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**Comments on the Draft Environmental Impact Statement (EIS) for Proposed National Aeronautics and Space Administration (NASA) Demolition and Environmental Cleanup Activities for the Santa Susana Field Laboratory, Ventura County, California**

Dear Mr. Elliott:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Draft EIS for NASA's cleanup activities at the Santa Susana Field Laboratory in Ventura County, California. The Conservancy is the state planning agency for the Santa Monica Mountains Zone and Rim of the Valley Trail Corridor. The EIS document offers only two alternatives: "No Action" and one alternative to demolish and clean the 451-acre NASA site to "background levels."

The Conservancy and its park partners include the Mountains Recreation and Conservation Authority (MRCA), a joint exercise of powers agency comprised of the Conservancy, the Rancho Simi Recreation and Park District, and the Conejo Recreation and Park District; the California Department of Parks and Recreation (California State Parks); and the National Park Service. Our agencies own and manage thousands of acres of parklands in close proximity or adjacent to the larger SSFL property. SSFL, including the NASA property and Boeing's holdings, occupies a key and critical location in the Simi Hills as an intermountain habitat linkage, part of the Santa Monica- Sierra Madre Connection linkage (2006 South Coast Wildlands Report). The park agencies have worked assiduously for over three decades to preserve and protect habitat, wildlife connectivity, cultural and historic resources, and recreational access throughout the area.

Sage Ranch Park is owned by the MRCA and lies immediately north of Boeing's SSFL property, and the former LOX liquid oxygen site now controlled by NASA is adjacent to southeastern border of Sage Ranch Park. Upper Las Virgenes Canyon Open Sapce Preserve (former Ahmanson Ranch) adjoins Boeing property on the southwest. The Draft EIS does not present a full and complete picture of the existing publicly owned parklands, and ongoing planning efforts to link and expand the parkland network for habitat protection and public access. The National Park Service's continuing Rim of the Valley Special Resource Study, authorized by Congress, is given short shrift even though SSFL is within the study area. The area has been included as important private open space in the Conservancy's designated Rim of the Valley Trail Corridor boundaries for several decades.

The Conservancy and the MRCA have over the past years provided cooperation with the United States Environmental Protection Agency (EPA) and with the California Department of Toxic Substances Control (DTSC) for their sampling studies including access to agency parklands for sampling to establish "background standards."

We recognize that the environmental review and analysis of a range of alternatives for the EIS has been greatly limited by the legal constraints of the Administrative Orders on Consent (AOC'S). It is unfortunate that a more comprehensive review of the physical environment and science-based risk assessments has not been possible to provide the public with information on a range of cleanup alternatives to protect public health while still preserving more of the site's ecological, cultural, and historic resources. "Alternatives Considered but Dismissed" are contained in EIS Section 2.4: Table 2.4-1 is instructive in comparing the magnitude of demolition and habitat removal required by the background standard versus a recreation use standard. Under the one cleanup alternative, almost one quarter of NASA's 451 acres--105 acres-- is proposed for clearance of vegetation and soil to a depth of a minimum of two feet, and the removal of the historic Space Age rocket test stands Alfa, Bravo, and Coca, in order to remove the soil beneath them. These test stands are nationally significant artifacts of our country's space exploration effort and would provide unique interpretative and educational opportunities for the public, if they were preserved. Likewise, extraordinary Native American archaeological and sacred sites and as-yet-potentially-undiscovered sites and artifacts are at risk of damage or loss.

If not for the concerns over liability for extreme clean up standards, the site would otherwise most logically be eventually included as public parkland owned and operated by the National Park Service or any of the park agencies, to protect a stunning landscape, ecosystems, cultural and historic resources, and recreational access. However, what may be left of the site after the one cleanup alternative is implemented could curtail a natural open space parkland designation, especially if cultural and historic features have been eliminated or compromised by cleanup activities.

While analysis of growth-inducing impacts may not be specifically required for the EIS, the topic of land use is not comprehensively addressed. What will be the end result for a future land use of the NASA site after scraping 105 acres to mineral earth (and below), with additional scoured and flattened pads to store excavated soil prior to off-site removal or treatment? Or Woolsey Canyon Road improved in order to provide adequate offsite removal of soil by thousands of truck trips? It does not seem beyond the realm of unintended consequences that a result of the cleanup alternative could be graded, development-ready pads and improved road access that would inure to the benefit of some private, industrial, or institutional use, courtesy of federal funding.

Removal of soil offsite to limited disposal sites is estimated between 320,000 cubic yards up to a maximum of 500,000 cubic yards, with an extended time frame of truck trips up and down Woolsey Canyon Road. Later, truck trips to import soil back into the site in order to replace removed soils present additional impacts. Not adequately addressed is the issue of importing large quantities of soil of as-yet unidentified composition back onto the scraped sites in a mitigation attempt. How would questions of importing weed seeds, fungal spores, and macroinvertebrates be addressed, and general soil profile suitability for any attempt at restoration or recolonization by species native to the SSFL site? Habitat restoration to original condition would be highly unlikely if not impossible and must not be characterized as a long term "moderately beneficial" biological result. Also needed is more in-depth explication for mitigation measures to limit wind erosion and exposure to Valley fever fungal spores, and sedimentation potential and impact on streams draining the site.

Please contact Rorie Skei, Chief Deputy Director, for any questions or additional information, at (310) 589-3200, extension 112.

Sincerely,

IRMA MUÑOZ
Chairperson