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

msfc-ssfl-eis@mail.nasa.gov

Re: Comments on Draft Environmental Impact Statement for Proposed Demolition and Environmental Cleanup Activities at Santa Susana Field Laboratory, July 2013.

Dear Mr. Elliott,

I am pleased to submit these comments and express my deep concern over the contents of the DEIS and the negative impacts of both of the two alternatives that are evaluated.

The document and the process that created it are flawed by the political interference that caused the removal from consideration of alternatives intermediate between two unacceptable extremes. The Proposed Soil Cleanup to Background/Detect would have significant negative environmental impacts and the No Action would leave contamination in place that most would agree should be removed. Surprisingly, the No Action appears to have far fewer negative environmental impacts than the proposed action.

Additionally, because the re-evaluation of significant negative impacts 'After Implementation of Best Management Practices and Mitigation Measures' for two resource areas, Cultural Resources and Biological Resources, are dependent only on the results of future consultations, there is significant uncertainty in the ultimate evaluation of these impacts. The possibility of additional behind-closed-doors political influence/coercion affecting these consultations is real, based on the actions leading to the removal of the alternatives from this DEIS.

The DEIS itself is overly optimistic and minimizes the amount of soil to be removed by neglecting the likely impacts of the very low soil remediation trigger levels coupled with the extensive confirmation sampling that would be required. Note that DTSC has stated that when the chemical LUT values were applied to the background locations false positives in the range of 20-25 percent were observed. The minimization of soil removal is further compounded by the assumption that all Best Management Practices and Mitigation Measures would be 100% effective in eliminating the negative environmental impacts. As will be discussed in later comments this is highly unlikely.

Finally, the removal of two feet of soil, with all of its lifeforms, from large portions of the NASA areas together with deeper excavations down to bedrock, plus replacement of only one-third of the removed volume would significantly reconfigure the landscape and could be characterized as

