

From: [Mary Wiesbrock](#)
To: [MSFC-SSFL-EIS](#)
Subject: SOS comments Darft NASA EIS
Date: Monday, September 30, 2013 3:28:25 PM
Attachments: [SOS comments NASA Draft EIS page one0001.pdf](#)
[SOS"s comments NASA"s Draft EIS page two0001.pdf](#)
[SOS"s comments NASA Draft EIS page three0001.pdf](#)
[SOS"s comments NASA Draft EIS page four0001.pdf](#)

Allen: Please let me know that you have received these comments and that they will be made part of the record.

Thanks!

Mary

§ 1506.2

Elimination of duplication with State and local procedures.

(a) Agencies authorized by law to cooperate with State agencies of statewide jurisdiction pursuant to section 102(2)(D) of the Act may do so.

(b) Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and State and local requirements, unless the agencies are specifically barred from doing so by some other law. Except for cases covered by paragraph (a) of this section, such cooperation shall to the fullest extent possible include:

(1) Joint planning processes.

(2) Joint environmental research and studies.

(3) Joint public hearings (except where otherwise provided by statute).

(4) Joint environmental assessments.

(c) Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and comparable State and local requirements, unless the agencies are specifically barred from doing so by some other law. Except for cases covered by paragraph (a) of this section, such cooperation shall to the fullest extent possible include joint environmental impact statements. In such cases one or more Federal agencies and one or more State or local agencies shall be joint lead agencies. Where State laws or local ordinances have environmental impact statement requirements in addition to but not in conflict with those in NEPA, Federal agencies shall cooperate in fulfilling these requirements as well as those of Federal laws so that one document will comply with all applicable laws.

(d) To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.

Comments on Specific Environmental Areas:

Water Resources

(ES-5.2.1, ES-3.1.3) There has been already (GETS Pump and Treat) been a significant impact on water resources without any federal and/or state environmental review in violation of environmental law. We requested Boeing that they stop this destructive process which removed contaminated water from one area above Bell Canyon, cleaned it and then returned it to an entirely different area. Our request was ignored. The results have been significant destruction of that wetland ecosystem which includes significant impacts on flora and fauna there from the water loss and the Bell Canyon waterfall drying up.

The hydrology will be and has been (GETS impacting Bell Canyons) significantly (not moderately) impacted if the Pump and Treat draws water from one area and dumps it in another area.

The source ground water wells used for drinking water in areas of Simi Valley need independent analysis for all the NASA chemicals of concern listed in this document. These groundwater wells, Sycamore and Niles, are below and within 4 miles of the SSFL Mountain. After some five decades of industrial activities, NASA needs to independently demonstrate that their COC's have not finally reached and impacted these wells used for drinking water for thousands of Simi

Valley residents. Source water testing for the Sycamore well showed Perchlorate = 5.2 micrograms per Liter in 1/05/10. The source water from Niles well had 1,600 MG/L Total Dissolved Solids with the MCL for TDS being 1,500 MG/L. (10/16/12). Independent 2013-14 testing should include testing of all of NASA's metal COC's without using a filtering methodology. I have been told that the water from these wells is not filtered at all just blended. Independent testing of these two drinking water wells for all NASA COC's should be done this upcoming rainy season 2013-14 to insure that NASA's COCs have not impacted these drinking water wells after NASA's five decades of activities up on the SSFL mountain above these wells located in Simi's valley floor.

Earth

There needs to be a separate analysis on the impacts to the earth. If the backfill material comes from an offsite area, it will not be of the same geological composition as the existing NASA property's Chatsworth Formation's alluvial sediments and the Cretaceous Chatsworth Formation of imbedded sandstone and shale. The cleanup alternative limited only to background will change a significant amount of native soil: 105 acres of earth from 2 to 20 feet down. This significant environmental impact needs its own separate analysis. The amount of imported soil of a different composition will significantly alter the existing flora of the area and this in turn impacts the fauna. The non-native backfill soil needs properly analyzed as to amount, locations, and the impacts on biota adequately determined.

Biological

A spring survey is needed. The biological analysis is grossly inadequate. The surveys were done in the fall. "Many of the plants, especially flowering plants and grasses were senescent, and migratory breeding birds were not present in the study area." Bird species raising their young, including the raptors, will be best observed in the spring time when the surveys should have been done. A spring study is even recommended to "provide a more comprehensive inventory of wildlife within the study area". (D-23) A Least Bell's vireo, a federal and state endangered species, was found in the fall survey, but a nesting pair could have been missed because no spring survey was done.

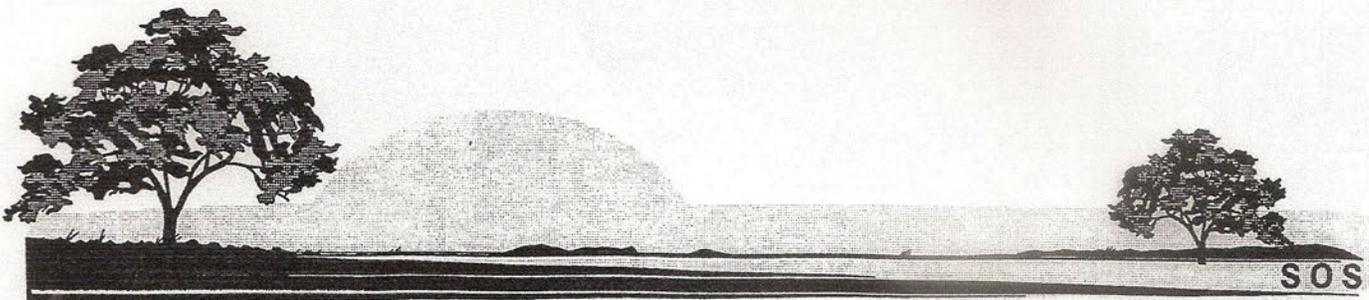
4.4.1.1 This EIS should not limit its discussion to just the sensitive species. All wildlife species should be listed not just the sensitive federal species. One should not have to look at Appendix E for the animal species which were found and include: 11 butterfly species, 12 reptile and amphibian species, 60 bird species, and at least 15 mammal species including the top predator, the mountain lion. Even this list is not complete because doing only fall surveys were done.

The wildlife corridor map (Figure 3.4-2) is incorrect as it has the vast majority of the wildlife corridor outside of the NASA property. This grossly inaccurate map should be eliminated from the document. Ever since the NASA activities have been halted, the entire 400 plus NASA acreage has become part of the major wildlife habitat and corridor which serves our national park, the Santa Monica Mountains National Recreation Area (SMMNRA). "Wildlife moves between the SSFL and SMMNRA without regard for jurisdictional boundaries." (SMMNRA letter, April 19, 2013 to Mr. Armenta of the Santa Ynez Band of Chumash Indians)

The document is inadequate in that it does not analyze the cleanup alternative impacts to the various habitats. Sensitive and protective habitat was wrongly eliminated from further consideration (Table 2.5-1). Federal agencies are required to avoid destruction or adverse modification of designated critical habitat under Endangered Species Act. By the fact that only fall surveys were done, this document can't make the statement that there is no designated critical habitat within this NASA property. (Page 2-42) This inadequate analysis of sensitive habitats proves that a joint EIS/EIR is needed at this time. Then state agencies can weigh in on this project to properly protect the habitats, flora and fauna considered sensitive by the state. There needs to be an overlay map of the PRAs (map figure 2.2-3) with the vegetation cover type map. (Figure 3.4-1.) Are there impacts to the coast live oak riparian forest (NASA total 9.16 acres) and coast live oak woodland (NASA 13.22 acres)? How are chaparral and coastal sage scrub habitats impacted? How are the grasslands and other sensitive habitats within the NASA study area which provide "important foraging and nesting sites" (D-23) impacted? Another alternative, cleanup to suburban residential, should be analyzed since it will reduce these significant (not moderate) impacts to all sensitive habitats and the biota.

Mary Wiesbrock

Mary Wiesbrock, retired State of California Clinical Scientist, Chair Save Open Space/Santa Monica Mountains



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Re: Comments Draft EIS NASA

September 30, 2013

Allen Elliott, SSFL Program Director
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Huntsville, AL 35812

Comments Draft EIS NASA.

ES-2.2 Selection of Alternatives to Evaluate

We request that the **AOC be modified to include a risk based PRG table of suburban residential risk levels**. It is not necessary to remove to background soil which does not present a risk to human health. This EIS is grossly inadequate and legally deficient in that it only evaluates two extreme alternatives: the clean-up to background and/or no-action alternative.

Only considering a cleanup alternative to background, results in unacceptable significant environmental impacts which include: demolishing 100% of the structures (historical test stands etc.) and significantly adversely impacting 105 NASA acres from 2 feet to 20 feet down. Significant environmental impacts (ES-11.0) can be avoided when the suburban residential risk based level is added to the alternative's analysis.

JOINT EIS/EIR NEEDED

1.3 Scope of the Analysis

In order to be acceptable and comprehensive, there should be a **joint EIS/EIR document** as required per CFR 1506.2. DTSC's EIR document should not follow the completion of this NASA EIS. DTSC's EIR should jointly be a part of this document.

The NEPA regulations similarly encourage federal agencies to cooperate with local agencies "to the fullest extent possible to reduce duplication between NEPA and comparable State and local requirements, including the preparation of a joint document". (40 CFR 1506.2) See below: