From:	Teena Takata
To:	MSFC-SSFL-EIS
Subject:	Comment Letter, DEIS for NASA Site at Ventura County, CA
Date:	Tuesday, October 01, 2013 11:45:30 AM
Attachments:	TT Nasa DEIS Comment Letter Final.pdf

Please find attached, my comment letter for the above-referenced DEIS.

October 1, 2013

Mr. Allen Elliott
SSFL Project Director
NASA MSFC AS0, Building 4494
Huntsville, AL 35812

Comments on the Draft Environmental Impact Statement for Demolition and Environmental Cleanup Activities for the NASA-administered portion of the Santa Susana Field Laboratory (SSFL), Ventura County, California, dated July 2013

I am one of the authors of the comment letter filed by the Santa Susana Mountain Park Association, and hereby adopt and incorporate all comments in that letter in this letter which represents more personal comments. I have not re-defined the various abbreviations used in the DEIS and

I wanted to speak regarding the cancer statistics. About four years ago, West Hills Neighborhood Council hosted a presentation by Dr. Mack, who maintains statistics related to cancer and other possible negative health affects that could result from contaminants at the SSFL. During his presentation, he commented there was NO statistically significant increase in the cancer statistics in nearby zip codes. In making this statement, he noted there was a tiny increase of perhaps 1 or 2 percent in a certain cancer. He immediately commented further, that the observed increase WAS NOT STATISTICALLY significant to one educated in statistics, and therefore the overall conclusion from a educated perception was that there was no measurable increase in cancer risks from the site.

Personally, my mother and my grandfather died from cancer. In neither case, does their death certificate indicate cancer was a proximate, or secondary cause of their death. I think if anybody within a community made an effort to interview residents and identify underlying causes of death, they would find a huge amount of cancer deaths, over the statistics reported for cancer deaths. And not to ignore this terrible disease, but it appears likely that usual standards of cleanup such as Suburban Residential or Recreational would be perfectly protective of human health, particularly if the end use of the property is for open space/recreational. So while I am sympathetic to losses that certain protesting residents have experienced, I do not believe the SSFL caused the problem from a statistical, or scientific point of view. And I believe the lesser cleanup standards of open space/-recreational use are adequately protective of health in the surrounding community.

Unfortunately, the extreme standards of cleanup to background, will have a much greater impact on residents of nearby communities than is needed for a adequate cleanup under the open space/recreational alternative. The DEIS is helpful for analysis in that it shows some of the severe, and in my opinion, totally unacceptable results of this cleanup.

Removal of 2/3 of the soil (after remediation/restoration)
Impacts to the Burro Flats Site
Inconsistencies in the basic description of the Burros Flats Site to the NRHP description
Removal (apparently, not clear) of the test stands and their associated structures.

During Groundwater University, participants were taught about "fractured rock", representing the bedrock at this site that is part of the Chatsworth Formation and is primarily sandstone. The scientists who specialized in soil and water, explained that the contaminants that were now-imbedded in the rock is left undisturbed, it really would not cause any problems. Results of testing contamination plumes were presented, and it was noted that the great majority of these contamination plumes are on the property, and are no longer spreading based on the stoppage of additional contamination by stopping chemical work on the property, and steps already taken to clean up the property.

Taking the above paragraph at face value – now remove all the soil that is contaminated in ANY way (beyond background). And then, replace that soil, only to the extent of 1/3 of the soil removed. Now the contaminants in the fractured rock are much more exposed and the reduced soil provides a much more significant water wash of the rocks when it rains. That then runs off to the community, which can be impacted by runoff which is not addressed in the DEIS.

One of the great characteristics of the SSFL is the undisturbed nature of the land that has not been used for buildings or industrial uses. The entire site should be viewed as a special area, and an example of how the Valley may have looked before it became grazing land, farmland, homes, and a suburb of Los Angeles. Removal of huge amounts of soil, and replacement with soil from outside the area, will bring an unknown amount of foreign plants to this area, which presently has few invasive plants.

Not addressed in the DEIS is where the replaced soil will come from. What additional plants will be introduced through seeds in those soils? The SSFL has multiple rare or endangered plants, such as Santa Susana Tarplant, Brauntons milk vetch, and many others. What steps will be taken to clean the soil, to monitor the incompatible plants that are introduced, and to remove invasive plants that may impact the site in a negative way. The expected cost of this type of monitoring and cleaning of inappropriately introduced plants should be disclosed, and the cost should be funded before the DEIS moves on to a remediation phase.

Not addressed in the DEIS is the effect on the community of diseases that may be introduced in the community by the removal of vegetation and the disturbance of soil, for possible Valley fever outbreaks and other diseases that may occur through air-borne dust.

Given our chaparral vegetation community, plants that are removed due to soil bearing a 1 or 5 percent too much of a tested chemical out of hundreds of chemicals tested…..it may take 10 years to regenerate the plant and to regenerate a root system under it to hold soil again. A tree of significant size such as an oak tree, in good climatic conditions, may take 200-300 years to regenerate. In too dry years, the young trees will die. HOW will the community be protected for the many years of reparation???? HOW will that be managed? How will dust from the soil be contained while the plant community is regenerated? Remember we have Santa Ana Winds each fall; control of fugitive dust over 105 disturbed acres (with all surface dirt removed and partially replaced) in high wind circumstances is a frightening responsibility – HOW can that be accomplished? But as the soil is disturbed, I believe NASA creates an obligation to protect the community for many years – but this is not discussed in any significant detail in the DEIS . The cost of this, and a detailed management

plan explaining how protection from dust due to wind during huge wind events, should all be disclosed. All the above are integral considerations associated with soil removal – and impacts from the dust, from general particulate air pollution to Valley Fever, can affect many more people in the surrounding community than leaving dirt onsite.

Meanwhile, the excessive cleanup impacts the surrounding community for truck emissions, traffic and goes by many schools.

I do not believe the benefit to the community for removal of contaminants to background levels, justifies the various pollution effects to our community and to the eventual dump site.

The Santa Susana Mountain Park Association letter speaks of the cultural resources. Impacts or destruction of cultural resources (Burro Flats site, NRHP eligible structures), BEFORE we have any CEQA analysis from DTSC that controls the decision under the AOC, is simply wrong! DTSC has been intimately involved in this project for many years. DTSC told the PPG (the public participation group that it ran) that met with them in 2009-2010 that CEQA WOULD BE CONSIDERED under the AOC's. The timeline shown by the NASA Inspector General report referred to in the Santa Susana Mountain Park Association letter, makes it clear that CEQA analysis now is scheduled to occur after a substantial amount of the actual clean up is already completed. It's unfortunate the timing of the CEQA analysis by DTSC is not as clearly shown in the DEIS. Both the timing of the CEQA analysis and the results of the CEQA analysis, that considers costs of various alternatives and benefits (alternatives such as clean up to residential standards or open space standards) should be considered. This should be incorporated in a re-issued DEIS.

I encourage NASA to re-issue the DEIS. Include costs compared to benefits. Show multiple alternatives based on usual cleanup standards (such as residential use, recreational use, as well as background, no alternative), for each impact item mentioned below.

- Include Multiple Alternatives consistent with general California law.
- Include how DTSC will decide various issues.
- Include a definition of an Artifact.
- Include a definition of a recognized Cultural Resource.
- Include how restoration using 1/3 of the removed soil can be justified.
- Include source of soil.
- Include detailed effects from removal of 2/3 of the soil on the surrounding community.
- Provide information on how dust will be controlled in the revegetation and soil removal period.
- Provide contaminant information on how emission and traffic impacts vary under multiple alternatives.
- Complete the evaluation of the cultural resources including limited contamination testing of soils near NRHP eligible structures.
- Include which structures and related buildings will be retained.
- Reconcile the NRHP definition of the Burro Flats site with the DEIS.
- Explain what part of the Burro Flats site is proposed to be impacted and even better, eliminate that.
- Explain how the Indian Sacred Site will be handled.

The list above will not be resolved for some time. Based on a likely three year delay in the CEQA analysis being available by DTSC, it seems extending the clean up date from 2017 to 2020 is an excellent short-term solution to provide NASA with time to gather appropriate input and develop an adequate and comprehensive plan to deal with the items above, which should all be part of the analysis provided on this extremely significant and special property.

This time frame is based on the Inspector General Report on the NASA portion of the Santa Susana Field Laboratory, which notes that NASA will assist DTSC with CEQA in Winter 2015, which means at earliest their DEIR would be available in 2016, three years out from now. In fact, to avoid more confusion, the target cleanup date should be extended to three years after DTSC issues its final DEIR, since environmental documents are to be issued before projects are worked on. That likely will cause longer than a three year delay, but will be the most appropriate time frame to govern the NASA cleanup under the AOCs.

Please refer to the Santa Susana Mountain Park Association letter for footnotes and other references that relate to the above issues.

We look forward to your review of our comment letters and hope for significant revisions to the DEIS so it can, indeed, provide adequate information so it can become a true decision-making document, as outlined by the various laws that require it to be issued. Thank you for the opportunity to make comments on this document.

Sincerely,

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