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Marshall Space Flight Center
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Huntsville, AL 35812
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RE: Comments on the Draft Environmental Impact Study (DEIS) for Demolition and Environmental Cleanup Activities for the NASA-administered portion of the Santa Susana Field Laboratory (SSFL), Ventura County, California

Dear Mr. Elliot,

On behalf of the Resource Conservation District of the Santa Monica Mountains (RCDSMM), thank you for the opportunity to submit comments on the DEIS for the NASA-administered portion of the SSFL. The RCDSMM is a non-regulatory, locally-led Special District of the State of California that fosters the conservation and enhancement of local natural resources through research, watershed and community-based planning, education and on-the-ground restoration, demonstration, landscape-infrastructure and architectural design projects. The RCDSMM is uniquely chartered by Division 9 of the CA Natural Resources Code to be responsive to the needs of our community, public and private land stewards alike. RCDSMM's expertise is in the specific resource conservation issues of the Wildland-Agricultural-Urban interface. RCDSMM is uniquely positioned to liaise between public/private landowners and regulatory/enforcement officials and agencies toward achieving sustainable communities and resource conserving land use approaches.

As a non-regulatory reviewing and resource agency in the Santa Monica Mountains, as well as portions of the Simi Hills, including the subject property and the Bell Canyon and Chatsworth Reservoir areas, the RCDSMM is actively involved in monitoring resources and local restoration efforts in the area. We prepared the 2011 *Upper Bell Creek Subwatershed Plan* for the Bell Creek Headwaters Council of Bell Canyon, the majority of which subwatershed is SSFL land. Since completion of that plan, RCD staff have continued study of the SSFL property, watersheds, and adjacent lands, including submission of a Conceptual Area Protection Plan (CAPP) of the critical Habitat linkage lands immediately adjacent to SSFL in the Simi Hills for the California Department of Fish and Wildlife. We acknowledge and appreciate the cooperative involvement of the various land stewards and stewardship groups of the region, including NASA, who have

given their time in support of those various study efforts. The RCDSMM is currently a consulting party to the Section 106 process for the subject property.

We provide the following comments and considerations relative to the DEIS:

Summary and Context

Overall, we applaud the clarity and organization of the DEIS, which states its assumptions and findings clearly. We appreciate its direct and thorough description of the analysis completed to date. The DEIS provides analysis of a required “no action” alternative, and one alternative proposing demolition and clean up of the 451-acre site to “background levels” as established in a previous agreement made between government agencies—referred to in the documents as “2010 agreement on consent” (AOC) for which no formal, public study of the environmental impacts of the agreement was completed. The first and overarching comment of the RCDSMM therefore is that after completion of this first draft of the EIS, given the single action proposed at only the most stringent standards levels of contaminant removal, the environmental impact documentation and analysis remains incomplete. **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.**

One Action Proposed

By providing only a no-action alternative and clean-to-background alternative analysis, the DEIS proposes a type of circumlocution in which an agreement established on the basis of contaminant measurement, without adequate study or public review of the environmental consequences, is cited as the sole reason for not providing an adequate study or public review of a full range of alternatives. The RCDSMM suggests that a place of such critical ecological and exceptional cultural resource value merits consideration of a full suite of reasonable alternatives.

We recognize that the no action alternative leaves the site unsafe for human use, so to leave the existing contaminants at the site at current levels is unacceptable. However, by providing only one proposed action, no actionable “alternatives” have been provided at all for consideration, but a single action alone. “Alternatives” implies more than one action be provided which is the analysis approach that follows the spirit, intent and purpose of the public environmental review process.

We understand that NASA is working to comply with AOC-established timelines and internal “directives”, and that a number of elements of the analysis lack clear definition which we understand to be in the purview of the DTSC and their own as yet incomplete

environmental analysis. Nevertheless the even the impact of the single (and insufficient) proposed action cannot be completely analyzed until such time as the DTSC/NASA provides more specific information. We request that a revision of the DEIS not only provide the DTSC components, but also provide:

- Complete and balanced analysis of various reasonable cleanup scenarios.

Please note that RCDSMM fully supports reduction of human health risk as the highest priority consideration, and recognizes that the current condition of SSFL does not provide an appropriate environment for any public or private end-use of the property. Reduction of contaminants to safe levels must be achieved according to measurable standards. However, “background” is a measure that requires a qualitative decision on the point in time and specific location in which such a condition could have existed, and as such the choice of quantitative determination drives significant impacts. Given that this background 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, and that the negative ecological and cultural impacts at the site may increase exponentially with increasing quantitative standards of “safe”, other reasonable alternatives should be provided for analysis- as has been requested by numerous commenting parties during the scoping process.

- Identification of specific outcomes for cultural resources, archeological as well as structural.

We find the description of the end condition of the cultural landscape to be lacking specificity in the DEIS. The likelihood of finding archeological elements within contaminated soils is possible, and the outcome of that situation is not sufficiently defined

- Identification of replacement material for soils of sufficient quality to meet the AOC standards.

We understand that a number of sources for replacement material have been studied and none have been as yet identified as meeting the standards now required in the single proposed action. The replacement soil values, if not matching the lookup tables, will drive a different cleanup approach and excavation quantities than is described in the DEIS

Integrated Cultural and Natural Resources

The relatively undivided and sparsely developed Simi Hills and Santa Susana Mountains (SHSSM) are of great importance to the people and land managers of the region, as

they represent the core areas of a primary habitat linkage that provides the Santa Monica Mountains (SMM) with the source of its sustainable biodiversity. However, the connectivity between core habitat areas in the SMM, Simi Hills (SH), Santa Susana Mountains (SSM) and the Los Padres National Forest (LPNF) has been severely degraded by intrusive “fingers” of development, fenced off freeways and railroads, etc. Mitigation for these environmental impacts that occurred prior to the California Environmental Quality Act has been the primary driver for 20 years of wildlife corridor studies, the most recent being the South Coast Missing Linkages Project (<http://www.scwildlands.org/projects/scml.aspx>). It is important to note that a habitat linkage is more than a “wildlife migration corridor”, but is rather a contiguous area connecting significant habitat patches (sources or sinks) within which species can feed, breed and adapt over time to changes in the ecosystem, and through which genetic diversity can flow over generations to maintain species health and viability. As such, the definition of “corridors” is only part of the consideration of ecological importance of the NASA property and SSFL. The subject parcel is the heart of the habitat linkage that is most critical to maintaining the ecological health of the entire Santa Monica Mountains ecosystem, as well as the Simi Hills ecosystem it currently anchors.

As such, the several acknowledged “significant, negative, regional and long-term” impacts of the single action proposed by the DEIS must be understood in this context. 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”- as currently proposed in the action will leave a significant concavity in the Bell Creek upper catchment. Downstream impacts to the miles of Oak Riparian woodlands downstream have not been adequately studied, but replacement of a positively draining 100-acre surface with a non-draining concavity will certainly devastate the local hydrological cycle. The DEIS cites only the removal of impervious surface and corresponding increase in infiltration to establish a claim of beneficial impact. But a critical analysis of the sectional gradient of the resulting hydrology- that is, the loss of positive flow within the riparian corridor resulting from the impoundment created by the unrestored topography- is missing from the DEIS. Clearly, the costs and number of truck trips proposed are contributing factors rationalizing the proposed action, but this extraordinarily unbalanced cut-fill has impacts we ask be fully recognized and evaluated and the claims of beneficial impacts corrected.

The DEIS does not note that the subject property is part of the Rim of The Valley Special Resources Study (ROTV) area for which an Environmental Assessment (EA) is currently being drafted. The ROTV in its completed initial stages has identified and described the natural and cultural resource value and connectivity of the area, noting the critical importance of the region in which the subject property is located. In our letter of comment at the Feasibility stage of the ROTV study the RCDSMM noted that “some important resources that are not yet designated National Historic Landmarks” and commented that:

The 50-years of relative isolation of this [SSFL] site afforded by its use as a rocket-engine testing facility has resulted not only in contamination that is now in the process of remediation, but also in preservation of some remarkable cultural and natural resources. As fellow providers of interpretive design and environmental education, the RCDSMM urges NPS to work internally or with the current SSFL landowners to ensure completion of the “additional research and analysis needed” referenced in the current study documents as required to validate and conserve the exceptional cultural resources that exist on the SSFL site. These artifacts include not only those of indigenous origin, but also uniquely preserved ecosystems that supported these original cultural sites, as well as some modern-era architectural elements such as the Coca Test Stands remaining on site that are among the most significant remaining historic structures related to the American Space Program. NPS through the ROTV process may soon expand its stewardship role to the 2,800-acre SSFL landscape, so working with other agencies and owners before then to ensure that a careful consideration of its critical cultural and ecological resources is part of any and all environmental studies is crucial. The connecting link across the centuries between the paleo-astronomical and modern-era exploration of the heavens is an overlay of unprecedented interpretive significance, and an educational resource worthy of conservation within the context of appropriate remediation.

The sole action described in the DEIS would forever sever this nationally significant connection between the highest aspirations and technological feats of two historic cultures, and create impacts for which no mitigation may be possible, but certainly for which no adequate mitigation has been proposed in this document.

As rare as this convergence of aspirations from widely separated eras and cultures is the opportunity to interpret Native American cultural resources within the largely intact ecological systems that supported their activity and sourced their cosmology. It is a contemporary mistake to compartmentalize the physical characteristics of an historic cultural site from its spiritual and cultural significance. The oak woodlands, the horizontal and sectional geometry of the exposed rock formations and the converging valleys all contributed to the inevitability of this site as the Chumash place of solstice observation, of the human effort to support the cause of Coyote in his yearly contest with Raven to bring the sun back from its journey south and diminishing day-life. The “artifacts” of the human hand ought not be separated from the “artifact” of the ecosystem and space that directed the hands and supported the ceremony. 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. These are protected resources for which no mitigation is possible.

The co-location of ethno-astronomical technology with modern-era technology created in order to explore the heavens reaching presents an extraordinary inspirational value and interpretive opportunity. Nine eligible historic structures exist at the site. We suggest that demolition of most of these historically significant structures can not be mitigated by retaining only one of them. We will provide section 106 comment under separate cover,

but propose that the remaining Coca and Alfa district test stand structures have the greatest potential for interpretive, educational, and inspirational value at the site and at least one test stand at each site should be preserved along with its critical contextual structures, such as the associated blockhouse. We suggest that appropriate mitigation for the historically significant structures that are to be demolished not only be 3-dimensional documentation of their pre-destructed state, but also an endowment for the maintenance and interpretation of all of the “structures” both indigenous and modern and the absolutely unique co-location at *Hi'im* (mystery valley), also known as SSFL.

Preparation for Disposition

In addition to creating negative, significant and long-term impacts to rare riparian and oak woodland areas and their supporting hydrology, removal of nearly a quarter of the surface soils and much of their underlying topography to a depth of up to 20 feet, and replacing that with a small fraction of “backfill”, the removal of up to 100% of the modern era historic structures and protection of only the “artifacts” found within a destroyed context- even that of the Burro Flats Cave site- will limit not only the not only the number, but the type of recipients who will take interest in assuming ownership. The GSA disposition process cannot force a preferred steward to take on the property, so it must be left in a state that is suitable for some end-use. Public open space managers with stressed budgets and very clear missions may be hard-pressed to justify obtaining a 451-acre property with 100 acres of un-restored excavation area, a weed, erosion, and surface water management problem, stripped of all cultural resource and interpretive value, with only fragile artifacts remaining without context yet still in need of protection. The disposition process does not guarantee any public or open-space/recreational end use. Should no such stewards accept the property, others will evaluate the “highest and best use” of a former development site, now free of contaminants, within a fully accessible 100-acre graded area. The potential for losing the site to development is a potential unintended consequence of look-up tables and timelines rather than Purpose and Need driving the choice reasonable alternative approaches to cleanup. The stated Purpose and Need to remediate the environment and prepare the property for disposition is not met by the single action proposed.

Environmentally Superior Alternative

Discussion of the environmentally superior alternative is absent from the DEIS. Perhaps this is because “no action” is clearly not what the community has been working toward for 30-plus years. Nevertheless, this section should be completed, as it is not a foregone conclusion that the single action studied would be superior to “no action”, or that the action proposed meets the standards required for the significant long term benefit claimed. The RCDSMM notes that the minimum amount of on-site remediation techniques proposed, and the 500,000 cubic yards to be removed to another site do not together represent true cleanup so much as contaminant relocation and concentration.

The offsite impacts of concentrating low levels of contamination in a single site such as Kettleman to create an area of significant contamination ought be considered when this required discussion and identification of the environmentally superior alternative is completed- as well as in the environmental justice analysis. The environmental impact and justice of taking soil of “background” level quality from another location should also be taken into consideration. It stands to reason that such soils, if available, would come from areas minimally impacted by surface or atmospheric deposition of environmental contaminants- that is, primarily natural and relatively pristine sites. What environmental permit process would allow such a taking? And, if material of such quality is physically or legally unobtainable, as may be the case if it can only be found in another community’s treasured open space, then what quality of material would be provided as a substitute? If that quality allows for a higher measure of contaminants within a safe standard, then why remove the existing soil that meets that elevated level of acceptability in the first place? The result would be a new alternative, one that would be possible within the constraints of available material.

We do not agree with the conclusion that the single action proposed will result in a moderate improvement to the biological resources of the site in the long term. 100 acres of soil is to be removed, and far less returned as backfill, which is not of course soil. The net loss of native soils cannot be considered a benefit under any time frame or standard of objective measurement. With that correction, the reports tables seem to suggest that the no action alternative is the superior alternative. This result of course cannot stand, as there is a recognized need for contaminant removal at the site, and yet we do not have an action yet that has less than significant negative impacts in critical categories.

In conclusion, we request that NASA, with DTSC’s full involvement and assistance, provide a revised DEIS evaluating a full suite of safe alternatives that 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. We urge the agencies to take the long view, and extend the deadlines and clarify or renegotiate the agreements that appear to be driving this understudied environmental analysis. Section 2.4 of the DEIS is particularly helpful, revealing, and provides a potentially valid framework for analysis of just such a complete suite of alternatives, as presented in earlier public meetings and truly useful for engaged public comment.

Thank you for the opportunity to comment, and for the NASA staff’s sincere public engagement efforts and exceptional availability up to this point in the process. If you have any questions about this letter please feel free to contact me at the 818-587-8627, ext. 105.



RESOURCE
CONSERVATION DISTRICT
OF THE
SANTA MONICA MOUNTAINS

Respectfully submitted,

Clark Stevens, Architect
Executive Officer