



## Santa Susana Mountain Park Association

*Dedicated to the Preservation of the Simi Hills and Santa Susana Mountains*

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**Comments of Santa Susana Mountain Park Association on  
NOTICE OF PREPARATION FOR A  
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT  
SANTA SUSANA FIELD LABORATORY SITE, VENTURA COUNTY, CALIFORNIA  
dated November 2013**

### SUMMARY:

DTSC's PEIR must supply much still-missing information.

1. Responsible Parties (RPs) need guidance on situations and actions that depend on vague language in the 2010 Administrative Orders on Consent (AOCs) that govern the cleanup. DTSC must provide RPs with an authoritative and binding interpretation of the language of the AOCs.
2. The PEIR must specify expected outcomes for cultural resources, both archeological and architectural.
3. The PEIR must include analysis of all practical levels of cleanup, in addition to the "cleanup to background" alternative, to comply with CEQA.

DTSC's PEIR document must include a CEQA analysis that balances cleanup goals under various scenarios, including costs (both financial and environmental). Additionally, the DTSC PEIR must provide information on what soils are to be removed in culturally sensitive areas, and what cultural resources will remain after the cleanup, as DTSC has sole authority to make these decisions under the AOCs.

4. The PEIR must specify how to obtain replacement soil that will meet the requirements in the AOCs.
5. The PEIR must clearly specify cumulative impacts of all related concurrent projects; viz., the NASA, DOE and Boeing cleanups.
6. The PEIR must include comprehensive surveys and mitigation methods for plants.

## **ESSENTIAL POINT OF SSMPA's COMMENTARY:**

**DTSC must define, specify, and provide important information to all RPs. The PEIR must provide to decision makers adequate, clear and specific information to make informed decisions on how an environmentally responsible cleanup should proceed.**

### **COMMENTS:**

#### **1 Guidance on AOC Language and on Site-Specific Guidelines**

- 1a.** The AOCs signed by DOE and NASA charged DTSC with oversight authority for the cleanup.<sup>1a</sup> DTSC must provide the RPs with a binding, authoritative interpretation of certain vague requirements in the AOCs. The RPs must learn what SSFL-situation-specific rules will govern decisions and actions for the cleanup.
- 1b.** DTSC must provide guidance to the RPs governed by the AOCs on many subject areas before the RPs can complete their DEISs and EISs. Of major consequence for every decision is the requirement under the AOCs that at least 95% of any soil that has ANY amount of contamination over background level must be removed.<sup>1b</sup> This ambiguous requirement has pervasive impact on every item discussed below.
- 1c.** DTSC does not expect to deliver its Draft PEIR until sometime in late 2014. The RPs need information from the PEIR to complete their own valid EISs that can be used as decision making guides. Does this schedule not call into question the feasibility of the AOC-mandated completion date of 2017 for the NASA and DOE managed cleanups? Can the governing AOCs therefore any longer be considered 'binding'?
- 1d.** The NASA Associate Administrator for Mission Support Directorate notes that NASA will be assisting DTSC in its CEQA analysis estimated to be complete by the end of 2015, but also notes that analysis will be restricted to the single AOC cleanup level.<sup>1d.1</sup> (See **Attachment 1.**) To the best of our knowledge, both NEPA and CEQA set standards for environmental considerations that must be addressed in environmental documents, and contracts that are inconsistent with those laws do not trump NEPA and CEQA provisions. The NEPA and CEQA analyses must consider all options, not the single path set by the AOCs.<sup>1d.2</sup> When will DTSC's actual PEIR, including CEQA considerations, be issued as a draft? When will it be issued in final form? It appears these documents are scheduled after the supposed start of execution of the cleanup to the constraints of the AOCs. That is not our understanding of how CEQA and environmental policy should work. Even Rick Brausch, then DTSC project director for the SSFL cleanup, acknowledged in the July 2011 PPG meeting, that CEQA and other environmental laws still apply and indicated DTSC would follow the laws' requirements. However, DTSC's public start date for the PEIR is now two years behind the suggested schedule he mentioned in July 2011.<sup>1d.3</sup>
- 1e.** There are many environmental cleanup projects in the U.S. They "all" (as far as anyone knows) MUST operate according to federal and state EPA laws that were passed by

legislators concerned with protecting the environment. Operating under EPA processes means any toxic cleanup MUST evaluate multiple reasonable alternatives. The NASA and DOE SSFL cleanups were forced to be uniquely different from other projects, because the AOCs were signed before any EIS-type document. Why the difference? <sup>1e</sup> See **Attachment 2**. How is the different treatment of these projects explained? We can fathom no reasonable explanation.

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

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## 2 PEIR Must Specify Expected Outcomes for Cultural Resources

- 2a.** DTSC must interpret the AOCs on the handling of Native American cultural resources. The AOC language is vague in its definition of Archaeology, defining it as “Artifacts.” They must be “formally recognized as Cultural Resources”.<sup>2a</sup> What does “Artifacts that are formally recognized as cultural resources” mean? Who needs to recognize what to meet that odd definition? Interpretive guidance is critically needed, because the Burro Flats Cave area, registered in the National Register of Historic Places, is primarily on the NASA property. In addition, where archaeological surveys on DOE property have been done, perhaps 20 archeological sites have been located that have not been formally recorded. We expect similar indications of past Native American Use based on tribal commentary and the proximity of the Boeing property to the Burro Flats Cave complex and the Bell Canyon creek area that also is a major archeological site. The future of Burro Flats and related nearby Native American areas is yet to be articulated by DTSC. An artifact is generally understood to represent a movable, historically used, significant object. Given that definition, the Burro Flats Cave itself could be eliminated by the language in the AOCs, as well as bedrock mortars that are part of the NRHP recorded site, which are also very significant. An explanation of how the Burro Flats Cave, and nearby related sites, including sites such as found on the DOE property and elsewhere in the project, will be treated must be provided by DTSC in the PEIR.

In addition to the specific language quoted above, the AIPs that address this area for the AOCs, indicate that no more than 5% can be excluded and any acceptance of an exception is subject to DTSC’s oversight and approval. Please explain what that means on a specific basis, naming sites under consideration and the boundaries of each site (or artifact), particularly since there is significant sampling data now available to make appropriate decisions.

- 2b.** At the August 28, 2013, public comment session on the NASA DEIS, a NASA representative indicated they have been told the Cultural Resource definition in the AOC means the National Register of Historic Places (only). Under that definition, the Burro Flats site (CA-VEN-1072) is exempt from cleanup. Why would NASA indicate any portion of this site is to be cleaned? Has DTSC overridden the AOC under its global override authority? This discrepancy highlights the problem of “Who controls the cleanup?” We do note, however, that DTSC still has not clarified the definition of Artifact, so the Burro Flats site may still be subject to cleanup under the AOC; since this site may still be subject to cleanup due to vague language, we object to cleanup of the Burro Flats site, as it is an identified and registered National Register of Historic Places

area, and as it is an identified Indian Sacred Site. What position will DTSC take on this very particular property, in addition to our prior more generic request for clarification?

What are the contamination levels at the archaeological sites, and in particular the Burro Flats parcel, slated for cleanup? What safeguards will be put in place to reduce impacts to the Burro Flats parcel, as to dust, and impacts due to changes to surface water runoff when RPs choose not replace removed soil?

- 2c. DTSC's PEIR must provide information on how the boundaries of the archaeological sites on the property have been determined. What survey methods were used? When was that done? What was found on the site? How was it tested? At what depth? When was it surveyed? What will DTSC do with an artifact a RP found in that survey, or a midden area that would not qualify as an artifact (that surely would be "contaminated")?
- 2d. Only a pedestrian survey of site boundaries was done. Are additional pedestrian studies, and more detailed studies needed in the area where soil is to be removed? Comments submitted by professional archaeologists indicate the survey methods used by NASA were very inadequate due to large distances between areas evaluated, far in excess of accepted practices. Will a more adequate archaeological evaluation be required, and if so in what areas? A comprehensive survey using soil sampling techniques must be undertaken to determine the true size of the District. The Burro Flats Archaeological District extends outside the borders of Area II into Area III and possibly into Area IV. This site should not be segmented between the 3 RPs, but should be looked at holistically as part of the entirety of the Cultural Resources of SSFL. New, detailed surveys of this site must be accomplished prior to making irreversible decisions to "clean up" this exceptional and irreplaceable Indian Sacred Site.

An adequate definition and description of the Burro Flats site must be created and reviewed with all RPs, as they all will have the most critical role in site cleanup or preservation. An additional boundary dilemma with the Burro Flats site and the National Register of Historic Places (NRHP) is that as of 1972, the NRHP site is 25 acres. Since the NASA DEIS recognizes only 17 acres as the site, where are the boundary differences? Does the NRHP boundary exclude or include the 0.65 acres that is to be cleaned up? What is protected under the NRHP, and what should be protected as part of VEN-1072? **Please also address how a 25 acre NRHP site (plus other sites) will be treated, considering the total area NASA proposes to clean up is approximately 105 acres (page 2-17 of NASA DEIS), and the maximum exception is 5%. DTSC must take the lead in answering such questions.**

The steps in 2b, 2c, and 2d are all necessary to define the Burro Flats site. Again we see the same problem – DTSC must advise what can be excluded from the cleanup. The RPs must provide information on what they will exclude, given an updated DTSC interpretation. And here, on the single site that is already NRHP certified, the boundaries must be established, and the site still needs a detailed evaluation by a qualified archaeologist, and careful and limited testing must be done to provide information on contamination of any part of the site. The approach that DTSC and the RP's, especially NASA, will take to an Indian Sacred Site must be incorporated in the decision. All this information needs to be provided and presented, with proposed resolutions, in DTSC's PEIR, and NASA's EIS.

- 2e.** What will be done with newly discovered archaeological Artifacts found in the process of the cleanup, that are not “culturally recognized”? How will these items be preserved or protected?
- 2f.** DTSC must interpret the AOC on the handling of Architectural Structures (NASA project) that are eligible historic structures (rocket engine testing facilities). Three structures at each of the Alpha, Bravo and Coca test stand areas have been found eligible under NRHP and SHPO (nine total structures).<sup>2f</sup> What contamination has been found in the soils under the test stands? Have testing boreholes been drilled under these structures? What has been found?
- 2g.** Will DTSC allow some or all of these historic structures to remain?
- 2h.** Since test stands are not “artifacts”, but are recognized as significant historic structures under Section 106, NRHP and SHPO, what will happen to these structures? How will the 5% exception for “artifacts” under the AOC’s be applied to the NASA parcel that has the greatest quantity of cultural resources? What will be allowed to remain considering this limitation and other considerations?
- 2i.** The standards established by Section 106 (reproduced below) provide a mandate to seek ways to avoid or mitigate adverse effects on historic properties. Both NASA and DTSC need to indicate their intention for these structures that could be irreparably destroyed and a key part of our country’s rocket history thereby forever lost. Because the NASA property holds key remnants of our country’s space and rocket development, consideration of the possible end use of the property as a park should be incorporated in the preservation decisions. If the NASA parcel ultimately is joined with the larger Boeing parcel that is expected to become a park, preservation of appropriate NRHP and SHPO-eligible structures to inspire future generations should be given a much higher priority. These decisions should be documented in Alternatives presented in DTSC’s PEIR and NASA’s re-issued DEIS.

Appendix C, Section 5.1 of NASA’s DEIS is reproduced in part below (emphasis added):

“The enabling legislation for Section 106 is contained in 36 CFR 800, “Protection of Historic Properties.” The Section 106 process entails three basic steps:

1. Identify historic properties potentially affected by the undertaking.
2. Assess adverse effects on historic properties.
3. Seek ways to avoid, minimize, or mitigate adverse effects on historic properties.”

- 2j.** Prepare and present a cost/benefit analysis for preserving and maintaining the historic structures and Districts. Include contamination analysis (soil and building), as well as costs and benefits identified in the study, to make informed decisions about which to preserve, and which can be preserved and be safe for visitors. We encourage special attention to Coca V and Alfa III and their associated blockhouses, as those were targeted early as preferred candidates for preservation, if preservation choices ultimately are necessary.
- 2k.** With respect to all cultural resources, please provide information for the groundwater and surface water effects due to soil mitigation. Specifically include consideration of the effect of all reductions in site soils resulting from only partial replacement of removed

soils, including collateral re-contamination and other effects from flooding and silt runoff due to soil changes.

The impacts anticipated to archaeological cultural resources from removal of soil from parcels within the designated archaeological site must be reviewed and disclosed in the PEIR.

The impacts anticipated to archaeological cultural resources from removal of soil from parcels outside of the designated archaeological site, but within the cleanup study areas must be reviewed and disclosed in the PEIR.

The impacts anticipated to the historic test stands (Alpha, Bravo, Coca) from removal of soil from parcels within the designated historic area must be reviewed and disclosed in the PEIR.

The impacts anticipated to the historic test stands (Alpha, Bravo, Coca) from removal of soil from parcels outside of the designated historic area, but within the NASA DEIS study area, must be reviewed and disclosed in the PEIR.

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### 3 PEIR Must Include Consideration of Alternative Cleanup Levels

- 3a. Exclusion of any possible cleanup alternatives, except the expected cleanup approach, would be a momentous detriment to the usefulness of the PEIR, and likely invalidate it under CEQA. The PEIR must not exclude from consideration reasonable alternatives supported by authorized standards of the State of California including cleanup to Suburban Residential, Commercial/Industrial, and Recreational levels, for any of the RP's.
- 3b. DTSC's PEIR must include reasonable alternatives, presenting comparison of costs and all related effects on transportation, biological resources, cultural resources, soil, water, and air.
- 3c. A discussion of alternatives should include what DTSC will have the RPs do if the Appeals Court supports the lower court decision, which will have the effect of stating that a special, negotiated cleanup standard is not permissible at SSFL under California law. An explanation should be provided to explain why the public should pay for a cleanup that is inconsistent with the law, and 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. See, in **Attachment 4**, the text of the District Court decision filed May 5, 2011, which prohibits DTSC from compelling compliance with SB990.<sup>3c</sup> The AOCs appear to operate as substitutes for a questionable law, but the justification for its position requiring a "background level cleanup" on this important site is very unclear. That DTSC and political pressure seem to have required signature of the AOCs by NASA and DOE shortly before this decision was issued in May 2011 is very significant. We believe all decision makers and the public are entitled to see the effects of all alternatives.

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#### 4 PEIR Must Clearly Specify Requirements for Soil Cleanup

- 4a. DTSC's PEIR must fully address how appropriate backfill soil will be sourced. DTSC must give guidance on how soils that must match the specific background levels for SSFL will be identified. Source sites from which sufficient quantities of such soils may be obtained must be identified. This is a very important issue because if adequate replacement soils cannot be located, alternative solutions, including on site treatments clearly should be allowed, and the overall approach to the cleanup may need to change.
- 4b. The PEIR must explain why or how any soil replacement plans may remove significantly more soil from the site as will be backfilled. Can permanent reduction (by non-backfilled removal) of thousands of cubic yards of soil be deemed appropriate mitigation?

Will DTSC allow NASA's proposal in their DEIS to not replace 2/3 of the removed soil? What will happen with soil replacement on the DOE parcel, if not all removed soil needs to be replaced? What amounts of soil are to be removed on the Boeing parcel and what replacement is to be used on that parcel?

- 4c. Surface water runoff effects resulting from any substantial reduction in surface soils must be reviewed, explained, and disclosed in the PEIR, if DTSC anticipates accepting NASA's proposal to replace significantly less soil than it removes. Consideration of any as-yet not publicly disclosed similar shortage in replacement soil by DOE also needs to be incorporated in DTSC's commentary and disclosure. It is well settled that a reduction in permeable surfaces (typically associated with development) causes significantly increased runoffs. What will be the runoff effects of the decreased soil in a year with average rainfall? What is expected when rainfall is significantly over average levels?
- 4d. "Onsite" (*ex situ* and *in situ* treatment) soil cleanup is a promising alternative to soil removal, where appropriate. Yet, the AOCs seem to prohibit this and state the only allowable method for soil cleanup is removal.<sup>4d</sup> DTSC must explain how this seeming contradiction is possible based on the AOC language. The "leave in place" remediation alternative should be considered in the NEPA and CEQA analysis because such a remediation approach would entail significantly less environmental impact, by reducing soil excavation, hauling, and soil replacement.
- 4e. The PEIR should include a review of Environmental Justice which generally looks at the impacts to lower income and minority populations that will be affected by soil hauling activities. Furthermore the PEIR should address such demographics in the areas that are proposed to receive, and then permanently live with possible effects from the contaminated material, such as Buttonwillow, Kettleman, and Beatty. The adequacy of the identified sites to accept the combined material volumes needs to be incorporated in the PEIR, and if inadequate, alternative solutions need to be incorporated
- 4f. At the August 28, 2013, public comment session on the NASA DEIS, it was disclosed the haul trucks are merely covered with tarps when traveling with contaminated material. We request that the Department of Toxic Substances Control ensure much more complete protection for all communities along transport routes from the contaminated material that

the AOCs require to be removed. Better alternatives for reduced dust from the trucks and containment of all materials, including dust from bumps as the material is trucked, need to be developed and implemented.

- 4g. Is remediation in a project like this where buildings are removed, adequate where a flat landscape is left after remediation? Should remediation include providing topographic restoration or variable elevations/topography, such as the site originally had?
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## 5 PEIR Must Define and Disclose Cumulative and Combined Impacts

- 5a. The combined impacts of all concurrently operating SSFL projects regarding traffic and transportation-related pollution must be made specific in the PEIR.
- 5b. What transportation routes will be used by all the RPs? Will they use the same or different haul routes?
- 5c. What will the transportation emissions be for all projects combined? What will be the total effect on all communities?
- 5d. The number of trucks on all projects, travelling on Woolsey Canyon during daylight hours must be disclosed, as well as twilight and night truck traffic volumes for all projects combined. This disclosure should be presented in a table format, and specify the anticipated number of incoming and outgoing trucks in one hour increments during weekdays and weekends (if applicable), for all projects to present a realistic understanding of the traffic impact. Include a column for worker arrivals and departures from the site. Provide hour of the day in the rows, and in columns show incoming and outgoing traffic for each of NASA, DOE, Boeing. Combine all workers for all projects in the last set of columns for cumulative incoming and outgoing traffic.
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## 6 PEIR Must be Complete Regarding Plants

- 6a. DTSC's PEIR must answer questions such as: How many plants of each type are involved? How many coast live oak (*quercus agrifolia*) trees will be removed or otherwise endangered? How many western sycamores? Santa Susana tarplants?
- 6b. What steps will DTSC require the RPs to take, over what period of time, to regenerate sensitive species? For example, we do not believe Santa Susana tarplant is part of the seed mix specified for replanting. How will plantings be monitored to encourage regrowth?
- 6d. What steps will DTSC require the RPs to take to eliminate introduction of invasive species as off-site soil is brought in as part of the soil replacement? How will plants be affected by re-filling the site with less soil than was removed? How will the segmented cleanup and backfills affect the overall health of this habitat, which in many areas is



uniquely undisturbed by the major metropolitan community next door?

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## CONCLUSION AND CLOSING COMMENTS:

We believe the preceding comments taken as a whole make it clear that DTSC's PEIR must conform to all applicable environmental laws including CEQA and NEPA. DTSC's PEIR must deliver guidance to the RPs for virtually every decision affecting cultural resources and key soil removal approaches. Additionally, it is dangerous to adhere to the 2017 completion date for cleanup that the AOCs arbitrarily mandate, especially when one considers the delay in starting work on this PEIR, and the time expected for a final EIR to be prepared. A hurried cleanup will likely become an irrevocable mistake, due to significant negative impacts to soil and cultural resources that may occur. DTSC and the RPs must determine and agree to robust decision-enabling guidelines, and the PEIR must evaluate multiple reasonable alternatives.

The target date for completion of the cleanup must be extended. The current target date of 2017 has become unrealistic; DTSC has not yet provided an EIR, and DOE has not moved forward beyond initial scoping hearings. Cleanup needs to be performed after environmental documents are prepared, not before they are prepared.

A revised target date of 2020 will permit meaningful evaluation, compliant with CEQA processes, of multiple, reasonable cleanup alternatives and their impacts. An orderly and logical cleanup can then be executed responsibly, thereby avoiding unwarranted destruction of irreplaceable cultural and natural resources.

SSMPA looks forward to seeing your responses to our comments in upcoming environmental documents and asks that you seriously consider them. We primarily represent Chatsworth and West Hills, two areas that will be most affected by the tens of thousands of truckloads of materials that are required to be moved by the AOCs. In a manner similar to that voiced so clearly by the NASA Inspector General<sup>7</sup>, we too, have great difficulty seeing that cleanup to special, pre-emptive AOC standards is of any tangible benefit to anyone. (See **Attachment 6**.) But we certainly see the detriment to communities local and remote, and we see the huge governmental costs all taxpayers will pay.

Please be assured that we resolutely support cleanup of SSFL to "reasonable" levels. We believe the "Suburban Residential" cleanup standard, set by the 2007 Consent Orders, is a very reasonable cleanup level, significantly exceeding requirements, if the land will become open space, as almost all who are familiar with the property desire.

Sincerely,

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About **Santa Susana Mountain Park Association:**

Santa Susana Mountain Park Association is a 41 year-old non-profit organization based in Chatsworth, Los Angeles, California.

We represent approximately 700 members and concerned citizens, and we partner with many organizations to promote ecological and recreational quality in Southern California.

**SSMPA's mission is to preserve and protect the Simi Hills, Santa Susana Mountains, and surrounding open space.**

SSMPA Board of Directors:

Teena Takata, John Luker, Vanessa Watters, Diana Dixon-Davis, Bob Dager,  
Carla Bollinger, Warren Stone, Donna Nachtrab, Tom Nachtrab, Sarah Stone

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- Attachment 1, (1d.1)      Audit Report: NASA's Environmental Remediation Efforts at the Santa Susana Field Laboratory, Report No. IG-13-007, Feb. 14, 2013, p. 33  
<http://oig.nasa.gov/audits/reports/FY13/IG-13-007.pdf>  
retrieved 8/20/2013
- Attachment 2, (1d.2, 1e)      U. S. District Court Central District of California, Case CV-10-04839-JFW (MANx), Plaintiff the Boeing Company's Statement of Uncontroverted Facts and Conclusions of Law, p. 46-56  
[http://www.dtsc-ssfl.com/files/lib\\_boeinglawsuit%5Clegaldocs/64849\\_Boeing\\_statement\\_uncontroverted\\_facts.pdf](http://www.dtsc-ssfl.com/files/lib_boeinglawsuit%5Clegaldocs/64849_Boeing_statement_uncontroverted_facts.pdf)  
retrieved 8/20/2013
- Attachment 3                      Three Documents:  
                                        Cleanup NASA Alternatives (4 pages)  
                                        NASA Cleanup and Related Costs (Table), p. 11  
                                        NASA Remediation Levels Defined (Table), p. 6
- Attachment 4, (3c)              U. S. District Court Central District of California, Case CV-10-04839-JFW (MANx), Judgment Pursuant to Fed. R. CIV. p. 54(b)
- Attachment 5                      Audit Report: NASA's Environmental Remediation Efforts at the Santa Susana Field Laboratory, Report No. IG-13-007, Feb. 14, 2013, overview, p. i– iv
- Attachment 6, (7)                Audit Report: NASA's Environmental Remediation Efforts at the Santa Susana Field Laboratory, Report No. IG-13-007, Feb. 14, 2013, p. 10
- Attachment 7, (1d.3)            Partial Transcript from July 2011 DTSC PPG meeting, discussing the interaction of AOCs and CEQA and other environmental laws (emphasis added).

## References

- 1a** Docket No. HSA-CO 10/11 - 038 ADMINISTRATIVE ORDER ON CONSENT FOR REMEDIAL ACTION, section 5.19.1, [http://ssfl.msfc.nasa.gov/documents/governance/NA\\_DTSC\\_Final\\_AOC\\_Dec\\_2010.pdf](http://ssfl.msfc.nasa.gov/documents/governance/NA_DTSC_Final_AOC_Dec_2010.pdf) retrieved 8/20/2013
- Docket No. HSA-CO 10/11 – 037 ADMINISTRATIVE ORDER ON CONSENT FOR REMEDIAL ACTION, section 7.19.1, [http://www.etec.energy.gov/Library/Cleanup\\_and\\_Characterization/SSFL\\_DOE\\_AOC\\_Final.pdf](http://www.etec.energy.gov/Library/Cleanup_and_Characterization/SSFL_DOE_AOC_Final.pdf) retrieved 1/7/2014
- 1b** Agreement in Principle between The National Aeronautics and Space Administration and the State of California, p. 1-2 [http://ssfl.msfc.nasa.gov/documents/governance/NASA\\_DTSC\\_Final\\_AOC\\_Dec\\_2010.pdf](http://ssfl.msfc.nasa.gov/documents/governance/NASA_DTSC_Final_AOC_Dec_2010.pdf) retrieved 8/20/2013
- Agreement in Principle between The U.S. Department of Energy and the State of California, p. 1-2 [http://www.etec.energy.gov/Library/Cleanup\\_and\\_Characterization/SSFL\\_DOE\\_AOC\\_Final.pdf](http://www.etec.energy.gov/Library/Cleanup_and_Characterization/SSFL_DOE_AOC_Final.pdf) retrieved 1/7/2014
- 1d.1** Audit Report: NASA's Environmental Remediation Efforts at the Santa Susana Field Laboratory, Report No. IG-13-007, Feb. 14, 2013, p. 33 <http://oig.nasa.gov/audits/reports/FY13/IG-13-007.pdf> retrieved 8/20/2013
- 1d.2** U. S. District Court Central District of California, Case CV-10-04839-JFW (MANx), Plaintiff the Boeing Company's Statement of Uncontroverted Facts and Conclusions of Law, p. 36-37 [http://www.dtsc-ssfl.com/files/lib\\_boeinglawsuit%5Clegaldocs/64849\\_Boeing\\_statement\\_uncontroverted\\_facts.pdf](http://www.dtsc-ssfl.com/files/lib_boeinglawsuit%5Clegaldocs/64849_Boeing_statement_uncontroverted_facts.pdf) retrieved 8/20/2013
- 1d.3** Partial Transcript from July 2011 DTSC PPG meeting, discussing the interaction of AOCs and CEQA and other environmental laws (emphasis added). Attachment 7
- 1e** U. S. District Court Central District of California, Case CV-10-04839-JFW (MANx), Plaintiff the Boeing Company's Statement of Uncontroverted Facts and Conclusions of Law, p. 35-37
- 2a** Agreement in Principle between The National Aeronautics and Space Administration and the State of California, p. 1
- Agreement in Principle between The U.S. Department of Energy and the State of California, p. 2
- 2f** NASA DEIS, Appendix C, Draft Cultural Resources Study, 3.3.2 Historic Architectural Resources, p. C-38-39
- 3c** U. S. District Court Central District of California, Case CV-10-04839-JFW (MANx), Judgment Pursuant to Fed. R. CIV. p. 1-2 [http://www.dtsc-ssfl.com/files/lib\\_boeinglawsuit%5Clegaldocs/64933\\_DTSCvTheBoeingCoJudgement05-05-2011.pdf](http://www.dtsc-ssfl.com/files/lib_boeinglawsuit%5Clegaldocs/64933_DTSCvTheBoeingCoJudgement05-05-2011.pdf) retrieved 1/7/2014
- 4d** Agreement in Principle between The National Aeronautics and Space Administration and the State of California, p. 2
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- 7** Audit Report: NASA's Environmental Remediation Efforts at the Santa Susana Field Laboratory, Report No. IG-13-007, Feb. 14, 2013, p. 10