5416 Manton Avenue

Woodland Hills, CA 91367

September 30, 2013

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

RE: NASA Draft Environmental Impact Statement

Dear Mr. Elliott,

In this letter I present some of my comments on the Draft Environmental Impact Statement (DEIS) relating to the clean-up and remediation of the portion of the Santa Susana Field Laboratory controlled at present by NASA. My qualifications include former employment at Atomics International, a division of North American Aviation, and a long time residence in Woodland Hills, California. I was employed at Atomics International from November, 1955 until 1965, when I transferred to the Rocketdyne Division of North American Aviation. In 1968 I left North American and went to work for the AiResearch Manufacturing Company in Los Angeles and in Torrance, California.

One comment and objection to the DEIS is that the preparers have considered only two clean-up options:

1. Do nothing. Leave the property as it is.
2. Clean up the property to the condition it was in before it was used as a field laboratory.

I recommend that NASA redo the DEIS and include a clean-up standard in keeping with the proposed ultimate use of the land: a park. Using "park" rather than "original condition" as the basis for the clean-up standard would require much less replacement of soil at the site and much less truck traffic along routes that necessarily go past schools, residential areas, recreational areas, and through a street (Topanga Canyon Boulevard) that already has very heavy traffic. The standard chosen for the DEIS requires the removal of about 500,000 cubic yards of slightly contaminated soil with the replacement of 250,000 cubic yards. Moving this much material within two years requires at least 50 loaded trucks per day with the same number of empty trucks returning, or approximately one every five minutes in one direction or the other.

In addition to the truck traffic required to clean up the NASA site, there will be truck traffic needed to clean up the remainder of the SSFL – the park owned and controlled by the Boeing Corporation. Whatever standard of clean-up that is finally used in cleaning up the NASA portion will probably also be used for the Boeing portion.

The preparers of the DEIS did not consider the total risk of any clean-up standard. In the case presented in the report, the risk of a polluted or partly polluted site was not weighed against the risk to the general public of the activity required to achieve the "original" condition. Any activity associated with cleaning up the site involves risk to some populations. I think it would be appropriate to compute the total risk of each of several clean-up approaches and choose the one with the smallest total risk. Aside from the personal satisfaction that dedicated environmentalists get from a "perfect" clean-up, I see no reason for insisting that such a stringent standard should be applied.

Another comment is that I think it would be a good thing to leave at least one of the rocket engine test stands intact. An intact test stand would be an interesting souvenir of the early part of the space exploration age and an attractive exhibit if the land is to become a park. Leaving a test stand intact would encourage people who decide such things to make the land into a park instead of eventually selling it to developers.

In my opinion the draft EIS for the clean-up of the NASA property at the SSFL should be redone, with detailed consideration of several clean-up standards and an assessment of the total risk associated with each one. If that is done, the resulting document will be a useful tool in deciding which clean-up standard to use. In its present form, the document is useful only in fueling a controversy over the risks of the one clean-up standard described therein.

Sincerely yours,

Albert J. Saur, Ph.D.

cc.: Merrilee Fellows