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**To:** [MSFC-SSFL-EIS](#)  
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**Attachments:** [Uzemeck NAS DEIS.doc](#)

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Attached are my comments regarding the NASA SSFL Draft Environment Impact Statement.

Alec Uzemeck

Comments on the NASA Draft Environmental Impact Statement  
Alec Uzemeck 8/19/2013

The DEIS only provides a “no action plan” and one other plan that cleans to background. It is rumored that state and federal pressure drove this selection and no scientific review or analysis of other alternate plans was made.

NEPA requires that the Decision Maker be fully informed on all aspects of EIS and further should be informed of all alternate cleanup plans including those that are to be rejected along with an explanation for each rejection. The DEIS discusses the alternate cleanup plans but does not include any metrics to allow comparison of the plans or their attributes. Items such as risk, cost, schedule or disposal volumes are not provided. The reasoning for the rejection of alternates is not provided other than to refer to the AOC agreement that was forced on NASA by the politicians. The metrics need to be included and full rejection reasons need to be shown.

Future land use is not factored in so that cleanup requirements under the various alternate plans cannot be compared and only two plans are shown, cleanup to background or the do nothing alternate plan. Future land use is an important aspect of USEPA cleanup evaluations that matches the cleanup against the eventual land use. Thus land that would be used for parks would have less stringent cleanup requirements than land that would be used for homes. The AOC requirement that the NASA property be cleaned to background applies the most stringent cleanup for property that now is proposed for future park use. Park use would have much less demanding cleanup criteria.

Backfill should be fully discussed in the DEIS. The DEIS states that soil to a two-foot depth will be considered permanently contaminated and removed. Additionally, soil beneath that level may be removed and cleaned and then reinstalled however none of the proposed soil remediation methods have been tried and proven to clean to the levels required by the AOC. In the event that the soil remediation fails the backfill will have to be found from another source and significant delays will occur while looking for soil that complies with the stringent AOC standards. This entire process has a high probability of difficulties and the DEIS does not discuss any worst-case scenario or any plans for a corrective action to maintain the process and schedule.

The EIS further states that only one third of the soil will be returned to the site and does not provide any explanation why this reduced amount will suffice. Will there be areas without topsoil and biota? Will there be sufficient soil to minimize flooding and silt runoff?

The traffic analysis underestimates the number of truck trips. In the DEIS plan there would be trucks carrying away contaminated soil and those trucks coming back empty. But additional trucks would be bringing back remediated soil or backfill and leaving empty. It is possible that some truck trips may be eliminated if the trucks leaving with debris could be used to bring back backfill however that close coordination of events is unlikely as previously discussed under the subject of backfill.

The DEIS did not discuss another factor to the trucking problem and that is that Boeing and DOE will also be conducting excavation and trucking to remove the contaminated soil. The DEIS says that NASA will operate on a schedule beginning at 7:00 AM to 7:00 PM. If all of the RP's excavation occurs simultaneously the roads from the site will be jammed or operating in extended hours thus creating a further hardship on the surrounding communities. This also assumes that sufficient trucks and drivers are

available to meet the 2017 completion date. I recommend that NASA and DTSC discuss extending the completion schedule perhaps to 2020 so as to not overload the necessary transportation and roads.

The archeology, architecture and biology are not sufficiently discussed in the DEIS and are not clearly described in the AOC. NASA and DTSC need to develop specific directions in these subjects before the DEIS goes forward. For example the AOC's speaks about protecting artifacts and the question arises is the Burro Flats cave considered an artifact or will it be removed?

The DEIS does not present the full information for the NASA site and assumes that the Best Management Practices will mitigate all of the cleanup negatives while many of these BMP's have not been tested or proven. The BMP discussion does not contemplate failure and no failure scenarios or recovery plans have been presented and the effects of the cleanup in an accelerated/ catch up recovery mode have not been discussed. The narrative regarding cultural items is confusing since it appears that more information is required from DTSC and from specialists.