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Comments on SANTA SUSANA FIELD LABORATORY (SSFL) TRANSPORTATION OPTIONS - Conveyor Route B; Truck Routes 7, 8, and 8A

On August 7 and 9, 2014, DTSC presented in public meetings several "preliminary transportation route options identified to date" for soil removal from the SSFL site. Multiple route options affecting our immediate community were identified as **Conveyor Route B, and Truck Routes 7, 8, and 8A**.

These various routes were presented in DTSC's map "Potential SSFL Truck and Conveyor Routes for Feasibility Analysis."

At present, we believe all the routes noted above are unacceptable.

CEQA based analysis, which we are still waiting to see, will clarify timing issues such as a 12 year expected export period for DOE contaminated soil removal using background cleanup levels. Decision makers and the public need to see such information. See Supplement 1 for further discussion of this issue.

With a more reasonable cleanup standard, quantity of material to be removed will be significantly reduced. With a more reasonable schedule for completion of cleanup, huge effects from creating supplemental removal pathways (roads or conveyor routes) will be eliminated. Both these items should be major considerations in the PEIR to be issued by DTSC (draft expected sometime in 2015).

Routes affecting our community are discussed in more detail below:

Conveyor Route B invades many, many acres of undeveloped lands and protected open space preserves, including:

1. The western end of Conveyor Route B runs through approximately one mile of protected open space in **Sage Ranch Park** (Santa Monica Mountains Conservancy).
2. The eastern section of Conveyor Route B runs through significant distance, and historic routes, and perhaps may even be on the National Register of Historic Places Devils Slide area of protected open space in **Santa Susana Pass State Historic Park** (California Department of Parks and Recreation). Additionally, multiple archaeological sites are present in the park and may be affected by this route.
3. The eastern end of Conveyor Route B may run through a section of **Chatsworth Park South** (Los Angeles Department of Recreation and Parks).

4. **Rail Site #3, used by Conveyor Route B**, appears to be on land within both **Chatsworth Park South** and **Santa Susana Pass State Historic Park**.

Truck Route 7 has a huge long term environmental cost to the community.

1. This route travels along the North American Cutoff Road, and then through Box Canyon, a narrow road, that cannot be practically expanded due to surrounding homes, oak woodlands, and topography.
2. The North American Cutoff Road is a fire road, and is unimproved with difficult topography for a major haul route.
3. This route was identified in early 2014 by the National Park Rim of the Valley study as the most likely route for the Rim of the Valley trail in northwest San Fernando Valley. Since this goes along the ridge line of the Valley, it makes sense as a “Rim of the Valley” trail proposal. If this route were turned into a road bed and major truck route, the topography would be permanently altered, the resource value as a trail would be destroyed, and irreparable harm to this permanent trail in this area would occur.
4. This area is a wildlife corridor and this use is even more important to preserve with minimal development with the recent announcement of a freeway wildlife crossing at Las Virgenes Road and the 101 (Ventura) freeway.
5. There would be significant growth inducing impacts from creating a road in the area of the North American Cutoff Road (and we cannot conceptualize how a route through upper Box Canyon Road would be feasible).

The long term effects of **Truck Route 7**, combined with the lack of practicality of the upper Box Canyon route, make this route not feasible. Invasion of so much legally protected open space, traversing steep and fragile terrain, is unacceptable.

Truck Routes 8 and 8A are developed roads but still are unacceptable at present.

1. Transportation along Truck Route 8 and 8A both pass Chatsworth Park Elementary School and several private schools and day care centers. Chatsworth Park Elementary School is a Title 1 school.
2. The road through Lake Manor is not well-suited to high volume truck traffic, since it has one lane in each direction, multiple curves causing limited visibility, and cannot be expanded practically.

We do not believe this community should bear the brunt of an artificially excessive cleanup with unnecessary contaminants from truck emissions, traffic and accident risks involving these excessive cleanups.

We have provided multiple comment letters questioning the cleanup standards and timing. Due to the lack of environmental documents by DOE and DTSC, in particular, we have not seen any sort of analysis that justifies removal of low-level contaminants that normally would be left in place under open space or suburban residential cleanup standards. The aggregate amount of low-level contaminated soil is staggering, and perhaps represents 60-75 percent of the soil to be removed by DOE and NASA. NASA has proposed its own environmental nightmare, and proposes they will a) only replace 1/3 of the removed soil, and will b) frequently replace removed soil with gravel, due to lack of adequately clean replacement soil. The AOC requires replacement of removed soils, and the environmental effects of using gravel that cannot absorb rainfall and failure to replace large amounts of removed soil have not been analyzed in terms of the long term effect.

We believe failure to replace huge quantities of removed soil, dust from huge disturbed areas, huge volumes of truck traffic and related pollution and traffic hazards, and construction of roadways or conveyors to meet artificial and not achievable time deadlines, are significantly more harmful than leaving low level contaminants in place, that normally would not be cleaned up. We request that adequate environmental documents be prepared prior to the cleanup and the project proceed with reasonably required soil removal after all factors are considered.

It seems likely that the proposed roadways and conveyor routes are not necessary, since there is no realistic necessity to complete the cleanup by 2017. The long-term effects of these roadways to the surrounding communities are very significant; every route has very significant effects due to the surrounding pre-existing communities and topography.

Sincerely,

Andre van der Valk
President
Chatsworth Neighborhood Council

Enclosure: ROV map, released early 2014

SUPPLEMENT 1

Discussion of Cleanup Levels, Inability to Evaluate Routes due to Lack of Information, Significant Impacts and lack of information for entire project, Growth Inducing Impacts, and environmental necessity and cost of cleanup for low-level contaminants.

When this map was presented, members of the audience asked how this proposal integrated with the timing of the cleanup at the SSFL site. DOE and NASA, responsible parties who have signed AOC's have identified approximately huge amounts of contaminated soil that will be removed to create a "background" cleanup level. DOE states they will remove 1,667,400 cubic yards of contaminated soil (+50%/-30%) that require 12 years to haul out, using 104,213 truckloads, and NASA has identified approximately 500,000 cubic yards of contaminated soil. These soil volumes for removal include extensive soils that are not significantly contaminated under usual standards used in environmental cleanups, such as future open space or future suburban residential standards.

DOE has completed scoping meetings for its environmental analysis, NASA has completed EIS documents but has failed to provide adequate archaeological studies (notwithstanding a National Register of Historic Places archaeological site on its property). DTSC is beginning a PEIR, but drafts will not be available until 2015, and no date for the Final PEIR was even mentioned at the hearing. However, the presenter indicated at the August 2014 meetings where the proposed additional removal roads and conveyor routes were first proposed, that all possible cleanup should be done before 2017 which is the required cleanup date in the AOC's that control the NASA and DOE cleanups. How is the cleanup supposed to happen before these roads/conveyor routes will be built? At some point, DTSC needs to acknowledge the time delays that are necessary due to their delays in preparation of the PEIR, and the delays in preparation of DOE's EIS, and the inadequacies in the NASA EIS for the archaeological work.

These routes significantly impact any area they will run through, and make what likely will be permanent modifications to the route by building roads, extensive grading, and other infrastructure such as conveyors. Most of the proposed routes are through extensive, rugged, ridgeline fire roads or similar areas with very narrow tracks. Unfortunately, no information about ownership, expected future use of each route for non-SSFL uses, existing roads, schools, developments, or topography was available at the meeting for public review. Information was not available about what would happen to the road after it was used for this purpose; would the road remain? Or would it be deconstructed? And what would happen to other topography changes made to create the road? Obvious other considerations, commonly considered in environmental documents, such as growth inducing impacts of the roadways are major considerations based on remote open space lands these roads usually are running through. And most of the routes end up going through already populated areas, and no information on schools affected and other community impacts due to pre-existing development were available.

All the above should be reviewed as part of the environmental documents we are waiting to see from DTSC. CEQA analysis, that considers these issues, has been a cornerstone of California environmental laws for years, yet here, DTSC just said in a public meeting they effectively want the responsible parties to do the cleanup work by 2017, before DTSC issues their environmental documents, before DOE issues their environmental documents, and before NASA completes their documents.

It is clear the 2017 cleanup date needs to be modified. These roads are major projects. They deserve EIRs and EIR considerations to be applied to them, including CEQA analysis. "Balancing" considerations associated with the roads or conveyor routes (or any other method proposed in the future), related to costs (both financial and environmental) should be squarely considered. We believe the costs associated with an unrealistic cleanup schedule is far too high, and question the environmental costs of removing soil that has low levels of contamination with compounds that would be left in place under usual suburban residential cleanup standards. The difference in the quantity of material to be removed under the "background" cleanup and suburban residential cleanup standards is astounding and should be directly and completely compared in the environmental documents.

Current management practices at the site, which has been extensively tested, are preventing any significant (detectable) contamination to surrounding areas. There appears to be little justification to create huge and long term impacts to the surrounding communities due to huge infrastructure requirements for a cleanup of this magnitude, in this short of a time period, given the remote nature of the site and limited practical access routes. The site should be cleaned to reasonable levels, and within a reasonable time frame, taking factors such as cost, impacts to the site, impacts to the surrounding community into consideration. An artificial due date in a document (clean up by 2017 in the AOC's) should not override basic environmental laws that require analysis of effects of major projects.

DOE Cleanup Volumes

[http://www.etec.energy.gov/Library/Cleanup_and_Characterization/EIS/Draft Area IV ROM Soil Volume Estimate 020714.pdf](http://www.etec.energy.gov/Library/Cleanup_and_Characterization/EIS/Draft_Area_IV_ROM_Soil_Volume_Estimate_020714.pdf)

Memo dated September 4, 2013

Re: Rough Order of Magnitude Estimates for AOC Soil Cleanup Volumes in Area IV, and Associated Truck Transport Estimates based on DTSC Look-up Table Values - DRAFT

At page 26 of 30;

Chemical and Radiological clean up volume; 1667,400 cubic yards
 104,213 truckloads
 11.9 years

Note from Page 2:

The estimated soil volumes presented in this TM represent ROM engineering estimates based on the information available to MWH in August 2013, and are considered accurate within a tolerance factor of +50/-30%. These estimates should only be used for project planning purposes, and are not meant to represent the final Area IV cleanup requirements.

NASA Cleanup Volumes (Source, Final EIS) at

http://www.nasa.gov/sites/default/files/files/SSFL_Final_EIS.pdf

TABLE 2.2-6

**Estimated Total Soil Volumes and Truck Requirements under the Proposed Action
 Excavation and Offsite Disposal Cleanup Technology**

NASA SSFL EIS for Proposed Demolition and Environmental Cleanup

Removal Parameters	Amounts	Round Trips Required
Removal Volume	500,000 yd ³	Not applicable
Trucks Required for Soil Removal	26,441	52,882
Truck Frequency for Soil Removal Hauling ^a	53 trucks per day	106 per day
Backfill Volume—1/3 of total volume	167,000 yd ³	Not applicable
Trucks Required for Backfill Hauling	8,814	17,628
Truck Frequency for Backfill Hauling ^a	18 trucks per day	36 per day
Hauling Duration	23 months	Not applicable
Daily Material Handled ^a	1,698 tons per day	Not applicable

Note:

^a Assumes completion of cleanup and soil hauling by the end of 2017.