

**From:** [Diana Dixon-Davis](#)  
**To:** [MSFC-SSFL-EIS; Diana Dixon-Davis](#)  
**Subject:** DDD NASA DEIS re Air Pollution, Traffic Studies, Remediations  
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Dear Mr. Elliot,

Please find attached my third letter re the NASA DEIS.

this one deals with air pollution, Traffic Studies, and Remediations.

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29 September 2013

Mr. Allen Elliott  
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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

Dear Mr. Elliot,

In order for the decision makers and the public to better understand the nature of the SSFL Clean up to Background (CUB) and have accurate information for making decisions and to do realistic cost/benefit analysis the following items of fact need to be corrected, topics need to be added to the DEIS, and improved projections of environmental impacts made.

The current NASA DEIS is so limited in scope and constrained in considerations of remediations that it makes no sense under the NEPA process or subsequent laws. NEPA does not prohibit any actions, rather it should consider all possible and reasonable alternatives.(NEPA Documents)

How can we accept this DEIS as presented when in the DEIS Purpose and Need for Action (ES-1.0) the words "health of the community" is not included. The SSFL is located on the border of Los Angeles County, SSFL is surrounded by 10 million people. SSFL is not located in central Alaska where the entire population of the state is less than that of Ventura County. **The risk to the health of 10 million people, of the proposed actions, can not be ignored.**

If, the NASA DEIS Purpose and Need for Action (ES-1.0), is amended to add the reason for a cleanup of the SSFL is to reduce the health risks to the community around the SSFL, then **the current level of risk of the SSFL to human health must be measured.**

If, the only reason for cleanup remains as stated is to measure the effect on the local environment as described in the DEIS Purpose and Need for Action (ES-1.0).

Yet the only presented alternative to "Do Nothing" is to "Cleanup to Background "(CUB). CUB is the least sparing of the local environment of all possible alternatives discussed during the scoping and EIS Planning stages.

Three major areas of the DEIS that need to be added and/or corrected are:

1. Air Pollution
2. Traffic Studies
3. Suggestions for Remediation.

## AIR POLLUTION

Air pollution has been a major focus of Southern California and Los Angeles City Regulators for many years. We have strong environmental laws that govern tail pipe emissions, burning anything, and industrial by-products. To ignore this component in the SSFL cleanup is not to appreciate our unique problems. The LA area, and especially the San Fernando Valley, are in a basin that concentrates air pollution. The dry climate coupled with clear skies and sunshine almost year around leads to smog, heat inversions, and other negative effects on the ambient air.

1. The large number of trucks needed to haul out dirt from the SSFL, will produce large swatches of air pollution all along their routes. Numerous studies have been done on the negative effects of air pollution on Southern California communities.

One of the more recent studies done by McConnell, et al, Department of Preventative Medicine, The Keck School of Medicine (University of Southern California) published in Environmental Health Perspectives, May 2006 and followed by a March 2010 extension has found a significant increase in asthma and decrease in lung capacity of children living and/or going to school within 200 meters of a major roadway (freeway or secondary highway such as SR 27, Topanga Canyon Blvd).

There are 4 public elementary schools (Chatsworth Park, Nevada, Capistrano, and Justice Elementary Schools) one city park (Lanark) , and numerous smaller private schools, day care facilities, etc. within the 200 meters of the haul routes. Chatsworth Park's playground is only about 20 feet from Topanga Canyon Blvd. The majority of the non freeway haul routes are through residential neighborhoods where families with small children live.

The effect of the soil transport to hazardous waste dumps must include not just accident risks to children but also the life long effects of the air pollution on their lungs and risk for asthma.

2. These same considerations of added pollution to the air must also be done for the rest of the population living along these haul routes.
3. The current Best Practices of watering down soil, and covering with tarps during transport will not prevent major dispersions of dust and soil along the haul routes. This part of California is usually very dry, strong canyon winds in addition to Santa Ana winds, sunny most of the year, all lead to dusty conditions.
4. Provisions to test for and contain Valley Fever fungus spores (endemic to this area) must be incorporated into any soil removal plans.

## TRAFFIC STUDIES

1. The NASA DEIS presented traffic studies do not match my on the ground observations. The high traffic levels on Santa Susana Road (a very windy and narrow mountain road) are abnormally high in comparison to Plummer and Roscoe which feed large, west side residential and commercial communities. The abnormally high numbers on Santa Susana Road might be a result of traffic to the extremely large Church at Rocky Peak. But Traffic that is clustered around church service hours. This portion of the study needs to be revisited.

2. Some of the traffic projects that disperse the soil, and demolition debris truck traffic both north and south on Topanga and onto the 101 and 118 make no sense since all 8 disposal sites listed in the NASA DEIS are located north and east of the SSFL. (2-18,19).

3. The estimated Truck traffic is probably an underestimated figure for the following reasons:

3.a. More soil will be excavated than the 2 foot planned because of soil churning by local rodents, chemical migration, and uneven bedrock structure.

3.b. The replacement of only 1/3 of the original soil is an unacceptable level of remediation. This implies double the truck traffic, necessary to bring in as much soil as removed.

3.c. Unexpected traffic delays, peak traffic issues, less than full loads because of equipment failures, and climatic and weather caused complications.

4 The projected traffic impacts must be adjusted for the current traffic conditions, especially on Topanga Canyon Blvd. Approximately 15 F-Level of service intersections can be counted between the 101 and the 118 freeway. Averaging projected traffic counts over an 8 or 12 hour work day is not valid.

If the F intersections are avoided during peak hours (7-9 am, 11:30-1:30, 4:30-6:30) the 12 hour work days shrinks to 6 viable hours. Furthermore the truck numbers do not count the round trips; up to the SSFL and back down, so all numbers must be doubled.

A suggestion to reduce truck usage is for trucks containing "contaminated soil" should carry "clean" dirt back up. Trucks should not carry "clean soil" for remediation unless they have gone through a rigorous decontamination process. Both soil removal and remediation will probably require separate trucks, each of which will make a round trip.

Using the conservative NASA DEIS figures regarding soil removal; the proposed 38,731 trucks becomes 112,716 trucks trips (from disposal site to SSFL or reversed). If the trucks are scheduled at DEIS suggested 5 minute intervals, it will take 6.3 years of trucks traveling either down or up Woolsey Canyon and down or up Topanga Canyon Road. Since NASA is only 30% of the SSFL site, when we add in comparable truck traffic for the Boeing, DOE areas we actually get 14.6 years of truck traffic. And this is under perfect conditions with no road repairs, no traffic accidents, and no weather delays!

## REMEDIATION

1. The damage done to Woolsey Canyon, Valley Circle, Roscoe, and Topanga Canyon Road by 14.6 years of constant heavy truck travel must be estimated. All the damage to Los Angeles City and Ventura County Roads must be repaired as part of the cleanup, This cost must be factored in the total cost of the CUB level of cleanup or to other alternatives with lower soil removal goals, as presented.
2. The amount of long term Southern Californian air pollution caused by these 113,000 truck trips and damage to the health of the residents of North West Valley must both be measured and mitigated. The use of natural gas or electric powered trucks could result in a major reduction in Green House Gas and other emissions. This remediation measure must be considered and its cost/benefits calculated.
3. Another way to reduce the impacts of the site cleanup is to reduce the amount of demolition and soil removal. The cost/benefit of STIG, phytoremediation, treat in place, encapsulation, etc. and other remediation strategies must be considered.
4. No soil or debris removal during peak traffic hours.
5. A NASA paid crossing guard at the Topanga and Devonshire intersection to protect children from truck traffic unless prohibition of truck traffic during school arrival and dismissal hours is implemented. Consider crossing guards and extra traffic signals all along the residential portions of the haul routes.

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