

Comments by the  
Community Representatives  
Santa Susana Field Laboratory Inter-Agency Work Group

on  
the Draft Environmental Impact Statement  
for Demolition and Cleanup Activities at NASA's Portion of SSFL

October 1, 2013

The Agreement on Consent (AOC) for remediation of the contamination at the Santa Susana Field Laboratory (SSFL) that NASA executed in December 2010 was an important step forward in the long saga of trying to get that badly polluted site cleaned up. At its core is a requirement to cleanup to background, with certain exceptions for recognized Native American artifacts and endangered species protections. The SSFL Inter-Agency Work Group, on which NASA serves along with us, the community representatives, has been instrumental in bringing about the AOC and coordinating its oversight.

We have reviewed the Draft Environmental Impact Statement (EIS) prepared for the cleanup and have the following summary comments:

1. As recently as two weeks ago, NASA testified before the Committee on Science and Technology of the U.S. Congress and repeatedly reaffirmed that it is committed to carrying out its obligations under the AOC. As we have heard from many community members, however, and as NASA has undoubtedly heard as well in public comment submissions on the Draft EIS, there are portions of the EIS that can be seen as being at variance with the commitments made to the Congress and the community. The EIS should be revised so that there is absolutely no question about NASA's commitment to live up to the AOC in full and to its commitments to the Congress and the impacted population near the site.
2. The draft EIS is curiously deficient in examining the environmental impacts of the extensive contamination of soil, groundwater, surface water, structures, and other media, the whole purpose of the cleanup action. There is a marked imbalance in emphasizing relatively minor impacts such as traffic and paying virtually no attention to the contamination. This is particularly the case in the almost non-existent discussion of the need for the project—remedying decades of environmental damage—and the impacts of the No Action alternative, which would leave soil and groundwater contaminated for centuries and allow continued discharges into offsite areas of contaminants at levels above pollution (NPDES) discharge limits. (We note that the Interim Source Removal Action (ISRA) imposed by the LA Regional Water Quality Control Board is indeed merely an interim measure and to date has not been able to eliminate the exceedances of toxic benchmarks in releases offsite.)
3. On the other hand, the discussion of potential negative impacts of cleanup seems quite overblown. For example, the EIS implies there could be some damage to the Native American

cave paintings at Burro Flats. But the AOC expressly exempts recognized Native American artifacts from the cleanup-to-background requirement. There will therefore be no impact on the cave paintings. The EIS spends a great deal of time discussing traffic, yet fails to disclose how much traffic occurred over the years of operation, which included truck shipments of high level radioactive waste and very hazardous materials. The actual number of truck trips per hour for the cleanup estimated in fact seem quite modest, particularly if alternated over several routes. And the discussion of erosion and biological resource impacts ignores that much of the cleanup is to occur in the already-degraded areas where NASA stripped off the vegetation and graded in order to construct the test facilities from which much of the contamination was released, and that all of it is to occur where NASA polluted the land. In other words, the real situation is that NASA damaged the environment with land-scarring activities and pollution with very toxic materials, and that the AOC requires it now to remediate the environmental damage it has done.

4. The mitigation sections are weak. The EIS should, for example, require low-pollution vehicles (powered by electricity such as has been done at the LA Port or by natural gas). It could identify more routes than the three included in the EIS. It should require dispersing the shipments alternately over the different routes so that there are no more than a few trucks per hour per route once down the hill. NASA could reduce the number of shipments by increased emphasis on in situ treatment; indeed it estimates it could lower the number by a third this way, but there is no focus on making that a high priority. The EIS claims a certain number of trucks for taking clean fill up to SSFL, but there is no analysis as to why that would even be needed, nor any discussion of avoiding it by emphasis on on-site re-grading and use of an on-site borrow pit, which would also eliminate potential impacts of non-native seeds. But even if a bit of offsite soil were needed, there is no reason why the trucks going up to pick up contaminated soil can't take clean soil, instead of double-counting by assuming trucks travel to and from the site empty in one direction. The EIS should analyze improving an existing fire road leaving SSFL (including from Area IV, where DOE will face the same issue), and also consider taking the shipments to a rail spur for shipment by rail. While we do not necessarily endorse any particular option, we are concerned that NASA failed to analyze any mitigations, claiming simply they would cost money or take time.

Similarly, there is no real site restoration plan provided, e.g. re-vegetation. As indicated earlier, the site is already badly degraded by decades of NASA activities. But once the pollution is remediated, NASA needs thoughtful plans for restoring the native vegetation that had been there before NASA was. That is lacking in the Draft EIS at present.

### Conclusion

The signing of the AOC by NASA in 2010 and the entry into the binding commitments contained therein were milestones in a long struggle to rectify the environmental damage NASA had done by decades of inadequate environmental practices. The site is extensively contaminated with dozens of hazardous materials. Full cleanup is essential.

NASA has committed to that full cleanup—cleanup to background. Now it is time for NASA to carry out those commitments in the AOC fully, and eliminate the contamination for which it is responsible. NASA has reiterated to the U.S. Congress in recent days its complete commitment

to its obligations under the AOC. We urge NASA to proceed expeditiously and rigorously to carry out those AOC and Congressional commitments.

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