

Mr. Allen Elliott  
National Aeronautics and Space Administration (NASA)

10/17/2012



Dear Mr. Elliott,

Below are the ACME comments on the NASA National Historic Preservation Act Section 106 Consultation Meeting regarding the proposed actions that could impact historic properties on the NASA administered lands at the SSFL. NASA signed an Administrative Order on Consent (AOC) with the California Department of Toxic Substances Control (DTSC) on December 6, 2010 and in your March 1st, 2012 presentation...

[http://www.acmela.org/images/NASA\\_SSFL\\_Section\\_106\\_Meeting\\_March\\_1\\_of\\_2012.pdf](http://www.acmela.org/images/NASA_SSFL_Section_106_Meeting_March_1_of_2012.pdf)

...page 6 of the document states the [NASA proposed actions are a demolition of up to 100% of the structures and Soil Cleanup to Background levels], which would follow the AOC, yet before we have background or even the known extent of contamination below the proposed "Saved" structures, a determination on demolition or preservation cannot be made at this time. The Boeing Co. recently gave a contractor led presentation on the demolition of structures and they said it was more effective to demolish first and sample later, in fact they found previously unknown contamination after demolition. The first test stand in the Bowl Area would bear the most significance up at the SSFL, yet Boeing decided other ways of preserving its legacy. We need to realize that these structures, primarily the test stands sit on cancerous solvents are covered with thousands or even millions gallons of lead paint and in the case of COCA, there were test stands built upon test stands and the only way to find the extent of the contamination is removal.



ACME sent the below letter to GSA to inquire about some of the things said within the meeting... [http://www.acmela.org/images/ACME\\_to\\_GSA\\_Santa\\_Susana\\_SSFL\\_March\\_13\\_of\\_2012.pdf](http://www.acmela.org/images/ACME_to_GSA_Santa_Susana_SSFL_March_13_of_2012.pdf) ...one of the responses to my questions below that mentions "Substantial Progress" of characterization and not cleanup, we do not want NASA to walk away from a cleanup when the land is transferred prior to. "We have paused the process for now to allow NASA time to finish its EIS and Section 106 processes, and for NASA and DTSC to finish or at least make substantial progress toward completing the characterization of contamination on federal land. It is not unusual for federal, state and local governments to transfer land before completion of the environmental cleanup. As I brought up at one of the public meetings, California even has a law promoting transfer of brownfield properties" **During the recent Field Sampling Plan operations in AREA II, it was noted that there were a debris fields located within the "New" boundaries of the Burro Flats Cave perimeter. Was the new historic boundary drawn before or after the debris was found? We need to make sure this watershed is cleaned up for future visitors to the caves and because it is a tributary to the Los Angeles River, a recently designated navigable waterway declared by the EPA.**

**Action is needed on this issue to Ensure a Proper Cleanup of the Santa Susana Field Laboratory, it's Related Facilities and their Surrounding Communities.**

**William Preston Bowling**  
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<http://www.acmela.org/>

[http://www.acmela.org/images/NASA\\_SSFL\\_Section\\_Meeting\\_Summary\\_March\\_1\\_of\\_2012.pdf](http://www.acmela.org/images/NASA_SSFL_Section_Meeting_Summary_March_1_of_2012.pdf)