

What did stakeholders say about: **OVERALL QUALITY OF PLAN?**

... [O]ur communities are very disturbed by the DEIS ... (1) Citizen's Advisory Group for SSFL (CAG)

... [W]e have rated [NASA's] DEIS as [having] Environmental Concerns – Insufficient Information ... (L5) U.S. Environmental Protection Agency (USEPA)

... [NASA's] statement of purpose and need for the project ... is problematic ... (1.2) State Historic Preservation Officer (SHPO)

The West Hills Neighborhood Council (WHNC) is in disagreement with the plan being proposed by NASA. (1.1) West Hills Neighborhood Council (WHNC)

NASA's DEIS does not serve its purpose ... to completely inform decision makers so they can decide how to best execute the cleanup. (S.0) Santa Susana Mountain Park Association (SSMPA)

... [A] number of elements of the analysis [in the purview of the DTSC] lack clear definition. (2) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

... [T]he DEIS as written is unsatisfactory and the AOC requirements that caused the proposed destructive cleanup must be changed. (2) CAG

... release of the DEIS without the completion of [soil sampling and soil treatment pilot testing] studies is premature ... (3) Los Angeles-Ventura Cultural Research Alliance (LanVen)

The DEIS is flawed because it lacks important information. DTSC must supply much of the missing information. (S.0) SSMPA

The stated Purpose and Need to remediate the environment and prepare the property for disposition is not met by the single action proposed. (6) RCDSMM

... [T]he mitigation measures [to address adverse effects on cultural resources] included in the Draft EIS are premature and insufficient. (6.4) SHPO

[T]he DEIS as issued is incomplete, inadequate, and does not conform to key environmental laws such as NEPA and CEQA. (CC.1) SSMPA

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**The DEIS is incomplete because it lacks guidance that still-undelivered DTSC documents, such as the DTSC EIR should include.** (S.1) SSMPA

**... [T]he DEIS should provide the DTSC components ...** (3) RCDSMM

**... [T]he DEIS should provide identification of specific outcomes for cultural resources, archeological as well as structural.** (3) RCDSMM

**[A DTSC] EIR document must include a CEQA analysis that balances cleanup goals under various scenarios , including costs ...** (S.1) SSMPA

**The DEIS is incomplete because it does not specify expected outcomes for cultural resources, both archeological and architectural.** (S.2) SSMPA

**[The DEIS fails] to include the OIG [NASA Office of Inspector General] Report or any reference to it ...** (3.1) San Fernando Valley Audubon Society (SFVAS)

**[T]he Inspector General of NASA ... requested that the level of cleanup be re-evaluated.** (3.e) SSMPA

**The DEIS must be re-issued after DTSC and NASA determine and agree to robust decision-enabling guidelines.** (CC.2) SSMPA

**... [I]t appears that, based on the DEIS, NASA has no intention of implementing a program that will achieve cost avoidance and protection of resources.** (2.6) SFVAS

**The DEIS fails to account for other remediation projects in other areas of SSFL.** (13) Santa Ynez Band of Chumash Indians (SYBCI)

**The DEIS is so inadequate it should be re-issued after critical missing information is made available ...** (S.0) SSMPA

**... the cure that NASA has proposed is worse than the disease.** (1.4) SFVAS

## Commentary on NASA's Draft Environmental Impact Statement for Santa Susana Field Lab Issued July 2013

What did stakeholders say about: **ALTERNATIVE CLEANUP OPTIONS?**

... **NASA's decision to limit alternatives ... is problematic** ... (1.2) State Historic Preservation Officer (SHPO)

The **DEIS is deficient** because it only presents **two unacceptable extreme alternatives** for the cleanup. (1) Citizen's Advisory Group for SSFL (CAG)

**[NASA is] not providing an adequate study or public review of a full range of alternatives.** (2) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

The DEIS is incomplete because it **excludes analysis** of all possible levels of cleanup except the "cleanup to background" alternative. (5.3) Santa Susana Mountain Park Association (SSMPA)

**WHNC requests that NASA reconsider its decision to limit the selection of one cleanup method** ... (2.1) West Hills Neighborhood Council (WHNC)

... **[T]he DEIS should provide complete and balanced analysis of various reasonable cleanup scenarios.** (3) RCDSMM

... **[NASA's] DEIS does not contain sufficient analysis of [less-than-everything demolition] alternatives** ... (3.3) SHPO

The **DEIS excludes from consideration reasonable alternatives** supported by authorized standards of the State of California including cleanup to Suburban Residential, Commercial/Industrial, and Recreational levels. (3.a) SSMPA

... **[A]lternatives that would allow some degree of archaeological and historic preservation and still incorporate cleanup to levels protective of human health and the environment for suburban, industrial or recreational uses have been ... treated as nonviable alternatives.** (6) Los Angeles-Ventura Cultural Research Alliance (LanVen)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures **may require change to the preferred alternative** .... (RD 3) U.S. Environmental Protection Agency (USEPA)

**[The single alternative proposed does] not ... represent true cleanup so much as contaminant relocation and concentration.** (6) RCDSMM

... **NASA has not given full consideration to reasonable alternatives** that would avoid ... adverse effects to historic properties ... (3.7) SHPO

The DEIS should be expanded to **include ... excluded alternatives**, presenting comparison of costs and all related effects on transportation, biological resources, cultural resources, soil, water, and air. (3.b) SSMPA

... **[W]e request that NASA, with DTSC's full involvement and assistance, provide a revised DEIS evaluating a full suite of safe alternatives** ... (7) RCDSMM

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The magnitude of adverse effects ... that will result from the [NASA's] Proposed Action warrants serious consideration of alternatives ... (4.1) SHPO

WHNC requests that NASA look at other alternatives and procedures that would mitigate the negative effects of this DEIS. (2.1) WHNC

[The SSFL,] a place of such critical ecological and exceptional cultural resource value merits consideration of a full suite of reasonable alternatives. (2) RCDSMM

The NEPA and CEQA analysis must consider all options (1.e) SSMPA

We request a revision of the DEIS that includes more true alternatives for cleanup including an approach that gives primary consideration to the protection of critical natural and cultural resources while protecting human safety at a level appropriate to the anticipated future land use. (2) RCDSMM

[We have no choice but to] select the "no action" alternative, which will be less adverse to the environment and more protective of public health. (1.2) San Fernando Valley Audubon Society (SFVAS)

... [T]he reports tables seem to suggest that the no action alternative is the superior alternative. That [conclusion] of course cannot stand. (7) RCDSMM

[We] resolutely support cleanup of this site to "reasonable" levels. We believe the "Suburban Residential" cleanup standard, set by the 2007 Consent Orders, is a very reasonable ... (cc.6) SSMPA

The "Suburban Residential" level will exceed requirements when the land becomes open space, as almost all who are familiar with the property request. (cc.6) SSMPA

What did stakeholders say about: **END USE OF PROPERTY?**

We ... support an end use as parkland or open space for the entire SSFL property. (sc 1) Los Angeles-Ventura Cultural Research Alliance (LanVen)

Consideration of the possible end use of the property as a park should be incorporated in the preservation decisions. (2.j) Santa Susana Mountain Park Association (SSMPA)

[The property must be left in a state that is suitable for some end-use. (6) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

... [NASA] should take into account both the cleanup activities and disposition of the property rather than falsely contend that they are separate and unrelated activities. (3.4) State Historic Preservation Officer (SHPO)

... [NASA's] plan does not recognize the expected eventual use of the NASA land as open area which only requires cleanup to risk based levels. (1.6) West Hills Neighborhood Council (WHNC)

... [I]t is important not to divorce end use from cleanup, and ... both should be considered together in one joint-agency EIS/EIR document. (5) LanVen

It appears that total demolition to facilitate disposal is a discretionary decision on NASA's part (3.3) SHPO

If [100%] demolition is proposed as part of the "preparation for transfer," then the DEIS should be jointly prepared with GSA and consider the end use of the property ... (22) LanVen

... [R]emoval of soils and topography and replacing with a fraction of "backfill", and removal of the modern era historic structures, and protection of only "artifacts" found, will limit who will take interest in assuming ownership. (6) RCDSMM

[L]osing the site to development is a potential unintended consequence of look-up tables and timelines rather than Purpose and Need driving the choice [of] reasonable alternative approaches to cleanup. (6) RCDSMM

What did stakeholders say about: **Administrative Order on Consent (AOC)?**

**[The] AOC should be modified to allow a risk-based cleanup that would greatly reduce the amount of the soil to be excavated and thus mitigate many of the problems.** (1) Citizen's Advisory Group for SSFL (CAG)

**... defining the Purpose and Need solely according to the restrictions set forth in the 2010 AOC, [limits] the range of reasonable and feasible soil cleanup alternatives ...** (2) Los Angeles-Ventura Cultural Research Alliance (LanVen)

**NASA committed (2007 Consent Order and 2010 AOC) to a course of cleanup activities that has the potential to cause adverse effects to historic properties at SSFL.** (2.3) State Historic Preservation Officer (SHPO)

**... the DEIS should make[ the 2010 AOC] decision more transparent ...** (4) LanVen

**DTSC must provide NASA with an authoritative and binding interpretation of the [vague] language of the AOC.** (5.1) Santa Susana Mountain Park Association (SSMPA)

**... political pressures ... gave rise to NASA agreeing to the AOC in the first place.** (2.1) San Fernando Valley Audubon Society (SFVAS)

**The AOC allows for ... changes if accepted by both parties ... A Modification in Principle alternative is being proposed that would maintain the AOC and allow agreed changes.** (1) CAG

**SFVAS favors [throwing out the AOC entirely], as it is unlikely that modification [of the AOC] will correct the many flaws in the AOC, which underlies much of the purpose and need of the action.** (1.3) SFVAS

**... [N]o formal, public study of the environmental impacts of the "2010 agreement on consent" (AOC) agreement was completed.** (2) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

**The SSFL cleanup was forced to be uniquely different from other projects, because the AOC was signed before any EIS-type document.** (1.f) SSMPA

**[S]imilar to the NASA Inspector General, we too, have great difficulty seeing that cleanup to these special AOC standards is of any tangible benefit. But we certainly see the detriment to our community and the huge governmental costs we will pay as taxpayers.** (cc.5) SSMPA

What did stakeholders say about: **CONSISTENCY WITH ESTABLISHED PROCESS?**

... NASA is in violation of the spirit and intent of NEPA to provide an open and public decision-making process. (1) Los Angeles-Ventura Cultural Research Alliance (LanVen)

... [B]oth NEPA and CEQA set standards for environmental considerations that must be addressed ..., and contracts that are inconsistent with that [requirement] do not trump NEPA and CEQA (1.e) Santa Susana Mountain Park Association (SSMPA)

Considering environmental impacts *after* a decision has been made defeats NEPA's purpose of considering impacts in preparing to make decisions. (3) Santa Ynez Band of Chumash Indians (SYBCI)

... we are witnessing what appears to be a decision-making process that is arbitrary, capricious, an abuse of power, or otherwise not in accordance with law. (2.6) San Fernando Valley Audubon Society (SFVAS)

... NASA was politically pressured to only consider two alternatives ... (1) LanVen

"[I]nput," from a U.S. Senator, biases the NEPA process towards a particular outcome that tends to favor certain groups while others, possibly representing a majority of constituents, are effectively excluded. (3.2) SFVAS

SSMPA advocates a cleanup based on scientific results, testing and standards, not political pressures. (1.f) SSMPA

[E]xplain why the public should pay for a cleanup that is inconsistent with the law... (3.d) SSMPA

What did stakeholders say about: **"BACKGROUND" VS RISK-BASED STANDARDS?**

Cleaning up to [a "background"] standard will be devastating to the natural, cultural, and historical environments ...

(1.2) San Fernando Valley Audubon Society (SFVAS)

... [T]he DEIS as written using the Clean to Background method will have a major impact on the SSFL with the irretrievable loss of culture, history, environment, sensitive habitat and critical natural resources. (2) Citizen's Advisory Group for SSFL (CAG)

The DEIS ... needs to be rewritten ... including a risk based cleanup. (2) CAG

... EPA ... typically performs soil cleanups to health based levels ... (1.3) U.S. Environmental Protection Agency (USEPA)

... [A] health-based alternative (allowing residential reuse) would require just over a third as much ... soil volume ... (DC 1.2) USEPA

[NASA's] Final ... Statement should include ... the groundwater cleanup levels, based on standardized risk assessment ... (DC 5.5) USEPA

... if a standard risk-based protocol is sufficient for treatment of groundwater contamination ..., why is the same risk-based protocol not applicable to treatment of soil contamination ... ? (2) Los Angeles-Ventura Cultural Research Alliance (LanVen)

We support a reasonable cleanup effort, taking into account standard science-based risk assessment methodology, as well as considerations for end land use. (sc 1) LanVen

... [B]ackground level will not be found in the majority of the metropolitan region that surrounds this site and in which millions of people now live full time ... (3) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

... [NASA should] recognize not only the critical ecological and cultural context that exists on site, but also the environmental "background" reality of the city in which this damaged but storied and sacred landscape is improbably located. (7) USEPA

[E]xplain] why local residents should be subjected to significant environmental contaminants from emissions, disturbed soil and related fugitive dust effects, and surface water runoffs that are greatly increased by unavoidable consequences of a background level cleanup of the site. (3.d) Santa Susana Mountain Park Association (SSMPA)

What did stakeholders say about: **TIME SCHEDULE?**

**A hurried cleanup will likely become an irrevocable mistake.** (cc.2) Santa Susana Mountain Park Association (SSMPA)

... [T]he current NASA schedule for completing the EIS and issuing the Record of Decision (ROD) ... will not allow for enough time to develop adequate mitigation measures with opportunity for public comment. (sc.4) Los Angeles-Ventura Cultural Research Alliance (LanVen)

Given the schedule NASA has for adoption of the ROD and the limits of current cultural resource identification ..., a resolution of adverse effects that would meet minimum standards ... cannot be reasonably achieved. (7.1) State Historic Preservation Officer (SHPO)

Does this lack of a realistic schedule not call into question the feasibility of the AOC-mandated completion date of **2017**? (1.d) SSMPA

**We urge the agencies to extend the deadlines and clarify or renegotiate the agreements.** (7) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

[T]he target date for completion of the cleanup must be extended. The current target date of 2017 has become unrealistic. (cc.3) SSMPA

... SHPO recommends ... discussions about extending the timeline ... (7.3) SHPO

**A revised target date of 2020 will permit meaningful evaluation, compliant with NEPA and CEQA processes, of multiple, reasonable cleanup alternatives and their impacts.** (cc.4) SSMPA

What did stakeholders say about: **NATIVE AMERICAN & ARCHAEOLOGICAL RESOURCES?**

... **more resource inventory work** needs to be done before project effects can be fully assessed. (17) Los Angeles-Ventura Cultural Research Alliance (LanVen)

We are concerned that **some ... [archaeological] resources** are not being accounted for in the cultural resources inventory. (10) LanVen

The EIS must address **impacts on cultural resources**. (1) Santa Ynez Band of Chumash Indians (SYBCI)

NASA's level of effort on **identification of cultural resources** ... is incomplete and not sufficient ... (sc.2) LanVen

We request additional **subsurface archaeological testing** for all areas scheduled for any excavation. (11) SYBCI

The DEIS does not provide any information on how the **boundaries of the archaeological sites** on the property were determined. (2.c) Santa Susana Mountain Park Association (SSMPA)

... outstanding issues remain from the **2010 AOC**, including the **[lack of] definition** of "Native American artifacts" and the 5% exception provision to historic properties. (7.3) State Historic Preservation Officer (SHPO)

**DTSC must interpret the AOC** on the handling of Native American cultural resources. (2.a) SSMPA

What does a **"formally recognized cultural resource"** mean? Who needs to recognize what to meet that odd definition? (2.a) SSMPA

[The **Traditional Cultural Property Study**] should have been completed prior to the issuance of the DEIS. (14) LanVen

**New, detailed surveys** of [the Burro Flats Archaeological District] must be accomplished prior to making irrecoverable decisions to "clean up" this exceptional and irreplaceable Indian Sacred Site. (2.d) SSMPA

... the ... describing [of] the context of the [Burro Flats archaeological] site ... shows a **general lack of understanding and poor research** breadth of the site complex. (11) LanVen

... [W]e object to **cleanup of the Burro Flats site** ... (2.b) SSMPA

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**Given the significance of the archaeological resources at stake, relying solely on construction monitoring and a stipulation for unanticipated discoveries do not constitute a good faith effort in the identification of historic properties ... (17) LanVen**

**The approach that DTSC and NASA will take to an Indian Sacred Site must be incorporated in the decision. (2.d) SSMPA**

**Under the NASA proposal, Native American artifacts and sites including sacred areas and historic locations are to be destroyed. (1.5) West Hills Neighborhood Council (WHNC)**

**... the wholesale assumption that areas associated with existing structures, infrastructure, and other disturbance have [destroyed] the integrity of any archaeological resources is dubious. (16) LanVen**

**To remove the soil and the ecosystems would be to remove the Sacred Landscape identified by the federally recognized Santa Ynez Band in support of all Chumash people. (5) Resource Conservation District of the Santa Monica Mountains (RCDSMM)**

What did stakeholders say about: **ROCKET-RELATED HISTORIC RESOURCES?**

... several aspects of the compliance effort are problematic with regard to the treatment of historic properties (1.2)

State Historic Preservation Officer (SHPO)

NASA should make a greater effort to preserve as much [rocket test stand] heritage as reasonably possible. (1)

Citizen's Advisory Group for SSFL (CAG)

... [There is] no evidence that NASA has made an effort to analyze the feasibility of retaining any of the historic buildings and structures ... (3.7) SHPO

DTSC must interpret the AOC on the handling of Architectural Structures that are eligible historic structures (rocket engine testing facilities). (2.g) Santa Susana Mountain Park Association (SSMPA)

Further, the removal of the rocket test stands would destroy historic structures that were part of our national space program. (1.5) West Hills Neighborhood Council (WHNC)

Historic Property Identification and Evaluation remains incomplete. (4.6) SHPO

[A] DTSC EIR must provide information on what cultural resources will remain after the cleanup ... S(1) SSMPA

Both NASA and DTSC need to indicate their intention for these [rocket engine test] structures that could be irreparably destroyed and a key part of our country's rocket history forever thereby lost. (2.j) SSMPA

... NASA [must] enter into a legally-binding and enforceable agreement to resolve adverse effects to historic properties. (7.2) SHPO

The [proposed] action described in the DEIS would forever sever the nationally significant connection between the highest aspirations and technological feats of two historic cultures [Native American and space age]. (5) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

[P]reservation of all or some of the NRHP-eligible historic districts, including test stands and associated contributing structures ... would provide a tremendous future interpretive opportunity ... [for] a truly awe-inspiring piece of our American history. (25) Los Angeles-Ventura Cultural Research Alliance (LanVen)

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... [W]e support the retention of the Alpha and Coca [rocket engine testing] Historic Districts. (23) LanVen

... the remaining Coca and Alfa district test stand structures have the greatest potential for interpretive, educational, and inspirational value... [A]t least one test stand at each site should be preserved along with its critical contextual structures, such as the associated blockhouse. (6) RCDSMM

We encourage special attention to Coca V and Alfa III and their associated blockhouses. (2.k) SSMPA

All structures should be removed from the Coca Historic District. These structures impinge on the ceremonial areas. If a decision is reached to save a test stand, Alfa or Bravo should be retained instead of Coca. (9) Santa Ynez Band of Chumash Indians (SYBCI)

What did stakeholders say about: **SOIL?**

We are concerned about the impacts associated with NASA's proposed removal, transport, and disposal of the large volume of soil ... (L.4) U.S. Environmental Protection Agency (USEPA)

Non-excavation methods of remediation should be exhausted before performing excavation that could damage cultural sites. (1) Citizen's Advisory Group for SSFL (CAG)

NASA should exhaust all non-excavation methods of remediation before performing any excavation that could potentially impact cultural and historic sites. (12) Santa Ynez Band of Chumash Indians (SYBCI)

[NASA's Statement] contains no information on the cost or cost-effectiveness ... for soil removal. (DC 11.5) USEPA

... [There is] no evidence that NASA has made an effort to ... avoid large-scale soil removal ... (3.7) State Historic Preservation Officer (SHPO)

WHNC has serious concerns with the removal of such a large amount of soil fearing that erosion will endanger the creeks in Dayton Canyon, Bell Canyon and Woolsey Canyon. (1.4) West Hills Neighborhood Council (WHNC)

At other cleanup sites ... nearly two-thirds of the soil with comparable levels of chemical contamination would be left in place. (L.4) USEPA

The "leave in place" remediation alternative should be considered because such an approach would entail significantly less environmental impact, by reducing soil excavation, hauling, and soil replacement. (4.d) Santa Susana Mountain Park Association (SSMPA)

... [T]he DEIS should provide identification of replacement material for soils of sufficient quality to meet the AOC standards. (3) Resource Conservation District of the Santa Monica Mountains (RCDSMM)

The DEIS is incomplete because it does not address how to obtain replacement soil that will meet the requirements in the AOC. (s.4) SSMPA

The DEIS does not fully address how appropriate backfill soil will be sourced. (4.a) SSMPA

It is questionable that sufficient offsite soil can be found that meets the stringent cleanliness standards of the selected alternate to be used as backfill. (1) CAG

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**The DEIS calls for only a third of the removed soil to be replaced. (1) CAG**

**The DEIS does not explain why or how three times as much soil will be removed from the site as will be backfilled. (4.b) SSMPA**

**To excavate 100 acres of this key watershed, removing all of the soil and replacing less than 20% of that- and even that not with soil, but "backfill"- will leave a significant concavity. (4) RCDSMM**

**... [I]mpoundment created by the unrestored topography [of an] extraordinarily unbalanced cut-fill but ... has impacts. (4) RCDSMM**

**What will be the runoff effects of the decreased soil? (4.c) SSMPA**

**... [T]he DEIS does not address a grading or drainage plan. (1) CAG**

**The plan does not discuss grading or drainage methods. (1.4) WHNC**

**... widespread soil removal will damage existing native sacred grounds, ancient sites and artifacts. (1) CAG**

**The soil removal will destroy the existing biota and will alter the topography ... (1) CAG**

**What steps will NASA take to eliminate introduction of invasive species as off-site soil is brought in as part of the soil replacement? (6.d) SSMPA**

**.... [T]he total volume of soil would consume a notable portion of the hazardous waste landfill capacity in the state ... (L4) USEPA**

**The Environmental Justice analysis should be extended to include the areas that are proposed to receive [so much contaminated soils.] (4.e) SSMPA**

**[W]hat soils are to be removed in culturally sensitive areas ?... (5.1) SSMPA**

**[NASA's Final Statement] should include ... emissions from demolition and soil removal actions. (DC 9.4) USEPA**