

**From:** [Tom Nachtrab](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Subject:** Tom Nachtrab's Individual Commentary On SSFL DEIS  
**Date:** Monday, September 30, 2013 4:16:39 PM  
**Attachments:** [NASA DEIS Commentary by Nachtrab Final.pdf](#)

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Allen Elliott, SSFL Project Director at NASA:

Please find my commentary attached in the form of a .pdf file.

Thank you for the opportunity to offer comments.

Tom Nachtrab  
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September 30, 2013

Mr. Allen Elliott  
SSFL Project Director  
NASA MSFC AS0, Building 4494  
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**Comments on 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**

1. NASA's DEIS does not serve its intended purpose. It does NOT fully inform decision makers so they can decide how to best execute the cleanup. The DEIS should be re-issued after critical missing information is determined.
2. The DEIS is flawed because it lacks important information. DTSC must supply much of the missing information.
  - a. The DEIS is incomplete because it excludes analysis of all possible levels of cleanup except the "cleanup to background" alternative. Other reasonable cleanup alternatives must be evaluated. To accept that the 2010 Administrative Order on Consent (AOC) prohibits consideration of all alternatives defies both the letter and the spirit of the past half-century's environmental legislation, state and federal.
  - b. The DEIS lacks guidance on situations and actions that depend on vague language in the AOC that governs the cleanup. DTSC must provide NASA with an authoritative and binding interpretation of the language of the AOC.
  - c. The DEIS is incomplete because it lacks guidance that still-undelivered DTSC documents, such as the DTSC EIR should include. This future EIR document must include a comprehensive, CEQA-compliant analysis that balances cleanup goals under various scenarios, including costs (both financial and environmental).
  - d. The DEIS is incomplete because it does not specify expected outcomes for cultural resources, both archeological and architectural.
3. Some of the inadequacies of NASA's plan are consequences of the unreality of goals imposed on NASA by the AOC.
  - a. The incompleteness of the DEIS reveals that so much is yet to be decided, planned, and executed that the AOC-mandated completion date of 2017 has become unrealistic. The rules of the game must change to target completion for a realistic date such as 2020 or beyond.

- b. Some see the AOC as a guarantee that NASA will “take us and the Hill home again.” For better or worse, no one has ever been able to go “home again.”

Some interpret the AOC to mean that a cleanup to no less than background level is both possible and desirable. The AOC is sometimes interpreted to mean that we can “return the site to its natural state.” The unspoken assumption is that Background = Natural.

Yet, how can the result of any technological cleanup yield a natural result?

Unfortunately we may have to accept some reality. Man (our grandparents, parents, and we ourselves) made a mess in fifty years of the Hills that Nature crafted over millennia. Can Man now be expected to (play God) and re-Create in a handful of years, what Nature made? Presumptuous, no? Maybe we need to accept that Man screwed up here, and the best we can do is atone for our sins by cleaning up to a reasonable, very low level of risk; humbly learning from our arrogance; and preserving the scene of the offence against Nature as a reminder not to screw up so bad the next time.

4. Finally, I also fully endorse the comprehensive “Comments on Draft Environmental Impact Statement” separately submitted to you by the Santa Susana Mountain Park Association (SSMPA).

Sincerely,



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