

**From:** [Christine Rowe](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Cc:** [Elliott, Allen \(MSFC-AS01\)](#); [Fellows, Merrilee \(HQ-LD000\)](#); [GROMAN, JENNIFER A. \(HQ-LD020\)](#)  
**Subject:** NASA DEIS Comments  
**Date:** Tuesday, October 01, 2013 7:36:53 PM  
**Attachments:** [Allen Elliott WHNC Former Member Comments for DEIS October 1 2013.pdf](#)  
[NASALtr.pdf](#)  
[West Hills Neighborhood Council Resolutions regarding the Santa Susana Field Lab.pdf](#)

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Dear Mr. Elliott,

As a former Board member of the West Hills Neighborhood Council, and as their Public Health and Environment Committee Chair at the time that these letters were voted upon, I am submitting them to you as a reminder of actions that were taken by former WHNC Board members - some who still reside in West Hills.

Respectfully submitted,

***Christine L. Rowe***  
***October 1st, 2013 5:36 PM***

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

Dear Mr. Elliott,

The West Hills Neighborhood Council (WHNC) is an advisory body to the City of Los Angeles per its Charter. Neighborhood Council Board members are elected by the local stakeholders to represent them on issues related to land use, public health, public safety, and the environment. In fact, the WHNC has committees that address each of these issues.

The West Hills Neighborhood Council has been addressing the Santa Susana Field Laboratory cleanup for more than 10 years. As former members of this Board, we have been to the Santa Susana Field Laboratory, and we have been to see some of the NASA test stands and other facilities at the site.

When NASA and the DOE signed the 2010 Administrative Order on Consent (AOC) with the DOE, the WHNC considered potential conflicts between the AOCs with the DOE's need to comply with an order to perform an Environmental Impact Statement.

We also considered that the cleanup plans under DTSC's authority was being based on their authority under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). (1)

"California State Senate Bill SB 990 was codified as California Health and Safety Code Section 25359.20, effective January 1, 2008. As a result of this new direction from the State legislature, the California Department of Toxic Substances Control (DTSC) is transitioning their oversight of the SSFL cleanup from the State's RCRA Program to the California State CERCLA Program. A new Consent Order is being negotiated to finalize this transition. Cleanup at the SSFL will continue to be overseen by the DTSC and will meet strict federal and state cleanup standards. NASA is committed to cleaning up Area II and its Area I parcel to a level that is protective of public health and the environment and that meets regulatory processes and requirements."

DTSC did a presentation on the Agreements in Principle which are a part of the 2010 Administrative Order on Consent in September 2010. (2)

As a result of that discussion, the WHNC later discussed at their August 13 2011 Board meeting what CERCLA means, and the Nine Balancing Criteria among other issues. (3)

The letter which was addressed to the City Attorney of Los Angeles is attached. I believe that this letter was also generated to NASA after that meeting.

In May 2012, the West Hills Neighborhood Council called a "Special Meeting" to address the issue of the NASA Environmental Impact Statement. A letter was subsequently generated to NASA Administrator Bolden requesting that a full Scope Environmental Impact Statement be performed by NASA. West Hills will be one of the most impacted communities due to the NASA remediation. Minutes of that meeting are linked below. (4) The letter to NASA Administrator Bolden is attached.

As residents of West Hills and former members of the West Hills Neighborhood Council, we would like to reiterate our concerns related to the limited Draft Environmental Impact Statement that NASA has just produced, and we support the votes of the West Hills Neighborhood Council that we submitted in resolution approved on August 3<sup>rd</sup>, 2011 and May 17, 2013.

For the protection of our community, we respectfully request that NASA do an Environmental Impact Statement that addresses all of the alternative scenarios as was presented at NASA's March 27, 2012, NASA Environmental Impact Study Meeting. (5)

Please also consider our comments in our letter to the City attorney including:

- the request for the U.S. Government property to not be used for residential use; the use of the Nine Balancing Criteria of CERCLA;
- the need to monitor airborne emissions and dust from remediation;
- the need to monitor surface water and groundwater;
- to monitor soils at the Santa Susana Field Laboratory site until DTSC deems that the site is cleaned to all relevant and applicable laws;
- the future use of the site should be parkland or open space based upon the final characterization of the site;
- the WHNC recommended preservation of some of the test stands on the NASA property if it can be done in a manner that is protective of public safety and will not impede the cleanup beneath the test stands;
- the WHNC supports all environmental laws that are applicable to this site that were protective of endangered species and wildlife that uses the site as a major wildlife corridor;
- the WHNC supports all laws that are applicable for the protection of the Native American community and the archaeological sites that are on the National Register of Historic Places.

Respectfully submitted,

Christine L. Rowe

\*West Hills Neighborhood Council former Board member

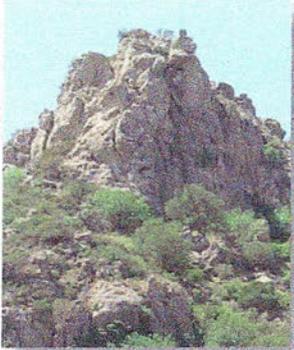
\*Former WHNC Public Health and Environmental Committee Chair

\* For identification purposes only

October 1<sup>st</sup>, 2013

- 1) State CERCLA: <http://ssfl.msfc.nasa.gov/environmental-cleanup/default.aspx>
- 2) Agreements in Principle: [http://www.dtsc-ssfl.com/files/lib\\_pub\\_involve/meeting\\_agendas/64728\\_AgreementsInPrinciple09-22-10.pdf](http://www.dtsc-ssfl.com/files/lib_pub_involve/meeting_agendas/64728_AgreementsInPrinciple09-22-10.pdf)
- 3) WHNC August 3, 2011 Minutes:  
[http://www.westhillsnc.org/uploads/WHNC\\_Minutes\\_8-3-11.pdf](http://www.westhillsnc.org/uploads/WHNC_Minutes_8-3-11.pdf)
- 4) WHNC May 17, 2012 Minutes:  
<http://www.westhillsnc.org/uploads/WHNCMinutes20120517.pdf>
- 5) NASA Environmental Impact Statement (EIS) Informational Meeting Presentation:  
[http://ssfl.msfc.nasa.gov/documents/presentations/201203\\_EIS\\_Informational\\_Meeting/NASA\\_EIS\\_Presentation\\_March\\_27\\_2012.pdf](http://ssfl.msfc.nasa.gov/documents/presentations/201203_EIS_Informational_Meeting/NASA_EIS_Presentation_March_27_2012.pdf)

# West Hills Neighborhood Council



May 25, 2012

NASA Administrator Charles F. Bolden, Jr.  
NASA Headquarters  
Washington, D.C. 20546



*First in the Valley*

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Dear Administrator Bolden,

As elected officials of the community of West Hills in the City of Los Angeles, we have an obligation to address issues that could have an impact on our community.

We, the members of the West Hills Neighborhood Council, believe that NASA should comply with NEPA and CEQA, and NASA should perform a complete full scope Environmental Impact Statement (EIS), and that NASA should consider all alternatives under the EIS with regards to the cleanup standards of NASA's property at the Santa Susana Field Laboratory.

Very truly yours,

STEPHEN A. LENSKE

President/Co-Chair

West Hills Neighborhood Council

SAL: mlr

cc: West Hills Neighborhood Council Board

## **RESOLUTIONS FOR THE REMEDIATION OF AND FUTURE USE OF THE SANTA SUSANA FIELD LABORATORY**

WHEREAS the West Hills Neighborhood Council is an advisory body to the City of Los Angeles under the City Charter and is the nearest community in the City of Los Angeles to the Santa Susana Field Laboratory site; and

WHEREAS West Hills is the community in Los Angeles that is most likely to be affected by contamination from the Santa Susana Field Laboratory site and by cleanup efforts that include truck traffic to and from the site, airborne contamination and emissions, potential groundwater contamination, and contaminants in the groundwater that may have a potential for vapor intrusion;

LET IT BE RESOLVED that:

[1] The West Hills Neighborhood Council respectfully requests that the future use of the Santa Susana Field Laboratory not be used for residential purposes;

[2] The West Hills Neighborhood Council encourages the use of the Nine Balancing Criteria for the remediation of the Santa Susana Field Laboratory;

[3] The West Hills Neighborhood Council recommends ongoing monitoring of airborne emissions and dust from remediation, monitoring of surface water and groundwater, and monitoring of soils at the Santa Susana Field Laboratory site until it [DTSC]\* deems that the site is cleaned according to all relevant and applicable laws;

[4] The West Hills Neighborhood Council recommends the future use of the Santa Susana Field Laboratory as parkland or open space based upon the final characterization of the site;

[5] The West Hills Neighborhood Council recommends the protection of some of the test stands on the NASA property if it can be done in a manner that is protective of public safety and will not impede the cleanup beneath the test stands;

[6] The West Hills Neighborhood Council supports all environmental laws that are applicable to this site that are protective of endangered species and wildlife that uses the site as a major wildlife corridor; and

[7] The West Hills Neighborhood Council supports all laws that are applicable for the protection of the cultural and archaeological aspects of this site, which is considered sacred to the Native American community and has archaeological sites that are on the National Register of Historic Places.

The West Hills Neighborhood Council recommends to the City Council and the City Attorney that this resolution be recorded as part of a Community Impact Statement for West Hills. The West Hills Neighborhood Council also requests that the City Attorney present this resolution with any other letters from elected officials and community groups when submitting any recommendations to the City Council or to Judge Samuel Conti or his peers relating to *NRDC, Committee to Bridge the Gap, and the City of Los Angeles v the Department of Energy*.

\*the word DTSC was placed for clarification because the previous paragraph in the original resolution which mentioned the California Department Of Toxic Substance Control (DTSC) was voted upon by the West Hills Neighborhood Council to be removed from the resolution.

Respectfully submitted by:

*Chris Rowe*

West Hills Neighborhood Council

Environment Committee Chair and Public Health Committee Chair

August 3, 2011