

**From:** [Moglen, Damon](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Subject:** Friends of the Earth Comments on NASA DEIS re SSFL  
**Date:** Monday, September 30, 2013 12:50:21 PM  
**Attachments:** [2355\\_001.pdf](#)  
**Importance:** High

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To Whom it May Concern, please accept the attached comments from Friends of the Earth to NASA draft EIS regarding the Santa Susana Field Laboratory. Thank you, Damon Moglen

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September 30, 2013

Re: Comment on Santa Susana Field Laboratory Cleanup Draft EIS

Dear Mr. Elliott:

Friends of the Earth (FOE) appreciates the opportunity to comment on the Draft Environmental Impact Statement for proposed demolition and environmental cleanup activities of the Santa Susana Field Laboratory (SSFL). FOE is a national, non-profit environmental organization with office's in Washington, DC and Berkeley, California and some 1,900 members across the state. We have worked on nuclear issues in California since the organization's founding in 1969. We are members of Friends of the Earth International, a global network representing more than two million activists in 74 different countries.

SSFL is one of the most contaminated sites in California. Decades of inadequate environmental practices by NASA resulted in widespread contamination of soil, groundwater and surface water, as well as significant airborne releases. Scores of toxic materials have been identified as released and needing remediation. These include such hazardous materials as TCE, PCBs, dioxins, perchlorate, and various heavy metals.

In 2010, NASA entered into a legally binding agreement --an Administrative Order on Consent (AOC) -- with the State of California to clean up all the contamination in the NASA part of SSFL to background levels. This EIS is supposed to examine ways of accomplishing the AOC's requirements and mitigating environmental impacts.

The Draft EIS, however, has us concerned that some within NASA may be working at cross purposes to the commitments made by NASA in the AOC—in particular, the EIS's significant focus on transports issues and relative silence on issues relating to existing environmental contamination and the environmental harm posed by failure to remediate the widespread pollution caused by NASA's activities facilities is puzzling and appears to provide a somewhat skewed analysis.

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Nonetheless, we were pleased to see NASA's commitment to carrying out fully the requirements of the AOC explicitly reiterated to the House Science and Technology Committee on September 20. Associate Administrator Richard Keegan testified there, "The Draft EIS is open for public comment until October 1 and we expect the final EIS in November and NASA is committed to fulfilling our obligations under the AOC. There is sufficient funding in our FY14 request to accomplish all the activities that are planned for FY14 leading to fulfilling our commitments under the AOC." Congresswoman Brownley, who represents the area and serves on the Committee, followed up, saying, "So, regardless then of what the IG may be recommending, your commitment is still to the agreement with the AOC?" And Associate Administrator Keegan responded, "We are committed to the agreement under the AOC."

FOE strongly urges NASA to live up to the requirements in the AOC in its entirety and to the commitments NASA has made to Congress and to the people who live near this badly polluted site. Full cleanup to background, as required in the AOC, should now proceed expeditiously.

Sincerely,



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