

**From:** [Diana Dixon-Davis](#)  
**To:** [MSFC-SSFL-EIS; Diana Dixon-Davis](#)  
**Subject:** FW: Response to NASA-DEIS re Chats.Nat.Prsv, Wildlife Corrid.  
**Date:** Monday, September 30, 2013 10:01:51 PM  
**Attachments:** [2013.09.25 DDD NASA SSFL DEIS Resp re Wildlife corridors.doc](#)

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From: dixon-davis@hotmail.com  
To: msfc-ssfl-eis@mail.nasa.gov; dixon-davis@hotmail.com  
Subject: Response to NASA-DEIS re Chats.Nat.Preserve and Wild life corridors  
Date: Mon, 30 Sep 2013 19:58:51 -0700

Dear Mr. Elliott,

Please find attached my second response to the NASA-DEIS.

This letter deals with Chatsworth Nature Preserve and the Wildlife corridors found in the SSFL.

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25 September 2013

Mr. Allen Elliott  
SSFL Project Director  
NASA MSFC ASO  
Building 4494  
Huntsville AL 35812

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. Elliott,

The NASA DEIS contains three major deficiencies in regard to wildlife corridors:

1. Effects on Chatsworth Nature Preserve are not evaluated.
2. Ignoring known , research verified, wild life ranges,
3. Use of flawed resources for DEIS wildlife corridor characterizations.

There needs to be a reassessment of singular impact (NASA) and cumulative impacts (remainder of the SSFL Site i.e Boeing and DOE ) and the effects of Clean Up to Background (CUB) on Biology. It can not be claimed that CUB is considered beneficial to Biology. (Table ES-2). Air pollution and water pollution and diversion must be factored into a cost/benefit analysis as to the impact on local communities, not just the SSFL site.

The Chatsworth community requests (see their DEIS Response of 3 Sept 2013) a major revision of the NASA DEIS which will then include several alternatives between "Do Nothing" and "Clean-up to Background" (CUB). CUB cleanup levels for approx 450 trigger point chemicals and compounds will leave the SSFL stripped of all flora, fauna, and most of its soil! I and my community want to be presented alternatives that will leave the area as natural as possible. I want the area to become a State or Federal Park; connected up with the Rim of the Valley master park, with a realistic preservation of this "choke point" wildlife corridor from the Santa Clarita Woodlands to the Santa Monica Mountains National Recreational Area.

1. The **Chatsworth Nature Preserve** (CNP) is repeatedly identified as the Chatsworth Reservoir thorough out the DEIS (i.e Figure 2.1-1, et al) .This Los Angeles City, Department of Water and Power property was reclassified as a Nature Preserve in 1997 with some areas having a **Perpetual Environmental Easement as of 2011**. This needs to corrected throughout the DEIS.

1. a. The individual and cumulative effects of air pollution, accidents, and dust and debris from the large number of trucks removing and bring in soil under CUB must be assessed on this Nature Preserve and its Permanent Environmental Easement wetland. Since all truck traffic and employee traffic will pass around a significant part of the Chatsworth Nature Preserve. The CNP's Permanent Environmental Easement is within a few feet of the intersection of Woolsey Canyon Road and Valley Circle Drive. This level of traffic will negatively effect movement of wildlife into and out of the CNP. The community of Lake View Manor and along Roscoe Blvd will also be subject to major traffic impacts.

1.b. The individual and cumulative effects of the diversion and disruption of water flow into the Chatsworth Nature Preserve and local Blue Line streams (Bell Canyon, Black Canyon) must also be evaluated.

2. . **Wildlife corridors and ranges cover all of the SSFL**, including the NASA area. Wildlife do not recognize the boundaries of the NASA property, As shown by Dr. Seth Riley\* Assistant Adjunct Professor, UCLA, Department of Ecology and Evolutionary Biology who has mapped the home ranges of many of the Los Angeles and Ventura County mountain lions. ( See mapped home ranges at <http://aprodxn.com/laist/zfiles/LAist-mountain-lion-map.jpg>). The wildlife corridor section of the SSFL DEIS must be corrected based on this research and the effects of CUB re-evaluated.

\* ( Dr.Seth Riley's research focuses on the ecology and conservation of wildlife in fragmented urban landscapes. Specifically, this includes the behavior and ecology of wide-ranging mammalian carnivores such as mountain lions and bobcats, the effects of fragmentation and roads on the population genetic structure of wildlife (including carnivores, reptiles, and birds), and the effects of urbanization on the diversity and abundance of reptile and amphibian communities. Seth is also interested in conservation and management of wildlife in National Parks, and in the effective long-term monitoring of National Park resources. UCLA Website).

3. The use of questionable data and unverified sources must be corrected. This portion of the DEIS must be redone.

An expert on wildlife corridors has evaluated the "Wildlife Corridors" described in the DEIS with the following criticisms:

"In sum, this NASA DEIS statement: "However, the NASA administered portions of SSFL are outside of the critical habitat corridors in the region identified by the U.S. Fish and Wildlife Service (USFWS) (Figure 3.4-2) (Ventura County, 2005)" contains two important factual errors

1. the corridors were not identified by the USFWS and
2. the citation is not to the source of the corridor maps either, it was taken from another source and printed in the UCSB report then is cited as "Ventura County, 2005".

This is a serious error of professional judgment; the use of unvalidated predictive wildlife movement models for the purpose of impact assessment. "

**IN SUMMARY** A cost/ benefit should be done to analyze costs associated with CUB cleanup versus costs to the surrounding communities and the Chatsworth Nature Preserve of truck traffic, damage to environment, and destruction of historical and cultural treasures. These costs must be weighed against currently unknown community health benefits of CUB on site. Cleanup of SSFL to Parkland Standards also has the very high and known benefits of creating a large park connecting the Santa Monica Mountains National Recreational Area, through the Rim of the Valley (proposed National Park) , Santa Susana State Historic Park, with the Santa Clarita Woodlands Park, and the Angeles National Forest.

Diana Dixon-Davis