

September 2, 2013

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 subject 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. While this is done on the subject of soil remediation, the DEIS limits its alternatives to cleanup to background and a 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 result 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.

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 ripping 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 fill - if such material in sufficient quantities can be found and made available. The availability of such materials seems unlikely, which would leave future generations with the same moonscape. 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.

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

Figure 2.4-1: Each of the cited potential conveyor routes, with the possible exception of Rail Site 1, to the Union Pacific Railroad (UPRR) would present multiple problems, including land use incompatibilities and inadequate sites for rail car loading. Note that the areal extent shown for Corriganville Regional Park omits portions of the park.

Rail Site 4 would go through or immediately adjacent an archaeological site complex, including rock art. It would go through the Brandeis-Bardin Campus, which features summer outdoor programs and some outdoor programs during the rest of the year. The proposed route would constitute an attractive nuisance for camp participants and an industrial hazard. The conveyor terminus would have to cross the Arroyo Simi Flood Control Channel and Los Angeles Avenue to access the railroad, where there simply isn't room for loading facilities. Both light industrial and residential land uses are nearby. The UPRR is a major interregional transportation corridor, which includes Amtrak and Metrolink services.

Rail Site 2A does not include a rail siding and would be across the railroad from the Corriganville Regional Park. The state water project pipeline runs under the area and facilities for loading would be near the west orifice of the railroad tunnel under Santa Susana Pass.

Rail Site 2B lacks room for a rail siding without taking parkland and would be located at the west orifice of the railroad tunnel under Santa Susana Pass.

The proposed construction of such conveyor and rail loading facility would require appropriate environmental review beyond what is stated in the subject draft EIS.

Page 3.23: It is my understanding the the Santa Susana Tarplant is listed by the USFWS as a "Threatened" species. Has it been delisted? Are any of the Santa Susana Tarplants located in open soil areas or are they restricted to sandstone outcroppings?

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. An argument could be made that the road is hazardous even for cars and light trucks, let alone for heavy construction vehicles.

Removal of Two Feet of Soil: All soils in our local mountains are subject to bioturbation by California ground squirrels, other rodents and rabbits. Burrowing activities can result in migration of soil contaminants below two feet. Where soils are contaminated, it is likely that some contamination would extend down below the two-foot level. Would testing be done to determine whether or not further removals would be necessary?

Not replacing nearly all of the soil that is removed could result in a “borrow-pit” landscape. A policy of smoothing the resulting landscape should be followed.

Replanting with local native plants and seeds in order to reduce soil erosion should be required.

Coast Live Oaks represent the dominant native tree on the site. The trees 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 determine based upon viewing a digital file of the Draft EIS. 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 Sites: The NASA properties was a heavily utilized area by native Americans. Much focus is relating to rock art sites and other features, such as cupules, bedrock mortars, rock alignments, and shadow and light effect, which may have been associated ceremonies. However, the site was probably used seasonally throughout the year to gather food and other resources as well as for hunting. Nearly all of the structures and associated road grading and parking lot activities during the historic period were conducted without environmental review. At the time there seemed to have been awareness of the spectacular rock art panel associated with CA-VEN-1072 and its significance and efforts seem to have been made to protect that rock art panel. However, it is likely that many archaeological loci were destroyed or buried during grading activities. Those sites, disturbed or not, may be impacted by cleanup activities. It is important to have all grading activities observed by Chumash Indian and archaeological consultant monitors, who are authorized to defer, at least temporarily, grading when such resources are encountered. These monitors should accompany each piece of grading equipment. This requirement may seem onerous, however, the operator of a piece of heavy equipment is not in a position to spot such resources and a

contractor has little incentive to comply with a requirement to be sensitive to archaeological deposits.

The Chumash buried their dead, so it possible, especial during soil removal from CA-VEN-1072, that human burials will be encountered.

Archaeological site CA-VEN-1803, listed as a "lithic scatter," should be subject to Phase II testing in order to determine its significance.

Sincerely,

Michael W. Kuhn