From:	Taylor Bradley Jacobs
To:	MSFC-SSFL-EIS
Subject:	Public Comment for SSFL Project
Date:	Tuesday, October 01, 2013 10:50:00 PM
Attachments:	SSFL Case Study.docx

Dear Mr. Elliott,

In this email is a public comment that I wrote in regards to the proposed project at SSFL. I appreciate all the time and effort that you and your staff must have put in to compile this information about the project and hope that my comment will be helpful to you going forward with process. Feel free to contact me at this email if you would like. Thanks!

Taylor Jacobs

September 30th, 2013

Comments Due: October 1st, 2013

Allen Elliott
National Aeronautics and Space Administration
SSFL Program Director
NASA MSFC AS01, Building 4494
Huntsville, AL 35812
msfc-ssfl-eis@mail.nasa.gov

RE: Proposed Demolition and Environmental Cleanup Activities at Santa Susana Field Laboratory

Allen Elliott,

My name is Taylor Bradley Jacobs, and I am currently a student at the University of Colorado at Boulder's Environmental Design School, with an emphasis in City Planning. I am writing this public comment as a generally concerned citizen in the hopes of aiding your process in deciding between the proposed Demolition and Environmental Cleanup Activities outlined by the DEIS and the No-Action alternative. I believe that first and foremost that it is a good idea to remediate the lands that the Santa Susana Field Laboratory (SSFL), but I believe certain alternatives are left unexplored in the DEIS. Restoring the lands would give Ventura County valuable open space for development in Area I (the Liquid Oxygen Plant Area- 41.7 acres) and all of Area II (409.5 acres), but due to the SSFL history in Ventura County I believe these structures may have historical relevance to the County and their disposal should be appropriately considered.

In Section 1.1 of Appendixes A, B, C, D of the DEIS, it is outlined that on the site there is approximately 500,000 cubic yards of contaminated soil from past and SSFL uses. It is also stated that 64% of this soil (320,000 cubic yards) will have to be removed, and the other 180,000 cubic yards may have to be excavated to remediate successfully. This remediation effort when compounded with the Proposed Action proposal of removing the 55 structures on the sites would essentially destroy all existing ecology on the site if not properly executed. I believe that it would be far more productive and cost effective to work with the County of Ventura's Planning Department to come up with a rough plan for development or preservation in the future on the site. Creating a plan would naturally inform upon what methods should be employed for remediation in specific areas. This could also save some of the landscapes of the Historical Indian sites, and buildings from the SSFL by slating them to be historical landmarks, museums, or adaptive reuse projects for the county. This could save both the County and NASA money by approaching this process with a little vision down the road of what they want the land to become.

The site also has three NRHP eligible districts (Alfa, Bravo, and Coca) with three buildings from each district eligible for the status. If the proposed action option is chosen than the buildings will no longer be there; therefore ineligible for NRHP status. But if the no-action alternative is chosen than the buildings

will remain but the land will stay contaminated and unproductive. The two-option plan is acting as a double edged sword that prevents responsible land use methods and much as it is trying to promote them. In appendix C of the NHPA's (Section 106) prepared report on "Findings of Effect Consultation Report, Ventura County, California" on page 5 it states: "NASA has found that the Proposed Action – demolition of up to 100 percent of structures, soil cleanup to background levels, and groundwater cleanup – would result in and adverse effect on historic properties…" By keep this plan as only a two-option project it detracting from what Section 106 was passed to do by the NHPA "preserve the historical and cultural foundations of the nation as a living part of community life." (A Citizen's Guide to Section 106 Review Pg. 4). For these reasons I hope you will consider opening up the project to more alternatives than just the proposed action and the no-action option.

Any questions of follow up communication may be sent to my school e-mail taja6029@colorado.edu. I greatly appreciate all of your time in considering my comments and all of your hard work at NASA.

Sincerely,

Taylor Jacobs

Addendum to Public Comment

Sources:

http://www.achp.gov/docs/CitizenGuide.pdf

http://ssfl.msfc.nasa.gov/environmental-cleanup/environmental-impact-statement/

Background:

SSFL is located in southeastern Ventura County, California. NASA administers part of Area I (the Liquid Oxygen [LOX] Plant Area, (41.7 acres) and all of Area II (409.5 acres). The Boeing Company owns the remainder of the 2.850 acres of SSFL property.

Since 1948, site activities at SSFL included research, development, and testing of liquid-fueled rocket engines and components. From the 1950s through the early 1970s Rocketdyne (one predecessor to Boeing) conducted operation in Areas I and III in support of various government space programs and in Area II on behalf of the United States Air Force, and then of NASA. NASA gradually discontinued test activities in the 1980's and conducted its final tests in 2006. Area II was deeded to the USAF in 1958 and to NASA in 1973. The LOX Plant in Area I was transferred to NASA in 1976. NASA reported its Santa Susana property as excess to its mission needs in September 2009. (From Executive Summary-Background section in DEIS)

In accordance of the National Historical Preservation Act (NHPA) Section 106, NASA was required to draft an EIS statement about the different historical structures that would be affected if the proposed action of the plan were to get approved.