

**From:** [Elisabeth Landis](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Subject:** NASA SSFL DEIS  
**Date:** Tuesday, October 01, 2013 7:08:42 PM  
**Attachments:** [CNPS Comments on NASA SSFL DEIS.20131001.doc](#)  
[SSFL Final Draft Orange Group Alternatives 062412.pdf](#)

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See the attached documents:

- 1) CNPS Comments on NASA SSFL DEIS, October 1, 2013
- 2) The Orange Group Alternative for the DOS SSFL DEIS

Betsy Landis, State California Native Plant Society Delegate for the  
Los Angeles / Santa Monica Mountains Chapter

# California Native Plant Society

## Los Angeles / Santa Monica Mountains Chapter

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October 1, 2013

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RE: Santa Susana Field Lab Draft Environmental Impact Statement

Dear Sir:

California Native Plant Society is a state-wide organization. The Los Angeles / Santa Monica Mountains Chapter has about four hundred members in the San Fernando Valley, Simi Hills and Santa Monica Mountains. We are actively involved in the process of determining how best to “clean up” the Santa Susana Field Lab site.

We have the following comments and questions concerning NASA’s Santa Susana Field Lab (SSFL) Draft Environmental Impact Statement (DEIS).

### Comments and Questions:

1. Why is there no environmentally superior alternative in this DEIS?
2. Isn’t an EIS supposed to provide several alternatives utilizing different approaches to minimize environmental impacts? The DEIS admits the two proposed alternatives both have severe environmental impacts.
2. Why are there only two alternatives (No Action or Soil Removal and Structure Demolition) proposed in this DEIS?
3. If the AOC and Consent Order previously described require vegetation removal, soil removal to the sandstone bedrock, destruction and destabilization of the site with resulting long-term severe air pollution (dust and sandstorms), water pollution (silted flows, mudslides), changes in groundwater retention and natural drainage patterns, firestorms swept by high winds through weed-choked arroyos, and damage to urban infrastructure such as roadbeds, why doesn’t this DEIS include an environmentally superior alternative that includes a modification of the AOC and Consent Order to fix 2017 as the timeline for scheduling and beginning a short- and long-term set of remediations?
4. The best management way to do the “clean up” is to retain the native vegetation, the natural drainages and as much of the soil as possible. This would protect the health and well-being of the urban population in the vicinity of the SSFL site, as well as protecting all the natural and cultural resources: important native American sites, resident and visiting wildlife, the vital wildlife linkage between the Santa Monica Mountains and Los Padres National Forest, and the natural vegetation supporting migratory and native bird populations.

5. Air Quality- Wouldn't the loss of mature oaks, shrubs and other native vegetation result in increased dust/sand storms in residential areas, not only from the site itself, but from the surrounding hills to the north and northeast of the site? This area is very windy. Leafy canopies act as dust catchers. Extensive root systems retain water and nutrients, supporting a complex understory that maintains healthy habitats and supports a rich biodiversity of species. Wouldn't the removal of these complex native habitats and the organism-filled soil system result in an invasion of non-native flammable plant species, raising the frequency of wildfires?

6. Biological Resources- Where is the inclusion and discussion of a federally-listed endangered plant, Braunton's Milkvetch (*Astragalus brauntonii*) in this DEIS? Where is a discussion of the uses of the habitats on this land by many species of fauna, from mountain lions to birds and raptors, reptiles and many pollinators. SSFL is a valuable traditional resting, nesting and foraging location for migrating fauna. How many species may perish if the vegetation and water sources are destroyed?

6. Greenhouse Gas Emissions and Carbon Sequestration- Does NASA realize the high carbon sequestration of the native vegetation on the site, e.g. long-lived Coast Live Oak (*Quercus agrifolia*), chaparral shrubs that resprout from their root collars or root systems (*Quercus berberidifolia*, *Malosma laurina* et al) over and over again for possible hundreds of years? Removing this native vegetation will cause a huge release of carbon into the air. Restoring the carbon-sequestering underground root systems to their current state would take centuries. Isn't one short-term impact the immense soil removal proposed, involving large numbers of greenhouse gas emitting machinery? How does that impact local air quality? Isn't a better choice to remediate most of the contamination on site? NASA should consider some useful remediation methods being developed at two local universities under contract to DOE.

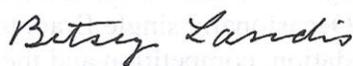
7. Hazardous Materials / Hazardous Waste- How can the DEIS say that this is a minor impact? Why are the following facilities on a list to receive possibly hazardous soil from the SSFL site? Lancaster Landfill, Antelope Valley Landfill, Chiquita Canyon Landfill are all Class III municipal landfills which are not legally allowed to accept any hazardous materials. Why are DeMenno Kerdoon Wastewater Treatment facility in Santa Fe Springs and Lakeland Ridgeline Processing in Compton also designated as receivers of possibly hazardous soil from the site? Compton is in the middle of the Los Angeles Basin, Santa Fe Springs is in the eastern Los Angeles Basin. What are levels of contamination in the material being sent to these locations? If the soil is not hazardous that is being taken to these facilities, why isn't the soil being left on the SSFL site?

8. Health and Safety- If neither of the alternatives offered by the NASA DEIS protects either the short-term or the long-term health and safety of the population (whether human, plant, animal, local geology, local hydrology or the ancient cultural heritage on the SSFL site) why is NASA even proceeding with this DEIS?

9. Land Use- The best use of the SSFL site is national park land, preserving magnificent sandstone geology, many unusual niche habitats of native flora and fauna, natural drainages supporting riparian habitat not only on the site but through lower elevations surrounding the site. As not only an outstanding natural resource, but as an ancient cultural heritage site where native Americans studied outer space and as a modern site of human endeavors to explore outer space, SSFL is worthy of careful, thoughtful remediation and restoration.

The basis for NASA's choices in alternatives needs to be reconsidered and the DEIS must be rewritten. An alternative written in a workshop on the DOS EIS is attached.

Sincerely,



Betsey Landis, State CNPS Chapter Delegate, LA / SMM Chapter

Date: June 28, 2012

Copies to:

Stephie Jennings

John Jones

John Wondolleck

Sandy Enyeart

Wendy Lowe

June 24, 2012

**FINAL DRAFT**

**Remediation for Area IV and Northern Buffer Zone  
Santa Susana Field Laboratory  
Environmental Impact Statement  
Alternatives Development Workshop  
Orange Group  
Warner Center Marriott, Woodland Hills, CA  
June 9, 2012**

<b>SUGGESTED DISCUSSION TOPICS</b>	<b>GROUP CONTRIBUTION</b>
<p><b>Condition of the Property at Transfer</b></p> <ul style="list-style-type: none"><li>• <i>What condition do you think the property should be in before transfer to Boeing</i></li><li>• <i>Describe what the property would look like</i></li><li>• <i>What would be left behind</i></li><li>• <i>What would the land look like</i></li></ul>	<p>At transfer, the property should be open space, highly invasive non-native plant species removed, re-vegetated with native habitat, preserving biological, botanical, cultural, and historical resources. All Federal, State, and local special status species will be protected. In particular, the major population of federally-endangered Braunton's milkvetch (<i>Astragalus brauntonii</i>) growing on the southwestern hills in Area IV will be undisturbed and protected, as will the major populations of Santa Susana tarweed (<i>Deinandra minthornii</i>) growing in the northern portion of Area IV. Smaller populations of Santa Susana tarweed growing on the rock outcrops around Area IV will also be protected from disturbance. The SSFL property will have a visitor's center focusing on history and educational issues relevant to the site. Replacement nesting/roosting structures shall exist on the site. (See Structure/Infrastructure below.)</p>
<p><b>Structure/Infrastructure</b></p> <ul style="list-style-type: none"><li>• <i>Removal of uncontaminated debris, slabs?</i></li><li>• <i>Retain any structures for historic preservation purposes?</i></li><li>• <i>Approach, sequencing, how to prioritize</i></li><li>• <i>On-site storage of debris (pending transport to disposal) – where, how</i></li><li>• <i>Sorting of debris for disposal</i></li></ul>	<p>Remove all contaminated structures and infrastructure that cannot be decontaminated in place on a cost-effective basis. Where possible, consider re-using non-contaminated structures for the visitor center. Removal and de-contamination priorities shall be based on toxic risk assessments.</p> <p>Known or newly discovered historical /cultural sites shall be left undisturbed and be protected.</p> <p>Short-term (measured in days or weeks, not months) on-site storage of containerized debris shall be confined to unused paved parking lots. No land shall be cleared for the purpose. Sorting of debris shall be done at the site of removal. Recycling shall be given priority.</p> <p>Remove all unnecessary road paving. Maintain critical access roads and use existing, uncontaminated roads and parking lots to the extent possible. Assess need for remaining uncontaminated infrastructure using best management practices and /or on a case-by-case basis. Uncontaminated debris and slabs may be left in place.</p> <p>Replacement structures for sensitive species, such as raptors, shall be constructed near existing structures currently used by wildlife prior to their demolition.</p>

<b>SUGGESTED DISCUSSION TOPICS</b>	<b>GROUP CONTRIBUTION</b>
<p><b>Soil Contamination</b></p> <ul style="list-style-type: none"> <li>• <i>Thoughts regarding the balance between excavation and on-site treatment</i></li> <li>• <i>How to minimize impacts on biological resources</i></li> <li>• <i>How to minimize impacts on cultural resources</i></li> <li>• <i>Prioritization, approach, sequencing under constrained budget scenarios</i></li> <li>• <i>Contamination in the northern drainages?</i></li> </ul>	<p>Toxicity is a major consideration in development of look-up tables.</p> <p>Conduct toxicity analyses on known areas of contamination. Prioritize clean-up areas by toxicity. Based upon prioritization, select best available treatment(s) for those most toxic areas first. Following that, focus on areas of lower toxicity. Minimize excavation by using a suite of alternative treatments, including on-site treatment, based on priorities (determined by toxicity analyses). This approach includes the assumptions:</p> <ul style="list-style-type: none"> <li>• That the prioritization process described above is carried forward through the look up table development and application;</li> <li>• Look up table numbers should be able to correlate with established EPA or State of California toxicity levels.</li> </ul> <p>The clean up process should be thoughtfully applied without deadline(s) as the driver. New treatment technologies should be continually sought. Cost-benefit analysis, based on toxic risk, shall be applied proactively and funds budgeted accordingly.</p>
<p><b>Disposal</b></p> <ul style="list-style-type: none"> <li>• <i>Preferences for radiological contamination</i></li> <li>• <i>Preferences for radiological/chemical contamination (mixed)</i></li> <li>• <i>Preferences for chemical contamination</i></li> <li>• <i>Preferences for uncontaminated debris</i></li> <li>• <i>Acceptability of recycling uncontaminated metals?</i></li> <li>• <i>Prioritization, approach, sequencing under constrained budget</i></li> </ul>	<p>For contaminated material: Subsequent to implementation of all treatment options, remaining contaminated materials would be taken to appropriate, licensed facilities. All other debris would be disposed of by landfill or recycling as appropriate, and include requirements as described in Structure / Infrastructure. Where necessary and feasible, local disposal, for example at Calabasas Landfill, is preferred over long-distance transport.</p> <p>Priorities should follow the recommendations indicated under Structure / Infrastructure, and cost-benefit analysis should be applied as indicated under Soil Contamination.</p>
<p><b>Transportation</b></p> <ul style="list-style-type: none"> <li>• <i>Depending upon preferred disposal sites:</i> <ul style="list-style-type: none"> <li>○ <i>Transportation modes</i></li> <li>○ <i>Routes</i></li> <li>○ <i>Logistics, as needed</i></li> <li>○ <i>How to minimize traffic impacts</i></li> <li>○ <i>How to minimize noise?</i></li> <li>○ <i>How to minimize air emissions and climate impacts?</i></li> <li>○ <i>How to maximize safety</i></li> </ul> </li> <li>• <i>Method and route for transporting fill material</i></li> </ul>	<p>Minimize number of loads and transportation of waste from site by truck by making every effort to treat soil on-site. Follow established routes and select route based upon contaminant types, concentrations, and load weights. For example, Chatsworth route may not be appropriate, because it is a narrow two lane road through a residential and light commercial area, and the road may not be designed to support hours of heavily-loaded truck traffic. Look to minimize shipping distances when selecting approved and /or licensed disposal locations. Best management practices should be utilized to protect the public health by minimizing noise and air pollution; trucks should be required to utilize new technologies such as alternate fuels, new hybrid engines, and/or engines with low emissions.</p> <p>Transportation activities should occur during the hours between 0900 and 1430 to avoid rush hours and school arrivals and departures., and to prevent accidents that could occur by trucks driving on Woolsey Canyon after dark</p>

<b>SUGGESTED DISCUSSION TOPICS</b>	<b>GROUP CONTRIBUTION</b>
<p><b>Groundwater</b></p> <ul style="list-style-type: none"> <li>• <i>Technology options</i></li> <li>• <i>Prioritization, approach, sequencing under constrained budget</i></li> </ul>	<p>Expand GETS. Pump groundwater to prevent further contaminant migration. Explore data gaps on seeps and springs. Install vapor extraction system where necessary. Continue with tests that are in place, but accelerate groundwater treatability studies to include present and future technologies. Tritium in groundwater: allow natural attenuation with continued monitoring.</p> <p>Priorities should follow the recommendations indicated under Structure / Infrastructure, and cost-benefit analysis should be applied as indicated under Soil Contamination.</p> <p>Groundwater and soil treatment must be considered and treated at the same time to prevent recontamination of new soil by groundwater.</p>
<p><b>Additional Actions</b></p> <ul style="list-style-type: none"> <li>• <i>What else might be necessary to accomplish the desired condition:</i> <ul style="list-style-type: none"> <li>○ <i>Backfilling?</i></li> <li>○ <i>Recontouring?</i></li> <li>○ <i>Revegetation?</i></li> <li>○ <i>Long-term monitoring?</i></li> <li>○ <i>Restoration of the northern drainages?</i></li> </ul> </li> <li>• <i>Would your proposed alternative accomplish your desired condition?</i></li> </ul>	<p>Backfilling should be minimized, and its placement should be timed to lessen erosion potential.</p> <p>Backfill soils should be similar to what was taken from the contaminated area.</p> <p>Any recontouring should be minimal, should consider natural drainage patterns, and should be performed for remediation purposes only after soil disturbances.</p> <p>Re-vegetation should be site-specific, consist of local, native plant species and should allow for re-colonization of Area IV by native plant species from adjacent habitat.</p> <p>Long-term monitoring will be performed and will include monitoring of soils, drainages, historical, archaeological and biological resources that are protected or listed (or when these resources are discovered during the remediation process). Clean-up impacts to the Northern Buffer Zone should be minimized to the extent possible.</p> <p>Systematic monitoring of plants growing on contaminated soils should be instituted to evaluate the effectiveness of contaminant uptake, degradation, and potential adverse effects on consumer species.</p> <p>The group believes its suggestions for conditions at transfer can be accomplished.</p>

<b>SUGGESTED DISCUSSION TOPICS</b>	<b>GROUP CONTRIBUTION</b>
<p><b>Total Package</b></p> <ul style="list-style-type: none"> <li>• <i>What is most important, least important</i></li> <li>• <i>What is urgent?</i></li> <li>• <i>Brainstorm predictable impacts – positive and negative</i></li> <li>• <i>Is the alternative as robust as possible?</i></li> </ul> <p><i>Any weaknesses that should be addressed</i></p>	<p>Most important: Review results of site assessments and toxicity characterization. Prioritize clean up accordingly based upon toxicity to humans and biota.</p> <p>Least important: Meeting the 2017 deadline.</p> <p>Urgent: There is a need for rumor control and a reliable, responsive source of information dissemination to combat exaggerated claims of negative health and safety impacts emanating from the site.</p> <p>Possible positive impacts: Public health and safety will be protected; the SSFL site will be restored to open space; and native habitat will be protected and restored as necessary.</p> <p>There is a lessening of fear levels in surrounding communities, a growing appreciation of the natural beauty and cultural history of the site, and involvement by local residents in staffing and in volunteering at the onsite Education Center.</p> <p>Possible negative impacts: Transportation of hazardous waste and non-hazardous waste and infrastructure and all transportation associated risks and drawbacks, including damage to the site environment, roads, etc., health and safety impacts for the community living in the area which include potential lung and other illnesses associated with traffic, the potential for accidents and spills, and noise. Increased contamination of other areas (other landfills) that may be impacted by AREA IV and NBZ remediation. Maintenance and security considerations may impact long-term site access for humans and wildlife.</p> <p>Weakness to be addressed: There is a potential for failures of treatment methodologies, lack of clarity as to the end state desired, failures or obstruction due to political interference, failures or obstruction from a proliferation of misinformation, and / or deliberate disinformation campaigns.</p>