



Santa Susana Mountain Park Association

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

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To:

Paul Carpenter, DTSC Project Manager for NASA SSFL at (916) 255-3691 or paul.carpenter@dtsc.ca.gov
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Marcia Rubin, DTSC Public Participation Specialist at (714)484-5338 or marcia.rubin@dtsc.ca.gov

Re:

“Draft Data Summary Report to the Department of Toxic Substances Control (DTSC) **dated May 2015**, which summarizes the results of extensive investigations of **soil chemical contamination** at 16 sites within the 405 acres of SSFL administered by **NASA.**”

Dear DTSC professionals,

Santa Susana Mountain Park Association notes the release of NASA’s report on soil chemical contamination at SSFL. While this is a very necessary measurement document, we want to remind DTSC of **additional essential matters** that should be fully reported in your final CEQA analysis in the upcoming DEIR and later EIR.

Archeological Sites and Artifacts

NASA has done a significant number of archaeological surveys on its property since the cleanup project began, and has identified **a large number of previously undiscovered archeological sites and artifacts**. This is no surprise due to the previously known existence on the NASA property of the Burro Flats cave and related sites that are NRHP registered. As this cleanup process has continued, the Santa Ynez Band of the Chumash has proclaimed the entire property as a sacred site, which is consistent with the remarkable Burro Flats cave area. It is critical that NASA and DTSC **clearly define how the invaluable archeological assets will be preserved and protected** in the midst of soil excavation and treatment.

Historic and Prehistoric Preservation

The NASA property is part of the long-proposed **Rim of the Valley management area** that will include open space for hiking as well as wildlife-supporting open space around the rim of the San Fernando Valley and perhaps beyond (proposal still in approval stages). The National Park Service may ultimately be a manager of the NASA site due to expansion of the Santa Monica Mountains National Recreation Area as a result of the Rim of the Valley Study. NPS has declared that the preservation of the combination of key historic **features of the “race to space”** and the prehistoric **archaeological assets** will provide greatest public and interpretive appeal. It is critical that NASA and DTSC **clearly define how the combination of historical and archeological assets critical to National Park status will be preserved and protected** in the midst of soil excavation and treatment.

Soil removal and Replacement

As various studies have continued, NASA has informed DTSC of its intention to **replace exported soil** with gravel. Furthermore, **only a portion of the removed soil is proposed to be replaced**. It is our understanding that **locating soil that meets the defined-as-clean “background” contamination metric** has been difficult or impossible. Meanwhile further studies continue to note that contamination off the larger SSFL site is extremely limited in the ground, and wastewater / flood / rain management facilities onsite are treating water that occurs due to rain and generally prevent offsite discharge of untreated water. It is critical that NASA and DTSC clearly define **if and how soil removal and replacement can be accomplished** in a real-world manner.

Practical, Implementable Cleanup Standard

The **AOC** was clearly signed by NASA under significant pressure from Senator Barbara Boxer to restrict funding for NASA (see NASA Inspector General Report IG-13-007, Feb. 14, 2013). The AOC used as a standard California legislative bill SB990 that mandated a **very expensive and unique “background” cleanup standard** for the Santa Susana Field Laboratory (which includes the NASA site). Usual cleanup standards would provide for a cleanup based on an open space use, which would apparently involve removal of only about 12% of the soil that is to be removed under the AOC. This type of removal would cause much less damaging impact on the surrounding community, much less disturbed earth that can cause Valley Fever, and meanwhile still satisfy state law. Of note, as expected, **SB990 was struck down** by appeals court subsequent to the signing of the AOC agreement.

Conclusion

Santa Susana Mountain Park Association encourages DTSC to consider all aspects of the project, including the benefits and burdens that will be paid for by the people: the same people who must also shoulder increased risks due to excessive soil hauling under the AOC standards. **Cleanup to residential use standards** (projected at 36% of the soil removal compared to the AOC) will be more than sufficient to satisfy state law and expected future uses of these lands; and will provide a better end result by leaving most soil on the site.

Sincerely,



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About **Santa Susana Mountain Park Association:**

Santa Susana Mountain Park Association is a 43 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 regional open space.

SSMPA Board of Directors:

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