

February 10, 2014

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California Environmental Protection Agency
8800 Cal Center Drive
Sacramento, CA, 95826

Subject: Santa Susana Field Laboratory Community Advisory Group Comments to the Notice of Preparation, Program Environmental Impact Report, Santa Susana Field Laboratory Site, Ventura County, California.

Mr. Malinowski,

The comments presented here represent the consensus of opinions shared by the undersigned Santa Susana Field Laboratory Community Advisory Group members. We have collaborated on its writing and negotiated our comments across the diversity of our viewpoints. We acknowledge that strong individual opinions exist within our well-informed group and that some members may have specific comments regarding the PEIR which they will share with you on an individual basis.

We appreciate the opportunity to provide comments to the Notice of Preparation, Program Environmental Impact Report (PEIR) which will provide an exhaustive consideration of project alternatives and support critical decision-making towards the completion of the environmental restoration of the SSFL.

The comprehensive CEQA evaluation of the SSFL cleanup arrives some twenty-five years after the U.S. EPA completed their CERCLA Preliminary Assessment/Site Investigation of the site.¹ Since 1989, the site has been subject to extensive and continuous environmental investigation: monitoring of the surface water discharge from the site, the installation of roughly 350 shallow and deep wells to study the nature and movement of the underlying site groundwater, the impacts to soil from the historical operations intensively have been studied within 135 areas of interest and a comprehensive characterization of radioactive material releases within a 290 acre portion of the 2,850 acre site. The SSFL been exhaustively investigated over the past two and a half decades.

¹ U.S. EPA. 1989. Summary review of preliminary assessment/site inspections of Rockwell International, Santa Susana Field Laboratory. Ecology and Environment, Inc., contractor to U.S. EPA.

The Department of Toxic Substances Control signed agreements with the two Federal departments involved with the site requiring impacted soils to be cleaned to background. A number of neighbors and community environmental advocates objected to the cleanup plan recently tendered by one agency; similar objections are likely when the other government agency reveals its plans in the near future. As of this writing, the cleanup plan for SSFL entails an arbitrary and capricious cleanup standard applied to roughly one quarter of the site, with a different risk-based cleanup process for the balance of SSFL, including all of the impacted groundwater.

To our knowledge, the DTSC-advocated cleanup requirement being applied at SSFL has not yet been implemented at any location to the extent proposed. We are disappointed with the current mandate, especially since DTSC staff have stated under oath that “there is no technical, scientific, or environmental basis to single out SSFL for more onerous cleanup procedures than apply to other cleanup sites in California.”² Santa Susana is a site having a great wealth of biological and cultural features, a diverse parkland for future generations much of which will be needlessly sacrificed if the current cleanup plan is allowed to proceed.

The PEIR has the ability to iron out the disparities between the various cleanup standards and processes at SSFL since DTSC will contemplate the “secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.”³ The following comments are respectfully submitted in the interest of contributing to the success of the Programmatic Environmental Impact Report for the SSFL:

- The DTSC must maintain a science-based decision making approach, sensitive to cultural issues and reject political influence and non-technical input.
- The PEIR should begin with a programmatic analysis of the corrective measure objectives including cumulative impacts as a core document which is then appended to incorporate the analysis of later CEQA projects as the program progresses towards completion. Regardless of the chosen implementation method, the PEIS must provide for the incremental review of documents to maximize stakeholder involvement.
- The environmental restoration activities undertaken should be consistent with the designated future land use of the SSFL site.
- The SSFL must have one site-wide cleanup policy for the surficial media rather than an arbitrary cleanup standard for part of the site and a risk-based cleanup standard for the remainder.

² U. S. District Court Central District of California, Case CV-10-04839-JFW (MANx), Plaintiff the Boeing Company’s Statement of Uncontroverted Facts and Conclusions of Law, p. 36-37 http://www.dtscssfl.com/files/lib_boeinglawsuit%5Clegaldocs/64849_Boeing_statement_uncontroverted_facts.pdf, retrieved 8 January 2014.

³ See 14 CCR 15168(d)(2).

- The activities undertaken to support the characterization and environmental restoration of SSFL must be similar to that conducted at other sites within California.
- The DTSC must analyze and present the risks and benefits of a practical range of cleanup limits to the public.
- Please communicate with the public to the degree above and beyond that required by law.
- Consider the mitigation of negative project outcomes by performing the cleanup of SSFL consistent with future land use.
- Any culturally sensitive site which is deemed necessary to destroy must be subject to investigation and study by qualified persons before disturbing the site in order to elucidate the prehistoric context of the site and to determine its significance.
- The PEIR should consider the novel approach of relaxing the cleanup standard in discrete locations to protect high-priority cultural and/or biologically sensitive areas and apply an alternative involving minimal mitigation when considered in light of the extensive site characterization and future use of the property.
- The individual mature trees identified for removal to facilitate the cleanup should be identified within the EIR documents.
- Support the on-site treatment of impacted soil if the process can be shown not to have negative consequences on the environment.
- The various risks to all exposed resulting from remedial actions involving the removal of soils from SSFL should be communicated. Further, clean fill materials must be identified prior to any soil removal actions begin.
- Determine and explain the risks of the proposed actions involving soil removal by communicating the incremental risks (both off-site and that remaining on-site) resulting from the differing cleanup standards applied to similar cleanup sites in California.
- Include the assessment of negative impacts to off-site landfill disposal facilities, the need for new or expanded landfill capacity and the environmental justice impacts to the surrounding communities.
- Include the assessment of negative impacts to the on- or off-site borrow pit supplying replacement soil to the Santa Susana Field Laboratory remedial action areas.
- Air pollution and dust dispersion effects on the local population and those living near the transportation routes must be determined and clearly communicated to the community.
- Spent gun cartridges originating from historic (i.e., over 50 years ago) movie making activities are found within SSFL. These artifacts represent a culturally valuable link to the past that must be identified and preserved as a resource.
- The scope of the SSFL PEIR should include the regulatory closure (and possibly the post-closure) of the Radioactive Materials Handling Facility (RMHF) and the demolition of former

radiological buildings, if required by CEQA. The removal of the remaining radioactive materials from within the RMHF must be a program priority.

- The Department of Toxic Substances Control should expedite the regulatory closure of the RMHF and the demolition of the remaining non-useful buildings in Area IV.

Thank you for the opportunity to provide our comments to you. We look forward to working with you and your staff to craft a cleanup plan for the Santa Susana Field Laboratory site that does more good than harm.

Sincerely,

Ross Berman, Thousand Oaks
Richard Brandlin, Arcadia
Sam Cohen, Solvang
Diane Dixon-Davis, Chatsworth
Sharon Ford, North Hollywood
Poly Georgilas, Bell Canyon
Christian Kiillkkaa, West Hills
Mike Kuhn, Simi Valley
John Luker, Chatsworth
Brian Sujata, Thousand Oaks
Barry Seybert, West Hills
Alec Uzemeck, Simi Valley
Kathy Weiner, Simi Valley
Abe Weitzberg, Woodland Hills
Ronald Ziman, Bell Canyon

ABOUT THE SSFL CAG: The SSFL Community Advisory Group (CAG) was formed in 2013 by the California Department of Toxic Substances Control in accordance with California law. The CAG provides a public forum for stakeholders to discuss issues and concerns relating to the environmental investigation and restoration of the former rocket engine and nuclear-development facility. Its volunteer members represent a cross-section of interested and affected neighbors from the surrounding communities.