

September 2, 2013

2345 East Brower Street
Simi Valley, CA 93065

Allen Elliott, SSFL Project Director
NASA MSFC ASO1, Bldg. 4494
Huntsville, AL 35812

SUBJECT: COMMENTS ON DRAFT EIS FOR PROPOSED DEMOLITION AND ENVIRONMENTAL CLEANUP ACTIVITIES AT SANTA SUSANA FIELD LABORATORY, VENTURA COUNTY, CALIFORNIA, JULY 2013

Dear Sir:

Thank you for this opportunity to comment on the adequacy of the subject draft environmental impact statement (DEIS) on the NASA portion of the Santa Susana Field Laboratory (SSFL).

LACK OF REASONABLE RANGE OF ALTERNATIVES

The heart of NEPA is that the sponsoring agency should rigorously explore and objectively evaluate all reasonable alternatives. The DEIS limits its alternatives to: 1) cleanup to background and 2) the "do nothing option." The "do nothing" alternative is not an alternative for cleanup of the site. Both the cleanup to "recreational standards" and the cleanup to "residential standards" must be considered. Both of these standards would require much less soil removal, would ultimately result in less soil erosion and destruction of the natural setting, including possibly rock outcroppings, natural vegetation and wildlife habitat. It is likely to require less destruction of buried, disturbed and relatively undisturbed cultural resources.

The DEIS should include a discussion of the ultimate land use of the site. If it is anticipated that the ultimate land use will be for recreational or residential purposes, then it is fiscally wasteful to attempt a cleanup to background standards.

Finally, to restrict the cleanup of the NASA property to one alternative, i.e., the to background readings, seems to have been a political decision, which seems to have swept aside the requirement to include in an EIS an objective evaluation of all reasonable alternatives. That decision has made a mockery of the federal review process as prescribed in the NEPA legislation and would not serve the public interest.

REMOVAL OF SOILS AND REPLACEMENT OF UP TO ONE THIRD OF THOSE SOILS

This alternative is characterized as an initial removal of two feet of soils wherever soil contamination has been or will be identified. If the underlying soils are found to still be contaminated, then excavation would continue until background, i.e., natural, readings are achieved. This procedure may require removal of all soils and ripping up the weathering front of the underlying bedrock. The resulting landscape may well resemble a moonscape or an array of "borrow pits." The report commits to replace of up to one third of the soil removed by imported clean fill - if such material in sufficient quantities can be found and made available. The availability of such materials seems unlikely. Even if one third of the volume of the exported soil is replaced by alluvium from outside the project area, the character of the site would be altered for the foreseeable future. Over the long term, the NASA lands would never fully recover.

Any relatively clean backfill is unlikely to resemble on-site soils geologically and would contain exotic unwanted plant seeds and organisms.

A benefit of the removal of so much soil is stated to be fewer animals dying from toxins in the soil. As far as I am aware there have not been any studies made to determine whether or not wildlife has been adversely impacted by soil contaminants on site. A benefit should not be forecast for an impact that has not been demonstrated.

COAST LIVE OAKS

Coast live oaks represent the dominant native tree on the site. Coast live oaks are near and dear to the hearts of people in the southern California area. Trying to determine whether only a few, many or nearly all of the trees are slated for demolition during soil cleanup operations is difficult to achieve based upon viewing a digital file of the Draft EIS and is not disclosed in the document. It may well be desirable to leave health oak tree undisturbed - thereby leaving some contamination behind. During demolition and soil removal operations the trees should be fenced off beyond the driplines of the trees using chainlink fencing. Any removals should be replaced with ten (10) or more seedling with a deep-root water program for a two-year period.

ARCHAEOLOGICAL DEPOSITS AND RESOURCES

The NASA properties was a heavily utilized area by native Americans. Much focus is relating to rock art sites and other ceremonial features, such as cupules, bedrock mortars, rock alignments, and shadow and light effect, which may have been associated with ceremonies. However, the site the site of the SSFL was probably used seasonally throughout the year for thousands years to gather food and other resources as well as for hunting. Nearly all of the structures and associated road grading, paving activities, and emplacement of utilities during the historic period were conducted without environmental reviews. At the time, there seemed to have been an awareness of the spectacular rock art panel associated with CA-VEN-1072 and its possible significance, and efforts seem to have been made to protect that rock art panel. However, it is likely that many archaeological loci were destroyed, disturbed or buried during grading activities. Those sites, disturbed or not, may be impacted by cleanup activities. It is

MISCELLANEOUS COMMENTS

Figure 2.1-1: The Brandeis Bardin Institute has been the Brandeis Bardin Campus of the American Jewish University since 2007.

Figure 3.10-1 Box Canyon Road is shown as an arterial street. The text mentions Box Canyon Road only in the context of it being a road that cleanup and demolition workers might use to get access to and from the work site on their way to and from work. I assume, therefore, that it is not being considered as a route to and from State Route 118 by heavy trucks for the removal of contaminated waste and demolition debris and the return of those trucks to the SSFL. An argument could be made that the road is hazardous even for cars and light trucks, let alone for heavy construction vehicles.

Sincerely,

A handwritten signature in black ink that reads "Michael W. Kuhn". The signature is written in a cursive style with a large, stylized initial 'M'.

Michael W. Kuhn