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Comments for the DTSC Draft SSFL PEIR

The PEIR is a disappointing document that does not satisfy its goals or conform to the two main regulatory requirements and guidelines. The PEIR notes in the introduction that it will comply with the CEQA report requirements and US EPA Guidelines in describing the project, which was created with the 2010 AOC agreements between DTSC and NASA and DOE for the SSFL cleanup.

The purpose of the CEQA document is to present the environmental impacts of the projects under a number of alternates so that DTSC may decide on the best choices for a cleanup, which safeguard human health and the environment, and these feasible alternatives would lessen the significant effects of the project and would attain the basic objectives of the project.

This PEIR only presents the 2010 AOC which has major consequences and damage and the PEIR does not include any of the USEPA guidelines covering the nine balancing criteria, effectiveness of the remediation, end use of the property, risk assessment, toxicity, exposure standard toxicity levels , area averaging or required cleanup.. The US EPA Guidelines are ignored.

No alternative is presented to allow comparison of methods and the lack of cleanup alternatives undermines the purpose and intent of the CEQA Laws.

The best feasible alternative to the 2010 AOC would be a risk-based cleanup of the NASA and DOE sites using US EPA Guidelines and standards which are used throughout the USA. This analysis should be included in the PEIR.

The 2007 AOC between DTSC and Boeing calls for a risk-based cleanup but does not specify a specific level, however discussion at the time of signing was that suburban residential would be the cleanup goal. Since then, Boeing has recorded a permanent conservation easement on the property, which prevents any future development on the site and the land would be kept as open space. Boeing resubmitted their cleanup plan, which called for a cleanup to open space/ recreational standards. DTSC in the PEIR directs Boeing to perform their risk based cleanup calculations to suburban residential and rejects the open space concept. Thus the PEIR call for an imaginary future use and cleanup regardless of the conservation easement. DTSC should allow Boeing to use the risk based cleanup to the recreational standard, which will be in line with the actual end use of the property as is a general requirement of US EPA Guidelines.

The PEIR should be rewritten to include risk based cleanup of the site and should follow both the CEQA requirements and US EPA Guidelines.

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