



The Boeing Company  
Santa Susana Field Laboratory  
5800 Woolsey Canyon Road  
Canoga Park, CA 91304-1148

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VIA OVERNIGHT AND ELECTRONIC MAIL

June 6, 2017

In reply, refer to SHEA-115696

Ms. Stephanie Jennings  
NEPA Document Manager  
SSFL Area IV EIS  
U.S. Department of Energy  
4100 Guardian Street, Suite 160  
Simi Valley, CA 93063

Dear Ms. Jennings:

On April 12, 2017, The Boeing Company ("Boeing") submitted comments on the Draft Environmental Impact Statement ("Draft EIS") for the Remediation of Area IV and the Northern Buffer Zone of the Santa Susana Field Laboratory ("SSFL") prepared by the U.S. Department of Energy ("DOE") pursuant to the National Environmental Policy Act ("NEPA"). The purpose of this letter is to provide DOE with additional information for consideration relating to events that have occurred since the close of the comment period on the Draft EIS, so that the information can be taken into account by DOE in preparation of the EIS. Boeing understands that the comment period on the Draft EIS has closed, but respectfully requests that DOE include this additional information in the record and consider these new circumstances as it continues to prepare the EIS.

#### Recording of Conservation Easement over Area IV and the Northern Buffer Zone

In our April 12 comments, we informed DOE of Boeing's plans to permanently preserve the property it owns at SSFL, including Area IV and the Northern Buffer Zone, as open space. As you are aware, on April 24, 2017, Boeing recorded a Conservation Easement in the Official Records of Ventura County in favor of North American Land Trust, covering nearly 2,400 acres of the SSFL, including Area IV and the Northern Buffer Zone ("the Property"). A copy of the Conservation Easement is enclosed for the record.

The Conservation Easement expressly prohibits the Property from ever being developed or used for residential, commercial, industrial or agricultural purposes. The Conservation Easement is perpetual in duration, meaning these uses and developments are and forever will be prohibited on the Property. The Conservation Easement unequivocally ensures, as a matter of law, that the Property will be preserved as open space habitat, protecting the unique and valuable natural and cultural resources that are present. On April 27, 2017, we notified DTSC that, as a matter of law, the State must recognize the restrictions that the Conservation Easement places on future use of the Property, and that the only legally feasible and reasonably foreseeable land use scenario for the Property is recreational. Boeing remains committed to completing a cleanup that is fully protective of human health and environment, consistent with the land's

future use as open space habitat; our cleanup will be safe for people who use SSFL for recreational purposes, the wildlife that live at there, and the neighboring communities.

#### Inclusion of a Risk Based Alternative Based on Recreational Land Use

With the recording of the Conservation Easement, there is no question that recreation is the only legally permissible future use of Area IV and the Northern Buffer Zone. DOE's stated reason in its Draft EIS for not examining an alternative based on a recreational user scenario was to be "consistent with Boeing's basis for analysis." As noted above, Boeing's proposed remediation activities will ensure protection of recreational and ecological receptors, consistent with the land's future use as open space habitat. On May 24, 2017, we provided DTSC with updated information on Boeing's proposed project activities for inclusion in the Project Description for the Program Environmental Impact Report ("Program EIR") being prepared by DTSC for remediation activities at the SSFL. We notified DTSC that following the recording of the Conservation Easement, in order to comply with CEQA, Boeing's proposed soil remediation activities should not to be based on residential land use scenarios, and that information previously provided to DTSC regarding such soil remediation activities should not to be used in the Program EIR as part of the Project Description or for any other purpose.

Not including an alternative that evaluates the only legally permissible future land use would appear to be inconsistent with both U.S. Environmental Protection Agency (EPA) and DTSC guidance for remediation activities based on risks to human health and the environment. Thus, Boeing again urges DOE to include a risk-based alternative for the remediation of Area IV and the Northern Buffer Zone that considers protection of the recreational user and ecological receptors.

#### Preservation and Protection of the Property's Conservation Values

The Conservation Easement identifies as its primary purpose the preservation and protection of the six "Conservation Values" that the Property possesses. Conservation Easement, Section II.1. These Conservation Values consist of and are prioritized as follows:

(1) Habitat Values, as the Property provides high quality natural, restored or enhanced habitat for a large number of species, including rare, threatened and endangered species under State and federal law;

(2) Open Space Values, as the Property links vital habitat corridors described as critical connectivity habitat;

(3) Cultural Resources Values, as the Property is important to the Chumash, Tatavian and Tongva Tribes;

(4) Scenic Values, given the unique natural scenic beauty of the Property, with significant, virtually untouched areas, and its visibility from nearby parks, reserves and natural areas and various developments;

(5) Historic Resources Values, reflecting the role of the Property in supporting numerous defense and space programs; and

(6) Education, Scientific, and Recreation Values, in light of the opportunities the Property has provided to various organizations and members of the public to research and observe of sensitive ecological habitats and wildlife populations.

Conservation Easement, Section I.C.

The Conservation Easement also provides that the remediation activities conducted on the Property, including activities performed by DOE, are important to the advancement and protection of, and therefore consistent with, these Conservation Values. It further provides that such remediation activities can be performed in a manner that will further the long-term preservation of the Conservation Values at the Property. Conservation Easement, Section II.1. Thus, DOE should consider which of, and how, the cleanup alternatives that are evaluated in the EIS will assure that these Conservation Values are protected and preserved to the fullest extent. The Conservation Values set forth in the Conservation Easement are especially important with regard to the protection of biological, cultural and land resources and the discussion of aesthetics, visual quality and recreation.

Cumulative Impacts Analysis

Boeing's April 12 comments included an attachment that provided data regarding Boeing's estimates for its remediation project to support DOE's cumulative impacts analysis. With the Conservation Easement restricting the future use of the Property as protected open space habitat, we have revised the information provided in this attachment. Enclosed is revised Attachment C, Revised Data for Cumulative Impacts Analysis of SSFL Remediation for DOE EIS – Boeing Remediation Project Estimates, May 2017. This document should be utilized in considering Boeing's comments on the EIS instead of the Attachment C previously appended to Boeing's April 12 comments.

Again, Boeing appreciates the opportunity to submit these additional comments to DOE. Should you have any questions regarding our comments or wish to discuss them, please contact Art Lenox of my staff at (818) 466-8795.

Sincerely,

*Steven L. Shestak*

Steven L. Shestak  
Director – Environment  
Environment, Health & Safety

Enclosures: Grant Deed of Conservation Easement and Agreement  
Attachment C – Revised Data for Cumulative Impacts Analysis of SSFL Remediation for DOE  
EIS—Boeing Remediation Project Estimates, May 2017

cc: John Jones, DOE (w/encl. via e-mail)

This comment document included as an attachment, the “Grant Deed of Conservation Easement and Agreement” between The Boeing Company and North American Land Trust. It is not considered a comment on the EIS so is not presented here to conserve space. A copy is included the Administrative Record.

**Attachment C - revised**  
**Data for Cumulative Impacts Analysis of SSFL Remediation for DOE EIS –**  
**Boeing Remediation Project Estimates, May 2017**

	<i>Boeing</i>
<b>Land disturbed (acres)</b>	
– Area Disturbed for Soil Removal	17
– Area Disturbed for Building Removal	3
<b>Employment (persons)</b>	
– Onsite Employees	100
– Truck Drivers - Truck drivers for occasional deliveries or pickups are not included in long-term employment	Assume 16 to 32 truck drivers when 96 truck trips are split between NASA, Boeing and DOE
<b>Resources used</b>	
– Backfill for Soil Excavation (cubic yards)	50,000 (a)
– Backfill for Building and Bedrock Removal (cubic yards)	1,300
<b>Resources used</b>	
– Water (gallons/day)	20,000 (c)
<b>Waste generated (cubic yards)</b>	
– Soil Excavation	150,000 (b)
– Building Removal	112,000 (d)
– Bedrock Excavation	None expected
<b>Truck trips</b>	
– Soil Disposal	9,800 (e)
– Bedrock Disposal	None expected
– Backfill Delivery	3,300 (f)
– Demolition Debris	1,000 (g)
– Other deliveries	400
Totals	14,500

Boeing = The Boeing Company;

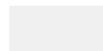
- (a) Estimates assume that approximately 33% of excavated soil volume will be needed as backfill obtained from other sources to supplement surrounding soils used as backfill to restore the soil remediation area.
- (b) Estimated in situ soil excavation volume for cleanup to protect future recreational and ecological receptors for DOE EIS planning.
- (c) Water use estimated based on generalized data regarding water use for prior soil removal activities at SSFL and comparable information for other MWH/Stantec soil remediation projects.
- (d) Building debris cubic yard volume based on 1.5 cy per ton to maintain consistency with soil volume estimates. Actual debris volume will be dependent on type of material.
- (e) Estimates assume 1.5 cy per ton of soil, and 23 tons per truck average.
- (f) Trucking estimates for backfill delivery provided for conservative planning estimates. To minimize truck trips, Boeing plans to use the trucks that bring clean backfill to the site from offsite sources for subsequent off-haul of contaminated soil. Also, Boeing may use onsite sources of backfill. In both of these cases, the truck trips estimated here would be minimized or eliminated.
- (g) Trucking estimate for building debris removal based on an average truck volume of 17 cy based on prior Boeing demolition projects.

**Attachments:**

Figure 1 - Potential Soil/Sediment Remediation Areas and Support Features, Recreational and Ecological Cleanup, Boeing Remediation Project

Figure 2 – Boeing-Owned Former Radiological Buildings in Area IV for Demolition

**Base Map Legend**

-  Administrative Boundaries
-  NASA/DOE Project Areas
-  Paved Road (current or historical)
-  Topographic Contours (50 foot interval)

**Figure Legend**

-  Potential Soil Vapor Extraction Area
-  Potential Soil Remediation Area
-  Potential Remediation by Others
-  Potential Future Action Under Evaluation
-  Potential Visible Lead Shot / Soil Removal Area

**Ancillary Support Features**

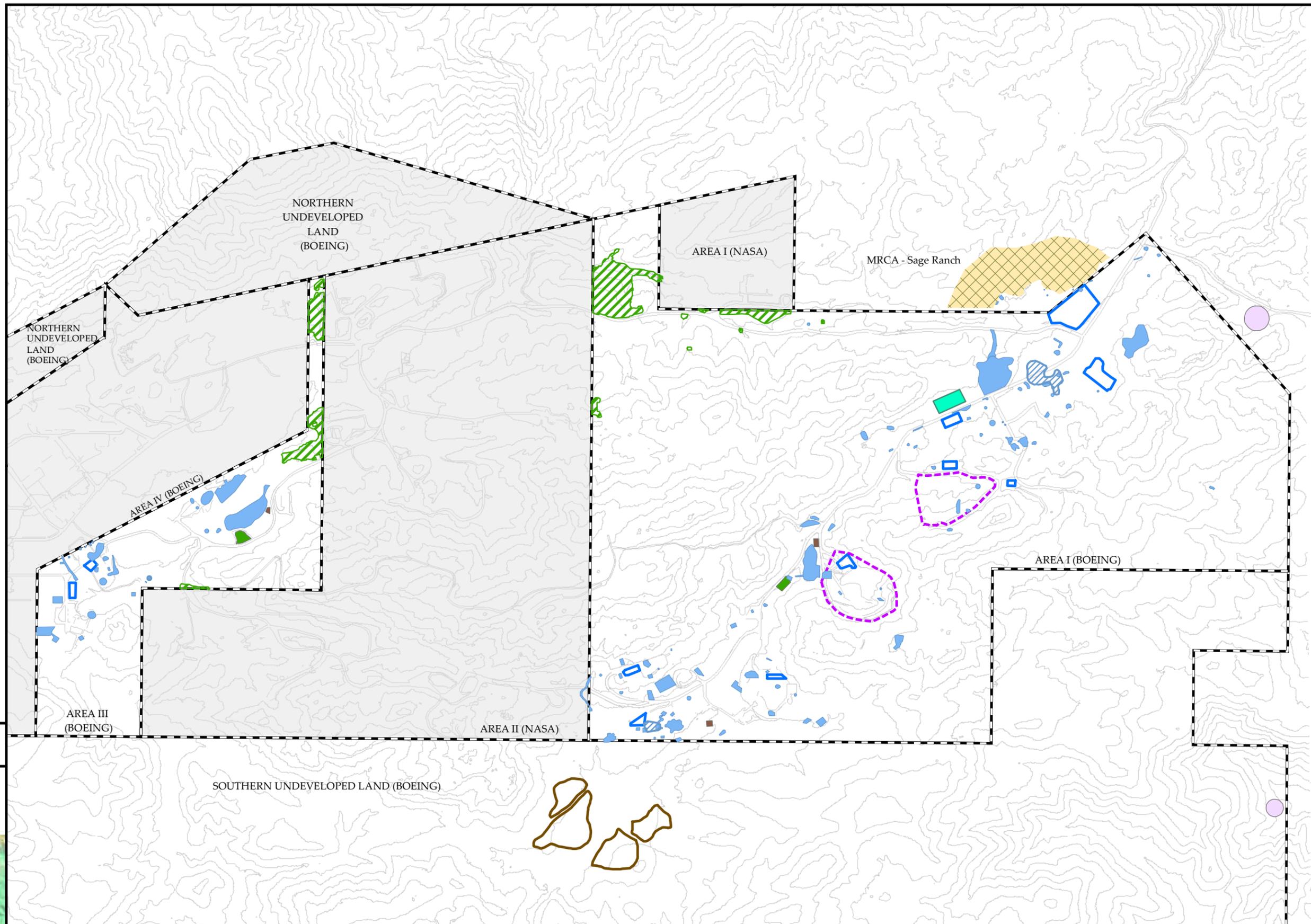
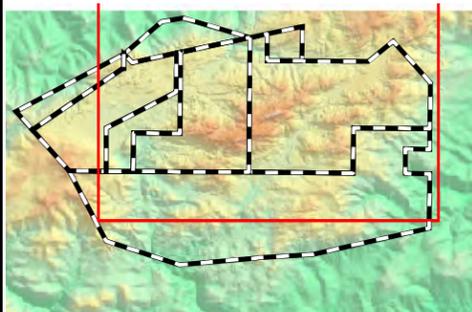
-  Surface Water Treatment System
-  Dewatering Area
-  Equipment Staging Area
-  Potential Ex Situ Bio Treatment Area
-  Potential Soil Borrow Area
-  Potential Onsite Permitted Soil Disposal Cell

Notes  
 1. Source for remediation by others in Boeing Areas I and III is NASA's DSFR (2015).  
 2. Each remediation area is assumed to require a 25-foot work zone surrounding it.

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Date: May 11, 2017  
 Path: C:\Rocketdyne\CEQA\FinalCEQAPDFootprints.mxd

0 500 1,000 Feet



**SANTA SUSANA FIELD LABORATORY**

**Potential Soil/Sediment Remediation Areas and Support Features  
 Recreational and Ecological Cleanup  
 Boeing Remediation Project**

**FIGURE 1**

Base Map Legend

- Administrative Boundaries
- Drainage
- Dirt Road
- Paved Road
- Structures (existing)
- Structures (removed)
- Boeing-owned former radiological building

Note 1: Above ground structure of Building 4005 was demolished in 1996; only concrete slab remains.

Note 2: Building 4011 high bay was demolished in 2013; only the low bay remains.

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Date: July 6, 2015  
Path: C:\Rocketdyne\AreaIV\FrmrRADBldgs.mxd Author: JMS

