

**From:** [Stephen Lenske](#)  
**To:** [MSFC-SSFL-EIS](#)  
**Subject:** Comments to NASA Draft Environmental Impact statement  
**Date:** Tuesday, October 01, 2013 10:18:01 PM  
**Attachments:** [Allen Elliott DEIS Comments former WHNC Board Members.docx](#)

---

Attached please find letter addressed to allen Elliott, SSFL Program Director, NASA MSFC AS01

October 1, 2013

FROM: Stephen A. Lenske  
7525 Sedgewick Court  
West Hills, CA 91304

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

RE: NASA Draft Environmental Impact Statement

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 a former member of this Board for more than 10 years and holding the elected position as its President for more than 6 years, I have been to the Santa Susana Field Laboratory, and I 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 a court order to perform an Environmental Impact Statement.

We also considered that the cleanup plans under DTSC's authority were 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, and information from many more meetings and documents, 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" after a meeting of their Environment Committee 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 resident of West Hills for more than 25 years and former member of the West Hills Neighborhood Council, I would like to reiterate our concerns related to the limited Draft Environmental Impact Statement that NASA has just produced, and 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, I 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 my signed WHNC 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,

STEPHEN A. LENSKE

\*West Hills Neighborhood Council former Board member and Council President

\* 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)