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To: [MSFC-SSFL-EIS](#)
Cc: [Elliott, Allen \(MSFC-AS01\)](#); [Fellows, Merrilee \(HQ-LD000\)](#)
Subject: NASA SSFL Comment; DEIS
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Attachments: [NASASSFLcommentsept2013.docx](#)

Dear Allen,

My NASA SSFL DEIS Comment is attached.

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October 1, 2013

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

Comment: DEIS for Santa Susana Field Lab (SSFL), Ventura County, CA
NASA portion AREA II and 42 acres AREA 1: Impact Statement for Demolition and
Environmental Cleanup under Administrative Order on Consent (AOC)

Rock Art to Rocket Ship: There is no other place on Earth representative of human's achievements in a broad range from prehistoric to modern time (circa AD1000 to 2006) as represented in the historic and sacred districts of Native Americans artifacts juxtaposed with rocket engine test stands. The site teems with Native American archeological and cultural assets including Burro Flats' pictograph representations of earth, animals, humans, symbolism and astral images. Rocket engine development and testing on Alfa, Bravo and Coca test stands built in the dramatic sandstone rock formations are testimony to the greatest culmination of mankind's scientific engineering achievements.

Each Test Stand in NASA Area II Historic Resources, built in the natural boulder settings, has rocket development historical significance:

Alfa 1 and 3: Tested Navajo, Jupiter, Thor, RS-27, Cold War Intercontinental Ballistic Missiles (ICBM) and Atlas engines (supported first manned orbital flight, 1962.)

Bravo Test Stands 1 and 2: Thor, F-1, Atlas, E-1 and Delta engine programs, project Mercury Missions, 1st manned mission: Mars Mariner.

Coca 3 and 4: Atlas, supported the second stage of Saturn 1B and V (Apollo,) Atlas, J2 (Space Shuttle Main Engines SSME)

Development of manned and unmanned space flights that reached outer space in the sphere of rock art astral images created by Native Americans is a phenomenon. Missile and outer space exploration, from the Atlas Intercontinental Ballistic Missile, Apollo rocket engines (Saturn V) to the Space Shuttle Main Engine (SSME) happened through development/testing at the NASA SSFL site. Sacred and historical districts of Native American and Rocket Engine development/test stand sites must be preserved, not demolished. Rocket engineers and scientists lamented Rocketdyne/Boeing's destruction of the first test stand built, Vertical Test Stand I in the "Bowl" area. Further demolition of any remaining test stand is destruction of historical assets and a callous disrespect to all the men and women who worked tirelessly during the 1940's through the present decade to make California and America a leader in outer space exploration. NASA rightfully calls the test stands "Historic Resources". All remaining test stands need to be preserved, not just one, an Alpha Test Stand, as suggested in the September Section 106 Consulting Meeting.

AOC: There are many “legal potholes” to the AOC, everything from the lack of implementation and adherence to the NEPA process to a comprehensive health risk assessment of an extreme cleanup to background level. The destruction of a natural landscape can lead to greater eco-destruction from future climate conditions, wildfires, flooding after a drought period made more severe from loss of natural vegetation, an insurmountable loss of habitat in the Simi Hills, a crucial wildlife corridor. The AOC needs to be legally challenged because it lacks the proper procedures to follow historical, cultural, and environmental federal and state laws. SB990 was found to be unconstitutional and lacking scientific evidence that the SSFL requires a radical cleanup procedure or poses any significant threat to public health. (Ref: Report #IG-13-007, Appendix F) The AOC is just as unlawful as the SB 990.

Environmental Justice: The contamination cleanup is challenging but better served to apply technical scientific methods on site, ongoing monitoring and cleanup while minimizing the need to remove soil/vegetation as opposed to moving tons of hazardous and non-hazardous earth and rock to other southwest locations. Locations such as Buttonwillow or Kettleman in the San Joaquin Valley, already recipients of large volumes of various contamination materials, are protesting future waste dumping. The Center on Race, Poverty and the Environment, (CRPE) has sponsored a bill, AB1329, that passed the California Assembly in May, 2013 and Senate in September, 2013, to prevent hazardous waste dumping in over-burdened communities; an environmental initiative that ensures justice fair and equitable environmental policies for all residents. NASA and Boeing have targeted these communities to receive SSFL hazardous and non-hazardous soil. Another targeted contamination dumping site, the Mojave Desert, must also be protected and not made into a manmade giant toxic dumping ground.

Health and Safety Risk Assessment: Moving 80,000 truckloads of soil and rock through the San Fernando Valley and beyond will cause great risk to lives. The beginning of the route from SSFL, Woolsey Canyon Road, was built to support delivery of materials to the SSFL. Los Angeles City and County does not have records on file of the load capacity for Woolsey Canyon. This road does not support the proposed truckload hauling of soil and rock. Because of the rock formations along the route the road is steep with hairpin turns. Full size dump trucks cannot make these turns without crossing over the 2-lane dividing lines, a road condition with high-risk accident danger. Because of the natural terrain, the road cannot be rebuilt or widened to accommodate years of heavy truck usage. The turn at Woolsey Canyon onto Valley Circle Boulevard is another high risk point and will severely hamper the movement of traffic at this turning point and throughout the route from the SSFL to any designated landfill site.

How much water during a natural drought condition will be needed to prevent huge dirt-dust contamination being kicked up during soil-rock digging in the surrounding area? What is the effect of diesel fumes and the release of toxic chemicals during excavation on the population located near the SSFL and along the truck routes that will occur in an extreme cleanup for a projected ten years? The risk assessment factors for an extreme cleanup need to be addressed.

Contamination Assessment: Is it possible to perform an accurate assessment of the actual amount of chemical residue from the Topanga fire, 2005, versus rocket engine cleaning chemicals that are in the soil? How can the State of California and the federal government determine fracking, a process of shooting a 90 plus toxic chemical cocktail deep into the earth, known to cause earthquakes and poison our water, is acceptable yet there is a hyperbole

legislation to cleaning SSFL to background level? DTSC has tested and found that the land at the base of Runkle property, adjacent to the SSFL, downhill on the Simi Valley side and in the SSFL watershed, is not contaminated and a large housing development can be built at this location. The Summit Mobile Home property on Woolsey Canyon on the Los Angeles County side, within one mile of the SSFL has also been soil tested and not shown to have SSFL contamination. Bell Canyon Creek supports a healthy population of amphibians and reptiles. The SSFL site is home to all species of wildlife from flying, crawling and walking. This is an indication that the ongoing SSFL on-site cleanup is working.

Rational Approach to Cleanup: A seemingly punitive and irrational approach to the SSFL cleanup has prevailed by a group of activists. There is no question or argument that during the post-WWII/Cold War and rocket exploration that rocket engine cleanup and chemical handling was not properly handled and cases of health conditions, including cancer, may be attributed to this factor. However, this was also the era of smoking, even smoking on the job. There is no way to determine which caused a slightly higher cancer incidence at the SSFL, chemicals or smoking. While there is a slightly higher incidence of cancer for SSFL workers, many of the engineers, including Samuel Hoffman, North American Aviation-Rocketdyne team leader of rocket propulsion (1949 through 1970), lived a long life (1902 – 1995). There are many SSFL engineers, scientists, machinists, workers who have lived beyond 80 years old.

Recently Boeing has been threatened with a lawsuit for demolishing and moving “contaminated” structures and materials from the SSFL to other sites. An extreme cleanup by NASA to the rigid AOC background level will require moving “hazardous” and “non-hazardous” material to other locations. This supports the concern that an extreme cleanup will cause another contamination problem in a new location where SSFL soil will be relocated.

A cleanup to background level as outlined by the AOC, will cause great harm to the environment, at the site and offsite, destroy historical and sacred Native American archaeological districts, historic rocket development test stands and structures, and threaten a sensitive ecological habitat. At risk from an AOC cleanup are the rare and endangered Braunton’s Milk-Vetch and Santa Susana Tarplant as well as many other native plants. SSFL, an integral part of the crucial wildlife corridor in the Simi Hills connecting the Santa Susana with the Santa Monica Mountains, must be protected, not destroyed. The National Park Service (NPS) is considering the takeover/management of the SSFL as an open space – historic park site. If the mandates of the AOC are enforced, the land will be destroyed along with all cultural/historic assets. All will be lost. NPS will not be interested in the property. Eventually, the possibility of a large developer of residential property will want to purchase this land. This must be prevented from happening by preserving the natural and manmade resources at the SSFL site. The community and environment is much better served by having NPS and possibly the Native Americans, Santa Ynez Chumash, become the stewards of this unique landscape and historical site.

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In summary, common sense, respect for the natural environment and historic sites, federal law on federal property, not state law, must be applied to handling the NASA-SSFL cleanup. A responsible cleanup without destruction to a natural place, acceptance of a long-range ecological restoration without severe damage to the environment caused by excavation and relocation, is a rational approach. We, the current caretakers of this sensitive eco-system, Native American sacred sites, cultural, and historic sites from prehistoric to modern technological structures, must preserve all that is sacred.

Sincerely

Carla Bollinger
Section 106 Participant

Affiliations but not speaking on their behalf: Santa Susana Mountain Park Association, Chatsworth Nature Preserve Coalition, SFV Audubon Society Member, Sierra Club Member, Southwestern Herpetologist Member, SSFL Public Participation Group Member representing Woolsey Canyon residents, and Associated Historical Society of Los Angeles Member.