

**From:** [Sharon Ford](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Subject:** Comments on Draft EIS  
**Date:** Monday, September 30, 2013 5:39:55 PM  
**Attachments:** [14 Sep 2013-Sharon's comments on NASA DEIS draft 1.doc](#)  
[14 Sep 2013-Sharon's comments on NASA DEIS draft 1.odt](#)  
[14 Sep 2013-Sharon's comments on NASA DEIS draft 1.pdf](#)

---

Dear Mr. Elliott,

Attached are different formats of my comments related to the DEIS describing the proposed actions.

Sharon Lee Ford  
sharon\_ford1@att.net  
818-780-5816

**30 September 2013**

**Allen Elliot, SFL Projector  
NASA MSFC ASO1, Bldg. 4494  
Huntsville, AL 35812**

**SUBJECT: COMMENTS ON DRAFT EIS FOR PROPOSED DEMOLITION  
AND ENVIRONMENTAL CLEANUP ACTIVITIES AT SANTA SUSANA FIELD  
LABORATORY, VENTURA COUNTY, CALIFORNIA, JULY 2013**

**Dear Sir:**

**Thank you for the opportunity to comment on the NASA Draft DEIS document. I have very deep concerns about the document, due to the politics involved by state and federal legislators, the federal court, and a monied, public interest group. Decisions, accusations, threats and a lawsuit have been made, without any consideration of the consequences to the site, the environment and the surrounding communities in two different counties.**

**The Santa Susana Field Laboratory (SSFL) is located within Ventura County, however, it is the public and communities of Los Angeles County that will suffer the greatest consequences. The SSFL site is only accessible via the gate on Woolsey Canyon Road, located within the boundaries of Los Angeles County. Although NASA, Department of Energy (DOE) and Boeing, the largest landowner of the SSFL site, appear to be working together, internally, with the Department of Toxic Substances Control (DTSC), and the public, in reality, it appears that each are doing, or have proposed their own method of cleanup, without DTSC oversight. For example, Boeing was granted permission by the authorities in Ventura County for the demolition of their structures. . Where is the DTSC? Now, NASA has released their DEIS for the proposed cleanup of NASA owned land, and it is very limited and extremely destructive. The Draft DEIS is incomplete, inadequate and flawed.**

**Department of Energy (DOE) also owns acreage involved in the cleanup, and, is subject to the same NEPA laws/regulations as NASA. Segmentation of two federal agencies and two AOCs, leads to a piecemeal analysis of an environmental document. This does not provide a true or full picture of the amount of soil to be excavated, number of buildings to be demolished, number of truckloads hauling soil to and from the SSFL site, damage or**

total destruction to cultural and architectural sites, or identified, remedial soil and water implementation plans. Each agency should not have its own DEIS; there should be *one* document governing both. The DEIS is incomplete, without necessary information, yet to be provided in the not yet written/released DEIS by DTSC.

■ Providing only two, extreme alternatives, clean-up to background or no cleanup, is unacceptable and inadequate, and the consequences devastating. It is not clear, in the DEIS, which clean-up to background standard has been considered: industrial, agricultural, residential, or recreational. Alternatives for residential or recreational use *must* be considered for the land to become parkland.

A health risk assessment *must* be considered over *any* level of cleanup to background. This is the most important issue of concern, to the people in the communities surrounding the SSFL site. Cleanup to background, does not imply health risks. It is quite possible, and likely, for some cleanup to background levels, to be higher than health risk levels set by the EPA. There is no doubt, by anyone, that some soil removal is necessary, but, if the AOC was modified to a health risk assessment, the amount of soil to be excavated would be greatly decreased, lowering the actual health risks to the public.

■ The DEIS is flawed because the level of cleanup is not balanced against costs, cultural impacts and environmental impacts required by NEPA and CEQA. This is a clear case of putting “the cart before the horse.” Cleanup to background would devastate the natural ecosystem, sensitive habitat, sacred Native American cultural sites, and the historic rocket test stands. It makes no sense to allow for demolition and soil removal, then have CEQA and DTSC step in to evaluate the environmental and health risks. It would be too late.

■ The AOC driving the project was based on a California legislative bill, SB990 (Kuehl2007), which was later struck down by a Federal District Court decision. The AOC goes *beyond* EPA recommended requirements for human health and safety, however, intervention by politicians and a monied activist group have forced NASA into the “all or nothing” position, without weighing any of the consequences.

The AOC needs modifications that are implementable, that are not time constrained, that address the concerns and needs of the surrounding public, and protect the environment and habitat. This includes use of

**existing and future alternative technologies, to minimize damage to the environment. A “no way or the highway” plan is unacceptable.**

**It is extremely doubtful that cleanup can be accomplished by 2017. It is an artificial date, not based on science, but set by “emergency” type pressures, to create environmental decision documents, prior to completion of studies or input from the California Department of Toxic Substances (DTSC). Due to the size and complexity of the project, no technologies should be ignored or dismissed. Studies on new technologies are currently being conducted at local universities.**

**■ Excavation and transportation of contaminated soil is a major public concern. The DEIS does not address how, or if, replacement soil will be obtained. Nor, does it address the environmental consequences of soils foreign to the SSFL site. Soils foreign to the site, can pose a threat to the current ecological biodiversity. Non-native plant species can have a significant impact on the wildlife food chain.**

**Many non-native plant species are invasive and a major threat to native vegetation. Also, non-natives are hazardous fuel for wildfires, and do not provide protection from soil erosion.**

**At great expense and time, members of environmental societies and the public volunteer in removal of non-native plants, in the Santa Monica Mountains. There is great concern that seeds from non-native plants, as a result foreign soil at the SSFL site, can easily be distributed by wind, and transferred by animal fur and clothing/shoes of humans.**

**The proposed amount of soil to be excavated poses great health and safety concerns due to air and water pollution. Dust, created by soil excavation, poses a great health risk for children, the elderly, and those with respiratory issues. Disturbance of such a large amount of soil, exposes the public to potential risks from deadly diseases, such as Valley Fever and Avian Flu.**

**Fuel emissions from the trucks not only pose a health risk, but the estimated number of truckloads (80,000) hauling soil, to and from the SSFL site, poses safety risks, traffic congestion, and accidents. Approximately 3-4 schools are located within the proposed routes of the trucks. Although, the proposed schedule is for trucks to be**

restricted, during hours when children are going to and from school, life happens, and all the public, pedestrians and in vehicles, will be subject to issues of safety during the cleanup operational hours.

Extreme damage will be done to Los Angeles County surface streets, state and federal highways, and freeways. The DEIS does not address who will pay for this damage and if there will be any mitigation.

■ Environmental issues are of great concern to the public. The proposed amount of soil to be excavated will leave the remaining soil unstable and highly subject to erosion by wind and rain. Erosion can and will have profound affects, on the environment, due to pollution of surface water, particularly in watershed drainage areas.

The proposed removal of such a tremendous amount of soil will also remove biota, rendering the remaining soil sterile, and unsuitable for habitat. This plan includes removal of all vegetation, including endangered plant species and very old oak trees. The AOC needs to be modified to allow for other and newer technologies.

■ Environmental issues regarding habitat protection of flora (previously addressed above) and fauna on the SSFL site is lacking in the AOC. The SSFL site is an important habitat area for resident and migratory birds and mammals, including deer, bobcats, and a mountain lion and offspring. The site is a critical wildlife corridor that links the Santa Monica Mountains, Simi Hills, Santa Susana Mountains, Los Padres Forest, San Gabriel Mountains, and Angeles National Forest.

To insure healthy wildlife, particularly herd animals, corridors are essential to reduce in-breeding, and to allow for migration, particularly in time of drought and climate warming, The fact that the wildlife corridor is not clearly defined in the DEIS is a major flaw.

■ Lack of protection of archaeological and historical resources, from damage or destruction, is as egregious as the lack of a health risk assessment in the DEIS. The DEIS is incomplete because it does not specify expected outcomes for cultural resources, both archeological and architectural.

**Protection needs must be established for archaeological sites, such as the Burro Flats site VEN-1072 and any other archaeological sites on the property. Non-excavation methods and technologies should be exhausted before performing actions that could permanently damage cultural sites.**

**Protection needs to be established before cleanup for historical, architectural structures, such as the Alpha, Bravo, and Coca rocket test stands and their related structures, eligible for protection as historic structures and districts. The AOC refers to removal of structures on soil. The test stands are built on bedrock, so their removal is not necessary or warranted.**

**Removal or destruction/damage to archaeological and historical resources will significantly decrease the interest in the property by state and federal park agencies.**

**The DEIS, as written, is unsatisfactory, and needs to be rewritten to include a health risk based cleanup. The AOC must be modified to allow for other technologies to be implemented.**

**Thank you, again, for the opportunity to comment on the NASA Draft DEIS.**

**Sincerely,**

**Sharon Lee Ford  
13028 Aetna St  
Valley Glen, CA 91401  
818-780-5816  
sharon\_ford1@att.net**