

SSFL Community Advisory Group

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Thank you for the opportunity to comment on the Draft Environment Impact Statement (DEIS). The SSFLCAG members have been reviewing the DEIS for a number of weeks and have submitted their individual inputs including substantive detail to you and this overall response is on behalf of SSFLCAG organization.

The SSFLCAG has found that our communities are very disturbed by the DEIS and our comments reflect this widespread feeling.

The DEIS is deficient because it only presents two unacceptable extreme alternative for the cleanup. The proposed Soil Cleanup to Background would have significant environmental impacts and the No Action alternative would leave contamination in place that most would agree should be removed.

The Cleanup to Background will require a major amount of excavation that will overload the one mountain road coming from the SSFL and saturate the community roads leading from that site. Truck accidents are anticipated and the DEIS notes that the danger to nearby school children will be significant. The danger to the school children is unacceptable.

The soil removal will destroy the existing biota and will alter the topography yet the DEIS does not address a grading or drainage plan. The DEIS calls for only a third of the removed soil to be replaced and it is questionable that the plants and habitat will be reproduced.

The plan proposes that some of the removed soil be remediated and returned as backfill however the techniques for this remediation are unproven. 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.

The widespread soil removal will damage existing native sacred grounds ancient sites and artifacts. The DEIS does not provide for professional assistance to identify and develop protection for these critical areas the impact of the cleanup will generally have significant negative effects and in particular the Burro Flats site will be impacted. Non-excavation methods of remediation should be exhausted before performing excavation that could damage cultural sites.

Under the proposed action numerous historical buildings are to be removed and the rocket test stands are to be dismantled. These test stands were used for all of the space vehicles and they are a remembrance of our national space program. NASA should make a greater effort to preserve as much of this heritage as reasonably possible.

The core of the many problems with the DEIS is the amount of soil to be excavated and this is dictated by the AOC which calls for the Cleanup to Background. This 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. The AOC allows for

agreement changes if accepted by both parties and with the inclusion of PRG's into the lookup tables would allow this alternate cleaning method to be evaluated and used. A Modification in Principle alternative is being proposed that would maintain the AOC and include this recommendation.

Finally, the 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. The nearby communities and those along the transport route will also be affected. The DEIS as written needs to be rewritten as suggested including a risk based cleanup.

The SSFLCAG, while not endorsing every comment made individually by its members, supports the overwhelming essence of those comments which state that the DEIS as written is unsatisfactory and the AOC requirements that caused the proposed destructive cleanup must be changed.

Copies of the comments on the DEIS from various SSFLCAG members are attached.

Alec Uzemeck
Chair, Community Advisory Committee

SSFL Community Advisory Group Members

Ross Berman	Richard Brandlin	San Cohen
Diana Dixon Davis	Sharon Ford	Paul Garret
Poly Georgilas	Linda Hays	David Karchem
Christian Kiillkkaa	Michael Kuhn	Frank Lopez
John Luker	Leigh Nixon	Barry Seibert
Thom Slosson	Brian Sujata	Alec Uzemeck
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