From:	polyvios georgilas
To:	MSFC-SSFL-EIS
Subject:	COMMENTS ON DEIS FOR PROPOSED DEMOLITION AND ENVIRONMENTAL CLEANUP ACTIVITIES AT SSFL, JULY 2013
Date:	Monday, September 30, 2013 1:13:28 PM
Attachments:	GEORGILAS SSFL COMMENTS.pdf

Dear Mr. Elliot,

Please find attatched letter as my submitted SSFL DEIS comments.

Thank You,

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9/17/2013

Allen Elliot, SSFL Project Manager
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RE: Comments on Draft Environmental Impact Statement for proposed Demolition and Environmental Cleanup Activities at Santa Susana Field Laboratory, July 2013.

Dear Mr. Elliot,

Thank you for providing this format for submitting the following comments.
As a resident of Bell Canyon, a community with perhaps one of the largest stakes in this process given its proximity to the SSFL, I am deeply troubled with the NASA DEIS as presented. This document is flawed primarily because it relies on a weak foundational premise. That is, the DEIS only considers the two extreme alternatives of either, a soil cleanup to a historically unprecedented Background/Detect level, or the alternative of No Action at all. Any reasonable mind can perceive that neither course of action is viable given the many variables present at SSFL. These variables require careful and collaborative solutions, none of which the two extreme alternatives offered adequately address.

By failing to include a risk based cleanup, the DEIS fails to balance the level of cleanup with the consensus end use of the site, that being some variation of a Public Land Use. Determining clean up levels prior to establishing site end use is putting the cart before the horse, and serves to waste tax payer dollars on a cleanup that exceeds all levels of reasonability. The Environmental, Cultural, and Biological impact of such a drastic cleanup to Background/Detect levels, leads one to contemplate which is worse the problem or the proposed solution. The DEIS fails to adequately define the current negative health effects to both Human and wildlife populations. This information would be helpful in contemplating an appropriate course of action, where short and middle term negative cleanup effects are brought to balance with the long term benefit of a site that does not put the public at risk.

As the DEIS is written, the proposed cleanup to Background/Detect levels puts at risk the rich cultural and historical resources that should be preserved for posterity. The Burro Flat site VEN-1072, as an NRHP designated site should be exempt from cleanup mitigation efforts, yet the DEIS seems to include at least portions of this important site in the cleanup. Nine structures at Alpha, Bravo and Coca test stand sites, have been found eligible as historic architectural structures under NRHP and SHPO. Given the significant role these test stand structures have played in our nations Space Program, they are an important symbol of our national heritage and should be preserved for posterity. As written,

the DEIS cleanup to Background/detect level, will in all probability destroy these structures in the very first phase of implementation.

The Traffic and Transportation impacts of a Background/detect level cleanup would involve the removal of approximately 1/2 million cubic yards of soil and 95,000 tons of debris. This would result in 142 truck trips per day, including Twenty-Eight peak hour trips(DEIS ES 5.1.4). These numbers fail to take into account returning loads of replacement landfill (1/3 of removed soil), or empties coming into the site to collect their initial loads. The traffic and transportation impact also fails to take into account the truck traffic that the concurrent mitigation effort at the much larger Boeing and DOE sites would produce. The Cumulative impact on the neighboring community will be devastating. As a lifelong resident of the immediate impacted area, it is an endeavor to travel east on Roscoe and North to highway 118 via Topanga Canyon Blvd(route 23) as it is today. One can only imagine the adverse conditions that the 142 to 250(extrapolated per all three sites and worse case basis) truck loads of Hazardous materials would create to the immediate communities of West, Hills, Canoga Park, Chatsworth and Woodland Hills. The DEIS uses a flawed Levels Of Service(LOS) threshold, that does not adequately take into account the effect of the low speeds (especially at Grade -Rocky Pointe, at peak traffic) that this volume of trucks will have on traffic times. The high density Commercial corridor on the Southern route via Topanga Canyon BLVD. (23) to interstate 101 , bisects an Elementary School, a High School, and one of the largest shopping malls in all of Southern California (a large portion of which is currently under construction), that stretches from Vanowen Street almost to Interstate 101. The LOS threshold numbers not-withstanding, this is a recipe for disaster.

At the essence of the weakness of the DEIS is the 2010 AOC agreement that guides it. The AOC agreement as written is not workable. The remedy is to amend or modify the 2010 AOC, so as to allow the EIS to include legitimate, reasonable and risk based cleanup solutions. The 2010 AOC goes beyond EPA recommended levels for human health and safety, because it was based on Senate Bill 990(KUEHL 2007). This Bill was stuck down by Federal District Court decision, yet the AOC survived. Section 5.26 Severability of 2010 AOC Order provides that ..."should any court determine that any state law or regulation incorporated into, referenced in, or authorizing this order is invalid or unenforceable in whole or in part, NASA shall comply with each remaining part."(5.26 Severability AOC2010 page 38). The 2010 AOC Order is open to Modification by mutual agreement of the parties(2010 AOC 6.0 pg 38-9), and should so be modified before any further action is taken. The modifications should include a risk based PRG table for suburban residential risk levels, for the purpose of avoiding removing near background soils which do not present a risk to human health or the environment. The remediation goal should be modified to include suburban residential PRGs to enhance LUT look up table process by comparing soil condition and risk standards established by USEPA as public remediation goals.

A reasoned approach to amending the 2010 AOC will by definition create a more thorough EIS. From a more functional EIS that studies the array of mitigation options available, current stakeholders can participate in conducting a cleanup effort that future stakeholders can be proud of.

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