

From: [Rick](#)
To: [MSFC-SSFL-EIS](#)
Subject: SSFL DEIS comments
Date: Monday, September 30, 2013 5:42:14 PM
Attachments: [Brandlin NASA DEIS Comments.docx](#)

Mr Allen Elliott
SSFL Project Director
NASA MSFC ASO1, Building 4494
Huntsville, Alabama, 35812

Dear Mr. Elliott:

Please find attached my comments on the NASA SSFL DEIS, with my contact information.

Thank you.

Richard Brandlin, M.S. Env. Mgmt, LEED AP

September 30, 2013

NASA SSFL DEIS Comments

Allen Elliott,
SSFL Program Director,
NASA MSFC AS01, Building 4494,
Huntsville, AL 35812

Dear Mr. Elliot:

Please find below my comments on the Draft Environmental Impact Statement for the NASA portion of the Santa Susana Field Laboratory.

I add my name to the long and growing list of interested parties for whom the NASA SSFL DEIS is fatally flawed from both a strategic and technical perspective. In the larger sense, the DEIS is artificially constrained by three impediments: 1. Slavish adherence to the 2010 AOC which compels the parties to attain clean-up levels that bear no relation to the public health risk posed by the site , 2. As the result of political pressure from Senator Barbara Boxer and the Council of Environmental Quality Chair Nancy Sutley, and in contravention of the letter and spirit of the NEPA process, NASA has produced an analysis of only two alternatives, one of which is the “No Action” alternative, itself a creature of the 2010 AOC which leaves no room for a middle ground; and 3. Failure to consider the combined effects of three separate but parallel cleanup actions from the Responsible Parties .

From the technical side, some of the analysis that did occur failed to adequately account for the preservation of historical and cultural resources as well as a failure to analyze or mitigate impacts from cleanup activities, specifically truck traffic impacts on surrounding streets and communities. I urge you to review and revise your analysis regarding the preservation of Native Peoples sacred grounds, particularly the Burro Flats area, and preservation of the Alpha

and Bravo test stands and ancillary buildings and structures that are critical to historical perspective on the U.S. space program, and to retain as much as possible for future generations. As to truck traffic, the DEIS should be revised to include the transportation risk in terms of additional morbidity/mortality per transportation mile for the evaluated alternative. ANY fatalities from site remediation activities are completely unacceptable.

Given the oppressively destructive consequences of NASA adherence to the AOC, I offer my position that the No Action alternative is actually preferable to AOC-level clean-up. I also strongly support a Modification In Principle of the type supported by the SSFL Community Advisory Group that would allow parties to the AOC to revert to the risk based clean-up scenario contemplated by the CA Dept. of Toxic Substances Control-approved SSFL Standardized Risk Assessment Methodologies, rev. 2007, to implement a cleanup standard consistent with the future land use of administered parcels, thereby creating a path forward toward resolution of the contamination issues at the SSFL, and final disposition of the site.

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