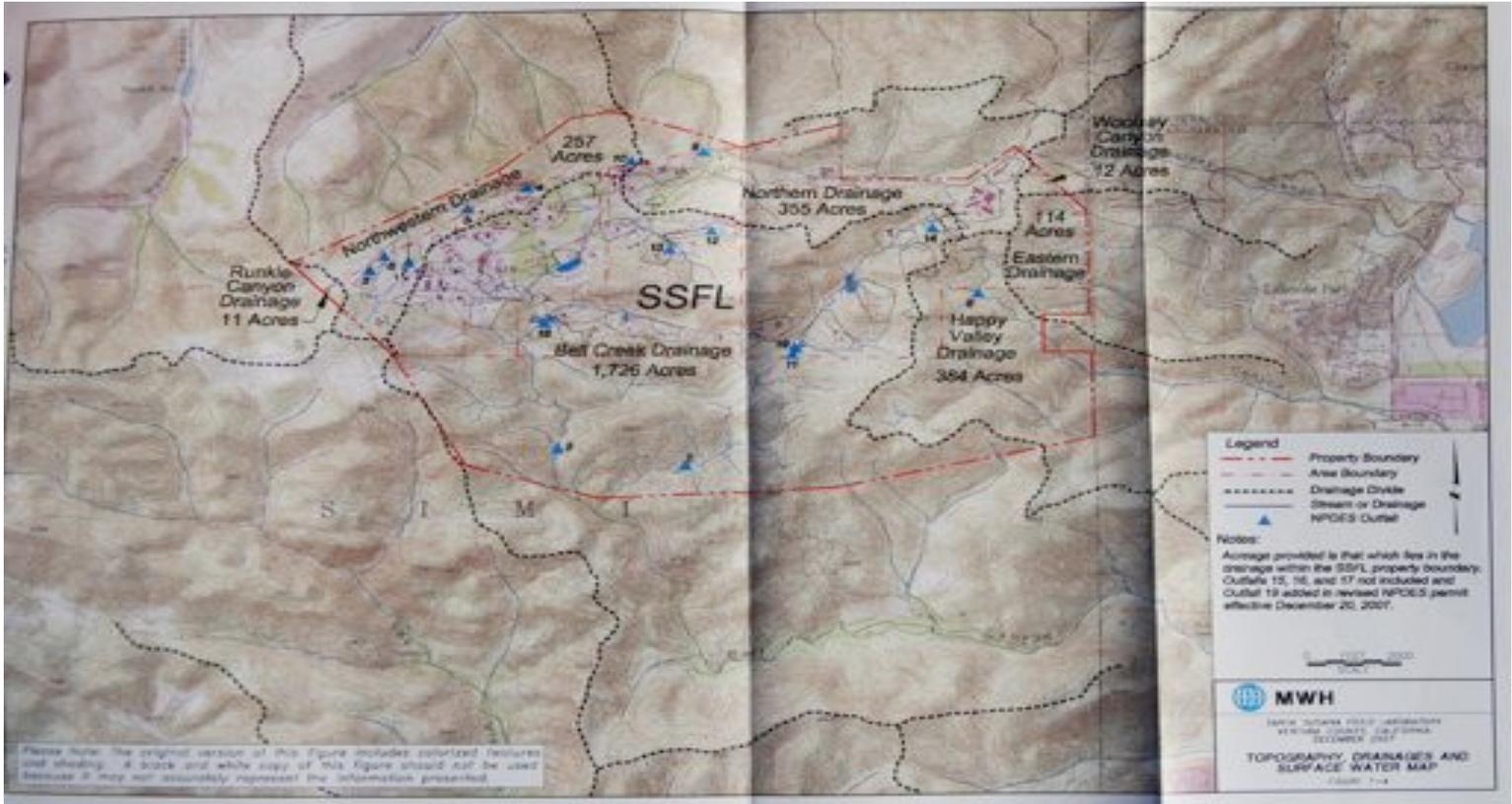
Thank you in advance for your time.

William Preston Bowling
Founder ACME
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10/1/2013



To: Allen Elliott, SSFL Program Director National Aeronautics and Space Administration (NASA)
Comments on the DRAFT Environmental Impact Statement (DEIS) for the NASA portions of the SSFL



Dear Mr Elliott,

The Draft Environmental Impact Statement (DEIS) for the Santa Susana Field Laboratory (SSFL) raises questions as to whether some within NASA are trying to break out of the 2010 Administrative Order on Consent (AOC)...

http://ssfl.msfc.nasa.gov/documents/governance/NASA_DTSC_Final_AOC_Dec_2010.pdf

...between the National Aeronautics and Space Administration (NASA) and the State Department of Toxic Substances Control (DTSC), which requires the cleanup of all the contamination (i.e., to background). It is a legally binding agreement. NASA or the General Services Agency (GSA) cannot even consider the SSFL land for any type of transfer until the cleanup is complete. This agreement was many years in the making and it states... 1.7.2. "Cleanup to Background Levels" means removal of soils contaminated above local background levels. The NASA property in question is the True Headwaters of the Los Angeles River (Above Map). It would be irresponsible to limit any cleanup of the headwaters as there are many plans for the public to engage the river including the recent United States Army Corps of Engineers (USACE) ARBOR Study that is currently up for public comment.

The Los Angeles Water Quality Control Board (RWQCB) have fined the responsible parties of the Santa Susana Field Laboratory (SSFL) hundreds of times for their polluting the Los Angeles River via their NPDES permit and will continue to do so, if the SSFL is not properly cleaned up. The Below photos shows the RWQCB at the NASA R2 drainage into Bell Creek/Los Angeles River Headwaters.



NASA, and prior operator United States Air Force (Plant #57) badly contaminated its part of the Santa Susana Field Laboratory with very toxic materials, some migrated off the property to neighboring areas. Studies have shown elevated cancer rates, both for people exposed on the site and for members of the public living nearby. NASA must live up to the AOC for the health and safety of the surrounding communities.



The above photo illustrates how the blackened hillside was washed down with toxins into unlined earthen ponds that impacted the groundwater as well. The ALFA test stands (shown above) are at the headwaters of the Los Angeles River and without a cleanup to background these areas will continue to impact the Los Angeles River and Beyond during rain events.

The AOC requires all contamination to be removed, but the EIS considers leaving in place old rocket test stands, trying to call them historical. The problem is that that is where much of the contamination is located, in the soil beneath the stands. NASA can't clean up the soil without getting those rusty structures out of the way. There is no discussion of how NASA could possibly clean up the contamination beneath the rocket test stands without getting them out of the way. Any such consideration should be removed from the EIS. Similarly, the AOC already provides protections for recognized Native American artifacts. For example, if the Burro Flats cave paintings could be impacted at all by the cleanup, which seems hard to believe, the AOC provides an exception to the cleanup to background requirement for soil immediately nearby. But the EIS goes way beyond the AOC provisions and seems to raise the possibility of just declaring all of the contaminated soil throughout the 2850 acres of the site sacred and then not comply with the AOC cleanup requirements all. This is unacceptable and would completely violate the agreement.

NASA uses the truck traffic "Scare Tactic" that would be needed supposedly to remove the contamination for disposal at toxic waste disposal facilities. There have been thousands of trucks per year since the opening of the SSFL, even to carry spent radioactive fuel into the SSFL for reprocessing and/or disposal. If one looks carefully at the numbers, it is really pretty trivial—a few trucks per hour. How much truck traffic was there when the facility was fully operating? How many car trips for workers? The DEIS shows a lot of exaggeration and double-counting about the trucks. For example, it counts both trucks taking contaminated soil or building debris, and adds to that trucks that might haul in clean fill. But there is no evidence NASA will need to bring in any fill, rather than simply regrade and use soil from the site. But if NASA needs any from offsite, the trucks going up to the site to haul away contaminated soil can haul up clean fill.



This property could be an example on how things are done right with a source removal of contamination to background levels and will leave a more positive legacy than pretending health risks do not exist. The EIS hypes secondary issues like trucks and is almost entirely silent about the environmental damage from the years of sloppy practices that led to widespread contamination, and the continuing environmental damage that would occur were NASA to breach its commitment to the AOC's requirement for full cleanup.

The Community looks forward to Ensure a Proper Cleanup of the Santa Susana Field Laboratory, it's Related Facilities and their Surrounding Communities. NASA should comply fully, without any more resistance, to the AOC in its entirety and, as promised, clean the contamination up to background.

Sincerely,

William Preston Bowling
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