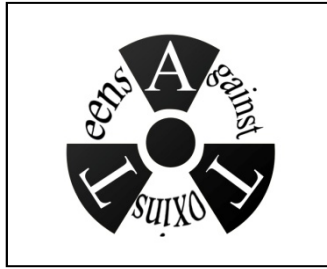


September 22, 2013



To: NASA
Re: Comments on the DEIS

We are a group of teenagers who live in and/or attend school within a few miles of the Santa Susana Field Laboratory. Some of us are in Oak Park and Agoura, both cities that are within five miles of SSFL, and we are now expanding into the West San Fernando Valley. We want to provide our comments on the DEIS for SSFL cleanup and simultaneously make it very clear that we want NASA to keep its commitment to the state of California and to the people of our community by complying completely with the cleanup agreement, the AOC, and cleaning up to a background level.

Here are our comments:

- First, we find it mind boggling that our federal government would spend all this money to create a 368 page document intended to provide the community information about the harmful effects of cleaning up a very polluted place without serious mention of the helpful effects of cleaning up the pollution. How can a quality conversation occur about the problems incurred by cleaning it up without discussing the benefits to the community of cleaning it up?
- For example, on the Table ES-5, under “Health and Safety” the cumulative impact is stated as “moderate, negative” and states “Combined Boeing, DOE and NASA activities can result in more exposure to hazardous materials, safety hazards, structural hazards, and natural hazards.” Is there a chart in the DEIS that states all the health and safety hazards associated with the “no action” alternative? We didn’t see one. Table 2.2-3 provides a list of the cleanup values for VOCs, PAHs, PCBs, arsenic, lead, cadmium, mercury, dioxins, and TPHs but NO explanation of the health and safety effects of those contaminants in water, soil and air. NASA should explain for each whether they cause cancer, neurological disorders, birth defects, or other health impacts
- Second, NASA signed an agreement with the state of California, and therefore with the people who live near the site, on December 10, 2010 that they would clean up to background. It is confusing and upsetting that there would be discussion at all about not complying with the cleanup agreements. NASA states that the Council on Environmental Quality advised it should not do include the alternatives that would violate the AOC and says it has agreed, but then goes ahead and breaks its commitment. This raises serious questions about whether NASA can keep its word.
- With respect to the truck transportation, frankly we don’t have any concerns about this. It was made clear to us at the NASA community meeting that the trucks will be safe with no reason to be afraid that the contamination will end up spewing out as the trucks drive by. Additionally, we have friends who say there are many trucks going in and out of the site at the moment and the full cleanup hasn’t yet started. NASA should disclose how much truck and car traffic has occurred at the site over the decades of operation compared to what is predicted for the cleanup. This whole thing seems insignificant and a scare tactic, which should be beneath NASA. The math seems to work out to about

a few trucks per hour per route. It is absolutely laughable that an issue of trucks should be used as an excuse to impede the removal of environmental and health hazards for generations to come.

- On Table 2.4-1, the proposed action of cleaning up to background with the daily material to be hauled at 1,698 tons per day or the total cubic yards of soil to be remediated at 500,000, to our group shows exactly how much of a problem there is at SSFL. We don't believe that less trucks per day or less material moved is in any way a good thing. Less contaminated soil removed means more it remains to be potentially washed down the hill in the rain and harm people living nearby. Furthermore, the report itself admits that these are "worst case" numbers and the true figures would be far less.
- Also, if NASA is truly committed to the AOCs then why does Table 2.4-1 include "Alternative 1", "Alternative 2" and "Alternative 3" with lesser cleanups to different standards? **The great majority of the community wants the soil cleaned up thoroughly - cleaned up to background as agreed.** You should disclose precisely how many comments you have received on the DEIS, and how many of those support living up to the AOC. Our guess is that the vast majority of comments received support NASA living up to those AOC commitments. Indeed, when the draft AOCs were out for public comment – twice in fact – something like 99% of the 3700 comments received supported the AOCs. We are concerned NASA is trying to break its commitments and won't honestly even disclose the public comments received opposing such a violation of promises.
- With respect to the test stands, Teens Against Toxins, feels strongly that the test stands must be taken down. This is common sense. The test stands are where the testing occurred obviously. Thus, that is where the chemicals were used and where the contamination is largely centered. The AOC requires the cleanup of all the soil and you can't do that without being able to get to it. The test stands are in the way. It is absurd to not clean up the soil that was most obviously contaminated for ANY reason. Again, it looks like NASA is searching for ways to break its obligations under the AOC.
- Just as with the thought of "preserving test stands", biological resources which include frogs, birds and vegetation are not as critical as protecting children and adults from the toxic contamination that migrates off the site. Studies already indicate increased cancers in the neighboring areas – something the DEIS doesn't disclose. But even so, the huge pollution NASA has created isn't good for vegetation and animals either, and cleanup is essential to restore the natural environment NASA has destroyed. Yet the DEIS does not address in any serious way the need to undo the pollution damage, the benefits of doing so, and the significant negative effects if you refuse to do so. Again, this seems like a political hit rather than a scientific document. Huge contamination of the environment has occurred; it needs to be fixed; and all NASA does is bemoan the number of trucks and other fake issues. There is no analysis of the environmental damage done by the pollution or the damage that would continue if no action were taken to clean it up.
- With respect to water resources, the DEIS does not inform the public of the current contamination that is occurring from SSFL. This is critical to anyone reading the DEIS in order to evaluate and comment on the problems from a cleanup. Table ES-5 lists the harmful effects to the water resulting from cleanup, "result in decreased surface water quality and ground water quality, and change the groundwater hydrology at SSFL" and then at the bottom states "Remediation could improve water quality." This is incredibly confusing to readers as the DEIS states the cleanup would both decrease and increase

water quality. How many times has Boeing been found guilty with water violations of contaminants in the surface water leaving the site? 180 in just the last few years? The analysis in the DEIS is completely skewed, talking of negative impacts on water from cleaning it up, and downplaying or ignoring the contamination and the necessity of getting rid of the pollution.

- Stating that the amount of traffic to which children are exposed would increase is ridiculous. You say nothing about the retinoblastomas – cancers of eyes – that occurred in young children downwind of your pollution, or the other cancer risks or health risks to people living near your toxic site and the continuing risks to them if you evade your cleanup obligations.
- We have noticed that in every case where there is a mention of benefit to remediation on Table ES-5, the mention is listed last. We find a great deal of bias in this EIS which is disturbing to us.

Fix the DEIS so that, rather than propaganda as to why NASA should be allowed to break your promises to this community and walk away from the pollution NBASA created, it instead provides an honest review of how much horrible environmental damage NASA did and why no action would perpetuate that environmental mess .

In summary, Teens Against Toxins and the families in our community are strongly opposed to any action other than a full cleanup to background. Live up to your commitments under the AOC.

Sincerely,

Davis Gortner
President, Teens Against Toxins

CC: Senators Barbara Boxer and Dianne Feinstein, Congresswoman Julia Brownley, Senator Fran Pavley, Supervisor Linda Parks, Los Angeles City Councilmember Mitch Englander, DTSC Director Debbie Raphael, USEPA Region IX