

**From:** [Scott Silverstein](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Cc:** [Dennis DiBiase](#); [Joyce Fletcher](#); [g.murley@whcouncil.org](mailto:g.murley@whcouncil.org)  
**Subject:** Comments regarding DEIS for Santa Susanna Field Lab clean-up.  
**Date:** Tuesday, October 01, 2013 1:03:31 PM  
**Attachments:** [WHWCNC NASA cleanup letter 9 30 13.pdf](#)

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Mr. Elliott

On behalf of the Woodland Hills-Warner Center Neighborhood Council and its Stakeholders, attached, please find our comments regarding the aforementioned DEIS.

We look forward to a favorable response.

Thank you,

Scott Silverstein, Chair  
Woodland Hills Warner Center Neighborhood Council



September 30, 2013

Mr. Allen Elliott, Program Director  
 NASA MSFC AS01, Building 4494  
 Huntsville, AL 35812

**RE: NASA Draft Environmental Impact Statement**

Dear Mr. Elliott,

The Woodland Hills Warner Center Neighborhood Council submits the following comments concerning the NASA Draft Environmental Impact Statement (DEIS).

In accordance with the Los Angeles City Charter, the Woodland Hills-Warner Center Neighborhood Council (WHWCNC) is an advisory body consisting of 22 individuals that have been elected by the nearly 70,000 stakeholders of Woodland Hills to protect their interests and bring the local elected officials closer to the community.

The Woodland Hills–Warner Center Neighborhood Council was not directly notified of the potential impact of the truck traffic and toxic material exposure to our community as related to the cleanup of NASA’s portion of the Santa Susana Field Laboratory.

We strongly request the public comment period to be extended from October 1<sup>st</sup> for an additional 30 days for our committees to address the Draft Environmental Impact Statement (DEIS). We request that NASA develop a new DEIS to show all options as listed in your summary Table 2.4–1. We need NASA to show all options – not just a cleanup to “background levels” or a “No Further Action”. A compromise on the Administrative Order on Consent is necessary due to the impact of the truck traffic and the potential of toxic materials being disbursed into our communities.

As stated above, there are two primary concerns that we have with the DEIS.

First, we are very concerned with the potential toxic and/or carcinogenic materials that our stakeholders may be exposed to. In Table 2.4-2, the types of waste and their percentages are defined as to where they are being shipped. The DEIS needs to clearly state how this hazardous waste will be encapsulated during shipping and what clean-up measures will be taken to mitigate any potential toxic residue that may be dispersed from the truck, its tires, or undercarriage. Additionally, it must contain what specific hazardous material cleanup program will be employed in the event of an accident on route. It is unreasonable and, in our opinion, unethical for this generation to potentially put our youngsters at unnecessary risk for long term or potentially lethal health issues.

Second, we are concerned about the increased heavy truck traffic through our area, much of it in residential districts and near schools. The WHWCNC was charged with reviewing this document on September 19<sup>th</sup>, 2013, and only then we became aware that 60% of the truck traffic from NASA’s portion of the cleanup, as stated in your own findings, would go south through Woodland Hills.

**WOODLAND HILLS - WARNER CENTER NEIGHBORHOOD COUNCIL**

20929 Ventura Boulevard Suite 47-535, Woodland Hills, CA 91364

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Mr. Allen Elliott  
September 30, 2013

Through our investigation we know that the information relating to this proposed route was not presented at the NASA DEIS Public Forums on August 27<sup>th</sup>, 2013 and August 28, 2013. At no previous meetings, that we are aware of, was the route for the trucks from Santa Susana Field Laboratory to go south on Topanga Canyon Boulevard through Woodland Hills along with the adjacent communities of West Hills and Canoga Park.

In the NASA assessment of schools, NASA was negligent in conducting a thorough investigation of all schools potentially impacted by the traffic. NASA's list of schools on Table 4.8-2 fails to list many Los Angeles Unified School District Schools sites which includes local schools, magnet schools, charter schools, and private schools, as well preschools and day care centers.

On or near the proposed NASA route south there are numerous schools including Canoga Park High, and the New Community Jewish High School in West Hills. Additionally, on the proposed route there are no less than three super-regional shopping malls including Westfield Topanga Plaza, Westfield "The Village" which is currently under construction, and the Westfield Promenade Mall. NASA has not considered the traffic that is currently generated in this area by the heavily attended Los Angeles Pierce College.

The NASA DEIS does not tell the Woodland Hills stakeholders the true impact of the cleanup of all of Santa Susana and how many additional trucks may go south on Topanga Canyon Boulevard from The Boeing Company and the Department of Energy sites. A full site Environmental Impact Report is necessary to weigh all of the impacts of the cleanup by all three responsible parties.

Furthermore, your DEIS only references repairs to Woolsey Canyon Road. The entire route in every direction should be surveyed for damage and ongoing maintenance should be paid for by the responsible parties.

In conclusion, as the DEIS is currently written, the Woodland Hills Warner Center Neighborhood Council strongly objects to the plan. It requires two or more years of daily and continuous heavy truck traffic, estimated to send over 140,000 truckloads through our communities. In our opinion, an EIR should have been required just for the enormous added volume of truck traffic. We also object to NASA's proposal for twelve operating hours per day. The hours of truck traffic needs to be limited to daytime hours only.

**We believe that the risks to public safety and the environment from the remediation activity proposed are greater than the risk of doing minimal or no cleanup.**

Please re-develop the DEIS and include the analysis of options that reduce heavy truck traffic through our neighborhood, infrastructure damage, and the potential disbursement of toxic waste and residue in our community.

Sincerely yours,

**Woodland Hills Warner Center Neighborhood Council**



Scott Silverstein, Chair

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Cc: Brad Sherman, United States Congressman, 30<sup>th</sup> District  
Fran Pavley, State Senator, California 27<sup>th</sup> State Senate District  
Eric Garcetti, Mayor, City of Los Angeles  
Bob Blumenfield, Councilman, Los Angeles City Council, District 3  
Mitchell Englander, Councilman, Los Angeles City Council, District 12  
Zev Yaroslavski, Supervisor, Los Angeles County Board of Supervisors, District 3  
John Deasy, Superintendent, Los Angeles Unified School District  
Tamar Galatzen, Board Member, Los Angeles Unified School District, 3<sup>rd</sup> Board District  
Dan Brin, President, West Hills Neighborhood Council  
Corinne Ho, President, Canoga Park Neighborhood Council  
Warren Fletcher, President, United Teachers Los Angeles