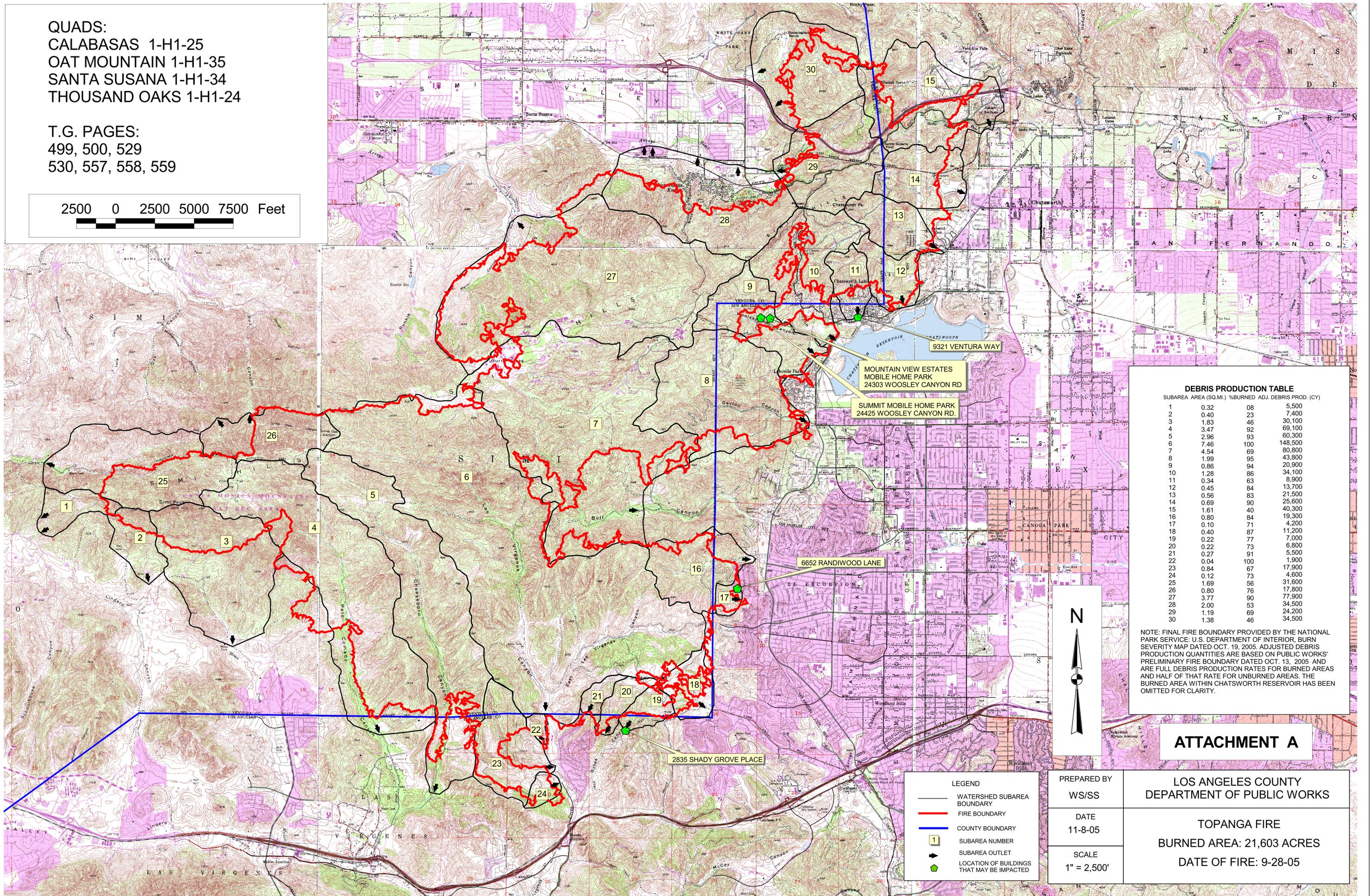


QUADS:
 CALABASAS 1-H1-25
 OAT MOUNTAIN 1-H1-35
 SANTA SUSANA 1-H1-34
 THOUSAND OAKS 1-H1-24

T.G. PAGES:
 499, 500, 529
 530, 557, 558, 559

2500 0 2500 5000 7500 Feet



DEBRIS PRODUCTION TABLE

SUBAREA	AREA (SQ.MI.)	%BURNED	ADJ. DEBRIS PROD. (CY)
1	0.32	08	5,500
2	0.40	23	7,400
3	1.83	46	30,100
4	3.47	92	69,100
5	2.96	93	60,300
6	7.46	100	148,500
7	4.54	69	80,800
8	1.99	95	43,800
9	0.86	94	20,900
10	1.28	86	34,100
11	0.34	63	8,900
12	0.45	84	13,700
13	0.56	83	21,500
14	0.69	90	25,600
15	1.61	40	40,300
16	0.80	84	19,300
17	0.10	71	4,200
18	0.40	87	11,200
19	0.22	77	7,000
20	0.22	73	6,800
21	0.27	91	5,500
22	0.04	100	1,900
23	0.84	67	17,900
24	0.12	73	4,600
25	1.69	56	31,600
26	0.80	76	17,800
27	3.77	90	77,900
28	2.00	53	34,500
29	1.19	69	24,200
30	1.38	46	34,500

NOTE: FINAL FIRE BOUNDARY PROVIDED BY THE NATIONAL PARK SERVICE, U.S. DEPARTMENT OF INTERIOR, BURN SEVERITY MAP DATED OCT. 19, 2005. ADJUSTED DEBRIS PRODUCTION QUANTITIES ARE BASED ON PUBLIC WORKS' PRELIMINARY FIRE BOUNDARY DATED OCT. 13, 2005 AND ARE FULL DEBRIS PRODUCTION RATES FOR BURNED AREAS AND HALF OF THAT RATE FOR UNBURNED AREAS. THE BURNED AREA WITHIN CHATSWORTH RESERVOIR HAS BEEN OMITTED FOR CLARITY.

ATTACHMENT A

- LEGEND**
- WATERSHED SUBAREA BOUNDARY
 - FIRE BOUNDARY
 - COUNTY BOUNDARY
 - 1 SUBAREA NUMBER
 - ▶ SUBAREA OUTLET
 - ◆ LOCATION OF BUILDINGS THAT MAY BE IMPACTED

PREPARED BY
 WS/SS

DATE
 11-8-05

SCALE
 1" = 2,500'

LOS ANGELES COUNTY
 DEPARTMENT OF PUBLIC WORKS

TOPANGA FIRE

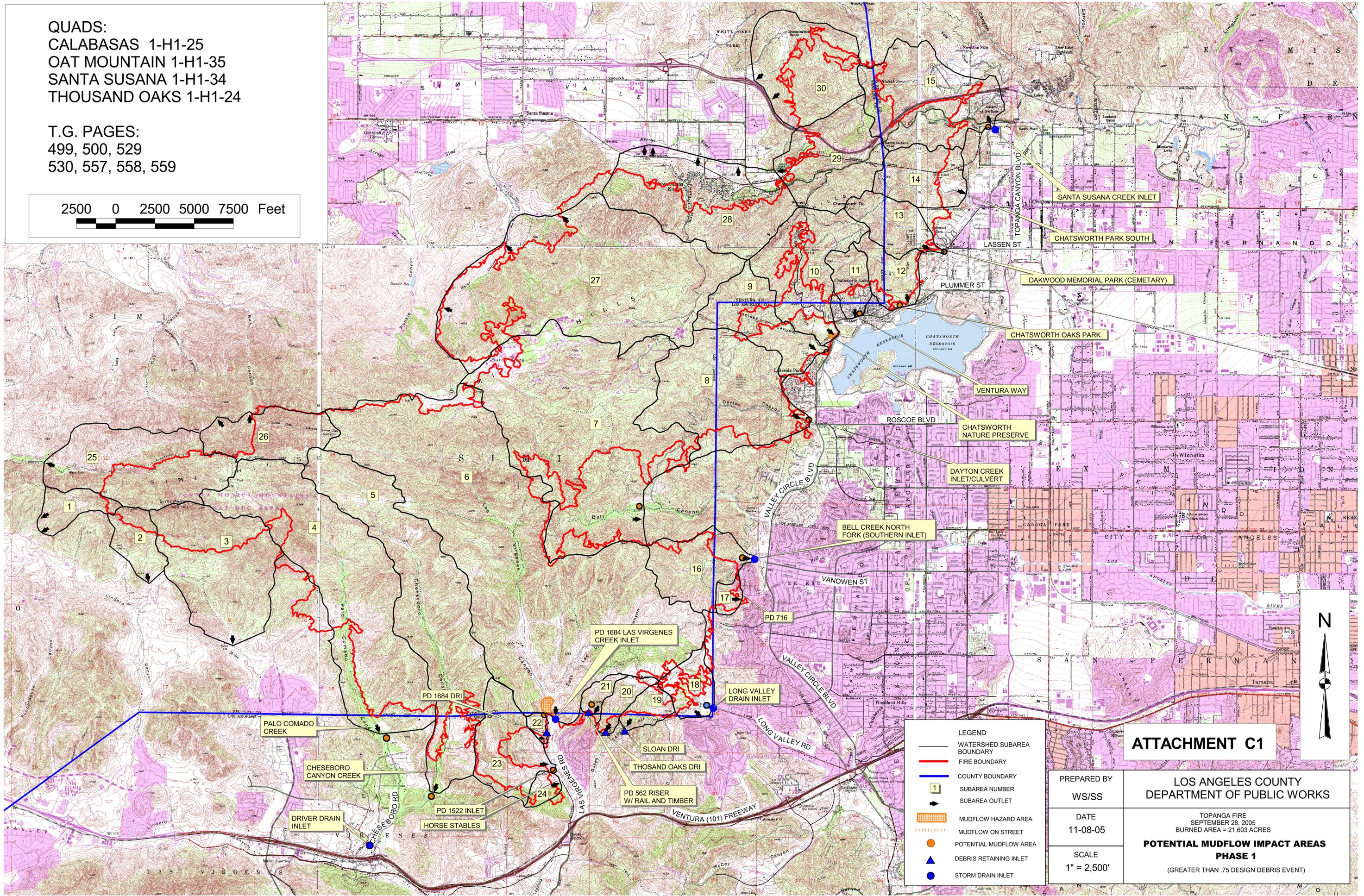
BURNED AREA: 21,603 ACRES

DATE OF FIRE: 9-28-05

QUADS:
 CALABASAS 1-H1-25
 OAT MOUNTAIN 1-H1-35
 SANTA SUSANA 1-H1-34
 THOUSAND OAKS 1-H1-24

T.G. PAGES:
 499, 500, 529
 530, 557, 558, 559

2500 0 2500 5000 7500 Feet



LEGEND

- WATERSHED SUBAREA BOUNDARY
- FIRE BOUNDARY
- COUNTY BOUNDARY
- 1 SUBAREA NUMBER
- ▶ SUBAREA OUTLET
- ▨ MUDFLOW HAZARD AREA
- ▤ MUDFLOW ON STREET
- POTENTIAL MUDFLOW AREA
- ▲ DEBRIS RETAINING INLET
- STORM DRAIN INLET

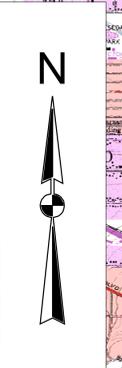
PREPARED BY	WS/SS
DATE	11-08-05
SCALE	1" = 2,500'

ATTACHMENT C1

LOS ANGELES COUNTY
 DEPARTMENT OF PUBLIC WORKS

TOPANGA FIRE
 SEPTEMBER 28, 2005
 BURNED AREA = 21,603 ACRES

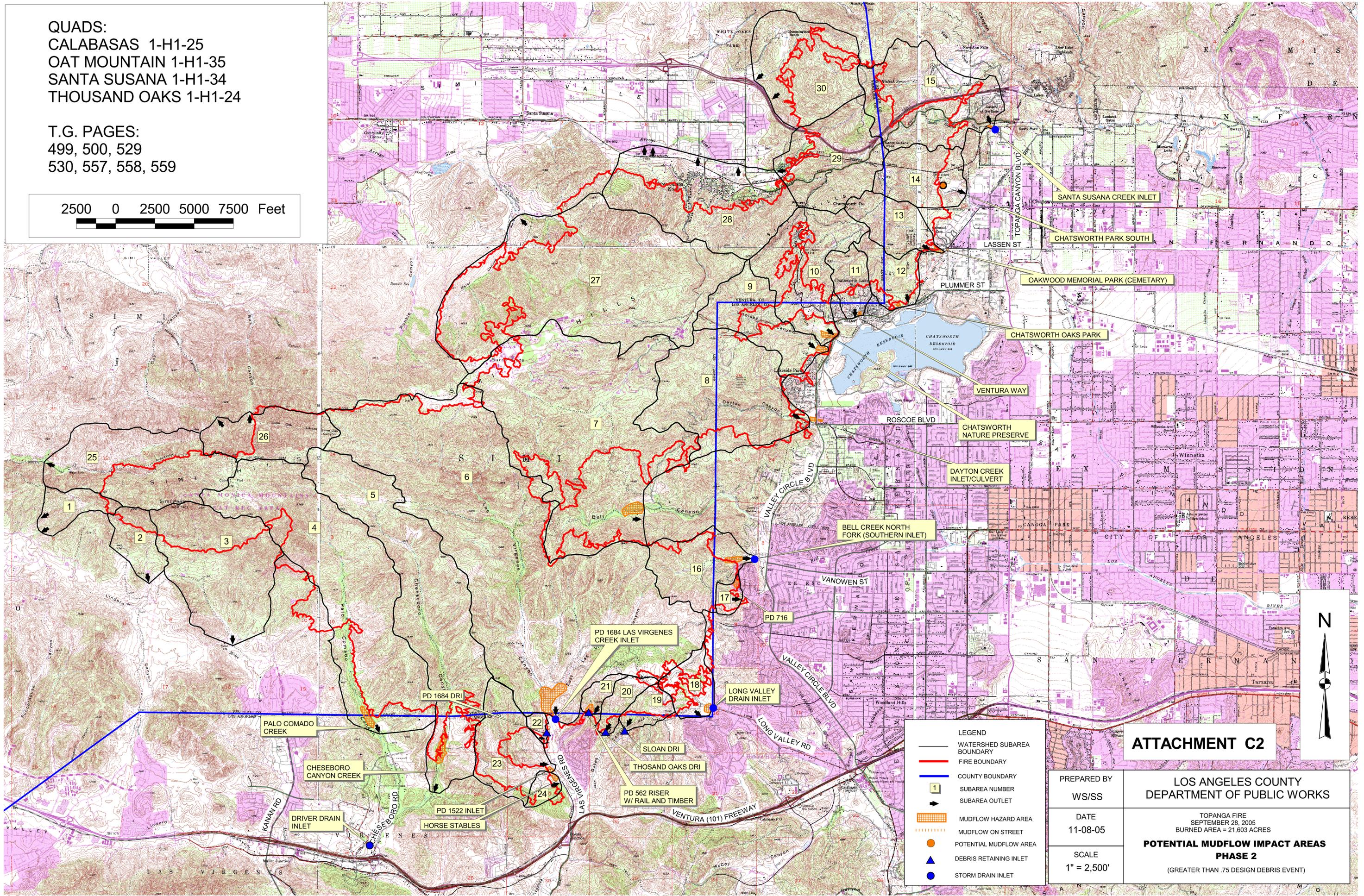
**POTENTIAL MUDFLOW IMPACT AREAS
 PHASE 1**
 (GREATER THAN .75 DESIGN DEBRIS EVENT)



QUADS:
 CALABASAS 1-H1-25
 OAT MOUNTAIN 1-H1-35
 SANTA SUSANA 1-H1-34
 THOUSAND OAKS 1-H1-24

T.G. PAGES:
 499, 500, 529
 530, 557, 558, 559

2500 0 2500 5000 7500 Feet



LEGEND	
	WATERSHED SUBAREA BOUNDARY
	FIRE BOUNDARY
	COUNTY BOUNDARY
	SUBAREA NUMBER
	SUBAREA OUTLET
	MUDFLOW HAZARD AREA
	MUDFLOW ON STREET
	POTENTIAL MUDFLOW AREA
	DEBRIS RETAINING INLET
	STORM DRAIN INLET

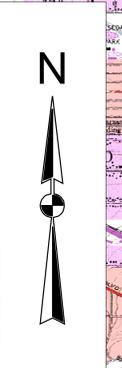
PREPARED BY	WS/SS
DATE	11-08-05
SCALE	1" = 2,500'

ATTACHMENT C2

LOS ANGELES COUNTY
 DEPARTMENT OF PUBLIC WORKS

TOPANGA FIRE
 SEPTEMBER 28, 2005
 BURNED AREA = 21,603 ACRES

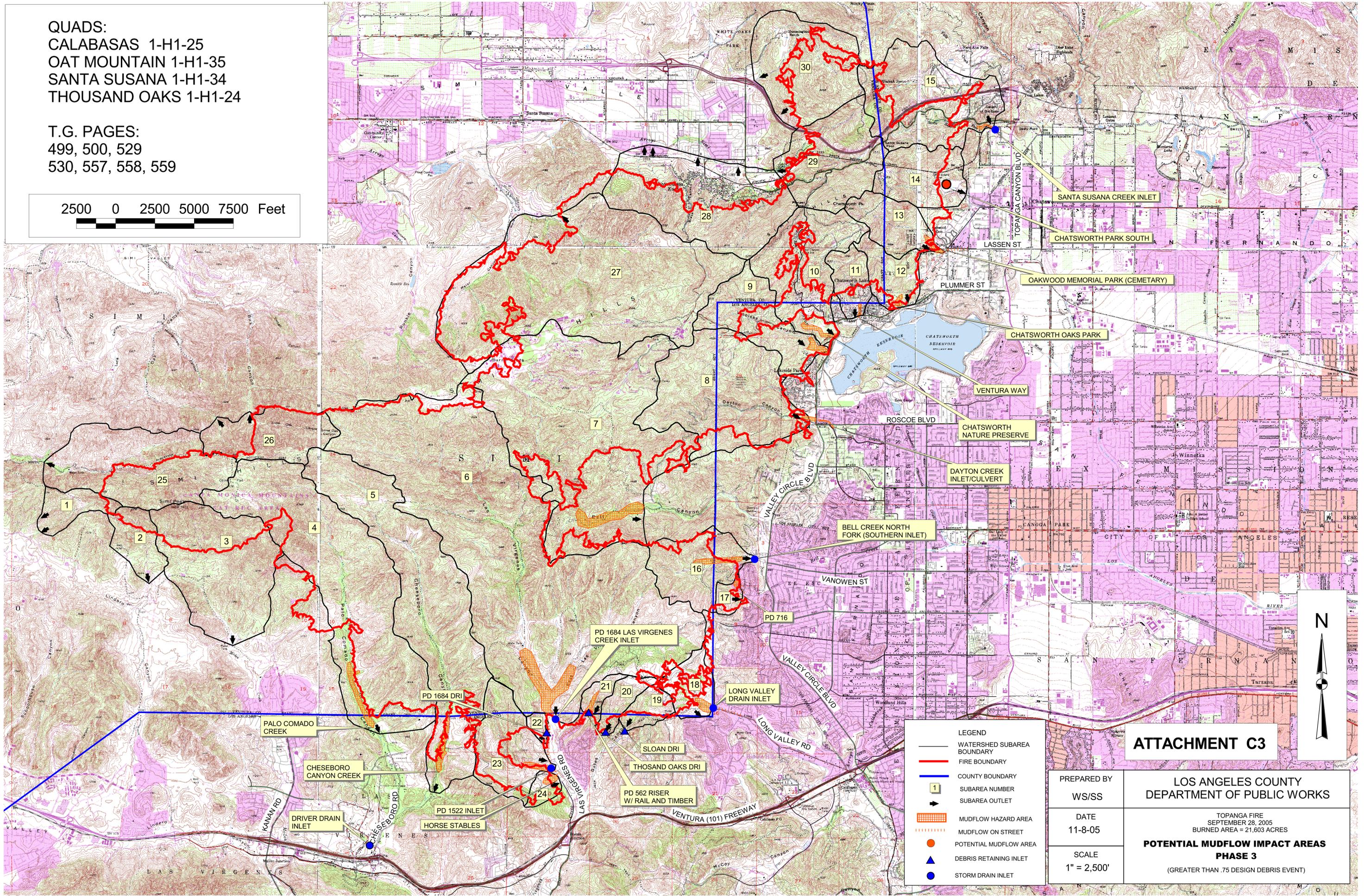
**POTENTIAL MUDFLOW IMPACT AREAS
 PHASE 2**
 (GREATER THAN .75 DESIGN DEBRIS EVENT)



QUADS:
 CALABASAS 1-H1-25
 OAT MOUNTAIN 1-H1-35
 SANTA SUSANA 1-H1-34
 THOUSAND OAKS 1-H1-24

T.G. PAGES:
 499, 500, 529
 530, 557, 558, 559

2500 0 2500 5000 7500 Feet



LEGEND

- WATERSHED SUBAREA BOUNDARY
- FIRE BOUNDARY
- COUNTY BOUNDARY
- 1 SUBAREA NUMBER
- ▶ SUBAREA OUTLET
- ▨ MUDFLOW HAZARD AREA
- ▤ MUDFLOW ON STREET
- POTENTIAL MUDFLOW AREA
- ▲ DEBRIS RETAINING INLET
- STORM DRAIN INLET

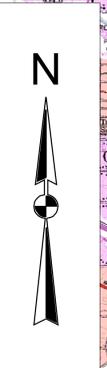
PREPARED BY	WS/SS
DATE	11-8-05
SCALE	1" = 2,500'

ATTACHMENT C3

LOS ANGELES COUNTY
 DEPARTMENT OF PUBLIC WORKS

TOPANGA FIRE
 SEPTEMBER 28, 2005
 BURNED AREA = 21,603 ACRES

**POTENTIAL MUDFLOW IMPACT AREAS
 PHASE 3**
 (GREATER THAN .75 DESIGN DEBRIS EVENT)



Dale Till

From: Christine Rowe <crwhnc@gmail.com>
Sent: Sunday, January 05, 2014 1:05 AM
To: DTSC_SSFL_CEQA
Cc: Malinowski, Mark@DTSC; Leclerc, Ray@DTSC
Subject: Fwd: Valley Fever 2

Dear Mr. Malinowski,

Please include the email below to NASA as part of my DTSC SSFL CEQA comments. DTSC must consider what is being stirred up in the dust as they approve remediation of the SSFL site.

Thank you.

Christine L. Rowe
West Hills resident

Date: Mon, Sep 23, 2013 at 1:45 AM
Subject: Valley Fever 2
To: msfc-ssfl-eis@mail.nasa.gov

Dear Mr. Elliott,

At the NASA DEIS meeting, one stakeholder brought up "Valley Fever" in the area. I have already sent one public comment in on this issue.

Today, I read an article in "ReportingonHealth.org" called: "

Just One Breath: Valley Fever Deserves More Ink in Scientific Journals".

<http://www.reportingonhealth.org/valleyfever/just-one-breath-valley-fever-deserves-more-ink-scientific-journals>

This story covered the fact that the CDC and the NIH will be in Bakersfield, California today to hear about that community's concerns about Valley Fever. It also discusses the amount of research that has been done on that illness v hantavirus which has a much lower incidence.

This story in *Scientific American* from last year,

"Valley Fever on the Rise in U.S. Southwest, with Links to Climate

Change": <http://www.scientificamerican.com/article.cfm?id=valley-fever-on-the-rise-in-us-southwest>, **states:** "These spores can break off in the desert wind, lofted to areas

where people can breathe them in and causing coccidioidomycosis, also known as valley fever. "Only a few spores are needed to cause the disease," Lauer said."

While NASA is not the only agency or party that is responsible for the contamination at Santa Susana, NASA should be making a decision on cleanup that is not just based on "Background" or the ability to detect a chemical or radionuclide in a lab - the lowest repeatable level. There must be a real health risk based decision before NASA digs more soil above the levels cleaned up to date under the Imminent and Substantial Endangerment Order for the Northern Drainage ordered by DTSC, and the Interim Source Removal Action ordered by the Waterboard.

Based on these articles, just a few spores is enough to cause this disease - especially in a period of drought such as the one that we are facing at Santa Susana today.

I respectfully request that NASA approach their medical doctors - I know that NASA does have MDs on their staff - to discuss the real risks to the community from illnesses such as Valley Fever.

Respectfully,

Christine L. Rowe

***West Hills resident - in the prevailing winds area of the NASA Santa Susana Field Lab property;
within ~ the one mile NASA proposed south on Topanga truck route***

Dale Till

From: Christine Rowe <crwhnc@gmail.com>
Sent: Sunday, January 05, 2014 12:58 AM
To: DTSC_SSFL_CEQA
Cc: Malinowski, Mark@DTSC; Leclerc, Ray@DTSC
Subject: Fwd: Watersheds

Dear Mr. Malinowski,

Please include my comments to below to NASA as part of my DTSC CEQA comments. There are too many potential environmental impacts on the site to evaluate in a 45 day period of time, especially without guidance from experts in this area.

My comments relative to the watersheds at Santa Susana is just one of potentially hundreds of environmental impacts that could occur if there is a cleanup to the AOC level for DOE and NASA.

Thank you.

Christine L. Rowe
West Hills resident

Date: Mon, Sep 23, 2013 at 12:56 AM
Subject: Watersheds
To: msfc-ssfl-eis@mail.nasa.gov

Dear Mr. Elliott,

As I read this article today on a water fund in Mexico, I thought of NASA Santa Susana. What will happen to our watersheds if you remove all of the vegetation and at least two feet of the top soil on more than 100 acres - a quarter of the U.S. Government property?

<http://blog.nature.org/conservancy/2013/09/18/new-water-fund-in-mexico-for-people-and-nature/>

How many wetlands areas will remain after all of the holding ponds on the U.S. Government property have been remediated? Isn't what the NASA DEIS proposes, and what DTSC agreed to in the Administrative Order on Consent, extremely short sighted?

I respectfully request that NASA and DTSC take the AOCs back to the "drawing board" - and maybe lose them in a stack of paper.

Respectfully,

Christine L. Rowe

Dale Till

From: Christine Rowe <crwhnc@gmail.com>
Sent: Saturday, January 04, 2014 11:09 PM
To: DTSC_SSFL_CEQA
Cc: Malinowski, Mark@DTSC; Leclerc, Ray@DTSC
Subject: Fwd: West Hills and West Hills's School Maps
Attachments: Schools map.jpg; screen shot LAUSD school map west SFV.jpg; Hamlin Street School Shoup Avenue Crosswalk.pdf; Enadia Steet Schooll Crossings.pdf; Welby Way School Crossings.pdf; Haynes Steet School Crossings.pdf; Justice Street School Crossings.pdf; Pomelo School Crossings.pdf; Capistrano School Crossings.pdf; Nevada School Crossings.pdf

Dear Mr. Malinowski,

Please include these comments on the NASA DEIS as part of my DTSC SSFL Scoping comments. I am concerned about the potential transportation routes and how the trucks could potentially impact public health and public safety in my community.

Thank you.

Christine L. Rowe
West Hills resident

Date: Mon, Sep 9, 2013 at 1:04 AM
Subject: Fwd: West Hills and West Hills's School Maps
To: msfc-ssfl-eis@mail.nasa.gov

Dear Mr. Elliott,

On NASA DEIS Figure 3.12.- 3, the Figure shows Schools, Parks, and Open Space. It shows the Region of Influence Roadways.

Because this map shows areas of open space that are not along the proposed traffic routes, it is not clear to me if this document should show all schools in West Hills, both public and private including preschools and Pierce College. I include Pierce College because I have read their traffic study, and some of the roads that you will be accessing will also be impacted by Pierce traffic. Pierce College is roughly two miles east of Topanga and Victory.

This is one link that I found for schools in the LAUSD.
<http://laschoolboard.org/sites/default/files/images/maps/2012-13BoardDistrict4Map.pdf>

I have also taken screen shots of other LAUSD maps which I have attached. I have attached all of the elementary school maps for West Hills that I am familiar with.

Based upon my research, if you wanted to indicate the major schools in West Hills (I do not know what ones you missed in other Neighborhood Council areas), I believe that you have not noted the following schools:

1. Enadia Way Elementary

2. Welby Way Elementay (which also is a Magnet school)

Another school that I found reference to was Ingenium Charter School.

NASA needs to be aware that the LAUSD has regular public schools, the Magnet program, and the charter schools. Many students do not attend their local schools - and there are not always buses. Therefore, parents must drive their children some distance to attend schools out of their local walking area.

On your map, if you are looking at the Region of Influence Roadways, I would like to direct you to a number of private schools and preschools that I am aware of - some which may be in your Region of Influence.

They include:

1. New Community Jewish High School (NCJHS)- proposed enrollment of 450 students with a maximum occupation of 700 people during school hours, That school would be plotted about where the flag is for Hamlin Street School on your map.
2. Today's Montessori School - about 200 feet east of the NCJHS.
3. Faith Baptist School on Farralone.
4. Academy Just for Kids - Fallbrook
5. Parkhill School
6. Stepping Stone Montessori - closer to Valley Circle
7. Kadima Day School - on Shoup
8. West Valley Christian School on Sherman Way
9. Shepherd of the Valley School on Kittridge

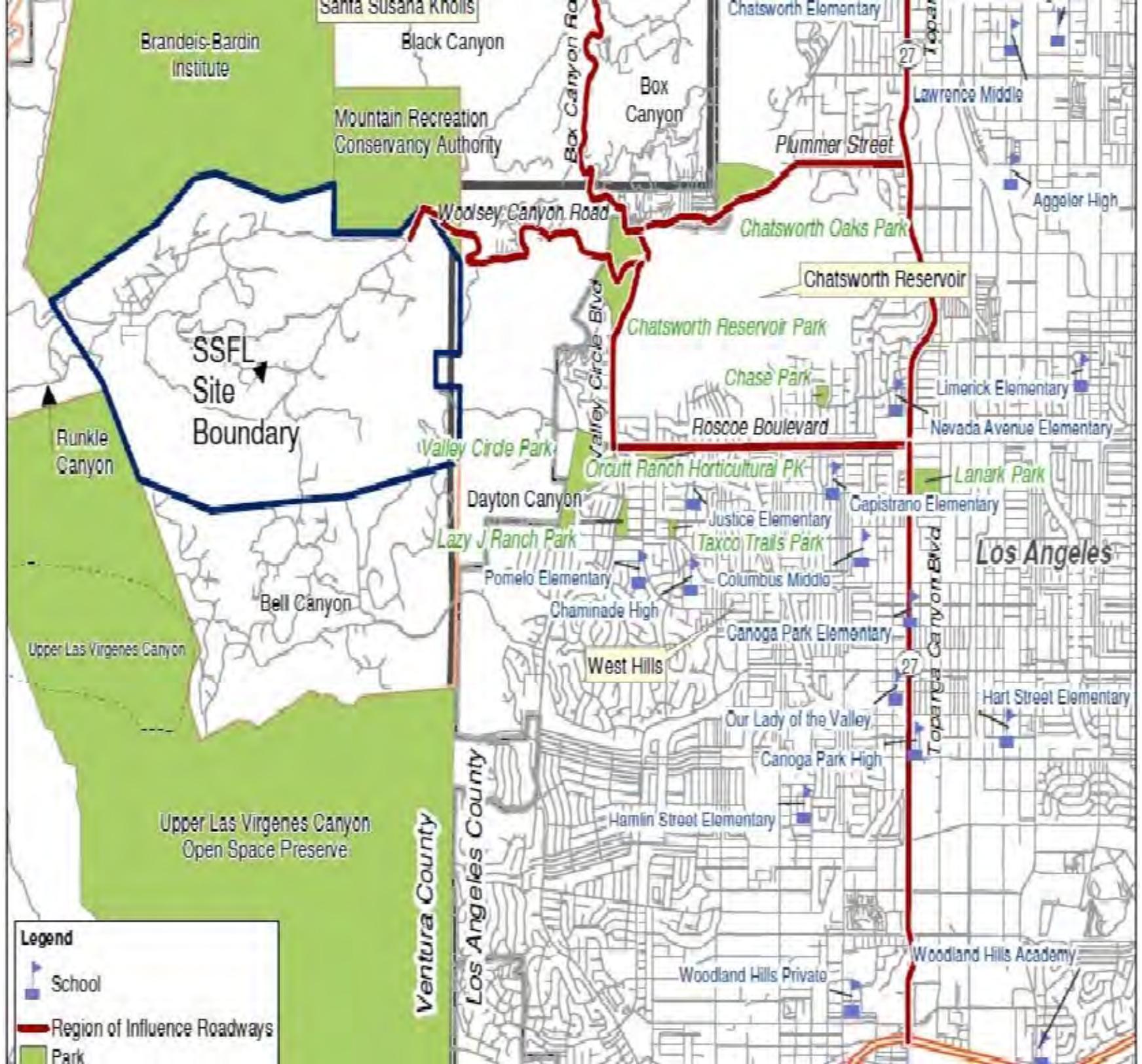
Some of these school may be in Canoga Park because of the way Neighborhood Council boundaries are formed.

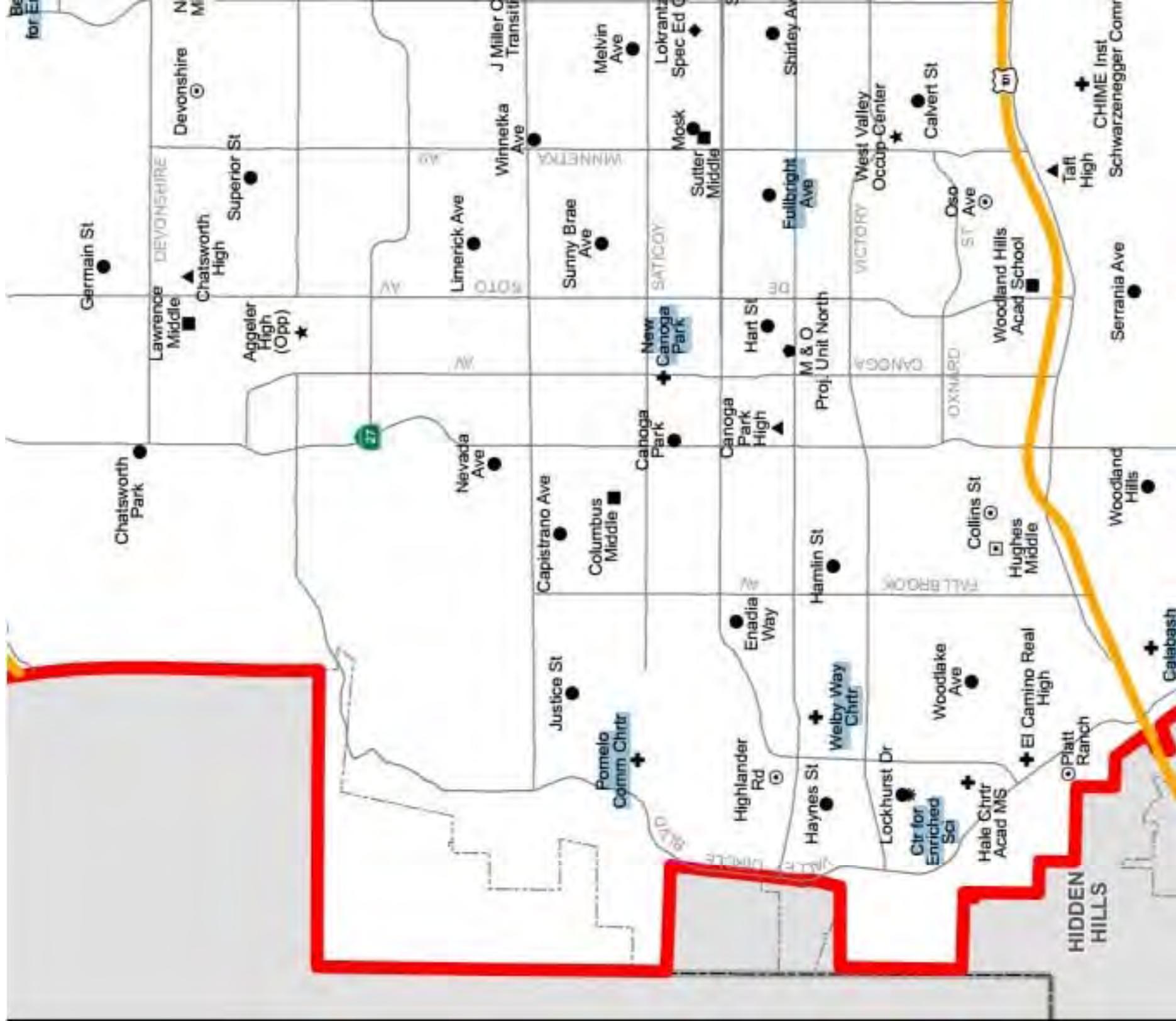
I would appreciate it if there is more detailed research done to find out the real number of school children that will be impacted by the NASA trucks.

Thank you.

Christine L. Rowe

West Hills





CITY OF LOS ANGELES

CALIFORNIA

RITA L. ROBINSON
GENERAL MANAGER



ANTONIO R. VILLARAIGOSA
MAYOR

DEPARTMENT OF
TRANSPORTATION
100 S. MAIN STREET, 10TH FLOOR
LOS ANGELES, CA 90012
(213) 972-8470
FAX (213) 972-8410

July 23, 2009

West Hills Neighborhood Council
Attn: Steven Lenske
P.O. Box 4670
West Hills, CA 91308

SUBJECT: SHOUP AVENUE AT KITTRIDGE STREET CROSSWALK MODIFICATION

Improving pedestrian safety and enhancing the pedestrian environment are important goals for the City. An important component of the pedestrian safety program considers the relative safety risk of using signalized versus uncontrolled crosswalks for routes to school. The designated Pedestrian Routes to School maps are periodically reviewed to determine if alternate routes should be designated, as a result of changes of school entrances, school boundaries, student usage and traffic conditions. Across most major highways near elementary schools, crossing guards and traffic signal control provide positive traffic control for students to cross the major highway. However, where these controls cannot be provided, these locations need to be evaluated periodically to determine if another route to school would be more advisable. If it is determined that another route to school would be preferable, then the current route to school, which may include utilizing an uncontrolled crosswalk, would be revised in the interest of traffic and pedestrian safety.

Currently, there is an uncontrolled marked crosswalk across Shoup Avenue at Kittridge Street. Traffic counts taken during a recent school day indicate that only 2 students use this crossing in the hour just before school begins. In addition, we noted that the average prevailing critical speeds along this segment of Shoup Avenue were 43 miles per hour. Numerous national studies indicate a significantly higher pedestrian safety risk where there is low pedestrian usage in combination with high speeds. It would appear to be preferable to direct students to cross Shoup Avenue at the traffic signal located a short distance away at the intersections of Vanowen Street and Victory Boulevard. This can be accomplished by revising the recommended crossing on Shoup Avenue at Kittridge Street in the recommended Pedestrian Routes for Hamlin Street Elementary School, which is sent to the school district for distribution to students and parents. In addition, it can be effectively communicated to the community by removing the conflicting pavement markings and signage of the existing crosswalk.

Enclosed are summaries of the Department of Transportation's programs with respect to school safety. See "School Pedestrian Safety" and "Pedestrian Safety At Uncontrolled Crosswalks: To Mark or Not To Mark?" from the TIPS Guide of the LADOT website. If your Neighborhood Council has any comments on how best to route students to the safest crossing, please submit your comments in writing within 30 days of the date of this letter to the City of Los Angeles Department of Transportation, 19040 Vanowen Street, Reseda, CA 91335.

Unfortunately, there is no City funding available for new traffic signals at this time. However, if the West Hills Neighborhood Council or other entity is interested in financing a traffic signal at this location we would be pleased to discuss it further with you.

We hope to receive any comments that your Neighborhood Council may have that would assist us in evaluating the school crossings. If you have any questions regarding this matter, please e-mail me at Randall.Tanijiri@lacity.org or call me at (213) 972-8871.

Sincerely,

A handwritten signature in black ink that reads "Randall Tanijiri". The signature is written in a cursive, flowing style.

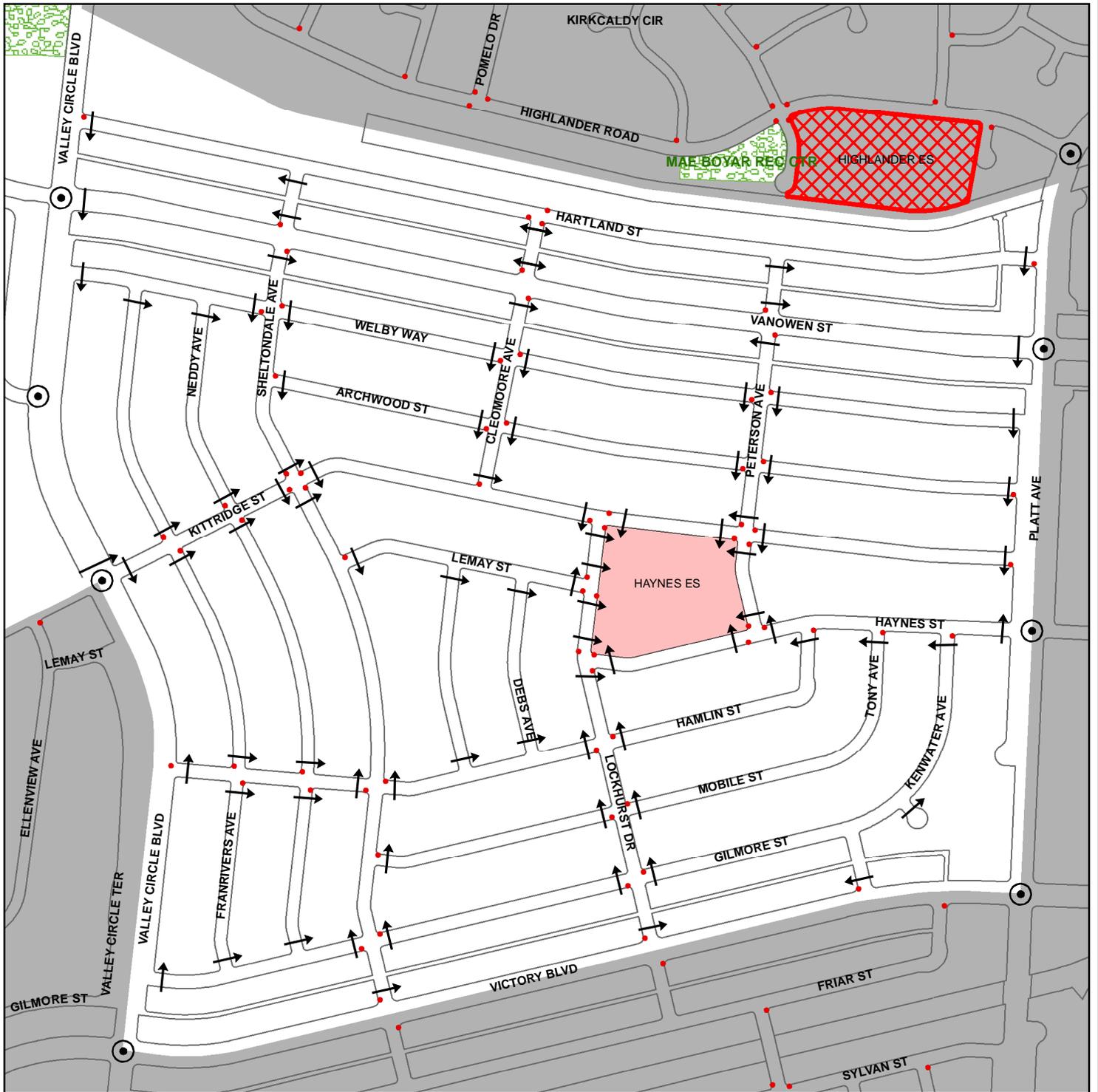
Randall Tanijiri
Senior Transportation Engineer
Department of Transportation

rmt:sierra/Shoup & Kittridge West Hills NC notification 7_23_09.doc

Attachments

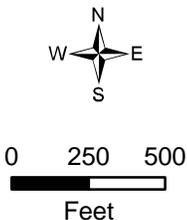
c: Council District 3
LADOT West Valley District
Carolyn Jackson, LADOT

PEDESTRIAN ROUTES FOR HAYNES STREET ELEMENTARY SCHOOL



Legend

- Recommended Crossing
- Stop Sign
- ⊙ Traffic Signal
- ⊗ Crossing Guard
- ⚡ Flashing Warning Light
- XXXX Stairs or Walkway
- ⌒ Pedestrian Bridge
- ⌒ Pedestrian Tunnel
- ⊞ Parks



Parents:

This map shows the recommended crossings to be used from each block in your school attendance area. Following the arrows, select the best route from your home to the school and mark it with a colored pencil or crayon. This is the route your child should take. Instruct your child to use this route and to cross streets only at locations shown. You and your child should become familiar with the route by walking it together. Obey marked crosswalks, stop signs, traffic signals and other traffic controls. Crossing points have been located at these controls wherever possible, even though a longer walk may be necessary. Instruct your child to always look both ways before crossing the street. If no sidewalk exists, your child should walk facing traffic.

Estimados Padres:

Este mapa muestra los cruzados recomendados para los peatones de cada cuadra en la area de su escuela. Siguiendo las flechas en el mapa, seleccione la ruta mas segura de su casa a la Escuela y marquelo con un lapis o tiza de color. Esta es la ruta que su hijo (a) debe de usar. Digale a su hijo (a) que use esta ruta y que cruce las calles solamente en los lugares indicados. Usted y su hijo (a) deberian de familiarizarse con esta ruta. Obedezcan los rotulos de peatones, de altos, semaforos y todos los señales de trafico. Puntos para cruzar estan localizados en areas controladas, aunque sea necesario de alargar el tiempo para cruzar. Instruye a su hijo (a) que siempre se fije de los dos lados antes de cruzar la calle. El estudiante debe de siempre caminar en la direccion opuesta del trafico si no existe una banqueta.

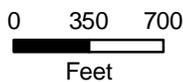
PEDESTRIAN ROUTES FOR ENADIA WAY ELEMENTARY SCHOOL

July 2008



Legend

- Recommended Crossing
- Stop Sign
- ⊙ Traffic Signal
- ⊗ Crossing Guard
- ⚡ Flashing Warning Light
- XXXX Stairs or Walkway
- ⌒ Pedestrian Bridge
- ⌒ Pedestrian Tunnel
- 🌳 Parks



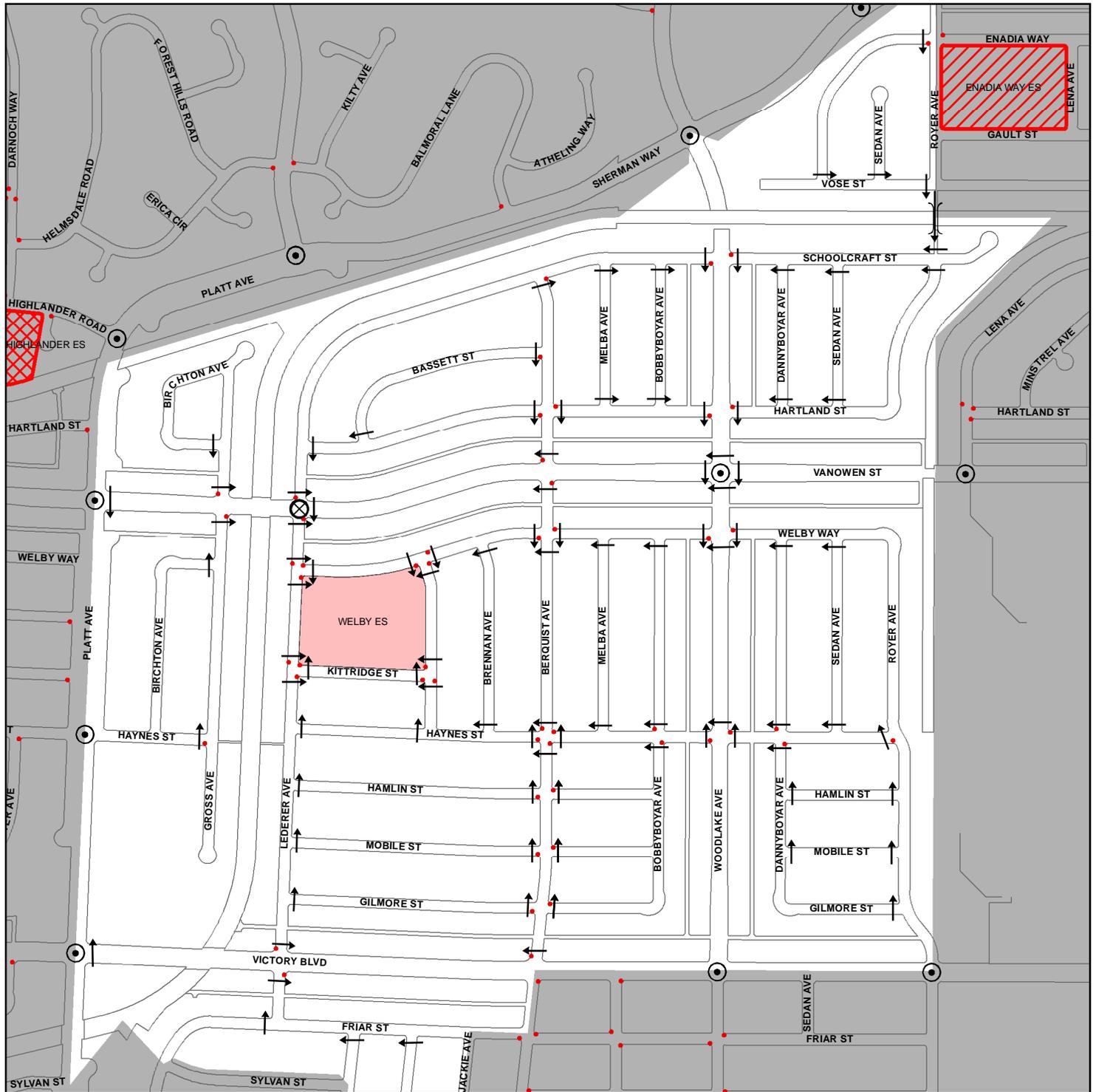
Parents:

This map shows the recommended crossings to be used from each block in your school attendance area. Following the arrows, select the best route from your home to the school and mark it with a colored pencil or crayon. This is the route your child should take. Instruct your child to use this route and to cross streets only at locations shown. You and your child should become familiar with the route by walking it together. Obey marked crosswalks, stop signs, traffic signals and other traffic controls. Crossing points have been located at these controls wherever possible, even though a longer walk may be necessary. Instruct your child to always look both ways before crossing the street. If no sidewalk exists, your child should walk facing traffic.

Estimados Padres:

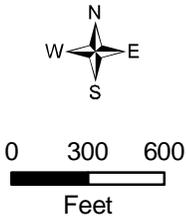
Este mapa muestra los cruzados recomendados para los peatones de cada cuadra en la area de su escuela. Siguiendo las flechas en el mapa, seleccione la ruta mas segura de su casa a la Escuela y marquelo con un lapiz o tiza de color. Esta es la ruta que su hijo (a) debe de usar. Digale a su hijo (a) que use esta ruta y que cruce las calles solamente en los lugares indicados. Usted y su hijo (a) deberian de familiarizarse con esta ruta. Obedezcan los rotulos de peatones, de altos, semaforos y todos los señales de trafico. Puntos para cruzar estan localizados en areas controladas, aunque sea necesario de alargar el tiempo para cruzar. Instruye a su hijo (a) que siempre se fije de los dos lados antes de cruzar la calle. El estudiante debe de siempre caminar en la direccion opuesta del trafico si no existe una banqueta.

PEDESTRIAN ROUTES FOR WELBY ELEMENTARY SCHOOL



Legend

- Recommended Crossing
- Stop Sign
- ⊙ Traffic Signal
- ⊗ Crossing Guard
- ⚡ Flashing Warning Light
- XXXX Stairs or Walkway
- ⌒ Pedestrian Bridge
- ⌒ Pedestrian Tunnel
- ⊞ Parks



Parents:

This map shows the recommended crossings to be used from each block in your school attendance area. Following the arrows, select the best route from your home to the school and mark it with a colored pencil or crayon. This is the route your child should take. Instruct your child to use this route and to cross streets only at locations shown. You and your child should become familiar with the route by walking it together. Obey marked crosswalks, stop signs, traffic signals and other traffic controls. Crossing points have been located at these controls wherever possible, even though a longer walk may be necessary. Instruct your child to always look both ways before crossing the street. If no sidewalk exists, your child should walk facing traffic.

Estimados Padres:

Este mapa muestra los cruzados recomendados para los peatones de cada cuadra en la area de su escuela. Siguiendo las flechas en el mapa, seleccione la ruta mas segura de su casa a la Escuela y marquelo con un lapis o tiza de color. Esta es la ruta que su hijo (a) debe de usar. Digale a su hijo (a) que use esta ruta y que cruce las calles solamente en los lugares indicados. Usted y su hijo (a) deberian de familiarizarse con esta ruta. Obedezcan los rotulos de peatones, de altos, semaforos y todos los señales de trafico. Puntos para cruzar estan localizados en areas controladas, aunque sea necesario de alargar el tiempo para cruzar. Instruya a su hijo (a) que siempre se fije de los dos lados antes de cruzar la calle. El estudiante debe de siempre caminar en la direccion opuesta del trafico si no existe una banqueta.

From: [Christine Rowe](#)
To: [DTSC_SSFL_CEQA](#)
Cc: [Malinowski, Mark@DTSC](#); [Leclerc, Ray@DTSC](#); [Perez, Marina@DTSC](#); [Owens, Cassandra@Waterboards](#); [Dassler, David W](#); [Kamara Sams](#); [John Jones](#); [Stephanie Jennings](#); [Bell, Jazmin](#); [James A. Elliott, \(MSFC-AS10\)](#); [Merrilee Fellows, \(HQ-NB000\)](#); [Bosan, William@DTSC](#)
Subject: Christine L. Rowe DTSC SSFL PEIR - Offsite Risk
Date: Wednesday, February 12, 2014 12:47:59 AM

Dear Mr. Malinowski,

It is imperative that DTSC address risk in their Draft Programmatic Environmental Impact Statement.

I attended the February 2014 SSFL Workgroup meeting, and there are still concerns about the safety of Runkle Canyon.

It is most likely that people have asked what the current risks are to Bell Canyon residents?

I am sure that people are questioning the safety of Dayton Canyon as well - what is the offsite risk there today - is it safe to build there?

What is the risk to Brandeis Bardin aka: American Jewish University campers, employees, and other visitors? I attended an event there in the past, and due to reports, I had to call the campus to find out if they use imported water.

What will be the risk to these communities from remediation to the Administrative Order on Consent (AOC) for NASA and DOE? What will be the risk from the cumulative impact of the AOCs with the Boeing cleanup - from airborne contaminants, storm water runoff, seeps and springs, groundwater contamination, and the potential for landslides?

Now there are concerns about Valley Fever? How do we protect the closest residents - including the ranger and his family at Sage Ranch - from the risks of this illness?

Respectfully submitted,

Christine L. Rowe

Newton's Third Law of Motion:

"For every action there is an equal and opposite re-action."

January 10, 2014

To: Mark Malinowski, DTSC

From: Cindi Gortner

c.c. Congresswoman Julia Brownley, Senator Fran Pavley, Supervisor Linda Parks, Director Debbie Raphael at DTSC, City Councilman Mitch Englander

Re: Comments on the Program Environmental Impact Report

It was unfortunate that you were not at the SSFL Workgroup meeting last Thursday. The public showed up in huge numbers (over 180 people) to express extreme concern about the risks of living near the polluted site and about their frustrations in the delays in site cleanup. The community is looking to the DTSC for leadership and protection as the agencies go through the EIR/EIS process.

The public overwhelmingly wants the AOCs to be carried out. It's been three years now since those agreements were signed, with 98% of the public's comments in favor of the laws. The PEIR must be on how to clean up to background – not alternatives to clean up to background.

I attended the DTSC public scoping meeting in Simi on 12/14/14 and was quite surprised and disappointed by the lack of a statement by DTSC assuring the community of your commitment to the AOCs. Instead the meeting focused, as NASA did, on the negative consequences of cleaning up the site. This reminds me of the children's story The Emperor's New Clothes when discussion doesn't include the current radioactive and chemical contamination. I sincerely hope that the DTSC's PEIR will not show the same anti-AOC bias as was seen in the scoping meeting.

Additionally, I am in favor of:

- Making certain all removed materials are sent to locations licensed for that particular material.
- Including information about what is under the test stands. The test stands must be taken down since of course the test stands are where much of the contamination occurred.
- Information about the contaminants in the water runoff should be included. The project and the alternatives should be restricted to how to cleanup to background not alternatives to cleanup to background. DTSC would be breaching the AOCs if the PEIR defined the project or its alternatives in a means that included breaking the legal obligations in the AOC.
- Again, the PEIR must include information about the environmental impacts that include the favorable environmental benefits to the cleanup of the pollution. By focusing only the supposedly negative impacts of cleaning up, the document will appear to the community to be biased against the AOCs.

I don't know if you are aware of the extent to which NASA has infuriated the community with a blatant lack of integrity. While it saddens me greatly as the daughter of a NASA employee to hear NASA lie and/or be absurdly evasive, there is no reason for us to trust NASA at this point. Allen Elliott told me on October 22nd at a DTSC meeting at Chatsworth High School that to the best of his knowledge about half of the comments were in favor of the AOCs and about half were opposed. The Teens Against Toxins group counted the actual over 3,000 comments and found that over 98% were supported the AOCs.

The DTSC is charged with the protection of the public. Please do the right thing in preparing a PEIR that gives the public confidence in the safety of the cleanup and provide information about the extent of the contamination that is why cleanup is necessary in the first place. Do a PEIR that is rigorously compliant with the AOCs.

Thank you.

Cindi Gortner

Mariah Mills

From: Robert Dodge [robertfdodge@gmail.com]
Sent: Monday, February 10, 2014 7:27 AM
To: DTSC_SSFL_CEQA
Subject: Comments by Dr. Robert Dodge @ 12-13 DTSC mtg

Robert Dodge MD

Comments for DTSC's Public Scoping Meeting on the SSFL Cleanup

December 14, 2013

My name is Dr. Robert Dodge. I am a family practice physician in Ventura and a Board member of Physicians for Social Responsibility-Los Angeles. PSR-LA has been involved for over 30 years in efforts to cleanup SSFL, the site of a partial nuclear meltdown and numerous other accidents, spills, and releases.

PSR-LA has always advocated for a cleanup that is fully protective of public health. That standard is met by the 2010 Agreements on Consent that stipulate that NASA and DOE's portions of SSFL shall be cleaned up to background levels of contamination – that is, any contamination that is detected will be cleaned up so the land will be restored to the way it was, before it was polluted.

This standard is of critical importance to public health. SSFL is contaminated with extremely dangerous radionuclides such as cesium-137, strontium-90, plutonium-239 and tritium. Last year, the EPA found radiation in hundreds of samples at the site, up to 1,000 times background. Strontium-90 concentrates in bone and can cause bone cancer or leukemia. Cesium-137 is a powerful gamma emitter, capable of causing cancer in any organ. Plutonium-239 is one of the most toxic materials on earth; a few millionths of an ounce if inhaled will cause cancer with virtual 100% statistical certainty.

In addition, SSFL is also polluted with hazardous chemicals such as TCE, perchlorate, dioxins, heavy metals, and other volatile and semi-volatile organics. These are extremely toxic materials that cause cancers and

leukemias, developmental disorders, genetic disorders, neurological disorders, immune system disorders, and much more.

Public health studies have identified elevated rates of certain cancers among the workers onsite associated with their exposures and in the offsite population associated with proximity to the site. The UCLA School of Public Health found significant increases in death rates from cancers of the lung, lymph and blood systems in the more exposed workers at the site compared to less exposed workers. In a study for the U.S. Agency for Toxic Substances and Disease Registry (ASTDR), Professor Hal Morgenstern found rates for key cancers in members of the nearby public increased the closer the person lived to SSFL. In another study for ASTDR, Professor Yoram Cohen of UCLA found evidence of toxic exposures to the offsite population in excess of EPA standards. Studies by regional cancer registries found elevated rates of bladder cancer associated with proximity to SSFL. And an extensive, many-year study by the UCLA School of Public Health found elevated death rates for lung cancers, lymphoma, and leukemia among workers based on their exposures to radioactivity and chemicals at SSFL. Furthermore, SSFL contamination continues to migrate offsite.

If the source of the contamination at SSFL is not cleaned up, it will continue to pose a risk to the offsite population. The DTSC must ensure that its EIR define the scope of the project as being compliant with the Agreements on Consent. Any discussion of alternatives for the DOE and NASA parts of the property should be limited to how to clean up to background, as required by the AOCs, not whether to comply. DTSC should also require, as mandated by longstanding law, that Boeing clean up its property to the standards the land is currently zoned for, and that is agricultural and rural residential, which are sufficiently protective standards.

Compass Rose Archaeological, Inc Comments on the DTSC 2013 PEIR scoping

Date: February 10, 2014

To: Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Compass Rose Archaeological, Inc greatly appreciates this opportunity to comment on the DTSC PEIR. In summary, we believe that from the start, the environmental review process for the entire SSFL has been incorrect, inadequate, and in violation of the spirit and intent of both NEPA and CEQA. To alleviate this error, we contend that the DTSC should complete a single, combined EIS/EIR, that assesses all the potential impacts within the entire SSFL, and proposes one set of mitigation measures. Compass Rose also feels the 2010 AOC violates the spirit and intent of the CEQA and that the entire SSFL should be cleaned up to comply with suburban residential levels as stated in the 2007 Consent Order. We feel that the clean up deadline should be extended to at least 2020, which would allow for alternative soil remediation measures to be implemented, thereby greatly lessening the impacts on natural and cultural resources.

General comments

The environmental review process already completed for the cleanup of the entire SSFL is absolutely incorrect, inadequate, and makes a mockery of Environmental Justice for the natural and cultural resources present there. The Responsible Parties (RPs) are completing separate environmental documents (Boeing, a private company, is completing an EIR under CEQA, and DOE and NASA, both federal agencies, are completing separate EISs under NEPA). All three documents are being completed on separate schedules. Neither document (Boeing and NASA) thus far being presented considers the impacts on the other RPs' land, although all the RPs own or administer the land in the SSFL.

All three RPs (Boeing, DOE, and NASA) should have been required a single, combined EIS/EIR for the entire SSFL, under a single schedule, with combined resource impact assessments, and with a single set of mitigation measures. As recourse to correct this grievous and egregious error, the DTSC should complete a EIS/EIR for the entire SSFL, that would take into account both environmental processes, even though the DTSC is a State agency, unless an EIR would legally suffice.

Although the DTSC has no role in the NASA structure demolition action, the increase in traffic caused by the increase in truck trips as a result of the action should nonetheless fall under DTSC oversight. For example, the DTSC should complete a traffic study that takes into account all the truck trips necessary for completion all the proposed cleanup actions (cleaning up soil to the suburban residential level, all demolition of structures, and all soil backfilling for Boeing, and soil cleanup to background levels, all demolition, and soil backfill for NASA and DOE) within the entire SSFL. In reviewing the NASA DEIS traffic study, we found that NASA simply counted the number of trucks needed for each activity (26,441 trucks for soil remediation, 8,814 trucks for backfill, and 3,476 trucks for demolition). This is an unnecessarily confusing method, when counting the number of truck round trips would be much more comprehensible, particularly for the general public.

When we calculated the number of round trips for the alternative with the most impact, (trucks arriving empty and leaving the SSFL with a full load for soil remediation and demolition and trucks arriving full and leaving empty for soil backfilling), we found that 77,462 round trips would be needed to complete all the activities. Although we haven't seen the Boeing EIR, sources tell us that approximately 40,000 round trips would be needed. If we add all the round trips together, there would be over 100,000 round trips needed. This should be the base number used to assess the traffic impact of the cleanup of the SSFL and surrounding communities. This method should be used for each alternative.

Compass Rose contends that the curves and narrowness of Woolsey Canyon Road will undoubtedly lead to greater traffic congestion and the potential for truck/truck and car/truck accidents as well as truck turnovers that may spill loads of contaminated soil. In addition, there would be increased diesel emissions from the trucks as well as potential visual and noise impacts to the surrounding communities. There will also be a potential increase for traffic congestion on the nearby larger streets and freeways.

Compass Rose believes that following the strict guidelines of the 2010 AOC is a violation of the spirit and intent of the CEQA, since it arbitrarily restricts the number of potential project alternatives and, as a result, does not take into account any feasibility studies. We strongly believe that the entire SSFL should be cleaned up to suburban residential levels, which is a stricter level than the EPA allows for parkland usage (the Boeing land will become open space parkland once the cleanup is completed to suburban residential levels). The suburban residential cleanup level assumes that adults and children residing under normal circumstances (24 hours a day, 350 days per year) within the SSFL can live there for 30 years or more before exposure limits are reached. Parkland usage exposure to contaminants would be much more intermittent and therefore much less intense and dangerous.

The NASA Inspector General states that that cleaning up the NASA portion of the SSFL is projected to cost over 200 million dollars, while cleaning up to suburban residential standards would, by contrast, cost a projected 76 million dollars. It must be remembered

that NASA has other sites in California with equal or greater contamination near population centers that also must be cleaned up. Also, there are only limited landfills where mixed contaminants can be placed. In this time of budget cuts as well as overspending, cleaning the NASA portion of the SSFL to “background levels” seems like overkill and an unnecessary waste of money. Since the 2010 AOC is not based on health risk, it does not substantially increase public and environmental safety.

The overly restrictive AOC seems to be the product of public distrust of governmental agencies (hiding the facts of the 1959 meltdown for 20 years and the general state of contamination of the SSFL, among others), and overzealous environmental activists. This caused an overlooking of impacts to the natural environment, surrounding communities, and cultural historical aspects that cleaning up the NASA portion of the SSFL to “background levels” will cause. A much more productive action by the activists would have been to sue for regulatory fines and not to destroy the environment and human history of the NASA portion of the SSFL.

Even though Compass Rose believes that the AOC should be overturned, just as SB990 was, the importance of beginning the final cleanup at the SSFL is paramount to the surrounding communities. Therefore, we suggest some modifications the current AOC.

First, Compass Rose recommends that the deadline for soil removal operations should be extended to at least 2020. This may possibly allow several of the alternative soil remedial methods to be used. In turn, this will reduce the amount of untreatable soil, resulting in even fewer truck trips.

Second, we believe that Section 1.7.2.1 of the AOC (“Cleanup to Background Levels” shall include in situ or other onsite treatment of soils that is able to achieve the cleanup standards as specified in the AIP), should be used as much as possible to reduce the amount of contaminated soil removed from the SSFL. These cleanup alternatives should be constructed (not completed) by the cleanup deadline (either 2017 or another date).

Third, under Section 4 (Environmental Review Processes) of the AOC, it is stated that the DTSC will comply with CEQA. Compass Rose believes this requires that alternatives other than “Cleanup to Background Levels” and “No Project”, must be considered. We believe that cleaning up the entire SSFL to suburban residential levels is the most appropriate mitigation, as it is a more stringent level than the recreational levels usually applied to parkland usage (Boeing has already stated they will consider their portion of the SSFL as open space parkland and NASA is also considering this). Due to the history of contamination at the SSFL, cleaning up the area to more stringent suburban residential levels would be protective of the surrounding communities, while being more realistic and not over-spending. Doing so would also probably lead to fewer major impacts and consider the actual feasibility of the mitigation measures. According to the NASA draft EIS, cleaning the soil to background levels would require the removal of 105 acres of earth as opposed to 18 acres if the NASA portion of the SSFL is cleaned up to suburban residential levels.

Fourth, under the Agreement in Principle, cultural resources are defined as “Native American artifacts that are formally recognized as Cultural Resources”. This definition is totally incomprehensible. As the AOC states that the DTSC must comply with the CEQA, the AOC should use the definitions, as well as the formal procedures, as specified in the cultural resource section of the CEQA.

Cultural Resources

First, since NASA now considers all of its land as a Traditional Cultural Property (TCP), Compass Rose feels that the entire SSFL property should become part of the TCP by the DTSC. This means that all of the sites (more than forty known sites) within SSFL boundaries should be considered as eligible for the National Register of Historic Places, and, therefore, subject to the protections of the list. Archaeological sites should no longer be treated separately during the eligibility process, but for their potential contributions to understanding the entire TCP. This is because very little is known about the specific activities that went on within the TCP as a whole. If the entire SSFL is considered a TCP, then both Boeing and NASA should, in cooperation, formally nominate the area as a Historic/Archaeological District.

Second, we feel that the analysis of past collections (1953, 1954, 1959 and 1960) started by Compass Rose of the Burro Flats Painted Cave site (CA-VEN-1072) should be completed by a local qualified archaeological firm with research interests in west San Fernando Valley prior to any further discussion of mitigation measures and eligibility studies. All the past collections are now being curated at the Autry Museum. As the site midden is located on both NASA as well as Boeing land, both should cooperatively fund the completion of the analysis. This would involve special studies by individual specialists, C14 dating, and a written report to analyze what specific activities were undertaken at CA-VEN-1072 and its potential relations to all the sites within the SSFL TCP.

Third, as the entire SSFL should be considered as a single TCP, all boundary testing for CA-VEN-1072 by both Boeing and NASA, all further sampling and characterization studies that involve earth disturbance or vegetation clearance, as well as soil remediation, must be monitored by a qualified archaeologist and a Native American with local experience.

Historical Structures

Area II of the NASA property is composed of three rocket engine test stand areas which are eligible as Historic Districts (Alfa, Bravo, and Coca). NASA is considering 100% demolition of all the involved structures and test stands prior to transferring the land. Ideally, Compass Rose believes that one test stand and associated control building in each of the three Historic Districts should be preserved. If this is not possible, and only one test stand can be saved, Compass Rose feels it should be Test Stand IV at the Coca Test Stand Area. This is because it is the largest and was heavily involved in testing rocket engines for the Apollo moon missions and the Space Shuttle.

There is a totally unique circumstance at the SSFL. Below the Coca Test Stand Area which was heavily involved in engine testing for space exploration, lies the Burro Flats Painted Cave site (CA-VEN-1072), which has evidence of ancient Native American astronomy and ritual. This creates a unique juxtaposition in which the complete history of mankind's interest in the sky and space is located in one place. Of major importance, neither resource is visible from the other. It may very well be that this is the most unique circumstance in all of the United States. All efforts should be made to preserve this unique circumstance.

Compass Rose believes that if one test stand and associated control building in each of the three Historic Districts were preserved as monuments to mankind's development of rocket engines, then little or no maintenance or rehabilitation would be necessary, if visitors can be kept at a safe distance from the preserved structures. NASA's attitude seems to be that the structures should be rehabilitated to perform as functioning entities or be completely destroyed because of the cost of rehabilitating them. This all-or-nothing approach is completely unacceptable. As the test stands are built into solid bedrock, they are not covered by the AOC. A recent court decision prevents the DTSC from allowing any further demolition of historic structures in Boeing-owned Area IV until intensive environmental studies have been completed for each structure. Compass Rose believes that this legal ruling should be extended to the entire SSFL, including the land owned by NASA with its three Historic Districts.

Compass Rose will present a set of potential mitigation guidelines which will preserve the historic structures with minimal impacts, while protecting human health to a large degree. Measures should be undertaken to keep the public at a distance from the preserved structures to minimize exposure to lead paint and other types of contaminants (NASA claims that yearly encapsulating of the lead paint is too expensive, especially for the Coca stands) as well as liability issues stemming from climbing on the structures. The distance from the structures to the public should include the amount of space needed to keep exposure levels at suburban residential standards for the various chemical contaminants which would affect an individual.

Access to the preserved test stand area should be restricted to separately scheduled, guided tours only. The number of tours per year should be decided by DTSC, NASA, or its successor, and the Santa Ynez Band of Chumash Indians and local Native American groups. All visitors participating in the tours should be required to sign liability waivers, with the understanding that there still residual contaminates in the area. A certain number of visits (based on cumulative exposure compared to suburban residential levels and the number of liability waivers signed by an individual) would be allowed for each visitor per year. When that limit is reached, the individual would be denied access to the test stand area, but might be allowed back after a certain amount of time has elapsed. Only a specified amount of time could be spent viewing each of the test stands for the purpose of minimizing contamination exposure. For the same reason, there should be no general hiking allowed in the test stand area.

The entire preserved test stand area should be fenced off in some manner and an Environmentally Sensitive Area (ESA) established to prevent visitors from viewing any part of, or gaining access to, the Burro Flats Painted Cave site (CA-VEN-1072). Even though the public would not be able to go right up and touch the test stands, they would still be able to get a spectacular, unforgettable view of these monuments of rocket and space travel. There could be exceptions to these guidelines for guided research and Native American ritual visits.

Natural Resources

In terms of natural resources, Compass Rose feels that it is extremely important to protect and restore the wildlife corridor at the SSFL. In a recent article in the Topanga Messenger newspaper (vol. 38, no. 2), DNA tests showed that mountain lions in the nearby Thousand Oaks area of the Santa Monica Mountains have begun inbreeding because their traditional range has been disrupted by human development. We believe it is extremely important to not let this happen in the Santa Monica Mountains/Simi Hills area where the SSFL is located.

Compass rose contends that the NASA proposal to backfill only two thirds of the soil volume than what would be removed as a result of soil remediation is completely inadequate for reconstructing and restoring the wildlife corridor within the SSFL. In addition, even slight changes in elevation and topography in the area of the headwaters of Bell Creek could cause changes in water volume and water velocity. This, in turn, could cause changes in the creek bed configuration and might lead to possible flooding impacts to lower Bell Creek and the surrounding communities. We don't think any of these possibilities have been considered. Once again, Compass Rose greatly appreciates this opportunity to comment on these very important topics.

Sincerely,
Dan Larson and Gwen Romani
Compass Rose Archaeological, Inc.

Mariah Mills

From: David Swanson [fatherchronica@live.com]
Sent: Friday, January 24, 2014 1:48 PM
To: DTSC_SSFL_CEQA
Subject: Radiation trickling into Simi

I am David Swanson, formerly of 2224 Athens Ave Simi Valley, Ca. 93065, and we moved away and don't care anymore that my father in law died in his 50's of myriad cancers after working on the meltdown clean up. Please remove our name from your mailing list. It has just dragged on for too long and we don't actually believe it will ever be made even partly right. I am moving in a different direction now, and will just pray that the faulty batteries on their jets eventually bankrupt Boeing or that the super subduction fault earthquake in Washington states future kills them all. Thank you, David Swanson

Mariah Mills

From: Davis Gortner [davisgortner@gmail.com]
Sent: Sunday, February 09, 2014 9:10 PM
To: DTSC_SSFL_CEQA
Subject: My Comments on DTSC's PEIR for SSFL

As a young person who lives near the Santa Susana Field Laboratory, I am concerned about toxins that can migrate from the site and impact my local community's health.

I urge that DTSC's draft Program Environmental Impact Report (PEIR) for the cleanup of SSFL fully comply with the Agreements on Consent (AOCs) to cleanup the NASA and DOE portions of SSFL to background levels of contamination. That means the project must be to clean up the Department of Energy and NASA parts of the property to background as required in the AOCs. All alternatives considered must also meet the cleanup standards of the AOCs. In other words, the PEIR must be about how to clean up to background as required by the AOCs, not whether to comply with the AOC.

I was also disturbed to learn that DTSC has allowed Boeing to tear down nuclear buildings and dispose of the radioactively contaminated debris at recycling facilities and landfills not licensed to receive radioactive waste, and that a court had to issue an injunction to stop this. The PEIR should therefore include consideration of the demolition and proper disposal of debris from contaminated structures at the site.

In addition, Boeing must clean up to the standard for which the site is zoned, agricultural, the most protective standard. The cleanup levels that Boeing wants would mean most of the contamination is not cleaned up, and therefore continue to keep migrating offsite where it could harm people's health.

Removing all of the contamination from the site is the best way to protect the nearby communities. And it is what the cleanup agreements and longstanding law require. I urge that DTSC's PEIR be consistent with the AOCs, and ensure that Boeing cleans up ALL of the contamination on its property.

Davis Gortner

January 9, 2014

To: DTSC

Re: Comments on the PEIR

c.c. Debbie Raphael at DTSC, Congresswoman Julia Brownley, Senator Fran Pavley, Supervisor Linda Parks, City councilman Mitch Englander

First I must comment that I am quite disappointed in the DTSC. I attended the DTSC public scoping meeting in Simi Valley on December 14th and was told the DTSC would stress the DTSC's commitment to the AOCs. Sadly, the scoping meeting did not give the public confidence in their commitment to the AOCs, but instead focused on the negatives of cleanup thereby giving the impression that the cleanup should be feared by the public. This is what happened with NASA's EIR, and NASA has lost the public's confidence and trust as result of their scare tactics and evident anti-AOC bias.

Teens Against Toxins is an organization comprised of teenagers who attend high school in Oak Park and Agoura, both cities that are within five miles of SSFL. We fully support a cleanup to background as agreed to by DTSC, NASA and the DOE.

Here are our specific comments:

- The environmental reviews must be consistent with the AOC requirements to clean up to background; therefore that is the project and the alternatives are to be restricted to how to cleanup to background not alternatives to cleanup to background. DTSC would be breaching the AOCs if it performed a PEIR that defined the project or its alternatives in a fashion that included breaking the legal obligations in the AOC.
- Any PEIR must include information about the environmental impacts that include the POSITIVE environmental benefits to the cleanup. It is misleading to focus solely on the purportedly negative impacts of cleaning up instead of focusing on the environmental damage to soil and water that has been created by all that radioactive and toxic chemical contamination. Otherwise it makes it seem like DTSC is trying to use the PEIR as propoganda to attack the very agreements it is supposed to be carrying out
- With respect to the test stands, include information about what is under the test stands. Teens Against Toxins feels strongly that the test stands must be taken down. This is common sense. The test stands are where the testing and much of the contamination occurred.
- With respect to water resources, include all data about violations and exceedances of pollution standards in runoff water.

DTSC is under great scrutiny from the Legislature and the news media for failing to not protect the public from hazardous materials. There is much suspicion in the community that Boeing has large influence over DTSC's decisions. We strongly urge DTSC to right itself, start protecting communities, and here, perform a PEIR that fully complies with the AOCs.

In summary, Teens Against Toxins and the families in our community are strongly opposed to any effort by DTSC to breach its legal obligations under the AOCs, which require full cleanup to background. The PEIR, if truly necessary, should give the public confidence in the safety of the cleanup and provide information about the extent of the contamination that is why cleanup is necessary in the first place.

Davis Gortner

President, Teens Against Toxins

Dale Till

From: Dee Goldberg <deegoldberg@verizon.net>
Sent: Thursday, January 02, 2014 10:50 PM
To: DTSC_SSFL_CEQA
Subject: Concerns about the Santa Susana Clean UP

To Mark Malinowski or whom it may concern:

I'm a resident of Simi Valley California and am looking forward to the Santa Susana Field Lab being cleaned up, completely to background levels.

I would like to make two comments that would be of concern for the clean-up:

1.) Please make sure that there is limited, if any, wind during the removal or moving of soil and that the soil is moist to insure the least amount of soil getting into the air.

2.) There should be a consistent effort to get the clean up completed by the end date, but if windy weather has created delays than there should be exceptions made that the clean up date be extended due to the weather.

In other words, it needs to be cleaned up and cleaned up properly while taking into consideration the safety and health of the residents living around the site, not to rush the clean up only to create more health risks and dangerous air quality to people living in the surrounding areas of the SSFL site.

Thank you very much,

De Anna Goldberg
Simi Valley, 93065

*The physician and health advocate voice for a world free from nuclear threats
and a safe, healthy environment for all communities.*

February 10, 2014

Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826



Re: Physicians for Social Responsibility-Los Angeles Public Scoping Comments on Program Environmental Impact Report for the Cleanup of the Santa Susana Field Laboratory

Dear Mr. Malinowski:

Physicians for Social Responsibility-Los Angeles (PSR-LA) is an organization of physicians and health professionals that works to protect public health from nuclear and environmental toxins. We are the largest chapter of Physicians for Social Responsibility, the American recipient of the 1985 Nobel Peace Prize. PSR-LA has many members who live near the Santa Susana Field Laboratory, and has been involved in efforts to cleanup the site since 1979, when the partial meltdown at the site was disclosed.

Given the widespread extent and toxicity of SSFL's radiological and chemical contaminants, PSR-LA joined with other environmental and health organizations, elected officials, community members and thousands of concerned citizens in support of the Agreements on Consent between DTSC and DOE and NASA to cleanup their portion of SSFL to background. It was to be pretty simple. Where contamination is found, it is cleaned up, restoring the site to its natural condition the way it was before it was defiled with hazardous pollutants.

PSR-LA supports cleaning up all – not just some – of the contamination because it is the best way to ensure that public health is protected. We were therefore extremely concerned that the notice for DTSC's PEIR public scoping meetings stated that the scoping was to "assess alternatives to the cleanup of SSFL" with no mention of the AOCs. We were further troubled that under questioning, DTSC would not commit to making sure that any alternatives considered in DTSC's PEIR be compliant with the AOCs.

DTSC must make sure that its EIR defines the scope of the project for the DOE and NASA portion of the lab as cleanup to background, as required by the AOCs. And all alternatives, with the exception of the "No Action" alternative, must also be compliant with the AOC. In other words, the alternatives must be limited to different ways to achieve the cleanup to background, not alternatives that would violate the AOCs.

When NASA, in 2012, proposed in its scoping for its EIS to include alternatives that would violate the AOC, by leaving large amounts of contamination not cleaned up, DTSC notified NASA that to do set the scope of the EIS in this fashion would violate the AOC. DTSC made clear that compliance with the AOC required environmental review that identified the project as cleanup to background and alternatives limited to alternative ways to achieve cleanup to background. DTSC must do the same.

In addition, the EIR must include contaminated structures and debris, and disposal of that material in sites licensed for such waste, particularly waste with radioactive contamination. The Superior Court in Sacramento has issued a preliminary injunction in *Physicians for Social Responsibility-LA v. DTSC*, indicating a likely CEQA violation by DTSC in approving these demolitions and associated disposal without conducting a CEQA review. The scope of the EIR must cover all potentially contaminated materials at SSFL, including the buildings and other structures.

DTSC should also require, as does the law, that Boeing clean up its parts of the property not subject to the AOCs to the standards the land is currently zoned for, and that is agricultural. (We are not referring to SB990, but to pre-existing law and regulations that apply statewide and are unaffected by any challenge to SB990.) Until the contamination is gone, the offsite population is at risk.

It is important this point to review why the site is being cleaned up in the first place. Ten nuclear reactors operated at SSFL, at least four of which suffered accidents. One of those accidents, in a reactor without a containment structure, was a partial meltdown. SSFL was subsequently plagued with contamination from cesium-137, strontium-90, plutonium-239 and tritium, among other radioactive materials. Last year, the EPA found radiation in hundreds of samples at the site, in some places over 1,000 times background.

In addition, the tens of thousands of rocket tests conducted at SSFL polluted the site with hazardous contaminants such as TCE, perchlorate, dioxins, heavy metals, and other volatile and semi-volatile organics. These are extremely toxic materials that cause cancers and leukemias, developmental disorders, genetic disorders, neurological disorders, immune system disorders, and much more.

Dangerous pollutants are widespread at SSFL, extending through all four operational areas and into the buffer zones and extending offsite. And, they exist in high quantities. Many of the chemicals found at SSFL are regulated at a few parts per billion (ppb), yet there are very large quantities present in the soil at the site. Perchlorate, for example, is not permissible in drinking water at levels greater than 6 ppb. Yet SSFL disposed of tons of perchlorate in open-air burnpits which polluted soil, groundwater and surface water. TCE is regulated at 5 ppb levels. At SSFL, 500,000 gallons are estimated to be in the soil column and aquifer.

DTSC's PEIR must include a thorough discussion of the radioactive and hazardous substances at SSFL, and their nature of their specific toxicities.

Public health studies have identified elevated rates of certain cancers in the nearby population associated with proximity to the site. In a study for the U.S. Agency for Toxic Substances and Disease Registry (ASTDR), Professor Hal Morgenstern found rates for key cancers in members of the nearby public increased the closer the person lived to SSFL. In another study for ASTDR, Professor Yoram Cohen of UCLA found evidence of toxic exposures to the offsite population in excess of EPA standards. Studies by regional cancer registries found elevated rates of bladder cancer associated with proximity to SSFL. And an extensive, many-year study by the UCLA School of Public Health found elevated death rates for lung cancers, lymphoma, and leukemia among workers based on their exposures to radioactivity and chemicals at SSFL.

In 2007, a cluster of retinoblastoma cases, a rare eye cancer affecting young children, was identified within an area in the community that was downwind of the site. And the Public Health Institute's 2012 California Breast Cancer Mapping Project identified Thousand Oaks, Simi Valley, Oak Park and Moorpark as "area of concern", finding that the rate of cancer is higher than there than in almost any other place in the state.

And despite DTSC's baffling insistence that it has not found off-site contamination that could threaten public health, it is abundantly and demonstrably clear that dangerous pollutants have indeed migrated from the site. There have been over a hundred exceedances of pollution standards in runoff from the site reported to the LA Regional Water Quality Control Board in just the last few years. A TCE plume extends offsite. Perchlorate has been found in numerous wells in Simi Valley and in Dayton Creek in Dayton Canyon. Strontium-90 was found at Runkle Ranch. Other contamination has been found at the nearby Brandeis Camp, where a recent well tested over 100 times background for a radionuclide, and Sage Ranch where hundreds of cubic yards of toxic soil were removed.

This is why PSR-LA supports a full cleanup to background. If the contamination is not cleaned up, it will continue to pose a risk to anyone who ventures on the property in the future and, more particularly, anyone who lives nearby and could face exposure to continued migration.

DTSC's EIR must focus solely on how to achieve a cleanup to background, not whether to do so. Any alternatives discussed must be alternative ways of reaching that cleanup standard as defined in the AOCs. As indicated above, when NASA tried to include alternative cleanup levels that were not compliant with the AOC in its EIS scoping meetings, the community and elected officials were outraged. DTSC Director Debbie Raphael herself wrote to NASA informing the agency that if its environmental review considered cleanup alternatives it would violate the AOC. DTSC must not now do exactly what it forbade NASA from doing. All alternatives considered must be compliant with the AOCs cleanup to background.

DTSC's PEIR must also not repeat the deceptions that were included in NASA's DEIS, such as misrepresentation of truck traffic, harm to habitat, and intentionally failing to include common sense mitigation measures. DTSC is well aware that most of the cleanup will occur in areas that are previously disturbed, and therefore not negatively impact natural habitat, that truck traffic can be negligible, mitigated, and that the trucks will be covered. DTSC knows the AOCs that provide exemptions for Native American artifacts, endangered species, and special circumstances and it must include those provisions in its PEIR. DTSC knows that it is possible to cleanup to background levels of contamination with minimal if any negative impact and must fully pursue and address all such methods – except for lowering the cleanup standard.

PSR-LA is regularly contacted by local residents and former workers who are suffering from illnesses they believe are connected to SSFL contamination. Their stories are very moving and tragic. We look forward to the day when the public has confidence that DTSC's primary concern is about people's health, about individuals' and families' wellbeing, about preventing needless suffering and heartache, and is uninterested in appeasing polluters, their lobbyists and their surrogates. We look forward to a full cleanup of SSFL to the AOCs' stipulated background levels of contamination, and to a DTSC PEIR that ensures this health-protective standard is, to the letter, carried out.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise Duffield". The signature is written in a cursive, flowing style.

Denise Duffield
Associate Director

Mr. Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826
DTSC_SSFL_CEQA@dtsc.ca.gov

Diana Dixon-Davis
10832 Andora Avenue
Chatsworth CA 91311
818-341-4242
<dixon-davis@hotmail.com>
10 February 2014

**NOTICE OF PREPARATION FOR A DRAFT
PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)
SANTA SUSANA FIELD LABORATORY (SSFL) SITE, VENTURA COUNTY,
CALIFORNIA**

Dear Mark Malinowski;

OVER VIEW REQUEST:

It is vital that the California Department of Toxic Substance Control (CA-DTSC) perform a complete and California and Federal law compliant EIR on the SSFL, to not do so will result in unnecessary delay.

Despite the 2010 Administrative Orders on Consent (AOC's) restrictions on content, coverage, and alternatives, an EIR based on this consent decree is in violation of California State and Federal laws. (Please refer to the deficient, flawed and restricted NASA DEIS).

The California Environmental Quality Act (CEQA) and Federal National Environmental Protection Act (NEPA) are settled law in the rest of California and for the rest of the USA, respectively. Until there is a U.S. Supreme Court ruling that the AOC contract supersedes the CEQA and NEPA, CA-DTSC must perform a complete and legally compliant EIR on the SSFL. DTSC needs to examine the usual alternatives, procedures, and 9 balancing criteria's. These usual procedures can only be deleted if the court rules in the current lawsuits and appeals that the AOC contract takes precedence over CEQA and NEPA legislation.

The PEIR analysis of all alternatives is requested so that once legal challenges are complete the CA-DTSC EIR can be used for planning further clean-up of the SSFL, regardless of the legal outcomes.

What are the consequences if the courts rule that the AOC's trump California State and Federal law? Will CA-DTSC have to redo all the currently completed California cleanup's? Will imposition of the Look-up Table/Detect levels values set a precedent for the rest of California, United States?

PROCEDURAL QUESTIONS:

These questions and requests are not in a strict hierarchical order—rather they are all areas of study that should be included in the DTSC EIR.

1. Ca DTSC should do a *cumulative impact analysis* of all alternatives for all areas of the SSFL based on the assortment of Responsible Parties (NASA, Boeing, DOE and others) EIS/EIR/ clean up plans.

2. The entire SSFL must be subject to a basic analysis based on recognized medical and scientific techniques. There must be an quantification and assessment of the SSFL'S current level of risk to public health of the almost 10 million people living around the SSFL.
3. EIS and EIR analysis, *must be completed* and lawsuits settled before clean-up begins. Plan for and ask for an extension of the NASA proposed deadline of 2017, perhaps to 2027?
4. Each cumulative impact study must compare and contrast the 6 main cleanup levels (Recreational, Industrial, Urban residential, Rural residential, Agriculture, and then the newly created (via AOC's) Detect/Look up Table Values.
5. Each study must evaluate and incorporate multiple alternative ways to "clean up". These studies need to evaluate all 6 levels for cleanup, time line, total cost (from start to finish—including all hauling costs), and total health effects on nearby communities and/or eventual inhabitants of SSFL.

A Cost Table must be presented for each separate SSFL area and for all areas combined. Cost for cleanup under all 6 alternatives needs to be done; emphasizing a comparison of Recreationion, Suburban Residential with a cleanup to Background/LookupTable (CUB) cleanup levels.

6. The usual alternatives to consider, to be modified with additional techniques, and to be applied to all or part of the SSFL:

- | | |
|---|---|
| a) Do nothing | f) Scoop and haul only area that clean, appropriate, and sufficient fill soil has been located for. |
| b) Encapsulate | |
| c) Treat and return | g) Scoop and haul out most contaminated areas only |
| d) Stratify, clean, and scoop and haul away "toxic" portion | h) Scoop and haul all areas above Look Up Table/Detect Levels. |
| e) Phytoremediation in appropriate areas with haul away of plants that removed toxics | i) Scrape entire SSFL area to bedrock |

7. At a minimum the areas of concern are:

- a) Soil
- b) Ground and surface water
- j) Air pollution, dust dispersion, water demands for remediation procedures
- k) Native American artifacts, cultural sites, supportive sites
- l) Historical structures (Space Race history)
- m) Wildlife corridors, mammals, fish, birds, game, reptiles, insects

- n) Native Plant communities.
- o) Traffic effects in the local area and along all the proposed haul routes
- p) Evaluation of the potential dumpsites for SSFL debris; cost per cubic yard to dump, sufficient capacity, ability to take mixed waste versus chemical wastes, other considerations.
- q) Environmental justice concerns and costs for the communities receiving the removed soils, plants, water, etc.
- r) Returning SSFL area to its natural contours, re-vegetation procedures and costs
- s) Preventing additional soil, water, wind erosion
- t) What is the current health risk level of the SSFL? Quantify the current health risks to the surrounding areas' population of already present arsenic, other heavy metals, dioxins from brush fires, dust storms and Valley fever(, etc, spores), air pollutants (cars, trucks, manufacturing, AQMD recognized pollutants), etc. versus those introduced by the proposed "clean-up" procedures .

GENERAL QUESTIONS TO ADDRESS:

1. Have one major theme and analysis for the PEIR based on an ultimate use of the property as a Park/OpenSpace/ Recreational area. Most of the local communities surrounding the SSFL do not want it turned into an Industrial Park or millionaire mansions; the consensus of the local community is to transfer the land to Federal, State, County or local cities as a Park/Open Space/ Recreational area.
2. Explain why SSFL require a higher level of cleanup than other more hazardous sites? Please list all California sites that were cleaned up to Recreational, Industrial, Suburban Residential, Rural Residential, Agricultural levels. Has some, or all of California agricultural land ever been tested to determine its contamination level?
3. Please answer the questions poised by the U.S. Office of the Inspector General (IG-13-007) 14 Feb 2013 . The questions are poised through out the document. Basic cost/benefit analysis must be included in the DTSC EIR.
- 4 .The cleanup needs to be health risk based.
5. Cleanup standards need to be uniform over the entire site.
- 6.Tailor cleanup approach to match the health risk level of each area.
7. Do no remediation or cleanup measures that can not be easily reversed until after all legal and planning /work plan activities are finalized.

8. Identify clean fill soil in sufficient quantity, that meets the soil contamination look up table values, and of the same composition before beginning making major cleanup decisions. *This factor alone might limit all remediation considerations. Currently no fill has been identified that meets the AOC standards*

9. *Replace all soil removed* and return SSFL to its current topography. Why is this not proposed? Will the current plan to replace only 1/3 of soil lead to erosion problems? Can re-vegetation be done in the 2/3 of the SSFL with no replacement soil?

10. There needs to be a *net health benefit* of the cleanup. If the health, environmental, cultural, environmental justice, and psychological costs of the cleanup are greater to those who live around the site, and will be subject to the sequelae of the clean-up activities are greater than to those "injured" in the past, a more moderate clean up standard (suburban residential, recreational) should be applied.

11. Determine the human health effects of the naturally occurring high levels of arsenic.

12. *Segment Dioxin contamination* into that created by local brush fires (naturally occurring for thousands of years) from those created by RP activities. Are the RP's responsible for naturally occurring contaminants, or contaminants they had no control over (lead from leaded gasoline, nuclear testing fallout, etc.?) or should they only be required to clean up contaminants they created?

13. Can the Buffer Zone be left undisturbed? It was once used as a ranch, grazing, and (I assume) rural residential. Can this area be exempted from soil remediation. And immediately reclassified as Recreational/Parkland?

14. All the traffic consequences of major soil removal must be done. *Trucks removing contaminated soil/ structures/ etc. CAN NOT be used to haul in "clean fill."* How many and what type of trucks will be needed under each of the 6 alternatives?

Current estimates used by NASA's DEIS seem to be very low. See a re-evaluation under Addendum B Traffic Studies. See new estimates done by David Collins, Mark Sherwin, Dixie Hambrick (MWH) 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 TableValues – DRAFT

Estimate the number of truck trips, milage, cost for personnel and trucks, maintenance of trucks, etc.

15. *Evaluate and quantify* all proposed haul routes. Give proportions of trucks going to central California, Nevada, and Utah land fills (mixed waste facilities?) and those going to metal and other disposal sites to the south. Evaluate and quantify accident risks, air pollution risks * (see *Addendum A: Air Pollution*) along the haul routes (Lung and Asthma risks to Children along route), Valley Fever risks, truck fumes, deaths per mile.

Calculate the number of trucks needed, and the miles driven (round trip) to waste disposal sites. Estimate the number of deaths and injuries (to pedestrians, school children, truck drivers and other drivers on highways and local roads) caused by the trucks needed to do the soil removal and replacement.

16. An estimates of cost to remediate damage to roads and freeways from the huge increase in truck traffic from CUB must be done and added to the cost of SSFL's cleanup.

17. Please see several remediation proposals in Addendum B: Remediation. Add school crossing guards in Chatsworth and West hills. Use natural gas powered trucks. Use alternative remediation measures to scoop and haul soil remediation measures. These measures might be slower but less costly and less environmentally damaging. Incorporate the exciting and very effective phytoremediation results that are being developed by the STIG .

18. Impact of clean up on Wildlife corridors and Significant Ecological Areas (SEA's) must be done based on current and peer reviewed ecological studies. U.S. Fish and Wildlife Service (USFWS) should be asked to map and describe the wild life corridors and SEA's on the SSFL and adjacent areas.

19. The negative effects of cleanup and truck traffic on the Chatsworth Nature Preserve must be studied and quantified.

This letter presents the case for the CA DTSC PEIR to be conducted in a comprehensive, complete, scientific, health based, cumulative and legal manner. CA DTSC needs to apply CEQA and NEPA in the conventional manner. Despite the political complexity of this issue the PEIR should be done in a scientific, health risk based, and cumulative manner. All reasonable alternatives should be studied. The usual procedure of determining the future use of the property and then tailoring the cleanup to meet that criteria is probably the best scenario to follow. Currently political forces have decided a level of cleanup based not on risk but a combination of hysteria and bad science. The responsible parties are currently being forced to justify this "Cart before the Horse" scenario.

A "revenge" clean up analysis is inappropriate. A politically limited analysis is inappropriate. Both scenarios will lead to further lawsuits and delay. SSFL does not currently warrant a totally new and politically dictated set of standards and procedures. Currently enacted environmental law dictated procedures are sufficient to cleanup SSFL .

It is up to CA DTSC, as the agency in charge of all player in the SSFL issue, to re-rig the cart, put the horse in front and apply a combination of common sense and thoroughness to the PEIR for SSFL.

Diana Dixon-Davis

MA/ Demography , Epidemiology

10832 Andora Ave, Chatsworth CA 91311

(818) 341-4242, <Dixon-davis@hotmail.com>

A: AIR POLLUTION

Air pollution has been a major focus of Southern California and Los Angeles City Regulators for many years. We have strong environmental laws that govern tail pipe emissions, burning anything, and industrial by-products. To ignore this component in the SSFL cleanup is to not appreciate our unique problems. The LA area, and especially the San Fernando Valley, are in a basin that concentrates air pollution. The dry climate coupled with clear skies and sunshine almost year around leads to smog, heat inversions, and other negative effects on the ambient air.

1. The large number of trucks needed to haul out dirt from the SSFL, will produce large swatches of air pollution all along their routes. Numerous studies have been done on the negative effects of air pollution on Southern California communities.

One of the more recent studies done by McConnell, et al, Department of Preventative Medicine, The Keck School of Medicine (University of Southern California) published in Environmental Health Perspectives, May 2006 and followed by a March 2010 extension has found a significant increase in asthma and decrease in lung capacity of children living and/or going to school within 200 meters of a major roadway (freeway or secondary highway such as SR 27, Topanga Canyon Blvd).

There are 4 public elementary schools (Chatsworth Park, Nevada, Capistrano, and Justice Elementary Schools) one city park (Lanark) , and numerous smaller private schools, day care facilities, etc. within the 200 meters of the haul routes. Chatsworth Park's playground is only about 20 feet from Topanga Canyon Blvd. The majority of the non freeway haul routes are through residential neighborhoods where families with small children live.

The effect of the soil transport to hazardous waste dumps must include not just accident risks to children but also the life long effects of the air pollution on their lungs and risk for asthma.

2. These same considerations of added pollution to the air must also be done for the rest of the population living along these haul routes.

3. The current Best Practices of watering down soil, and covering with tarps during transport will not prevent major dispersions of dust and soil along the haul routes. This part of California is usually very dry, strong canyon winds in addition to Santa Ana winds, sunny most of the year, all lead to dusty conditions.

4. Provisions to test for and contain Valley Fever fungus spores (endemic to this area) must be incorporated into any soil removal plans.

B: REMEDIATION

1. The damage done to Woolsey Canyon, Valley Circle, Roscoe, and Topanga Canyon Road by 14.6 years of constant heavy truck travel must be estimated. All the damage to Los Angeles City and Ventura County Roads must be repaired as part of the cleanup, This cost must be factored in the total cost of the CUB level of cleanup or to other alternatives with lower soil removal goals, as presented.

1. The amount of long term Southern Californian air pollution caused by these 113,000 truck trips and damage to the health of the residents of North West Valley must both be measured and mitigated. The use of natural gas or electric powered trucks could result in a major reduction in Green House Gas and other emissions. This remediation measure must be considered and its cost/benefits calculated.

3. Another way to reduce the impacts of the site cleanup is to reduce the amount of demolition and soil removal. The cost/benefit of STIG, phytoremediation, treat in place, encapsulation, etc. and other remediation strategies must be considered.

4. No soil or debris removal during peak traffic hours.

5. A NASA paid crossing guard at the Topanga and Devonshire intersection to protect children

from truck traffic unless prohibition of truck traffic during school arrival and dismissal hours is implemented. Consider crossing guards and extra traffic signals all along the residential portions of the haul routes.

6. HEALTH RISK ASSESSMENTS The current existing total level of health risk to the community that the current SSFL site poses (as is, before cleanup) must be calculated and compared to the postulated "improvements" resulting from the CUB cleanup, in order to see if cleanup achieves a measurable level of improvement to public health.

6.a . Health Risk evaluations must include all realistic ,on-site and off-site risks. The DEIS can not ignore the effects on the surrounding community and on the populations living along the haul routes and proposed dump sites. These health risks include, among others, air pollution, traffic, water usage and run-off, dust exposure, Valley Fever (sometimes lethal fungus infection endemic to area), truck and employee accidents. An analysis of and monitoring of the level of "contamination" in the streams leaving the SSFL site (Bell Canyon, Black Canyon, and all other "blue line" streams) must be done to see if retaining and treating ground and surface water on site is still feasible and required. The lack of information on air pollution caused by CUB projected truck traffic, especially in Woodland Hills, Canoga Park, and Chatsworth is a serious omission. Especially children and adults, will bear heightened health risks.

6.b. The amount of reduction in health risk to the community that each of the 7 alternatives will achieve must be calculated. The total cost to achieve each alternative must be calculated.

6.c. A re-evaluation must be done of the criteria that any one of the 450 chemicals can trigger a cleanup of an area on the site. The actual level of health risk of this one “trigger” must be weighed against the cost to the environment, etc. of this extreme interpretation of cleanup criteria. Arsenic occurs at a naturally high level and is already “exempted” in some cases from triggering total soil removal.

6.d. Under the current LUT and CUB, measuring ¼ of a banana and 1/16 tsp.(a few drops) of beer would qualify soil as contaminated and require removal to a “hazardous” waste site. These levels of

Cleanup stain credulity and require a health risk based evaluation.

7. **Evaluation of the cost/benefits of slower but equally/ almost as effective remediation alternatives** such as phytoremediation (plant based), treat soil and water in place, encapsulation of contaminated soil, and natural attenuation must be done. There is no requirement that the SSFL Cleanup be completed by a date certain, only a politically set date. (ES-3.1.2.2)

8. **Consideration of differential/ alternative cleanup treatments for different areas** within the site must be evaluated. This consideration must be done in regards to the Chumash religious and cultural areas and the Test Stand areas so that these historical sites are preserved and not destroyed or altered by the cleanup process.

9. **Consideration of the ultimate use of the SSFL** as a park and then work backward to re-evaluation of the health risks and the cost/benefits of the entire cleanup with this outcome in mind.

10. **Alternate uses for Federal Funds**. It is quite possible that the funds spent on the highest level of cleanup could be much more effectively used for public health measures that would broadly benefit everyone living around the SSFL site. This might reduce health risks much more than CUB will do. See especially the current use of ground water and wells in the Simi Valley area. NASA and the Federal Government must decide how much money will be spent on this project and to what benefit., especially when many other cleanup projects go unfunded.

C: TRAFFIC STUDIES

1. The NASA DEIS presented traffic studies do not match my on the ground observations. The high traffic levels on Santa Susana Road (a very windy and narrow mountain road) are abnormally high in comparison to Plummer and Roscoe which feed large, west side residential and commercial communities. The abnormally high numbers on Santa Susana Road might be a result of traffic to the extremely large Church at Rocky Peak. But Traffic that is clustered around church service hours. This portion of the study needs to be revisited.
2. Some of the traffic projects that disperse the soil, and demolition debris truck traffic both north and south on Topanga and onto the 101 and 118 make no sense since all 8 disposal sites listed in the NASA DEIS are located north and east of the SSFL. (2-18,19).
3. The estimated Truck traffic is probably an underestimated figure for the following reasons:
 - 3.a. More soil will be excavated than the 2 foot planned because of soil churning by local rodents, chemical migration, and uneven bedrock structure.
 - 3.b. The replacement of only 1/3 of the original soil is an unacceptable level of remediation. This implies double the truck traffic, necessary to bring in as much soil as removed.
 - 3.c. Unexpected traffic delays, peak traffic issues, less than full loads because of equipment failures, and climatic and weather caused complications.
4. The projected traffic impacts must be adjusted for the current traffic conditions, especially on Topanga Canyon Blvd. Approximately 15 F-Level of service intersections can be counted between the 101 and the 118 freeway. Averaging projected traffic counts over an 8 or 12 hour work day is not valid.

If the F intersections are avoided during peak hours (7-9 am, 11:30-1:30, 4:30-6:30) the 12 hour work days shrinks to 6 viable hours. Furthermore the truck numbers do not count the round trips; up to the SSFL and back down, so all numbers must be doubled.

A suggestion to reduce truck usage is for trucks containing "contaminated soil" should carry "clean" dirt back up. Trucks should not carry "clean soil" for remediation unless they have gone through a rigorous decontamination process. Both soil removal and remediation will probably require separate trucks, each of which will make a round trip.

Using the conservative NASA DEIS figures regarding soil removal; the proposed 38,731 trucks becomes 112,716 trucks trips (from disposal site to SSFL or reversed). If the trucks are scheduled at DEIS suggested 5 minute intervals, it will take 6.3 years of trucks traveling either down or up Woolsey Canyon and down or up Topanga Canyon Road. Since NASA is only 30% of the SSFL site, when we add in comparable truck traffic for the Boeing, DOE areas we actually get 14.6 years of truck traffic. And this is under perfect conditions with no road repairs, no traffic accidents, and no weather delays.

From: [Jason Ricks](#)
To: [Cristina Gispert](#); [Kimiko Lizardi](#)
Subject: Fwd: DDD CA DTSC PEIR 10Feb2014 Re-EDITEDResponse
Date: Wednesday, February 12, 2014 4:49:43 PM
Attachments: [2014 10Feb2014 DDD CA DTSC PEIR Response \(edited\).doc](#)
[ATT00001.htm](#)

And another...

Begin forwarded message:

From: "Malinowski, Mark@DTSC" <Mark.Malinowski@dtsc.ca.gov>
Date: February 12, 2014 at 4:37:08 PM PST
To: Jason Ricks <JRicks@esassoc.com>
Cc: "Hume, Richard@DTSC" <Richard.Hume@dtsc.ca.gov>
Subject: FW: DDD CA DTSC PEIR 10Feb2014 Re-EDITEDResponse

Hello Jason,

The last one. MM

From: Diana Dixon-Davis [<mailto:dixon-davis@hotmail.com>]
Sent: Wednesday, February 12, 2014 4:29 PM
To: DTSC_SSFL_CEQA; Malinowski, Mark@DTSC; Diana Dixon-Davis
Subject: DDD CA DTSC PEIR 10Feb2014 Re-EDITEDResponse

Dear Mark,

I reedited and added a few sentences to explain a point my husband (my editor) did not understand.

Thank-you for the chance to correct my errors.

Diana Dixon-Davis
818/341-4242

Mr. Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826
DTSC_SSFL_CEQA@dtsc.ca.gov

Diana Dixon-Davis
10832 Andora Avenue
Chatsworth CA 91311
818-341-4242
<dixon-davis@hotmail.com>
10 February 2014

**NOTICE OF PREPARATION FOR A DRAFT
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- r) Returning SSFL area to its natural contours, re-vegetation procedures and costs
- s) Preventing additional soil, water, wind erosion
- t) What is the current health risk level of the SSFL? Quantify the current health risks to the surrounding populations posed by current soil, water, and air conditions. Health risks and remediation can not be based on past events. Only currently quantifiable and measurable levels of chemical and radiological contaminants located on the SSFL property, that are scientifically linked to specific illness, can be claimed as part of the cleanup. Because of the current claims of negative health effects of the present day SSFL, CA DTSC needs to first quantify and predict the illness levels caused by the surrounding residential areas. CA DTSC needs to measure the effects of the surrounding communities current contamination by high levels of arsenic, other heavy metals, dioxins from brush fires, dust storms and Valley Fever, spores), air pollutants (cars, trucks, manufacturing, AQMD recognized pollutants), etc.,. The chemical and radiological health risks of the areas outside of the SSFL should be compared to the current health risks on the SSFL property. CA DTSC should also calculate the health risks created by the proposed cleanup measures to the local population. This is one way to differentiate between health risks caused by current conditions on SSFL and those already present in the surrounding area.

GENERAL QUESTIONS TO ADDRESS:

1. Have one major theme and analysis for the PEIR based on an ultimate use of the property as a Park/Open Space/ Recreational area. Most of the local communities surrounding the SSFL do not want SSFL turned into an Industrial Park or millionaire mansions; the consensus of the local community is to transfer the land to Federal, State, County or local cities as a Park/Open Space/ Recreational area.
2. Explain why SSFL require a higher level of cleanup than other more hazardous sites in California? Please list all California sites that were cleaned up to Recreational, Industrial, Suburban Residential, Rural Residential, Agricultural levels. Has some, or all of California agricultural land ever been tested to determine its contamination level?
3. Please answer the questions posed by the U.S. Office of the Inspector General (IG-13-007) 14 Feb 2013. The questions are posed throughout the document. Basic cost/benefit analysis must be included in the DTSC PEIR.
4. The cleanup needs to be health risk based. The CA DTSC must create a new Look Up Table based on scientific, health risk research, with a priority ranking of chemical and radiological contaminants.
5. Cleanup standards need to be uniform over the entire site.

6. Tailor cleanup approach to match the health risk level of each area.
7. There should be no remediation or cleanup measures that can not be easily reversed until after all legal and planning /work plan activities are finalized.
8. Identify clean fill soil in sufficient quantity, that meets the soil contamination levels in the look up table. This soil should also have the same soil composition as found on SSFL. This must be done before beginning to make major cleanup decisions. This factor alone might limit all remediation considerations. Currently no fill has been identified that meets the AOC standards!
9. Why is "Replace all soil removed and return SSFL to its current topography" not proposed? Will the current plan to replace only 1/3 of soil lead to erosion problems? Can re-vegetation be done in the 2/3 of the SSFL with no replacement soil?
10. There needs to be a net health benefit of the cleanup. More moderate cleanup levels (suburban residential, recreational) should be applied to SSFL instead of the proposed CUB level. Research is beginning to show that the health, environmental, cultural, environmental justice, and psychological costs of the AOC proposed cleanup at the SSFL are greater than the supposed health risks of the current SSFL, especially if used as Open Space. Will the CUB actually result in any meaningful reduction of health risks?
11. Determine the human health effects of the naturally occurring high levels of arsenic.
12. Segment Dioxin contamination into that created by local brush fires (naturally occurring for thousands of years) from those created by RP activities. Are the RP's responsible for naturally occurring contaminants, or only contaminants they had control over? Are the RP's responsible for local air pollution, lead from leaded gasoline, nuclear testing fallout, etc.?
13. Can the Buffer Zone be left undisturbed? It was once used as a ranch, grazing, and (I assume) rural residential. Can this area be exempted from soil remediation and immediately be reclassified as Recreation/Parkland?
14. All the traffic, accident, and health consequences of major soil removal must be calculated. Trucks removing contaminated soil/ structures/ etc. CAN NOT be used to haul in "clean fill." How many and what type of trucks will be needed under each of the 6 alternative levels?

Current estimates used by NASA's DEIS seem to be very low. See a re-evaluation under Addendum B Traffic Studies. See new estimates done by David Collins, Mark Sherwin, Dixie Hambrick (MWH) 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

Estimate the number of truck trips, mileage, cost for personnel and trucks, maintenance of trucks, etc.

15. Evaluate and quantify all proposed haul routes. Give proportions of trucks going to central California, Nevada, and Utah land fills (mixed waste facilities?) and those going to metal and other disposal sites to the south. Evaluate and quantify accident risks, green house gases, and air pollution risks * (see Addendum A: Air Pollution) along the haul routes (Lung and Asthma risks to Children along route), Valley Fever risks, truck fumes, deaths per mile.

Calculate the number of trucks needed, and the miles driven (round trip) to waste disposal sites. Estimate the number of deaths and injuries (to pedestrians, school children, truck drivers and other drivers on highways and local roads) caused by the trucks needed to do the soil removal and replacement by cleanup level.

16. Estimate of cost to remediate damage to roads and freeways from the CUB caused increase in truck traffic must be done and added to the cost of SSFL's cleanup.

17. Please see several remediation proposals in Addendum B: Remediation; e.g. add school crossing guards in Chatsworth and West hills; use natural gas powered trucks; use alternative remediation measures to scoop and haul; use in situ soil treatment and remediation measures. Incorporate the exciting and very effective phytoremediation results that are being developed by the STIG. These alternative procedures might be slower but less costly and less environmentally damaging.

18. Impact of clean up on Wildlife corridors and Significant Ecological Areas (SEA's) must be done based on current and peer reviewed ecological studies. U.S. Fish and Wildlife Service (USFWS) should be asked to map and describe the wild life corridors and SEA's on the SSFL and adjacent areas.

19. The negative effects of cleanup and truck traffic on the Chatsworth Nature Preserve must be studied and quantified.

This letter presents the case for the CA DTSC PEIR to be conducted in a comprehensive, complete, scientific, health based, cumulative and legal manner. CA DTSC needs to apply CEQA and NEPA in the conventional manner. Despite the political complexity of this issue the PEIR should be done in a scientific, health risk based, and cumulative manner. All reasonable alternatives should be studied. The usual procedure of determining the future use of the property and then tailoring the cleanup to meet that criteria is probably the best scenario to follow. Currently political forces have decided a level of cleanup based not on measured or quantified risk but a combination of hysteria and bad science. The responsible parties are currently being forced to justify this "Cart before the Horse" scenario.

A "revenge" clean up analysis is inappropriate. A limited analysis dictated by political interference is inappropriate. Both scenarios will lead to further lawsuits and delay. SSFL does not currently warrant a totally new and politically dictated set of new standards and procedures. Currently enacted and settled State and Federal environmental laws dictate procedures that are sufficient to cleanup SSFL.

It is up to CA DTSC, as the agency in charge of all responsible parties in the SSFL issue, to re-rig the cart, put the horse in front and apply a combination of common sense and thoroughness to the PEIR for SSFL.

Diana Dixon-Davis

MA/ Demography, Epidemiology

10832 Andora Ave, Chatsworth CA 91311

(818) 341-4242, Dixon-davis@hotmail.com

A: AIR POLLUTION

Air pollution has been a major focus of Southern California and Los Angeles City Regulators for many years. We have strong environmental laws that govern tail pipe emissions, burning anything, and industrial by-products. To ignore this component in the SSFL cleanup is to not appreciate our unique problems. The LA area, and especially the San Fernando Valley, are in a basin that concentrates air pollution. The dry climate coupled with clear skies and sunshine almost year around leads to smog, heat inversions, and other negative effects on the ambient air.

1. The large number of trucks needed to haul out dirt from the SSFL, will produce large swatches of air pollution all along their routes. Numerous studies have been done on the negative effects of air pollution on Southern California communities.

One of the more recent studies done by McConnell, et al, Department of Preventative Medicine, The Keck School of Medicine (University of Southern California) published in Environmental Health Perspectives, May 2006 and followed by a March 2010 extension has found a significant increase in asthma and decrease in lung capacity of children living and/or going to school within 200 meters of a major roadway (freeway or secondary highway such as SR 27, Topanga Canyon Blvd).

There are 4 public elementary schools (Chatsworth Park, Nevada, Capistrano, and Justice Elementary Schools) one city park (Lanark) , and numerous smaller private schools, day care facilities, etc. within the 200 meters of the haul routes. Chatsworth Park's playground is only about 20 feet from Topanga Canyon Blvd. The majority of the non freeway haul routes are through residential neighborhoods where families with small children live.

The effect of the soil transport to hazardous waste dumps must include not just accident risks to children but also the **life long** effects of the air pollution on their lungs and risk for asthma.

2. These same considerations of added pollution to the air must also be done for the rest of the population living along these haul routes.

3. The current Best Practices of watering down soil, and covering with tarps during transport will not prevent major dispersions of dust and soil along the haul routes. This part of California is usually very dry, strong canyon winds in addition to Santa Ana winds, sunny most of the year, all lead to dusty conditions.

4. Provisions to test for and contain Valley Fever fungus spores (endemic to this area) must be incorporated into any soil removal plans.

B: REMEDIATION

1. The damage done to Woolsey Canyon, Valley Circle, Roscoe, and Topanga Canyon Road by 14.6 years of constant heavy truck travel must be estimated. All the damage to Los Angeles City and Ventura County Roads must be repaired as part of the cleanup, This cost must be factored in the total cost of the CUB level of cleanup or to other alternatives with lower soil removal goals, as presented.

1. The amount of long term Southern Californian air pollution caused by these 113,000 truck trips and damage to the health of the residents of North West Valley must both be measured and mitigated. The use of natural gas or electric powered trucks could result in a major reduction in Green House Gas and other emissions. This remediation measure must be considered and its cost/benefits calculated.

3. Another way to reduce the impacts of the site cleanup is to reduce the amount of demolition and soil removal. The cost/benefit of STIG, phytoremediation, treat in place, encapsulation, etc. and other remediation strategies must be considered.

4. No soil or debris removal during peak traffic hours.

5. A NASA paid crossing guard at the Topanga and Devonshire intersection to protect children

from truck traffic unless prohibition of truck traffic during school arrival and dismissal hours is implemented. Consider crossing guards and extra traffic signals all along the residential portions of the haul routes.

6. HEALTH RISK ASSESSMENTS The current existing total level of health risk to the community that the current SSFL site poses (as is, before cleanup) must be calculated and compared to the postulated "improvements" resulting from the CUB cleanup, in order to see if cleanup achieves a measurable level of improvement to public health.

6.a . Health Risk evaluations must include all realistic ,on-site and off-site risks. The DEIS can not ignore the effects on the surrounding community and on the populations living along the haul routes and proposed dump sites. These health risks include, among others, air pollution, traffic, water usage and run-off, dust exposure, Valley Fever (sometimes lethal fungus infection endemic to area), truck and employee accidents. An analysis of and monitoring of the level of "contamination" in the streams leaving the SSFL site (Bell Canyon, Black Canyon, and all other "blue line" streams) must be done to see if retaining and treating ground and surface water on site is still feasible and required. The lack of information on air pollution caused by CUB projected truck traffic, especially in Woodland Hills, Canoga Park, and Chatsworth is a serious omission. Especially children and adults, will bear heightened health risks.

6.b. The amount of reduction in health risk to the community that each of the 7 alternatives will achieve must be calculated. The total cost to achieve each alternative must be calculated.

6.c. A re-evaluation must be done of the criteria that any one of the 450 chemicals can trigger a cleanup of an area on the site. The actual level of health risk of this one "trigger" must be weighed against the cost to the environment, etc. of this extreme interpretation of cleanup criteria. Arsenic occurs at a naturally high level and is already "exempted" in some cases from triggering total soil removal.

6.d. Under the current LUT and CUB, measuring $\frac{1}{4}$ of a banana and $\frac{1}{16}$ tsp. (a few drops) of beer would qualify soil as contaminated and require removal to a "hazardous" waste site. These levels of

Cleanup stain credulity and require a health risk based evaluation.

7. **Evaluation of the cost/benefits of slower but equally/ almost as effective remediation alternatives** such as phytoremediation (plant based), treat soil and water in place, encapsulation of contaminated soil, and natural attenuation must be done. There is no requirement that the SSFL Cleanup be completed by a date certain, only a politically set date. (ES-3.1.2.2)

8. **Consideration of differential/ alternative cleanup treatments for different areas** within the site must be evaluated. This consideration must be done in regards to the Chumash religious and cultural areas and the Test Stand areas so that these historical sites are preserved and not destroyed or altered by the cleanup process.

9. **Consideration of the ultimate use of the SSFL** as a park and then work backward to re-evaluation of the health risks and the cost/benefits of the entire cleanup with this outcome in mind.

10. **Alternate uses for Federal Funds.** It is quite possible that the funds spent on the highest level of cleanup could be much more effectively used for public health measures that would broadly benefit everyone living around the SSFL site. This might reduce health risks much more than CUB will do. See especially the current use of ground water and wells in the Simi Valley area. NASA and the Federal Government must decide how much money will be spent on this project and to what benefit., especially when many other cleanup projects go unfunded.

C: TRAFFIC STUDIES

1. The NASA DEIS presented traffic studies do not match my on the ground observations. The high traffic levels on Santa Susana Road (a very windy and narrow mountain road) are abnormally high in comparison to Plummer and Roscoe which feed large, west side residential and commercial communities. The abnormally high numbers on Santa Susana Road might be a result of traffic to the extremely large Church at Rocky Peak. But Traffic that is clustered around church service hours. This portion of the study needs to be revisited.

2. Some of the traffic projects that disperse the soil, and demolition debris truck traffic both north and south on Topanga and onto the 101 and 118 make no sense since all 8 disposal sites listed in the NASA DEIS are located north and east of the SSFL. (2-18,19).

3. The estimated Truck traffic is probably an underestimated figure for the following reasons:

3.a. More soil will be excavated than the 2 foot planned because of soil churning by local rodents, chemical migration, and uneven bedrock structure.

3.b. The replacement of only 1/3 of the original soil is an unacceptable level of remediation. This implies double the truck traffic, necessary to bring in as much soil as removed.

3.c. Unexpected traffic delays, peak traffic issues, less than full loads because of equipment failures, and climatic and weather caused complications.

4 The projected traffic impacts must be adjusted for the current traffic conditions, especially on Topanga Canyon Blvd. Approximately 15 F-Level of service intersections can be counted between the 101 and the 118 freeway. Averaging projected traffic counts over an 8 or 12 hour work day is not valid.

If the F intersections are avoided during peak hours (7-9 am, 11:30-1:30, 4:30-6:30) the 12 hour work days shrinks to 6 viable hours. Furthermore the truck numbers do not count the round trips; up to the SSFL and back down, so all numbers must be doubled.

A suggestion to reduce truck usage is for trucks containing "contaminated soil" should carry "clean" dirt back up. Trucks should not carry "clean soil" for remediation unless they have gone through a rigorous decontamination process. Both soil removal and remediation will probably require separate trucks, each of which will make a round trip.

Using the conservative NASA DEIS figures regarding soil removal; the proposed 38,731 trucks becomes 112,716 trucks trips (from disposal site to SSFL or reversed). If the trucks are scheduled at DEIS suggested 5 minute intervals, it will take 6.3 years of trucks traveling either down or up Woolsey Canyon and down or up Topanga Canyon Road. Since NASA is only 30% of the SSFL site, when we add in comparable truck traffic for the Boeing, DOE areas we actually get 14.6 years of truck traffic. And this is under perfect conditions with no road repairs, no traffic accidents, and no weather delays.

Cristina Gispert

From: Frederick Weniger <fweniger@vcnet.com>
Sent: Saturday, December 14, 2013 3:45 PM
To: DTSC_SSFL_CEQA
Cc: Hume, Richard@DTSC
Subject: DTSC SSFL CEQA Comment

This comment (revised), made by me at the 12-14-2013 community meeting at the Simi Senior Citizen's Center, was requested by a DTSC consultant to be included:

It seems to me from the number of attendees here that the most expedient solution for those concerned about SSFL contamination would be to move. However, this is not the answer for those concerned about the approaching radioactive plume from Fukushima in the Pacific Ocean, which affects the entire West Coast of North America. Instead of moving dirt around, I believe a more useful allocation of scarce resources would be to provide for the accurate, convenient, accessible, economical testing of food, etc. in local high schools as is done in the Ukraine in the wake of the Chernobyl disaster. The challenge for our capitalist system would be maintaining the integrity of the testing program against the onslaught of corrupting influences by affected stakeholders.

Frederick Weniger
5434 Katherine St.
Simi Valley, CA 93063
fweniger@vcnet.com
ph: 805-582-1640

p.s. Richard, if you see that the initial recipient above is incorrect, kindly let me know - thanks!



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

November 22, 2013

To: Reviewing Agencies

Re: PEIR for Cleanup of the Santa Susanna Field Laboratory (SSFL)
SCH# 2013111068

Attached for your review and comment is the Notice of Preparation (NOP) for the PEIR for Cleanup of the Santa Susanna Field Laboratory (SSFL) draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Mark Malinowski
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3000

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013111068
Project Title PEIR for Cleanup of the Santa Susanna Field Laboratory (SSFL)
Lead Agency Toxic Substances Control, Department of

Type **NOP** Notice of Preparation

Description The proposed project includes the activities necessary to implement soil and groundwater remediation. The anticipated remediation approaches and methodologies for surface media (soil and related surficial media) will be further defined in Corrective Measures Study work plans to be submitted by The Boeing Company and comparable Soils Remedial Action Implementation Plans to be submitted by DOE and NASA for each of their respective areas at the Santa Susanna Field Laboratory site. The anticipated remediation approaches and methodologies for groundwater will be further defined by the Groundwater Remedial Investigation and CMS being conducted by Boeing, DOE and NASA.

Lead Agency Contact

Name Mark Malinowski
Agency Department of Toxic Substances Control
Phone 916 255 3717 **Fax**
email
Address 8800 Cal Center Drive
City Sacramento **State** CA **Zip** 95826-3000

Project Location

County Ventura
City
Region
Cross Streets Woolsey Canyon Road and N American Cutoff Road
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways No
Airports No
Railways
Waterways No
Schools No
Land Use

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; CA Department of Public Health; Native American Heritage Commission; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4

Date Received 11/21/2013 **Start of Review** 11/22/2013 **End of Review** 12/23/2013

Mariah Mills

From: Joseph Maizlish [jmaizlish@igc.org]
Sent: Friday, February 07, 2014 8:49 PM
To: DTSC_SSFL_CEQA
Subject: PEIR Comments - DTSC Protect the Public, not the Polluters

I have read a claim that the the Department of Toxic Substances Control is not effectively protecting the public from hazardous materials.

This story includes the claim that DTSC is to carry out a 2010 legally binding cleanup and appears to be headed towards ignoring some of the requirements.

I request that the DTSC perform an Environmental Impact Report fully compliant with the 2010 cleanup agreements. I am told that those require cleaning up all the contamination that can be detected to background level as required by those agreements, regardless of which approach is used in the cleanup.

If the claimed facts are correct, then DTSC is failing its duty to protect the public, the land, and the future

Joseph Maizlish

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Laura Hocking/Lori Gregory, Planning

DATE: February 4, 2014

FROM: Alicia Stratton

SUBJECT: Request for Review of the Notice of Preparation for a Draft Programmatic Environmental Impact Report, Santa Susana Field Laboratory, California Department of Toxic Substances Control (Reference No. 13-027)

Air Pollution Control District staff has reviewed the subject notice of preparation (NOP), for a draft programmatic environmental impact report (DPEIR) for this project. The Santa Susana Field Laboratory (SSFL) is located 30 miles northwest of downtown Los Angeles in southeastern Ventura County, near the crest of the Simi Hills at the western border of the San Fernando Valley. A former rocket engine test and nuclear research facility, the 2,849-acre field laboratory is currently the focus of a comprehensive environmental investigation and cleanup program, conducted by Boeing, the United States Department of Energy and the National Aeronautics and Space Administration, and overseen by the Department of Toxic Substances Control. The project entails activities necessary to implement soil and groundwater remediation at the SSFL. The project area is composed of four administrative areas (Areas I, II, III, and IV) and two buffer zones. Area I includes 672 acres; Area II includes 404 acres; Area III is 119 acres; Area IV is 290 acres; The Southern Buffer Zone is 1,143 acres and the Northern Buffer zone is 182 acres.

The NOP identifies probable adverse environmental effects of the project, which include hazards and hazardous materials, air quality, biological resources, traffic, cultural resources, geology, noise, hydrology and water quality. Because the NOP identifies air quality as an area that will probably have adverse environmental effects and impacts from the project, we recommend that the DPEIR evaluate all potential air quality impacts that may result from the project. Specifically, the air quality assessment should consider reactive organic compound, particulate matter and nitrogen oxide emissions from all project-related motor vehicles and construction equipment.

We understand that the anticipated remediation approaches and methodologies for surface media (soil and related surficial media) will be further defined in Corrective Measures Study work plans to be submitted by Boeing and comparable Soils Remedial Action

Implementation Plans to be submitted by DOE and NASA. The DPEIR will establish a framework for "tiered" or project-level environmental documents to be prepared to address further development and refinement of remediation approaches and actions. We recommend that all tiers of the project-level environmental documents resulting from the DPEIR and the Corrective Measures Study work plans evaluate all potential air quality impacts that may result from the project.

Particulates and Air Toxics Evaluations

If the Corrective Measures Study work plans indicate that a large amount of grading is involved, fugitive dust is likely to result. We recommend that a fugitive dust dispersion model and health risk assessment for soil disturbance be performed to assess potential impacts to sensitive receptors in the area from fugitive dust.

The California Air Resources Board (CARB) has identified diesel exhaust particulate matter as a Toxic Air Contaminant (TAC). Diesel exhaust includes hundreds of different gaseous and particulate components, many of which are toxic. The project earthmoving equipment and haul trucks have the potential to expose sensitive populations in the vicinity to elevated levels of diesel exhaust. The District recommends that an air toxics health risk assessment be conducted for the project to assess the potential health risks on any nearby sensitive receptors, such as schools, hospitals, day care centers, retirement homes, and residences from diesel exhaust. Mitigation measures should also be identified and discussed if the assessment indicates a significant risk. Additional information on TACs can be obtained from the District's website at http://www.vcapcd.org/air_toxics.htm. If you have any general questions regarding air toxics, please contact Terri Thomas of the APCD at (805) 645-1405 or by email at terri@vcapcd.org.

Carbon Monoxide

A carbon monoxide screening analysis should be conducted for any project-impacted roadway intersection that are currently operating, or that are expected to operate at, Levels of Service D, E, or F, or at any project-impacted roadway intersection that may be a CO hotspot. If a potential hotspot is identified, the District recommends that a complete CALINE3 or CALINE4 carbon monoxide analysis be conducted for that intersection.

Valley Fever

We recommend that the potential for Valley Fever be addressed in the DPEIR because of the recent fires and potential Valley Fever disturbance on the project site.

Mitigation Measures

If the project is determined to have a significant impact on regional and/or local air quality, the DPEIR should include all feasible mitigation measures. Moreover, any project design features that mitigate air quality impacts should also be described in the DPEIR.

Conformity

This project may be subject to the requirements of the federal General Conformity regulation. Conformity is defined in the Clean Air Act as conformity to an air quality implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards, exacerbate existing violations, or interfere with timely attainment or required interim emission reductions towards attainment. Section 176(c) of the Clean Air Act requires the EPA to develop criteria and procedures for determining the conformity of transportation and nontransportation (general) projects that require federal agency approval or funding with the applicable air quality plan. Although this is not a CEQA issue, we recommend that the DPEIR includes a summary of the federal general conformity rule, which actions(s) related to the project may require a conformity analysis to be performed, and which agencies will likely be involved with the conformity determination(s).

If you have any questions, please call me at (805) 645-1426.

Marina Perez, Public Participation Specialist
Department of Toxic Substances Control
9211 Oakdale Ave.
Chatsworth, CA 91311

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death!

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28859 ROCK CANYON DR
SAUGUS CA 91390-5280



1/26/14

You should concrete that
whole site!
Lorraine Kurowski

Husband always
said - "When I die"
"Shut the lights and
watch me glow!"

Lorraine Kurowski
28859 Rock Canyon Dr
Santa Clarita CA 91390-5280

SANTA CLARITA CA 913

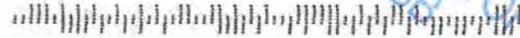
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Mark Malenowski, Project Mgr
Dept of Toxic Substances Control
8800 Col Center Dr
Sacramento, Ca 95826

DTSC
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RASP

95826320000



Mariah Mills

From: margery brown [probationdiva@yahoo.com]
Sent: Wednesday, January 29, 2014 8:43 PM
To: DTSC_SSFL_CEQA
Subject: Fw: Comments for DTSC draft PEIR

On Wednesday, January 29, 2014 8:31 PM, margery brown <probationdiva@yahoo.com> wrote:

Attn: Mark Malinowski, Project Director

The following are my comments regarding the DTSC draft PEIR:

- I. NASA and DOE signed the AOC agreements to clean up the SSFL to background in good faith, and we expect them to abide by their agreement.
 - a. Excuses of having signed the agreement under political pressure are absolutely NOT acceptable and NASA and DOE must accept responsibility for signing the agreement, any possible reasons for doing so..notwithstanding.
 - b. The AOC's do NOT allow for an analysis of or use of alternatives....and this kind of procedure is therefore illegal on this particular occasion.

2. The Santa Susana Field Laboratory (SSFL) has already had an extremely long and shameful record of having been and continuing to be heavily contaminated by radionuclides and toxic chemicals that have:
 - a. Migrated, and continue to migrate to surrounding communities.
 - b. Caused many elevated cases of cancer, according to a number of scientific studies.
 - c. Migration of contamination has been validated by over 100 citations of Excedences by the Water Board. And heavy winds in this area create another pathway for contamination of surrounding communities....literally blowing in the wind.
 - d. Are still present on the SSFL site in spite of previous but inadequate cleanup efforts.....as shown by testing by NASA and DOE.

3. Continuous and non-ending and obvious attempts to frighten the community about all of the truck trips which will supposedly be necessitate by cleanup to background fail to take into account that:
 - a. Treating some of the soil on site will significantly lessen the number of truck trips.
 - b. Three different exit routes from the SSFL will result in approximately one trip each, per hour for the cleanup. (And, for that matter, hundreds and hundreds of truck trips have apparently been acceptable over the many years that the SSFL has existed).
 - c. The DTSC has largely dismissed and not satisfactorily reported on the details of establishing a possible truck route on an existing fire road...to truck the contamination only to the fairly nearby railroad where covered rail cars could then carry the contaminated soil away to a properly licensed outlet.

4. Never ending claims that the SSFL will become "moonscaped" and that historical or cultural treasures will either be harmed or destroyed are without merit since:

a. Many of the areas which still need cleanup have already, previously, been very disturbed, and the AOC's provide cleanup exemptions or consideration for cultural sites on the SSFL... or endangered plant species.

b. Replacement soils will be brought in to replace a lot of the areas that were deeply dug up.

c. A risk assessment approach is NOT acceptable for the signers of the AOC agreement....NASA and DOE.

5. Boeing Corporation did not sign the AOC agreements, but they are, nevertheless, required by law to clean up to the standard of Agricultural or Rural Residential. They are not free to change to an Open Space standard which would leave up to a thousand times more contamination in the soil.

They are not free to manipulate, lower the standard, or to seek the approval or blessings of the DTSC in lowering this standard. They knowingly took ownership of a highly contaminated property, and now THEY NEED TO CLEAN IT UP !!!

6. We will absolutely expect the DTSC to strongly require NASA and DOE to adhere to the AOC agreement which they did knowingly and willingly sign, as responsible and accountable Government agencies.

Margery Brown,

22500-8 Jeffrey Mark Ct.,
Chatsworth, CA 91311-0175



San Fernando Valley Audubon Society

Incorporated as California Audubon Society 1913

P.O. Box 7769 Van Nuys, CA 91409-7769

“For nature education and the conservation of wildlife”

Mark Malinowski, Project Manager
DTSC,
800 Cal Center Drive
Sacramento, CA 95826
Via e-mail to DTSC SSFL CEQA @dtsc.ca.gov

RE: SAN FERNANDO VALLEY AUDUBON SOCIETY COMMENTS ON DTSC
DPEIR SCOPING

The purpose of this letter is to provide comments on behalf of San Fernando Valley Audubon Society (SFVAS) concerning the scoping of the content for the Draft Program Environmental Impact Report (DPEIR) for the Santa Susana Field Laboratory (SSFL) Site to be produced by the California Department of Toxic Substances Control (DTSC) as lead agency pursuant to the California Environmental Quality Act (CEQA).

SFVAS, an approximately two thousand plus member charitable organization, is a chapter of the National Audubon Society with its territory adjacent to SSFL. The chapter has as its mission, in part, the conservation of areas that provide essential habitat for wildlife along with protection of human health from environmental pollution. The chapter has been engaged in clean up issues and the monitoring bird life at SSFL through its San Fernando Valley Bird Observatory unit for approximately four years.

These comments supplement, clarify and expand upon comments made by SFVAS Special Representative for the SSFL Clean-up, Mark Osokow, on December 10, 2013 at the first public scoping meeting held in Chatsworth, California.

INITIAL CONSIDERATIONS

SFVAS supports the 2007 Consent Order entered into with DTSC by the three responsible parties – the Boeing Company, National Aeronautics and Space Administration (NASA), and the U. S. Department of Energy (DOE) – but opposes the 2010 Administrative Order on Consent (AOC) for soil clean-up entered into with DTSC by NASA and DOE. This opposition is based on factors described in previously submitted comments, both orally and in writing, to DTSC, NASA, and DOE on many occasions in public, stakeholders, and technical advisory meetings.

Most recently, SFVAS opposition to the AOC was expressed orally at the last meeting of the SSFL Community Advisory Group (CAG) in January, 2014. Opposition to the AOC was also expressed in written comments submitted in response to the publication of the NASA Draft Environmental Impact Statement. Those written comments, which describe many of the issues that should be considered by DTSC as part of its EIR are herein incorporated by reference. SFVAS will provide electronic copies of these comments to DTSC upon request, if needed. However, electronic copies are also available at <http://foia.msfc.nasa.gov/docs/SSFL/index.html>, the NASA Freedom of Information Act website. In addition, SFVAS commented specifically on the scope of the NASA EIS with regards to the consideration of alternatives in a letter later incorporated into an audit report by the NASA Office of the Inspector General (OIG). The entire report (REPORT NO. IG-13-007), including the SFVAS letter and background material, is available at <http://oig.nasa.gov/audits/reports/FY13/IG-13-007.pdf>. That report is herein incorporated by reference. SFVAS also participated in the DOE EIS scoping process. Comments were submitted orally at the public scoping meetings and also, in writing, as part of the recommendations of the “Orange Group” of stakeholders in the process. The Orange Group recommendations are herein incorporated by reference. DTSC may obtain a copy of the recommendations from DOE; however, they may be obtained from SFVAS upon request.

BACKGROUND AND HISTORY

It is expected that the Draft EIR will include an accurate description and history of the SSFL. The description must discuss the geography, geology, and biological and ecological characteristics of the site as well as site activities and significant events. Past descriptions have underweighted the significance of the site’s biological and ecological significance. In addition, notwithstanding actual concentrations of hazardous chemicals that must be cleaned up, accounts of the history have been greatly distorted by aggressive politicizing by various pressure groups, politicians, and individuals. (For examples, see the NASA OIG Audit Report referenced above.)

Perhaps the most notable examples of distortions relate to the accident at the Sodium Reactor Experiment (SRE) in **1959**, an alleged relationship between cancer cases among workers at SSFL and among residents in the surrounding communities with contaminants at SSFL, and the extent and severity of contamination attributable to site operations (for example, dioxins, which have largely resulted from fire sweeping the site in 2005, arsenic and other mostly naturally occurring chemicals).

It is DTSC’s responsibility to address these and all other such issues in the DPEIR in an unambiguous manner. Concerning the SRE accident, for example, pressure groups have publicized this accident as a nuclear “meltdown.” However, the California Department of Public Health (DPH) recently declared that the accident was not a meltdown (See the DPH response to the Complaint in the present lawsuit by Physicians for Social Responsibility *et al.* v. DTSC and DPH.) DTSC must acknowledge this conclusion by the state agency with the authority and expertise in this type of analysis. The same pressure groups have claimed that a cover up of the accident occurred, whereas the truth is that the accident was reported in area newspapers shortly after the time of occurrence. Concerning the relationship between cancer and SSFL workers or cancer and area residents, a number of epidemiological studies have failed to find any clear relationship. Yet, some members of the surrounding communities continue to insist, without any clear evidence, that contamination at the site has caused or is causing cancer in workers and area residents. The DPEIR must summarize the various

unbiased studies (for example, those not rewarded by special economic incentives or conducted by aggressive advocacy groups assuming facts to achieve a particular outcome) that have been completed; including, their findings with respect to cancer. Concerning the presence of elevated dioxin concentrations on site, only limited direct links to site operations have been found. The impact of the 2005 fire, which swept through approximately 80% of the site, on dioxin production has not been properly analyzed.

DTSC must acknowledge these realities in any summary of the history of the site and stop encouraging, through inaction or otherwise, the proliferation of exaggerated accounts of discharges of radioactive and other substances causing cancer or other ailments along with exaggerated accounts of elevated cancer occurrence supposedly linked to those discharges. A properly targeted DPEIR can only be produced when accurate information is made available to the public. The continued failure to make such information readily available creates the appearance that DTSC is only interested in saving or creating employment positions at the agency, expanding its budget or authority, or avoiding conflict with well-organized radical groups rather than overseeing a responsible clean-up of a contaminated site.

DTSC must honestly consider the nature and extent of contamination at SSFL in relation to those same factors in other developed areas, such as in the San Fernando Valley. While for the purposes of understanding and avoiding in the future the overall impacts of modern industrial activities on contaminant levels in the environment, it is informative to compare contamination at a former industrial site, *i.e.*, SSFL, with relatively pristine background areas, such as those incorporated into the Conejo Valley Open Space District, such a comparison does not produce results that are relevant to current public health concerns in the surrounding highly developed areas. This is because it is likely that such areas are contaminated with the same toxic substances, for example PCB's, PAH's, dioxins, etc. that are being found in the area targeted for clean-up. Therefore, the DPEIR must consider the extent to which the clean-up will contribute to improving public health or reducing risks to public health in the adjacent developed areas. Any such consideration should factor in any increased risks to public health that will be caused by the clean-up activities (see below).

Furthermore, the DPEIR must consider the costs and benefits (including to public health) of clean-up scenarios based on various standards, *i.e.*, background, rural residential, suburban residential, industrial, and park land. Serious consideration should be given to cleaning up the area to a realistic standard based on anticipated future use of the area – in all likelihood, as park land.

SPECIFIC CONTENT

The following table describes an approach to scoping that should fairly address all of the categories outlined in the Community Notice (December, 2013) distributed by DTSC prior to the scheduled scoping meetings. Some categories were renamed, and a Public Health category was added. The table should only be considered suggestive. It is not exhaustive. Certain categories, marked with an asterisk, are discussed further under Special Category Details (following the table). In all cases, impacts can be minimized and mitigation maximized by adopting a more reasonable clean-up standard than clean-up to look-up table values based on background. A park-land clean-up standard is highly desirable; however, clean-up to suburban residential standards is probably acceptable. Furthermore, in all cases, the DPEIR should clearly describe the differences in impact and extent of mitigation needed

from clean-up to the background standard compared to clean-up to the other standards. This comparison should include cost analysis.

CATEGORY	IMPACT	MITIGATION
Aesthetics I	Adverse on vegetation, soils, visibility (dust), neighboring communities.	In case of soil excavation, work through one relatively small unit of area at a time. Restore disturbed vegetation and contours before moving on to the next area. Do not leave excavated ground bare.
Aesthetics II	Adverse on wildlife observation and persistence of wildlife on site.	Minimize intrusions, vegetation and soil removal; see above.
Biological/Ecological Nature*	Adverse on flora, fauna, general ecology, wildlife corridors and linkages	See Aesthetics I & II. Avoid work to the maximum extent possible during wildlife breeding seasons. Avoid known raptor nesting areas. Avoid disturbing sensitive species or their habitats.
Geology, Soils, Seismicity	Adverse to topsoil, erosion, and, possibly, to rock formations harboring sensitive habitats.	Minimize removal of topsoil. Apply soil partitioning, bio-remediation, and phytoremediation principles to remove contaminants where necessary and feasible. Avoid actions that might contribute to rockslides or weaken rock formations.
Traffic and Transportation*	Adverse to West Hills, Chatsworth, Canoga Park and Woodland Hills. Will destroy the Woodland Hills community in the vicinity of Topanga	Minimize truck and other traffic by minimizing excavation, building removal, and installation of clean-up facilities. See Geology mitigations.

	Cyn. Blvd. and Burbank Blvd., if the on-ramp to the 101 Fwy. is used at that location.	
Noise	Adverse to West Hills, Chatsworth, Canoga Park, and Woodland Hills.	See Traffic and Transportation.
Public Services	Adverse to West Hills, Chatsworth, Canoga Park, and Woodland Hills, due to increased traffic interfering with bus and emergency services.	See Traffic and Transportation.
Hydrology, Groundwater & Water Quality	Adverse impact on site, due to removal of water distribution facilities and surface water features.	Retain sufficient elements of water distribution facilities to provide water to ponds on site (such as Silvernale Pond).
Air Quality	Adverse impact on West Hills, Chatsworth, Canoga Park, and Woodland Hills due to air pollutant discharges by truck and other traffic to and from sites and pollutant-containing dust mobilized on site as a result of vegetation clearing	See Traffic and Transportation. Wet down excavated areas, cover, and restore vegetation and contours.
Cultural and Historical Elements	Adverse impact on historical rocket engine test stand areas to the extent facilities are removed.	Permanent loss; cannot be mitigated.
Greenhouse Gas Emissions	Adverse impact widespread in area	See Traffic and Transportation,

	and routes to landfills, due to traffic to and from site. Additional impact to result from vegetation removal.	Biological/Ecological Nature.
Land Use*	Adverse impact to West Hills, Chatsworth, Canoga Park, and Woodland Hills, due to traffic to and from site causing degradation of quality of life in these neighborhoods.	Permanent adverse impact. Cannot be mitigated.
Population and Housing	See Land Use	See Land Use
Utilities	Inevitable temporary adverse impact, due to traffic accidents sometimes involving hit fire hydrants or downed utility poles.	Restore facilities.
Hazardous Materials	Adverse to West Hills, Chatsworth, Canoga Park, and Woodland Hills, due to transport of hazardous materials through these communities and inevitable accidents involving spills.	See Traffic and Transportation, Land Use, and Public Services.
Public Health*	Adverse effects widespread to West Hills, Chatsworth, Canoga Park, and Woodland Hills, due to transport of hazardous materials, traffic accidents, disruption of utilities, and emergency services, pollution from	See Traffic and Transportation, Utilities, Public Services, Air Quality, Noise, Aesthetics I.

traffic, mobilization of hazardous chemicals, etc.
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SPECIAL CATEGORY DETAILS

Biological/Ecological Nature

The category name was changed from “Biological Resources” to reflect that these are not resources for humans to consume but rather elements of nature that are important in their own right. The site supports significant elements of nature that require preservation in order to assure that viable populations of native flora and fauna can continue to exist. This includes flora and fauna that may not now be considered sensitive but which will decline to that level as more and more populations and habitat areas are disturbed, especially in this rapidly developing super-urban area.

Traffic and Transportation

Excessive traffic through neighboring communities will have the effect of making these communities unlivable. Traffic, already heavy most of the time and frequently jammed, will become a daily nightmare with increased traffic jams, accidents, horn honking, pollution from exhausts, and frayed nerves. Emergency and other services relying on clear streets will be disrupted. Residents and businesses in the area will be continually disturbed. People will not want to live or visit such an area. Property values will decline, and businesses will close. Current residents will leave the area, and the area will deteriorate physically and socially.

This is especially true in the area of the 101 Freeway on-ramp at Topanga Canyon and Burbank Boulevards. This area is densely developed with apartments and condominiums housing tens of thousands of people, including many disabled and elderly. The traffic, disruption, noise, and pollution will force many people to relocate. The area will, in effect, be destroyed as a viable residential community. These effects are most likely to occur if the clean-up to background standard is upheld, in which case it is anticipated that more than two million cubic yards of soil will be removed from SSFL and transported through the neighboring communities.

Land Use

As noted in the previous section, neighboring community land use will be severely and permanently adversely impacted by the clean-up.

Public Health

This category was not included in the Community Notice but requires substantial attention in DPEIR. The DPEIR should consider the relative costs and benefits to public health, including risk, under various clean-up scenarios.

CONCLUSION

The DPEIR should clearly acknowledge the adverse impacts that will result from various clean-up scenarios as alternatives. The Administrative Order on Consent (for both

NASA and DOE) should be repealed, based on the severity of adverse impacts, and a new order, applying a less draconian standard, be issued.

SFVAS appreciates the opportunity to participate in the scoping process for the DPEIR.

Sincerely,

Mark B. Osokow,

SFVAS Board Member and

Special Representative for SSFL

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3716
Fax (916) 373-5471
Web Site www.nahc.ca.gov
De_naho@pacbell.net
e-mail: ds_nahc@pacbell.net



January 9, 2014

Mr. Mark Malinowski, Project Manager

California Department of Toxic Substances Control

8800 Cal Center Drive
Sacramento, CA 95826

Sent by FAX to: (916) 255-3734 (5 pages)

RE: CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the "**Santa Susana Field Laboratory EIR Project**;" located in southeastern Ventura County, near the Santa Susana Pass and the Los Angeles County Line, California

Dear Mr. Malinowski:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document. Also, we have revisited this project with representatives of the Santa Ynez Band of Chumash Indians and their contract archaeologists. With them, we have examined the entire site of 2,849-acres, all four areas and the buffer zone. There are more archaeological recorded sites than we previously identified including iVEN-1772 thru 1775, VEN-1065 thru 1068, VEN 1302 and 1303, Ven-1411 thru 1128, VEN-1800 and VEN 1803 thru 1805. Also, this entire area is included in the Native American Heritage Commission's Sacred Lands Inventory as "Santa Susana Sacred Sites & Cultural Landscape," The Santa Ynez Band of Chumash Indians, with NAHC assistance is nominating the entire sacred cultural landscape to be recorded as such with the National Register of Historic Places.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section

21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

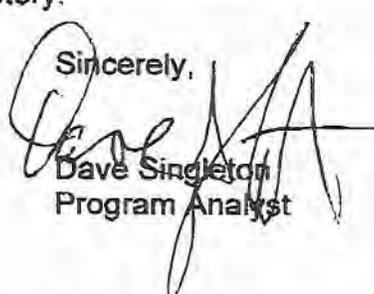
A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. This list may be revised from the one previously submitted in the earlier NAHC letter.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Ventura County California
January 9, 2014**

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes9@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Fernandeño

Patrick Tumamait
992 El Camino Corto
Ojai, CA 93023
(805) 640-0481
(805) 216-1253 Cell

Chumash

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson

P.O. Box 517
Santa Ynez, CA 93460
varmenta@santaynezchumash.

(805) 688-7997
(805) 686-9578 Fax

Chumash

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil

1030 Ritchie Road
Grover Beach CA 93433

(805) 481-2461
(805) 474-4729 - Fax

Chumash

Fernandeno Tataviam Band of Mission Indians

Larry Ortega, Chairperson
1019 - 2nd Street, Suite #1
San Fernando CA 91340

(818) 837-0794 Office

(818) 837-0796 Fax

Fernandeno
Tataviam

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley, CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL

Chumash

Barbareno/Ventureno Band of Mission Indians

Julie Lynn Tumamait-Stenslie, Chair
365 North Poli Ave
Ojai, CA 93023
jtumamait@sbcglobal.net
(805) 646-6214

Chumash

Stephen William Miller
189 Cartagena
Camarillo, CA 93010
(805) 484-2439

Chumash

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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed CEQA Notice of Preparation; Draft Environmental Impact Report (DEIR) for the Santa Susana Field Laboratory Project of the California Department of Toxic Substances Control; located in southeastern Ventura County, California

**Native American Contacts
Ventura County California
January 9, 2014**

Santa Ynez Tribal Elders Council
Adelina Alva-Padilla, Chair Woman
P.O. Box 365 Chumash
Santa Ynez , CA 93460
elders@santaynezchumash.org
(805) 688-8446
(805) 693-1768 FAX

Santa Ynez Band of Mission Indians
Tribal Admin/Counsel Sam Cohen
P.O. Box 517 Chumash
Santa Ynez , CA 93460
info@santaynezchumash.org
(805) 688-7997
(805) 686-9578 Fax

Randy Guzman - Folkes
4676 Walnut Avenue Chumash
Simi Valley , CA 93063 Fernandefio
ndnRandy@yahoo.com Tataviam
(805) 905-1675 - cell Shoshone Paiute
(805) 520-5915-FAX Yaqui

Carol A. Pulido
165 Mountainview Street Chumash
Oak View , CA 93022
805-649-2743 (Home)

Coastal Band of the Chumash Nation
Michael Cordero, Chairperson
P.O. Box 4464 Chumash
Santa Barbara CA 93140
CbcnTRIBALCHAIR@gmail.com

Melissa M. Parrá-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964
(805) 248-8463 cell

Charles S. Parra
P.O. Box 6612 Chumash
Oxnard , CA 93031
(805) 340-3134 (Cell)
(805) 488-0481 (Home)

Frank Arredondo
PO Box 161 Chumash
Santa Barbara CA 93102
ksen_sku_mu@yahoo.com

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**Native American Contacts
Ventura County California
January 9, 2014**

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Consint
P.O. Box 365 Chumash
Santa Ynez , CA 93460
805-688-7997, Ext 37
freddyromero1959@yahoo.
com

Coastal Band of the Chumash Nation
Crystal Baker
P.O. Box 723 Chumash
Atascadero , CA 93423
805-466-8406

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive Chumash
Rancho Pales Verdes CA 90275
310-831-5295

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
805-987-5314

Coastal Band of the Chumash Nation
Janet Darlene Garcia
P.O. Box 4464 Chumash
Santa Barbara CA 93140
805-689-9528

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NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net



December 2, 2013

DEC 05 2013

A handwritten signature in dark ink, appearing to be "EB".

Mr. Mark Malinowski

California Department of Toxic Substances Control

8800 Cal Center Drive
Sacramento, CA 95826-3000

RE: ~~SCH#2013111068~~; CEQA Notice of Preparation (NOP); proposed Mitigated Negative Declaration for the **"PEIR for the the Cleanup of the Santa Susana Field Laboratory;"** located at Wolsey Canyon Road; southeast Ventura County, California

Dear Mr. Malinowski:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document. This location is known to local tribes to be very culturally sensitive.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

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Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

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**Native American Contacts
Ventura County California
December 2, 2013**

Beverly Salazar Folkles
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes9@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Ferrnandeño

Patrick Tumamait
992 El Camino Corto
Ojai, CA 93023
(805) 640-0481
(805) 216-1253 Cell

Chumash

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson

P.O. Box 517
Santa Ynez, CA 93460

varmenta@santaynezchumash.

(805) 688-7997
(805) 686-9578 Fax

Chumash

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil

1030 Ritchie Road
Grover Beach CA 93433

(805) 481-2461
(805) 474-4729 - Fax

Chumash

Fernandeno Tataviam Band of Mission Indians

Larry Ortega, Chairperson
1019 - 2nd Street, Suite #1
San Fernando CA 91340

(818) 837-0794 Office

(818) 837-0796 Fax

Fernandeno
Tataviam

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley, CA 93426
mupaka@gmail.com

(805) 472-9536 phone/fax
(805) 835-2382 - CELL

Chumash

Barbareno/Ventureno Band of Mission Indians

Julie Lynn Tumamait-Stensslie, Chair
365 North Poli Ave
Ojai, CA 93023

jtumamait@sbcglobal.net

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Stephen William Miller
189 Cartagena
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**Native American Contacts
Ventura County California
December 2, 2013**

Santa Ynez Tribal Elders Council
Adelina Alva-Padilla, Chair Woman
P.O. Box 365 Chumash
Santa Ynez , CA 93460
elders@santaynezchumash.org
(805) 688-8446
(805) 693-1768 FAX

Santa Ynez Band of Mission Indians
Tribal Admin/Counsel Sam Cohen
P.O. Box 517 Chumash
Santa Ynez , CA 93460
info@santaynezchumash.org
(805) 688-7997
(805) 686-9578 Fax

Randy Guzman - Folkes
4676 Walnut Avenue Chumash
Simi Valley , CA 93063 Fernandefio
~~ndnRandy@yahoo.com~~ Tataviam
(805) 905-1675 - cell Shoshone Paiute
(805) 520-5915-FAX Yaqui

Carol A. Pulido
165 Mountainview Street Chumash
Oak View , CA 93022
~~805-649-2743 (Home)~~

Coastal Band of the Chumash Nation
Michael Cordero, Chairperson
P.O. Box 4464 Chumash
Santa Barbara CA 93140
CbcnTRIBALCHAIR@gmail.com

Melissa M. Parra-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964
(805) 248-8463 cell

Charles S. Parra
P.O. Box 6612 Chumash
Oxnard , CA 93031
(805) 340-3134 (Cell)
(805) 488-0481 (Home)

Frank Arredondo
PO Box 161 Chumash
Santa Barbara CA 93102
ksen_sku_mu@yahoo.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SSCH#2013111068; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the PEIR for the Cleanup of the Santa Susana Field Laboratory; Ventura County, California.

**Native American Contacts
Ventura County California
December 2, 2013**

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Conslt
P.O. Box 365 Chumash
Santa Ynez , CA 93460
805-688-7997, Ext 37
freddyromero1959@yahoo.
com

Coastal Band of the Chumash Nation
Crystal Baker
P.O. Box 723 Chumash
Atascadero , CA 93423
805-466-8406

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive Chumash
Rancho Pales Verdes CA 90275
310-831-5295

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
805-987-5314

Coastal Band of the Chumash Nation
Janet Darlene Garcia
P.O. Box 4464 Chumash
Santa Barbara CA 93140
805-689-9528

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Mariah Mills

From: North Valley Democratic Club [nvalleydemclub@gmail.com]
Sent: Monday, February 10, 2014 4:15 PM
To: DTSC_SSFL_CEQA
Subject: clean SSFL to background

Follow Up Flag: Follow up
Flag Status: Completed

We, the North Valley Democratic Club, write to you to urge you to ensure a thorough cleanup of SSFL to background. We wish that Boeing were using the same standard. Please do consider ways to reduce impacts on neighbors; but to do so, please do not sacrifice the quality of the cleanup, as described in the AOCs.

You should consider ways to reduce the impact on neighbors that do not reduce the quality of the cleanup. Do more onsite decontamination. Do more to concentrate contaminants that cannot be degraded in order to reduce the amount of gravel that needs to be moved. Consider alternate routes. Consider building new routes that do not pass close to existing neighborhoods. But do not reduce the quality of the cleanup. It must be cleaned to background.

We would like to see the site restored to the condition it was in when NASA and DOE came to the site in the 1940s. The buildings should be removed. Native vegetation should be restored.

The North Valley Democratic Club (formerly the Chatsworth Democratic Club) is the oldest such club in the San Fernando Valley. Our membership is concentrated in the West Valley, close to the SSFL site. Cleaning and restoring the site thoroughly is one of our top priorities.

It is our understanding that the five Democratic Clubs closest to SSFL have all supported a cleanup to background. In addition, the Democratic Party of the San Fernando Valley, a coordinating body for a coalition of 27 Democratic Clubs in and around the Valley, has called for a prompt and full cleanup.

Our club has approved the resolution below.

Richard M. Mathews
President, North Valley Democratic Club

Santa Susana Field Lab Cleanup Resolution

WHEREAS, in 1959 a partial nuclear meltdown and numerous other accidents, spills, and releases resulted in widespread radioactive and hazardous chemical contamination at the Santa Susana Field Laboratory, a former nuclear and rocket testing facility in Ventura County just outside the cities of Los Angeles and Simi Valley, so that the United States Environmental Protection Agency has determined that the SSFL site is eligible for placement on the Superfund List, but the cleanup remains under the management of the California Department of Toxic Substances Control; and

WHEREAS, the United States Department of Energy (DOE) and National Aeronautics and Space Administration (NASA) have entered into agreements with the California Department of Toxic Substances Control (DTSC) to restore the site to its natural state by cleaning up all detectable contamination on their parts of the property to background levels defined by DTSC, but Boeing, which controls the rest of the property, is resisting full cleanup and pushing for most of the contamination at the entire SSFL site to be not cleaned up, and neighbors of the site are concerned about truck traffic from the cleanup; and

WHEREAS more than half a million people live within ten miles of the site, and federally-sponsored studies have found elevated cancer rates among those who worked at the site and in the offsite population associated with how close they live to the site;

THEREFORE BE IT RESOLVED that the North Valley Democratic Club calls for a full cleanup to background levels while mitigating cleanup effects on neighbors including by on-site processing of contaminants and consideration of alternate routes for removal of material that cannot be decontaminated on-site; and

THEREFORE BE IT FURTHER RESOLVED that the North Valley Democratic Club calls on the California Democratic Party, the state of California Governor and DTSC to assure that the agreements with NASA and DOE to clean up all contamination to background are fully and rigorously carried out and calls on the Governor, the legislature, DTSC, and EPA to use all their authority to require Boeing to fully clean up the contamination on the remaining portions of SSFL, and will send this resolution to all parties identified in this paragraph.



February 10, 2014

Mr. Mark Malinowski
Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

By email to: DTSC_SSFL_CEQA@dts.ca.gov

RE: Scoping Comments on Draft Program EIR for Cleanup of the Santa Susana Field Laboratory

Dear Mr. Malinowski:

The Natural Resources Defense Council (NRDC) appreciates the opportunity to comment on the Draft Environmental Impact Statement for the cleanup of NASA's portion of the Santa Susana Field Laboratory (SSFL). NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has worked on nuclear cleanup issues for over four decades, and continues to be engaged in shaping U.S. law and policy on the nuclear fuel cycle.

NRDC has been involved in the SSFL matter for nearly a quarter of a century. We were parties in nuclear proceeding over whether the "Hot Lab" should be relicensed. More recently, we were lead plaintiff, along with the City of Los Angeles and the Committee to Bridge the Gap, in a successful lawsuit in federal court against the Department of Energy (DOE) regarding compliance of its cleanup activities with the National Environmental Policy Act. We also played a supportive role in the 2010 adoption of the Administrative Orders on Consent (AOC) entered into by NASA and DOE with the State of California, requiring the NASA and DOE portions of SSFL to be cleaned up to background.

The Draft Program Environmental Impact Report (PEIR) is to be prepared for the cleanup of SSFL. For the DOE and NASA portions of the property, the cleanup is governed by the AOCs. The PEIR should therefore define the project, for those parts of SSFL, as cleanup to background, consistent with the AOCs. Alternatives that should be considered, other than the standard "No Action" option, should also be compliant with the AOCs (i.e., different ways of achieving the required cleanup to background). DTSC itself made the same point to NASA in the scoping for

the NASA EIS.

Additionally, we are cognizant of the controversy arising from DTSC's approval of Boeing's requests to ship radioactively contaminated debris from demolition of old nuclear structures at SSFL to metal recyclers, municipal landfills, and other facilities not licensed for disposal of radioactive waste. The Sacramento Superior Court has recently issued a preliminary injunction against DTSC, finding potential for a violation of the California Environmental Quality Act. We urge such waste go only to licensed disposal sites and the PEIR include analysis of the cleanup, demolition, and disposal of the remaining buildings and other structures at the site.

In conclusion, we urge DTSC to enforce the AOCs and prepare a Draft PEIR that is fully compliant and consistent with those cleanup agreements, including but not limited to the requirement to clean up the DOE and NASA portions of SSFL to background.

Sincerely,

Geoffrey H. Fettus (electronic signature)

Geoffrey H. Fettus

Senior Attorney

Natural Resources Defense Council

1152 15th St., NW #300

Washington, D.C. 20005

(202) 289-6868

gfettus@nrdc.org

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



February 6, 2014

Mark Malinowski
Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826



RE: Notice of Preparation for Draft Program Environmental Impact Report, Santa Susana Field Laboratory Site, Ventura County, California

Dear Mr. Malinowski:

The State Office of Historic Preservation (OHP) thanks you for the opportunity to comment on the above referenced Notice of Preparation (NOP) for a Draft Program Environmental Impact Report (EIR) to be issued under the California Environmental Quality Act (CEQA). The OHP has broad responsibility for the implementation of federal and state historic preservation programs in California. Under CEQA, OHP is an agency with jurisdiction by law. The focus of this letter is the impact to resources at Santa Susana Field Laboratory (SSFL) that are listed in or eligible for listing in the California Register of Historical Resources, making them historical resources pursuant to CEQA Guidelines § 15064.5(a).

A programmatic CEQA approach to the entire SSFL site(s) by DTSC is complicated by the fact that the site is broken into separate parcels with different ownership (NASA, DOE, and Boeing). To date, DOE has not completed its National Environmental Policy Act (NEPA) or Section 106 analysis. The cleanup at the Boeing site does not occur within a federal nexus. The federal environmental review on the NASA property, which is near completion, has considered only the project level activities that will be carried out on the portions of the site under their jurisdiction. The Program EIR prepared by DTSC needs to contain enough property/project specific information to reasonably relate DTSC's authority and activities at a programmatic level to other existing project level environmental analysis and actions.

The OHP is particularly concerned with an artificial separation between DTSC's cleanup responsibilities and activities from the demolition of historic properties in Area IV and any foreseeable demolition on the DOE and Boeing properties. The NASA DEIS and the proposed NASA section 106 Programmatic Agreement (PA) state clearly that DTSC will provide testing and analysis and establish toxic thresholds that will directly affect the retention and/or demolition of historic properties, specifically the test stand structures and soil removal within the boundaries of the Burro Cave site. The DTSC Program EIR must disclose the relationship between its toxics analysis and threshold determinations and the environmental consequences of those decisions on cultural properties. Segmentation violates the basic principal of CEQA that the environmental consequences of the whole of an action must be considered.

In order to make sure that the interested parties and reviewing agencies can relate the varying authority and diverse actions of several owners and involved agencies at both the programmatic and project specific levels, OHP requests that DTSC include the following information and analysis in the Draft Program EIR:

- The project description should include a clear delineation of the separate properties involved in the project area and the cleanup actions contemplated for each ownership parcel, including projected scheduling;
- A clear explanation of the authority and role of DTSC in the site cleanup and the role of the federal agencies and Boeing with jurisdiction over the parcels
- Disclosure of decision-making responsibility of DTSC in determining what buildings and structures require demolition or removal;
- Disclosure of decision-making responsibility of DTSC in determining what archaeological sites will be disturbed;
- Description of consultation with Native American tribes;
- Disclosure of the Administrative Orders of Consent (AOCs) and the exemption provisions of those agreements and how they will be applied and implemented;
- Clear definition of the process for establishing toxicity thresholds and remediation methods and procedures;
- Criteria and/or thresholds of contamination used to determine retention or demolition of historic buildings and structures;
- Consideration of alternatives that would avoid impacts to historical resources for each of the ownership parcels;
- Consideration of mitigation measures, including which agency(ies) would be responsible for implementation and monitoring of mitigations; and
- Construction monitoring plan.

The OHP has no disagreement that remediation of contamination at SSFL is warranted. However, the potential impacts to historical resources could lead to a substantial adverse change to the resource pursuant to CEQA Guidelines § 15064.5(b). As stated above, the OHP recommends that the DTSC consider alternatives that would avoid substantial adverse changes.

If you have any further questions, please feel free to contact me directly at (916) 445-7050 or Carol.Roland-Nawi@parks.ca.gov.

Sincerely,



Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer

January 9, 2014

Mark Malinowski,
Project Manager
DTSC
CEPA
8800 CAL CENTER DRIVE
Sacramento, CA, 95826



Subject: Comments to Notice of Preparation, PEIR, SSFL, Ventura County, California.

Mr. Malinowski,

Thank you for the opportunity to present my comments to the Notice of Preparation, PEIR, which is critical to providing and thoughtfully considering alternatives in the completion of the environmental clean-up efforts at SSFL.

As a member of the CAG-SSFL, I have signed on to a joint CAG SSFL response and comments to the PEIR. I was also a signatory to the joint CAG-SSFL comment to the DEIS developed by NASA, and also contributed a more thorough individual comment to the NASA DEIS. What follows will be my comments as an individual, to the PEIR(report) as presented.

- A uniform, Risk-Based clean-up process should be applied to the entire property known as Santa Susana Field Laboratory.
- Future Land Use, should govern the criteria, as to the environmental restoration activities to be undertaken at the SSFL site.
- Maximize stakeholder involvement at all phases of any perspective environmental restoration process.
- A thorough explanation of the risks resulting from removing/replacing soils at SSFL, to all affected parties.

Thank you for the opportunity to present my comments to you.

Best Regards,

Poly Georgilas
81 Stagecoach Rd.
Bell Canyon, CA. 91307
Member-CAG-SSFL

Mariah Mills

From: Richard Fish Sr. [pr@liveride.org]
Sent: Sunday, February 09, 2014 7:50 PM
To: DTSC_SSFL_CEQA
Subject: Knolls Resident Comments on DTSC Public Scoping for SSFL PEIR

My Family, Children & now 6 Grandchildren live in the Santa Susana Knolls at the bottom of the mountain on the Simi Valley side just below the Santa Susana Field Lab (SSFL). A thorough cleanup of SSFL is absolutely of utmost importance to me and my family.

I also Pastor a Church in the Knolls that hosts more than 300 people per week with the children playing in the fields and on our property that in rainy weather floods our property from run off from the rest of the mountain. The watershed from SSFL to our drainage ditch that runs the length of our property often overflows our swail to flood our parking lot.

DTSC's draft Program Environmental Impact Report for the cleanup of the Santa Susana Field Laboratory MUST be compliant with the Agreements on Consent (AOCs) to cleanup the NASA and DOE portions of SSFL to background levels of contamination. Any discussion of "alternatives" must be limited to how to cleanup to background, not whether to do so. In addition, the PEIR must include contaminated structure and disposal material.

As you know, SSFL, site of a partial nuclear meltdown and numerous other accidents and spills, is highly contaminated with radiological and chemical contamination that has been migrating offsite for years, and studies have indicated elevated cancers in those exposed. The only way to protect the nearby communities is to clean up the polluted source, SSFL.

DTSC, DOE and NASA committed to clean up all the contamination and must not break their word. The law requires DTSC to ensure that Boeing must clean up to the standard for which the site is zoned, agricultural, the most protective standard. The weak alternative standards pushed by Boeing would result in the great majority of the contamination not being cleaned up, and therefore continuing to keep migrating offsite and putting people at risk of cancer, developmental, neurological, and other illnesses.

Thus, the PEIR must comply with those legal requirements. It must define the project to be carried out as cleanup to background, as required in the AOCs for DOE and NASA, and for Boeing, cleanup to the most protective standard, consistent with current zoning. The alternatives to be evaluated must also be compliant with those legally binding requirements, i.e., they must be alternative ways of meeting those requirements, not alternatives that would breach them.

DTSC must live up to the legally binding AOCs, enforce strictly the law regarding Boeing's cleanup, and defend the people from the polluter, rather than helping out the polluter and putting the public at risk. DTSC has been getting a lot of bad press lately for failing to protect the public from hazardous materials. I urge you to not compound the problem by conducting an environmental report that violates the cleanup agreements, or taking any other action to try to break those obligations.

Most sincerely,
Rev. Rick Fish Sr.

Richard Fish Sr.

Mariah Mills

From: Richard M. Mathews [richardm.dem@gmail.com]
Sent: Monday, February 10, 2014 4:21 PM
To: DTSC_SSFL_CEQA
Subject: implement a prompt and full cleanup of the SSFL site

Follow Up Flag: Follow up
Flag Status: Completed

I write to you to inform you that the Democratic Party of the San Fernando Valley has called for you to implement a prompt and full cleanup of SSFL.

The Democratic Party of the San Fernando Valley is a coordinating body for a coalition of 27 Democratic Clubs in and around the San Fernando Valley, Simi Valley, and the Conejo Valley.

Our organization has approved the resolution below.

Richard M. Mathews
Co-chair, Political Action Committee of the Democratic Party of the San Fernando Valley

Santa Susana Field Laboratory Cleanup

WHEREAS, a partial nuclear meltdown in 1959, chemicals utilized in rocket testing, and numerous other accidents, spills, and releases resulted in widespread radioactive and hazardous chemical contamination at the Santa Susana Field Laboratory (SSFL), a former nuclear and rocket testing facility in Ventura County just outside the cities of Los Angeles and Simi Valley; and

WHEREAS, the United States Department of Energy (DOE) and National Aeronautics and Space Administration (NASA) have entered into agreements with the California Department of Toxic Substances Control (DTSC) to restore the site to its natural state by cleaning up all detectable contamination on their parts of the property to background levels defined by DTSC, but Boeing, which controls the rest of the property, has not entered into the agreement and successfully sued to overturn legislation requiring cleanup to “background levels,” and

WHEREAS, DSTC has begun a CEQA process to evaluate potential environmental impacts relative to the proposed cleanup of the SSFL site, and as part of this process will seek public input on remediation and mitigation;

THEREFORE BE IT RESOLVED that the Democratic Party of the San Fernando Valley calls upon the DTSC, NASA, DOE, and Boeing to implement a prompt and full cleanup of the SSFL site; and

THEREFORE BE IT RESOLVED that the Democratic Party of the San Fernando Valley urges all organizations and other stakeholders in respecting and observing the above principles in evaluating and implementing cleanup operations, also do more to protect the public’s health, safety and welfare,

giving due consideration to minimizing negative impacts of the cleanup on neighbors, including utilizing when possible on-site processing of contaminants, considering alternate routes and methods for removal of material that cannot be de-contaminated on site to reduce traffic, to prevent accidental dissemination of contaminants into the community, preserving and restoring archeological sites and artifacts, and protecting the water system.

Date Passed:

Monday, February 3, 2014



SCOPING COMMENTS ON THE DRAFT PEIR
BY THE ROCKETDYNE CLEANUP COALITION
February 10, 2014

The Rocketdyne Cleanup Coalition (RCC) hereby submits scoping comments for the Draft Program Environmental Impact Report for the cleanup of the contaminated Santa Susana Field Laboratory (SSFL). Since 1989, RCC has worked for the full cleanup of the radioactive and chemical contamination at SSFL, caused by decades of sloppy practices by the Responsible Parties (RPs) and weak oversight and enforcement by the regulatory agencies.

We—and the overwhelming majority of the public that commented during the two comment periods—strongly support the Administrative Orders on Consent (AOCs) for Remedial Action signed between DTSC and NASA and the Department of Energy (2010) in 2010. As you know, there is considerable concern in the community and by its elected officials that DTSC, under the new leadership that entered office in 2011, intends to breach those legally binding cleanup agreements.

The scoping notice mailed out to the public, the Notice of Preparation (NOP) for the Draft PEIR filed with the State Clearinghouse, and the statements made (and not made) by DTSC personnel at the scoping hearings have only further reinforced those concerns. For example, the notice mailed out to interested parties states that, “The California Department of Toxic Substances Control (DTSC) is preparing a Draft Program Environmental Impact Report (PEIR) *to assess alternatives for environmental cleanup* at the Santa Susana Field Laboratory site in Ventura County.” However, for the DOE and NASA portions of the site, no alternative except cleanup to background is permissible under the AOCs; no non-background cleanup alternative is therefore feasible. But the public notice made it appear that DTSC is planning a PEIR that would address alternatives that would violate the AOCs. Indeed, the AOCs were not even mentioned in the public notice mailing.

Similarly, the NOP likewise is silent about the AOCs. It defines the project not as cleanup to background consistent with the AOCs for the DOE and NASA areas, but rather as “The proposed project includes the activities necessary to implement soil and groundwater remediation. The anticipated

remediation approaches and methodologies for surface media (soil and related surficial media) will be further defined in Corrective Measures Study (CMS) work plans to be submitted by Boeing and comparable Soils Remedial Action Implementation Plans to be submitted by DOE and NASA for each of their respective areas at the SSFL site. The anticipated remediation approaches and methodologies for groundwater will be further defined by the Groundwater Remedial Investigation and CMS, being conducted by Boeing, DOE, and NASA.” One will note the complete absence of any reference to the AOCs or to mandatory requirement to clean up to background, despite direct references to CMS work plans and soils remediation action implementation plans.

Lastly, at the scoping hearings, DTSC was repeatedly asked if it was committed to complying with the AOCs and if the PEIR would thus be compliant as well, and DTSC personnel refused to make any such commitment. Instead, they said that the information being gathered was to assist department decision makers on those matters.

However, we do note that Ray LeClerc, DTSC SSFL project director, publicly stated on the record and in express terms at the February 5, 2014 SSFL Inter-Agency Work Group large public meeting in Simi Valley that DTSC was fully committed to carrying out the AOCs and that it would enforce them.

These conflicting signals need to be resolved, once and for all, and by explicit commitment to complying with and enforcing vigorously the AOCs. The PEIR must be fully compliant with the AOCs. That means that the PEIR must define the project—for the DOE and NASA areas—as cleanup to background. And the PEIR alternatives must be limited to ones that are also compliant with the AOCs—i.e., different means of achieving cleanup to background, as required in the AOCs.

In 2012, NASA held scoping hearings for its EIS. At those scoping hearings, NASA proposed a scope that would entail the EIS alternatives being for far less protective cleanup standards than the cleanup to background required by the AOC. The alternatives NASA proposed to examine would have allowed the great majority of the contaminated soil to not be cleaned up.

The NASA attempt produced a huge uproar among the public, and at DTSC. DTSC informed NASA that to proceed as it proposed and consider in its EIS *whether* to comply with the cleanup to background required in the AOC rather than *how* to comply would violate the AOC. DTSC said that consideration of alternatives that violate the AOC would violate the AOC itself. And indeed, the AOC refers to environmental impact reviews being about *how* to meet the AOC cleanup standards.

The DTSC Director and the CalEPA Secretary flew to Washington, D.C., to press the matter and prevent an EIS that would violate the AOC. The

Council on Environmental Quality weighed in, making clear that under NEPA alternatives that are not feasible need not be examined in an EIS and that alternatives that would violate the AOC are not feasible. (CEQA has a parallel provision.) In response to CEQ and to DTSC, NASA backed down and agreed to perform an EIS in which the alternatives considered were limited to those compliant with the AOC. The project was defined as cleanup to background and the alternatives as alternative ways of doing that.

But now it appears unclear whether DTSC is trying to violate the AOC in the preparation of its PEIR in precisely the way NASA had tried with its EIS to which DTSC had strenuously objected. DTSC must promptly act, affirmatively, to establish a scope that is AOC-compliant.

Therefore:

1. For the DOE and NASA parts of the property, the project must be defined as cleanup to background as required by the AOC.
2. The alternatives must be limited to alternative ways of achieving cleanup to background, as required by the AOC.
3. In light of the Sacramento Superior Court ruling of a probable CEQA violation by DTSC in approving dismantlement and disposal of potentially contaminated debris in recycling facilities and municipal and other landfills not licensed for low-level radioactive waste (LLRW), the PEIR must include demolition and disposal and assure the latter only occurs in sites licensed for LLRW.
4. For the Boeing areas not covered by AOCs, the project must be compliant with law, regulation and policy. We are not here referring to SB990, which has been challenged in court by Boeing, but to the pre-existing requirements unaffected by that challenge. DTSC has made clear that it is generally required to assure cleanup to standards fitting current land use designations. SSFL is zoned agricultural; and the lands around it are zoned agricultural; and the County general plan has specified the land use permitted as including agricultural. Therefore, the project must be cleanup to standards associated with current zoning, and the alternatives must be limited to those that can achieve that.

Additionally, the PEIR should take a thorough look at alternative transportation options: natural gas-powered or electric-powered trucks; alternative routes; dispersing trucks over different routes to reduce impacts in any one place; upgrading fire and service roads as alternative routes off the property; enclosed conveyor mechanisms; and particularly, getting by truck with bimodal cannisters or by conveyor down to railroad spurs and transport by rail.

One additional point of importance. NASA used (or misused) its EIS not as an honest assessment of impacts, alternatives, and mitigation measures but as propaganda for why it should be permitted to breach its solemn obligations in the legally binding AOC. The focus was all on trucks, vegetation, etc., all hyped tremendously; but with no honest discussion of the contamination and environmental damage from that pollution that the cleanup is designed to redress.

The eyes of the community will now be on DTSC to see if its professed commitment to rigorous compliance with and enforcement of the AOCs is empty promises or real. If DTSC allows a PEIR that is propaganda for breaking the agreements, and if the PEIR itself, by definition of the project and alternatives that in themselves violate the AOCs, it will be clear that the Department is indeed captured by the polluter interests it is supposed to be regulating. If, however, DTSC insists on DOE and NASA living up to the AOCs, and performs an honest PEIR that is compliant with the AOCs and truthfully deals with the tremendous environmental damage decades of irresponsible environmental stewardship has created and that needs to be fully remediated, the community will see that DTSC was true to its word. Time will tell.

Mariah Mills

From: Sandy Capaldi [scapaldi@outlook.com]
Sent: Saturday, February 08, 2014 9:46 AM
To: DTSC_SSFL_CEQA
Subject: Comments on DTSC Public Scoping for SSFL PEIR

OMG! Comply with the AOCs. Just because you are bigger and have more money doesn't mean that you DONT HAVE TO FOLLOW THE LAW!!!
OUR HEALTH and our CHILDREN'S HEALTH is at RISK.

Does anyone REALLY CARE?????????

From where I sit that answer is a resounding NO!

Sandy Capaldi



Santa Ynez Band of Chumash Indians

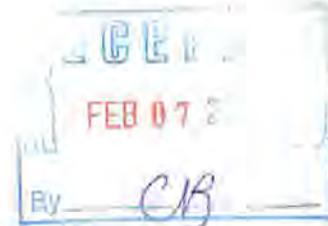
P.O. Box 517 • Santa Ynez, CA 93460
805-688-7997 • Fax 805-686-9578
www.santaynezchumash.org

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David D. Dominguez, *Committee Member*
Gary Pace, *Committee Member*

February 5, 2014

Mark Malinowski,
Project Manager
Department of Toxic Substances Control
California Environmental Protection Agency
8800 Cal Center Drive
Sacramento, CA
95826



Subject: Comments to Notice of Preparation, Programmatic Environmental Impact Report, Santa Susana Field Laboratory (SSFL) Site, Ventura County, California.

Dear Mr. Malinowski:

The Santa Ynez Band of Chumash Indians ("Tribe") appreciate the opportunity to provide comments to the Notice of Preparation Programmatic 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 ENTIRE SSFL SITE MUST BE ANALYZED AS A TRADITIONAL CULTURAL LANDSCAPE

This constitutes a project for the purposes of CEQA and the lead agency has a duty to prepare an Environmental Impact Report ("EIR") to assess the potential environmental effects of the proposed project and identify mitigation measures that could reduce or avoid potential environmental impacts. CEQA Guidelines at 14 CCR 15121(a). The lead agency must consider direct physical changes in the environment and reasonably foreseeable indirect changes in the environment which may be caused by the project and to mitigate or avoid the significant effects on the environment of projects whenever feasible. Public Resources Code (PRC) Secs. 21083.2 – 21084.1 and 21002.1; CEQA Guidelines at 14. CCR Sec. 15064(d). CEQA provides for the protection of unique archaeological resources and historic resources. PRC secs. 21083.2 and 21084.1. A project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment. 14 CCR sec. 15064.5(b). Thus the lead agency has a duty to avoid substantial adverse changes to historical and cultural resources.

Furthermore, the Governor's Office of Planning and Research (OPR) has observed that California Executive Order W-26-92 affirms that all state agencies shall recognize and, to the extent possible, preserve and maintain the significant heritage resources of the State. See Tribal Consultation Guidelines (Interim), March 1, 2005 at p. 7. California state law includes a variety of provisions that promote the protection and preservation of Native American cultural places. Id.

AUTHORITY TO IDENTIFY CULTURAL RESOURCES

CEQA provides that certain historical resources are presumed to be historically or culturally significant for the purposes of CEQA. See PRC Sec. 21084.1. Additionally, CEQA provides that, even if a resource has been identified as significant pursuant to one of these mechanisms, a lead agency has the discretion to determine whether the resource may be a historical resource for the purpose of CEQA. Id. The CEQA Guidelines further clarify the authority of a lead agency to determine the presence of historically significant resources:

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant to in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the record.

CEDQ Guidelines at 14 CCR sec. 15064.

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in CRHP, which include the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- (B) Is associated with the lives of persons important in our past.
- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA Guidelines at 14 CCR at Sec. 15064.5

Thus, provided there sufficient evidence, there is authority to identify resources of historic significance even if such historic resources have not been previously identified. In fact, in light of the recommendations regarding the protection of traditional tribal uses, the lead agency appears to have an obligation to evaluate ongoing traditional tribal uses as significant historic resources in the CEQA process.

CULTURAL LANDSCAPES

A historic property may be a cultural landscape and it may be based on traditional uses of natural resources. The Department of State Parks has interpreted historic resources to include "cultural landscapes" and has looked to federal guidance interpreting the National Historic Preservation Act (16 U.S.C. sec. 470, et seq.) to define what resources may be designated a cultural landscape. See www.parks.ca.gov/default.asp?page_id=22854 (examples such as Golden Gate Park and Lake Shasta). Consistent with federal guidance, the State Parks website explains that the term "cultural landscape is an umbrella term that includes four general landscape types: historic designated landscapes, historic sites, and ethnographic landscapes which are defined in the National Park Service, Preservation Brief 36, Protecting Cultural Landscapes (Brief 36). Id. Brief 36 defines a cultural landscape to be a "geographic area, including both cultural and natural resources and the wildlife and domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." In the definition of ethnographic landscape, Brief 36 also notes that subsistence of often a component of the landscape.

After reviewing the various types of cultural landscapes, State Parks identifies a list of themes in California history that are recognized as cultural resource deficiencies in the State Parks System. With regard to significant properties, State Parks offers the following themes:

- Settlement and Subsistence Patterns;
- Special Adaptations and Environmental Management;
- Trade and Movement; and
- Ideology (e.g. sacred sites, petroglyph and pictograph sites, intaglios).

California State Parks website at www.parks.ca.gov/default.asp?page_id=22854.

The California Environmental Resources Evaluation System (CERES) has also issued guidelines for monitors and consultants working with Native American cultural, religious, and burial sites, which describe the scope of historical resources. Guidelines for Monitors/Consultants Native American Cultural, Religious, and Burial Sites, <http://ceres.ca.gov/nahc/guidelines4non.html>. Consistent with State Parks interpretation of cultural landscapes, these guidelines advise that historic resources can include Native American graves and artifacts; traditional cultural landscapes; natural resources used for food, ceremonies or traditional crafts; and places that have special significance because of the spiritual power associated with them. Id.

The protections of historic and cultural resources under CEQA and the National Historic Preservation Act are interrelated, and as noted above, the State Parks looks to federal policy documents with respect to evaluating historic and cultural resources. Similarly, the National Parks Service guidelines for cultural resources management help illustrate the connection between cultural landscapes and traditional uses. The National Parks Service recognizes that "[e]thnographic resources are basic expressions of human culture

and the basis for continuity of cultural systems” and they are not limited to things commonly thought of as cultural resources. See NPS-28, Cultural Resource Management Guideline, issued pursuant to Director’s Order #28. “A cultural system ... includes traditional arts and native languages, religious beliefs and subsistence activities.” Id. “Ethnographic resources are variations of natural resources and standard cultural resource types. They are subsistence and ceremonial locales and sites, structures, objects, and rural and urban landscapes assigned cultural significance by traditional users.” Id. When natural resources acquire meaning according to different cultural constructs of a particular group, they become ethnographic and thus cultural resources as well, and the heritage significance of the natural resources may be related to religious, healing, and subsistence. Id.

RECENT FIFTH CIRCUIT CA COURT OF APPEALS DECISION THAT PROTECTS TRADITIONAL CULTURAL PLACES (TCPs) AS PART OF THE CEQA AFFECTED ENVIRONMENT

MADERA OVERSIGHT COALITION CASE CITATION AND ABSTRACT:

http://www.narf.org/nill/bulletins/state/documents/madera_oversight_v_madera.html

Court of Appeal, Fifth District, California.

MADERA OVERSIGHT COALITION, INC., et al., Plaintiffs and Appellants,

v.

COUNTY OF MADERA, Defendant and Appellant;

Tesoro Viejo, Inc., et al., Real Parties in Interest and Appellants.

No. F059153, Sept. 13, 2011.

CEQA requires consideration of project impacts on either archaeological sites or historical sites deemed to be historical resources. If the project will cause a substantial adverse change to the characteristics of an historical resource that conveys its significance or justifies its eligibility for inclusion in the California Register, the project is judged to have a significant effect upon the environment, according to Section 15064.5 of the CEQA guidelines. Five of the seven resources in the Project Area are considered historical resources: CA-MAD-295/827, 826, 2392, 2394 and P-20-002308. In addition, there are areas that are of special religious or social significance to the Native Americans (e.g., Traditional Cultural Properties) in the Project Area. [¶] Based on the current project design, all historical resources and the sites of special religious or social significance within the Project Site may be impacted by the proposed development, either directly or indirectly.

2. Specific rules for historical resources of an archaeological nature

Guidelines section 15126.4, subdivision (b) addresses mitigation measures related to impacts on historical resources. When the particular historical resource is archaeological in nature, the discussion contained in the EIR is governed by subdivision (b)(3) of that guideline, which provides in part:

“Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archeological site:

“(A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

*84 “(B) Preservation in place may be accomplished by, but is not limited to, the following:

“1. Planning construction to avoid archaeological sites;

“2. Incorporation of sites within parks, greenspace, or other open space;

“3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.

“4. Deeding the site into a permanent conservation easement.

“(C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall **653 be prepared and adopted prior to any excavation being undertaken...” FN16

FN16. These provisions apply to archaeological sites that are historical resources. Archaeological sites that are not historical resources are subject to different requirements. For example, when a site meets the definition of a unique archaeological resource and is not an historical resource, it is treated in accordance with the provisions in section 21083.2, not Guidelines section 15126.4, subdivision (b)(3). (Guidelines, § 15064.5, subd. (c)(3).) As a result, unique archaeological sites that are not historical resources are subject to less stringent requirements regarding mitigation of impacts.

CONCLUSION

The Tribe appreciates your consideration of the entire SSFL site as a traditional cultural landscape and sacred site. These comments also incorporate by reference that Sacred Lands filing for the entire SSFL site made with the Native American Heritage Commission on January 8, 2014, a copy of which without any confidential appendices is attached for your convenience.

Sincerely,



Vincent P. Armenta,
Tribal Chairman



Santa Ynez Band of Chumash Indians

P.O. Box 517 • Santa Ynez, CA 93460
805-688-7997 • Fax 805-686-9578
www.santaynezchumash.org

BUSINESS COMMITTEE
Vincent Armenta, Chairman
Richard Gomez, Vice Chairman
Kenneth Kahn, Secretary/Treasurer
David D. Dominguez, Committee Member
Gary Pace, Committee Member

January 8, 2013

State of California
Native American Heritage Commission
915 Capitol Mall Room 364
Sacramento CA 95814

RE: Santa Susana Field Laboratory, Areas I, II, III & IV and Buffer Zones
Request for listing by State of CA as a sacred site and cultural landscape

Members of the Commission:

The rocky hills and beautiful canyons that are located in the Simi Hills are well known to the Chumash and Fernandeno peoples as places where we lived and where we worshiped. Tribal Elder, recently deceased, Charlie Cook previously requested that the "Burro Flats Pictograph Cave" site (AKA the Burro Flats site), also be listed by the State of California as a sacred place.

Since that time the Chumash people have come to realize that the entire Santa Susana Field Laboratory site, both NASA, Boeing and other parcels I, II, III & IV, and surrounding buffer zones need to collectively be listed by the State of California as a sacred site and cultural landscape. We want to do everything possible to make sure that the entire site and the surrounding canyon, is recognized by the State of California as a sacred place cultural landscape, and is given the protection that it deserves. NASA is about to relinquish ownership of the site, and at this time it is not clear who will own, manage, and protect the area, in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Armenta".

Vincent P. Armenta
Tribal Chairman

**Native American Heritage Commission Sacred Lands Inventory
Santa Susana Sacred Sites and Traditional Cultural Landscape**

NAHC Site No: _____

Date Entered: _____

Site Name: The (Former) Santa Susana Field Laboratory

Counties: Ventura County

Location: Eastern Simi Hills

The nomination includes archaeology sites #s:

CA-VEN-151 through CA-VEN-161
CA-VEN-1065 through CA-VEN-1068
CA-VEN-1072 (NRHP #76000539; Listed as Sacred Land by CNAHC)
CA-VEN-1302 and CA-VEN-1303
CA-VEN-1411 through CA-VEN-1428
CA-VEN-1772 through CA-VEN-1775
CA-VEN-1800
CA-VEN-1803 through CA-VEN-1805

Plus +50 prehistoric isolated artifacts not listed here

And all recently discovered sites in Area I, Area III, and the Southern Undeveloped Area

And while not part of the sacred site listing, other historic resources also exist at the field lab, including:

The National Register Eligible Alfa Test Area
The National Register Eligible Bravo Test Area
The National Register Eligible Coca Test Area

Ownership

Area I, Area III, Area IV, the Northern Undeveloped Area, and the Southern Undeveloped Area

Owner Name: Boeing Company
Santa Susana Field Laboratory
attn: David W. Dassler
Address: 5800 Woolsey Canyon Road
Canoga Park CA 91304-1148

Area II and a small part of Area I

Owner Name: National Aeronautics and Space Administration
attn: Allen Elliott
Program Director Santa Susana Field Laboratory
Address: Marshall Space Flight Center
AS 01
Huntsville AL 35812

Headquarters: National Aeronautics and Space Administration
attn: Mr. Charles Bolden, Administrator
attn: Ms. Olga Dominguez, Assistant Administrator for Infrastructure
Administrator's Office, 9th Floor
300 E Street S.W.
Washington D.C. 20546-0001

Area IV (Managed by the United States Department of Energy)

Attn: Department of Energy
attn: John Jones
Address: 4100 Guardian Street, Suite 160
Simi Valley CA 93063

Headquarters: U.S. Department of Energy
attn: Dr. Ernest Moniz, Secretary of Energy
100 Independence Ave. SW
Washington D.C. 20585

USGS Quad Calabasas 1952/1967 Quad/Topographic map T2N R17W SBBM.
The entire SSFL area is part of the Mexican Period Rancho Simi land grant.

Sacred Site Type / Additional Features

Ethnographic information collected by J.P. Harrington 1916-1917, archaeological and archaeoastronomical studies performed from the 1950s to the 1990s, and most importantly, direct observation by contemporary Native Americans and locally knowledgeable archaeologists, shows that the entire SSFL area is a Traditional Cultural Landscape, and that it includes Sacred/Power areas and Worship/Ritual areas. The site complex present at the SSFL also includes Polychrome and Monochrome pictographs, several loci of Cupules, and a few simple Petroglyphs. The size and the depth of the midden at CA-VEN-1072, and supporting ethnographic information, show that a Village Site was present, and a careful examination of the archaeological deposit at this site would probably show that House Pits are or were present. There are numerous Rock Shelters and

occasional small Caves at the SSFL, and numerous Bedrock Mortars are also present at multiple locations. The often lush native vegetation shows that almost all of the SSFL would also have been a Collection Area. Additionally, Lithic Scatters, including especially fused shale and quartzite, are common across essentially the entire SSFL.

Documentation

Comments on the Documentation.

Until recently, the only part of the Santa Susana Field Lab which written archaeological studies were available for was the National Register of Historic Places Burro Flats Painted Cave site (CA-VEN-1072). Almost all of this information concerns the main Locus 10 panel, and most of this is description of and theories about the paintings and their interpretation. No written study of the many artifacts recovered at the site has ever been written. Available written information has recently been summarized in Knight (2012). In 1917 local Native Americans specifically mentioned the Burro Flats village to John Peabody Harrington (see Attachments 4 and 7).

Attached you will find the following:

- 1- The National Register of Historic Places application for "Burro Flats Painted Cave." The NRHP # is 76000539.
- 2- Recent Investigations at Burro Flats (CA-VEN-1072), Ventura County, California, By Albert Knight. Society for California Archaeology Newsletter 29 (5), December 1995:11-12.
- 3- CA-VEN-1072 Site Record Supplement. By CH2M Hill 2007.
- 4- Three Chumash-Style Pictograph Sites in Fernandeno Territory. By Albert Knight. Society for California Archaeology Proceedings, Volume 26, 2012.
- 5- Integrated Cultural Resource Management Plan for Santa Susana Field Laboratory Ventura County, California, January 2009-2013. Prepared by Marshall Space Flight Center. Huntsville, Alabama. Contains detailed information on Area II
- 6- A copy of the Final Report Cultural Resource Compliance and Monitoring Results for USEPA's Radiological Study of the Santa Susana Field Laboratory Area IV and Northern Buffer Zone, Ventura County, California. By John Minch and Associates, Inc. Contains detailed information on Area IV. Site Records not included.

Other important references (not included here) include:

- 7- J.P. Harrington's 1916-1917 San Fernando Valley Field notes: Fernandeno, Reel #106. See 106-117:3:1 to 106-117:5-7, and 106-153:6:1 to 153:6:3. Includes oldest known references to the Santa Susana Field Lab area.
- 8- The First Angelinos - The Gabrielino Indians of Los Angeles (1996 Malki Museum Press/Ballena Press), which provides a good summary of Harrington's notes on the Burro Flats area (Plate 3, pp. 38, 158-161, 166-168).
- 9- State of California Sacred Lands Nomination for the Burro Flats Painted Cave Site (CA-LAN-1072) by Charlie Cooke and Albert Knight. September 11, 2013. On file Native American Heritage Commission, Sacramento, California.

California Indian Consultant

Santa Ynez Band of Chumash Indians
attn: Chairman Vincent P. Armenta
P.O. Box 517
Santa Ynez CA 93460

Facilitator

Albert Knight
1731 Riverside Drive
Glendale CA 91201 818-426-4730
ahunknight@msn.com
Chair Los Angeles/Ventura Cultural Research Alliance

Comments / Location Description

The former Santa Susana Field Lab is located on private land in the eastern Simi Hills. The main uses of the field lab were rocket engine testing and atomic energy research. Due to the sensitive and dangerous nature of the uses of the field lab, the public has been almost entirely excluded from access to the area since the late 1940s. Although there have been significant negative impacts to some areas, other areas remain in a mostly natural state. It is now known that prehistoric archaeological sites are common in almost all of the less disturbed areas (at least where recent archaeological surveys and monitoring have taken place, and shown them to be present). Reports for the archaeology in Area II, Area IV, and the Northern Undeveloped Area now exist (see Documentation, Attachments 5 and 6). A draft report for the archaeology of Area I, Area III, and the Southern Undeveloped Area, has recently been provided to the Boeing Company by the CRM firm John Minch and Associates. The report will be available sometime in early 2014.

The best known and possibly the most important location in the greater SSFL site complex is the "Burro Flats Painted Cave." It is of special interest that the "main panel" of paintings is still very bright, especially some of the red paintings. Given the freshness of many of the paintings and given the isolation of the area where the Painted Cave is located, it is likely that the "Burro Flats" site may have been one of the last, if not the last, important ceremonial site in the general region. Even so, we have no way of knowing exactly who the last of the "Old Ones" were, no way of naming the last natives- probably born in the 19th century- who continued to visit Burro Flats during the first decades of the 20th century. Perhaps it was Juan Melendrez of El Escorpion, who was one of the consultants for John Peabody Harrington, in 1917. In any event, the entire Santa Susana Field Laboratory, as well as much of the area surrounding the Field Lab, would have been utilized by the inhabitants of the Burro Flats village.

Beginning in the mid-1970s individual Native Americans were granted occasional access to the Burro Flats Painted Cave area. Access for Native Americans gradually became less restrictive during the last decade of the 20th Century. The first part of the 21st century has seen an even greater easing of access restrictions for Native Americans. All of those who have had the opportunity to visit agree that the Burro Flats Painted Cave and the surrounding Santa Susana Field Laboratory (where numerous Native American sites are now known to exist) are part of a large and important Traditional Cultural Landscape. Today, many indigenous people consider the Burro Flats Painted Cave to be a very important shrine site, and feel strongly that it and the surrounding area are important to their culture. It is for this reason that the Elder's Council of the Santa Ynez Band of Chumash Indians has requested that the entire former Santa Susana Field Lab be described as the Santa Susana Sacred Sites and Traditional Cultural Property, by the State of California.

Cristina Gispert

From: Deanna Hansen
Sent: Friday, December 27, 2013 12:55 PM
To: Jason Ricks; Cristina Gispert
Subject: Fwd: Santa Suzana Field Laboratory Site, Venrtura County DPEIR

Deanna Hansen

Begin forwarded message:

From: DTSC_SSFL_CEQA <DTSC_SSFL_CEQA@dtsc.ca.gov>
Date: December 27, 2013 at 12:11:10 PM PST
To: "Malinowski, Mark@DTSC" <Mark.Malinowski@dtsc.ca.gov>, "Deanna Hansen (DHansen@esassoc.com)" <DHansen@esassoc.com>, "Hudson, Kimberley@DTSC" <Kimberley.Hudson@dtsc.ca.gov>
Subject: FW: Santa Suzana Field Laboratory Site, Venrtura County DPEIR

From our public comment email address

From: Gordon Mize [<mailto:gmize@aqmd.gov>]
Sent: Thursday, December 26, 2013 9:40 AM
To: DTSC_SSFL_CEQA
Subject: Santa Suzana Field Laboratory Site, Venrtura County DPEIR

Mr. Mark Malinowski, Project Manager
Department of Toxic Substances Control
Sacramento, CA

The SCAQMD staff has received the Notice of Public Comments for the proposed Notice of Preparation for a Draft Program EIR for the proposed Santa Susana Field Laboratory Site in Ventura County. Although the proposed project will occur in an area that falls under the jurisdiction of the Ventura County Air Pollution Control District, the proposed project could result in activities including truck traffic hauling soils in and out of the project area to and from destinations within the boundaries of the South Coast Air Basin (SCAB).

In addition to the Draft Program EIR containing emission estimates for potential soil hauling emissions that could occur with the SCAB, the SCAQMD staff will send to your attention a letter outlining other air quality information affecting the SCAB we would like included in the draft CEQA document.

If you have any questions, please feel free to contact me.

Sincerely,

Gordon E. Mize
Air Quality Specialist
South Coast Air Quality Management District
CEQA Section, Inter-Governmental Review
(909) 396-3302 phone

(909) 396-3324 fax
gmize@aqmd.gov



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

January 3, 2014

Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Notice of Preparation of a CEQA Document for the Santa Susana Field Laboratory Site Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at:

<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at:

http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources



January 9, 2014

Mr. Mark Malinowski, Project Manager
Department of Toxic Substances Control
 8800 Cal Center Drive
 Sacramento, CA 95826

via: e-mail (dtsc_ssfl_ceqa@dtsc.ca.gov)

Re: Santa Susana Field Labs

Dear Mr. Malinowski:

We thank you for helping to arrange Roger Paulson's attendance at the meeting of the Woodland Hills-Warner Center Neighborhood Council on December 11, 2013. He briefed us on the plans the DTSC is considering for the clean-up of the former Santa Susana Field Laboratory. Unfortunately, Mr. Paulson was not able to answer many of our questions, partly because he was not familiar with the NASA Draft Environmental Impact Statement, and partly because these questions dealt with matters outside his area of expertise.

We are concerned about how DTSC has done their outreach. The WHWCNC and the community at large have not been adequately informed as to how and why the cleanup decisions are being made. We would like DTSC to engage more community groups in their outreach including the neighborhood councils, schools, churches, and homeowners associations.

We believe that the public comment period should be extended for at least six months and preferably a year depending upon your ability to do effective outreach to a broad swath of the community.

There is too little outreach, too little education, and many unanswered questions. In our opinion, there appears to be a lack of cooperation between the agencies so that the activities related to the cleanup are disjointed. It is nearly impossible for a layman in our community to get a comprehensive understanding of the problems associated with the site. We need an executive summary that covers all areas of concern and by all involved agencies and responsible parties. We really don't know what our concerns should be due to lack of outreach to our community. The project issues to be discussed, according to your handout, are secondary in nature relative to the primary issues of concern to us - which are that we have not been educated by the appropriate agencies. It is your agency's responsibility to educate the community on this project.

We have several questions that need to be answered before we can intelligently comment on the scope of the planned Environmental Impact Statement. Some of the questions are as follows:

1. DTSC needs to explain what were the past hazards related to the SSFL site, what they are today, and what are the anticipated problems based on the various choices for cleanup.
2. We would like to know who is making the cleanup decisions.
3. In our comments to NASA, the WHWCNC expressed its concern that thousands of the trucks were anticipated to enter our community. What is unknown at this time are the number additional trucks from Boeing and the Department of Energy.
4. What traffic studies have been done relative to the impact on the communities of all these trucks?
5. What potential hazards are created by the trucks and their payloads of hazardous materials?
6. What emergency remediation plans are in effect should a payload from a truck be accidentally discharged in the community?
7. What other trucks routes are being proposed?
8. What alternative methods of transportation are being considered?
9. How seriously is the rail option being considered?

10. The stakeholders are not being educated about the SSFL site, and the contamination levels that remain. How can they comment on the efficacy of the various plans?
11. Was there was a "meltdown of a reactor" at the Santa Susana Field Laboratory? Was there a breach of containment? What was released to the environment, and how much?
12. Is there any physical evidence on the site today from a "discrete" event in 1959?
13. Do you know what the baseline was for this site prior to the operations that began there in 1947?
14. Which chemical and radionuclides remain at the site today in excess of that baseline?
15. How much of the contamination on the Santa Susana site is the result of natural forest fires or burns?
16. What chemicals are on the Santa Susana site that may be from other anthropogenic sources other than from site activities? We are trying to determine if the cleanup will unintentionally clean up contaminants that may not be related to site activities.

We request that you provide a list of the specific areas that have contamination and the current level of contamination at those sites. We request that a risk-based clean-up be done at those specific locations and not a blanket clean-up of the entire area. If you do not already have such a list, doing the work of creating it should have first priority.

Very truly yours,

Woodland Hills Warner Center Neighborhood Council



Scott Silverstein, Chairman

Cc: Bob Blumenfield, Los Angeles City Council, District 3



September 30, 2013

Mr. Allen Elliott, Program Director
 NASA MSFC AS01, Building 4494
 Huntsville, AL 35812

RE: NASA Draft Environmental Impact Statement

Dear Mr. Elliott,

The Woodland Hills Warner Center Neighborhood Council submits the following comments concerning the NASA Draft Environmental Impact Statement (DEIS).

In accordance with the Los Angeles City Charter, the Woodland Hills-Warner Center Neighborhood Council (WHWCNC) is an advisory body consisting of 22 individuals that have been elected by the nearly 70,000 stakeholders of Woodland Hills to protect their interests and bring the local elected officials closer to the community.

The Woodland Hills–Warner Center Neighborhood Council was not directly notified of the potential impact of the truck traffic and toxic material exposure to our community as related to the cleanup of NASA’s portion of the Santa Susana Field Laboratory.

We strongly request the public comment period to be extended from October 1st for an additional 30 days for our committees to address the Draft Environmental Impact Statement (DEIS). We request that NASA develop a new DEIS to show all options as listed in your summary Table 2.4–1. We need NASA to show all options – not just a cleanup to “background levels” or a “No Further Action”. A compromise on the Administrative Order on Consent is necessary due to the impact of the truck traffic and the potential of toxic materials being disbursed into our communities.

As stated above, there are two primary concerns that we have with the DEIS.

First, we are very concerned with the potential toxic and/or carcinogenic materials that our stakeholders may be exposed to. In Table 2.4-2, the types of waste and their percentages are defined as to where they are being shipped. The DEIS needs to clearly state how this hazardous waste will be encapsulated during shipping and what clean-up measures will be taken to mitigate any potential toxic residue that may be dispersed from the truck, its tires, or undercarriage. Additionally, it must contain what specific hazardous material cleanup program will be employed in the event of an accident on route. It is unreasonable and, in our opinion, unethical for this generation to potentially put our youngsters at unnecessary risk for long term or potentially lethal health issues.

Second, we are concerned about the increased heavy truck traffic through our area, much of it in residential districts and near schools. The WHWCNC was charged with reviewing this document on September 19th, 2013, and only then we became aware that 60% of the truck traffic from NASA’s portion of the cleanup, as stated in your own findings, would go south through Woodland Hills.

Mr. Allen Elliott
September 30, 2013

Through our investigation we know that the information relating to this proposed route was not presented at the NASA DEIS Public Forums on August 27th, 2013 and August 28, 2013. At no previous meetings, that we are aware of, was the route for the trucks from Santa Susana Field Laboratory to go south on Topanga Canyon Boulevard through Woodland Hills along with the adjacent communities of West Hills and Canoga Park.

In the NASA assessment of schools, NASA was negligent in conducting a thorough investigation of all schools potentially impacted by the traffic. NASA's list of schools on Table 4.8-2 fails to list many Los Angeles Unified School District Schools sites which includes local schools, magnet schools, charter schools, and private schools, as well preschools and day care centers.

On or near the proposed NASA route south there are numerous schools including Canoga Park High, and the New Community Jewish High School in West Hills. Additionally, on the proposed route there are no less than three super-regional shopping malls including Westfield Topanga Plaza, Westfield "The Village" which is currently under construction, and the Westfield Promenade Mall. NASA has not considered the traffic that is currently generated in this area by the heavily attended Los Angeles Pierce College.

The NASA DEIS does not tell the Woodland Hills stakeholders the true impact of the cleanup of all of Santa Susana and how many additional trucks may go south on Topanga Canyon Boulevard from The Boeing Company and the Department of Energy sites. A full site Environmental Impact Report is necessary to weigh all of the impacts of the cleanup by all three responsible parties.

Furthermore, your DEIS only references repairs to Woolsey Canyon Road. The entire route in every direction should be surveyed for damage and ongoing maintenance should be paid for by the responsible parties.

In conclusion, as the DEIS is currently written, the Woodland Hills Warner Center Neighborhood Council strongly objects to the plan. It requires two or more years of daily and continuous heavy truck traffic, estimated to send over 140,000 truckloads through our communities. In our opinion, an EIR should have been required just for the enormous added volume of truck traffic. We also object to NASA's proposal for twelve operating hours per day. The hours of truck traffic needs to be limited to daytime hours only.

We believe that the risks to public safety and the environment from the remediation activity proposed are greater than the risk of doing minimal or no cleanup.

Please re-develop the DEIS and include the analysis of options that reduce heavy truck traffic through our neighborhood, infrastructure damage, and the potential disbursement of toxic waste and residue in our community.

Sincerely yours,

Woodland Hills Warner Center Neighborhood Council



Scott Silverstein, Chair

WOODLAND HILLS - WARNER CENTER NEIGHBORHOOD COUNCIL

20929 Ventura Boulevard Suite 47-535, Woodland Hills, CA 91364

Telephone 818-439-4376 | Local & Fax 818. 484.3270 | www.whcouncil.org

Mr. Allen Elliott
September 30, 2013

Cc: Brad Sherman, United States Congressman, 30th District
Fran Pavley, State Senator, California 27th State Senate District
Eric Garcetti, Mayor, City of Los Angeles
Bob Blumenfield, Councilman, Los Angeles City Council, District 3
Mitchell Englander, Councilman, Los Angeles City Council, District 12
Zev Yaroslavski, Supervisor, Los Angeles County Board of Supervisors, District 3
John Deasy, Superintendent, Los Angeles Unified School District
Tamar Galatzen, Board Member, Los Angeles Unified School District, 3rd Board District
Dan Brin, President, West Hills Neighborhood Council
Corinne Ho, President, Canoga Park Neighborhood Council
Warren Fletcher, President, United Teachers Los Angeles

Program Environmental Impact Report
Santa Susana Field Laboratory Site
10 February 2014
by Sharon Lee Ford

The California Environmental Quality Act (CEQA) is the single most important environmental regulations act to protect the California's environment for humans and wildlife. However, this Act has been greatly abused and manipulated since its inception, and has become a political football between legislators, big money, and special interests. We are being asked to make comments regarding the Program Environmental Impact Report (PEIR), to analyze the potential environmental impacts associated with remediation of soil and groundwater, the remedy selection and design, and resulting implementation.

The Santa Susana Field Laboratory (SSFL) site is an unique site with unparalleled geological, archaeological, architectural and historical resources. It is among the last of Southern California's important open spaces, wildlife habitat, and wildlife corridors. Remediation and mitigation must be consistent with the requirements of CEQA.

Rather than comment per area and agency, I am requesting CEQA requirements be implemented in each area and with each agency for the entire, and effected 2,850 acre site. I realize that two agencies are under NEPA regulations, but the agencies, and DTSC must come to an agreement as to how the restrictions/regulations can be met.

The first and most important considerations are that of *end use* of the land, and *cleanup*. The method of cleanup should be guided by the end use of the land. Boeing has made it clear that their plans are for the site to become parkland. Keeping this in mind, the method(s) of cleanup must be based on health risk, with the least amount of soil disturbance and destruction to the environment, and ecosystem.

The health and safety issues of this cleanup are very real, and must be individually analyzed and addressed. The disturbance of the predicted amount of soil to be removed, air quality (dust, gas emissions) must be analyzed as to the possible effects of increased asthma, and respiratory diseases, particularly in

children and the elderly. Also, disturbance of large amounts of soil is known to contribute to outbreaks of Valley Fever, a real and deadly health threat in the Valley. Spraying sites with water, as they are excavated, is not a 100% method for containing dust. Residents will be forced to keep their windows and door closed during operations, which will continue for an unknown number of years. This presents a difficult situation during warm and hot months, when homes, without air conditioners, are unable to have open doors and windows to cool the structures. When asked, at a SSFL – CAG, not one agency or Boeing would state that the cleanup will be done by the AOC 2017 date. They know the date is not realistic. Adjustments to the AOC must be made to allow for health risk based cleanup and a realistic deadline.

Changes to the hydrology, groundwater and water quality are also health issues. Excavating methods can change the flow of natural springs and streams, runoff, and pollute the water. The water and runoff from unstable are very important issues to the communities, especially Bell Canyon. Paving creek beds are not toxin free, and certainly have a negative effect on the aesthetics of a natural area.

Excavating tremendous amounts of soil and transporting it to another area(s) will result in a profound effect on the soundscape in the surrounding area. The noise of excavation equipment and trucks going up and down the hill will be loud and constant, and will have profound effects on the health of the surrounding population. Interrupted sleep patterns will lead to stress, depression, headaches, and other health issues such as heart attacks.

Traffic and transportation issues created by the thousands and thousands of trucks will be a safety issue. Boeing has already stated that accidents are inevitable. There are several schools in the area of the SSFL site. Limiting truck traffic when students are going to and from schools may help, but life happens and there are numerous reasons why students and parents come and leave school sites at various times.

Increased truck traffic will have an effect on public services: trash pickup, ambulances, fire and police departments, utility companies, and other city services, not to mention commuters trying to get to and from work. This will increase greenhouse gas emissions, which will effect air quality, and will increase health risks.

Soil removal is the biggest issue and most devastating method of cleaning up the SSFL site. Tremendous amounts of soil are to be excavated, much more than is necessary, creating its own health risk. NASA has already stated that they will not replace, with 'clean' soil, the same amount of soil as will be excavated. The soil removal will lead to unstable soil, subject to erosion by wind, rain, and wildfires. This presents a definite danger to the health and property of communities below.

What is 'clean' soil? From where will it be excavated, and how does NASA determine that it is 'clean'? There is no such thing as clean soil, as it will contain biota different than that of the soil removed at the SSFL site. It will contain seeds of invasive species. Removing these large amounts of soil will change the biological and ecological diversity of the SSFL site, and it will seriously endanger the already endangered plant life at SSFL. Ecological systems support all kinds of life, and when the ecosystem is disrupted or destroyed, it has a profound negative effect on the wildlife. The food chain is changed and when there are gaps in the food chain, wildlife cannot survive. They either adapt, die, or move to other areas. Moving/migrating, however, is not easy in a fractured landscape, even if you have wings.

Nothing is being said about the facilities, as to where the hazardous waste will be taken. What, if anything, is being considered for the health and safety issues for those communities. Who will be responsible for the damage done to repair our city streets, freeways and highways from the heavy trucks?

It is time for cleanups to be done on site, as much as possible, instead of transporting to another community's backyard. All technologies need to be considered, including any new technologies as they develop. This is the reason for supporting a health risk cleanup, and modification to the AOCs.

Much of the 2,850 acre SSFL site is open space, with woodlands containing many old oaks, riparian areas, grasslands, and rock outcroppings, which support various species of wildlife: insects, birds, reptiles, deer, coyotes, and mountain lion. With shrinking habitat in a fragmented environment, much of our wildlife is trapped within suburban islands. The SSFL site is an important wildlife corridor as it lying between the Santa Monica Mountains and the Santa Susana Mountains. As wildlife seek cooler climes, the SSFL wildlife are able to migrate to the Santa

Susana Mountains, and further, to the Los Padres Forest.

Currently, wildlife in the Santa Monica Mountains are basically trapped, particularly, mountain lions. This results in inbreeding, and a weakening gene pool. Unfortunately, mountain lions must cross the I-101 Hwy, where they are hit and killed by vehicles. A study is being done to consider building a corridor, under or over the highway. This would link the Santa Monica Mountains to the Simi Hills, Santa Susana Mountains and the Los Padres Forest.

Current activities on the SSFL site include beekeeping, pollination studies, and a bird observatory and banding station. Bee colonies are in great peril and this greatly affects pollination of our crops. I have heard numerous people complain about the concern for the birds, at SSFL, but they would be extremely concerned if the birds were gone and the area became infested with insects. These activities are important to a healthy and sustainable environment. The wildlife habitat and corridor is important, and must be a priority consideration in the PEIR.

The SSFL site is rich with cultural, archaeological, architectural, and historical resources. Plus, the site's geological formation and history is very unique. All this makes the site worthy of protection as parkland, Boeing's intention. However, basing the cleanup on background levels, will destroy much of what makes the site worth preserving. Presently, the US Park Service and the Chumash Indian Tribe have shown interest in the property. However, the US Park Service will not consider it worthy of preserving, if the resources are removed, damaged or destroyed, the property will remove any value for saving as a park. Nor, will they accept land that is inundated with invasive plants, as a result of non-native soil being dumped on site. With the cleanup to background as stated in the AOCs, this land could be rendered basically worthless.

If no agency will accept the SSFL site as parkland, since this requires a considerable amount funding, employees and management, what will become of the land? If Boeing's plan for a parkland fails, what will they do with the land? It is my understanding that Boeing would turn the land over to some organization to hold as open space in perpetuity. There is no certainty that the land will never be developed. Even with the best of intentions, Individuals and organizations have been known to sell property that has become too expensive to maintain. The most likely scenario would be for the property to be sold to already, anxious

developers.

Although the Chumash filed papers of interest that would prevent them from building a casino. However, if the sacred sites of the Chumash are damaged or destroyed, what would prevent them from eventually, filing for a casino permit, making them closer to communities. It would not be the first time lawyers for the Native Americans would legally change a permit. I doubt, very seriously, that anyone in the SSFL surrounding area, wants the consequences if the SSFL site is developed with hundreds of homes and or a casino. We must be careful what we wish for, the consequences could be much worse.

As I stated in my non-recorded comments at one of the scoping meetings, the cleanup to background is a cop-out by our legislators. They are not looking outside the box, at what could be; instead they are only listening to the demands of the angry portion of the communities. It is the easy way out! It is an easy way to appease the communities, and for legislators to wash their hands of the issue. We cannot allow our laws and regulations be swept under the rug, by an uninformed public and our legislators.

I urge DTSC to use CEQA as it was intended...to protect the environment and the health of humans and wildlife. Therefore, I urge DTSC to consider the cleanup on a health risk basis only. The AOCs must be modified to allow for cleanup within a reasonable time frame, which is safe and healthy and protects the environment and the communities.

Thank you for the opportunity to comment on the PEIR.

Sincerely,

Sharon Lee Ford
13028 Aetna St
Valley Glen, CA 91401

Dale Till

From: steve.reo <steve.reo@earthlink.net>
Sent: Wednesday, January 08, 2014 7:28 AM
To: DTSC_SSFL_CEQA
Subject: Draft Program Environmental Impact Report (PEIR) Response for the SSFL
Attachments: Response to the SSFL Draft EIS for land under NASA.docx

Dear Mr. Malinowski--I was unable to attend the December, 2013 scoping meetings. However, I was in attendance at the August 28, 2013 meeting held by NASA for the draft EIS that they had proposed. I came away with some thoughts about their document and comments made that evening. Unfortunately, some comments were made by members of the audience that went unanswered or went uncorrected by the discussion leaders that evening. That left community members (i.e., residents and others) uneasy or just misinformed as to what will occur during the cleanup itself. Nonetheless, I prepared a response to the Draft EIS and sent it on to NASA. I also attended the follow-up session at Chatsworth High last October 22, 2013, and spoke directly with Mr. Allan Elliott, (Project Manager for NASA and one of the discussion leaders during the August 28 meeting) about some of my concerns. He and a contractor representative from CH2MHill were able to respond one-on-one with me about those areas that had earlier left me unsure about how the Agency would proceed during the cleanup. For informational purposes, I have attached my response to the Draft EIS, as it may raise other issues that the State of California would like to address regarding the cleanup contract(s) that is (are) let.

I also followed up by e-mailing a response to Mr. Elliott one day later confirming my understanding of what we discussed that evening, and to offer suggestions about specific problems that I felt would occur during the cleanup. My areas of concern focused on: (1) how the waste materials (wet and dry) would be handled on-site; (2) transportation of wastes to the receiving facilities; and (3) how work would be handled on days of high winds caused by the Santa Ana wind phenomenon. One method of dealing with the "dry" wastes that was considered early on was to transport them on an enclosed conveyor belt to a nearby railhead; wastes would then be loaded into closed containers, then loaded into rail cars for the trip to the receiving facility. The conveyor belt idea was dropped (probably because building, operating and protecting the conveyor belt from terrorist attacks presented too many challenges), but the notion of train transport seems a viable alternative to trucking the materials on public streets and highways to sites hundreds of miles away. The plan put forth in the Draft EIS was to load wastes (inside metal bins) onto 19 CY trucks and send them out onto public highways. The logistics of locating enough trucks and qualified drivers had yet to be solved. The probability of roadway accidents, spilling many gallons of highly toxic materials in densely populated areas, is too great to ignore. Rail transport is safer overall, could be accomplished with fewer logistical problems, would limit physical damage to roadways and minimize the systemic alterations to traffic patterns that could arise by using truck transportation.

My suggestion was that the metal waste receptacles could be loaded onto trucks, which would be filled on a rotational basis; these would then be driven to the nearest practicable railhead(s) and placed on railcars for transport to the waste facility. These short hauls would shift impacts to the local area and be more economical, offering quick turnarounds. The train transport system in this country is well-developed and has a reputation for safety. Accidents that occur would limit exposure of toxic wastes to the public. By comparison, imagine a truck hauling TCE (a highly toxic wash solvent used at SSFL to clean rocket engines and test stand structures) overturning on the 405 Freeway in a rainstorm during rush hour on a Friday evening.

Beyond that, there will be damage to the roadways and disruption to traffic patterns to permit these trucks safe passage. The freeway system here in Southern California is already stretched to its limits with traffic flowing normally. I assume these trucks will require lead and chase vehicles to safely escort them through densely populated areas, disrupting these patterns. Will local municipalities have to bear that cost, and the cost for additional police enforcement? Or will those costs ultimately be borne by the Federal government? And who pays for the inevitable spills and damage that occurs during traffic accidents?

Little information was provided as to how the wastes would be handled on-site. The scenario discussed was that they would be digging these materials up and stockpiling them on site, in piles limited to eight (8) feet in height. I took issue with this as they'd be digging this material up, then having to handle it TWICE. Once to remove the material from the ground to put it in a pile, and then moving it a second time to load it into the trucks. Every time you touch something, labor and equipment costs are incurred; the cost of extracting it and moving it offsite goes up. Additionally, each time you move it, you generate airborne dusts that, depending on the prevailing winds, is taken

aloft and spread wherever it wants to go. I live nearby in Chatsworth, CA, so it's going to be heading my way, among others. That, gentlemen, is unacceptable.

The contractor(s) need(s) to get into a mode of working the same way the automakers figured out years ago: the "Just-In-Time" method of delivery. They deliver seats, tires and wheels, engines and chassis, etc., just at the moment they are needed in the assembly-line process, **and not before**. That eliminates moving parts three and four times, and cuts down on the storage required for component parts. By extension, contractors should not pick up a bucketful of waste material unless a truck with a metal bin is there waiting to receive it. This minimizes handling costs and the hazards of exposing local residents, contractor employees, domestic and wild animals, etc., to waste materials dispersed by wind action. Additionally, the piles of hazardous waste cause on-site congestion resulting in accidents and difficulties in maneuvering around the site. And one must also factor in the problems of cleaning up the slurry waste ponds resulting from a heavy rain. Some portion of that slurry will inevitably re-enter the ground and have to be dug up yet again.

The third item concerns the prevailing winds (the Santa Anas) causing work stoppages. The Santa Anas occur often during the winter months and can easily last for 2-3 days. These winds are harsh during that time, blowing at up to 45 m.ph., and can be quite cold. They can also descend at other times of the year and will have a disruptive effect on the cleanup process with each occurrence. They would likely blow the top 8-12 inches of material off the eight-foot piles unless an elaborate system of tarps and barriers is employed. Although the CH2MHill representative assured me they would not be working on windy days, I haven't seen anything in writing to that effect, either from the contractor or NASA.

The State and Federal partners need to insure an action plan that addresses that issue is made a portion of the contract, and that it is rigidly enforced. It should detail at what maximum windspeed work is stopped (or prevented from starting); what series of events must occur for work to resume after a shutdown is declared; who authorizes the shutdown and resumption of work; penalties for starting or continuing to work on days when the windspeed criteria is invoked; and other matters relevant to this issue. For the safety of all nearby residents, contractor employees and indigenous wildlife, **the maximum allowable windspeed during work activities should not exceed 5 (five) m.p.h.; i.e., it shall be less than or equal to and, in no event, shall it exceed 5 m.p.h.** The National Weather Service (NWS) would be consulted and responsible for forecasting wind events in excess of the permitted maximum, which could be verified by use of calibrated windspeed meters located around the work site.

These are the matters of greatest concern to me. I ask that you consider them in preparing the Draft Program Environmental Impact Report (Draft PEIR).

Thank you very much for allowing me the opportunity to comment.

Sincerely,

Stephen C. Reo
21301 Kingsbury St.
Chatsworth, CA 91311-2243

818-341-8574

steve.reo@earthlink.net

Response to the SSFL Draft EIS for Land Under NASA's Authority
(Area II and a portion of Area I)—by Stephen C. Reo

Item 1—Do you know the true nature of the chemical hazards that exist in the soil and groundwater at SSFL? Granted, there is a list of *known* contaminants and hazardous wastes that were dumped or spilled onto the ground, into the burn pits and other on-site repositories. Those are the chemicals and other materials purchased in their “pure” state. However, those have potentially recombined with hundreds of other chemicals and known carcinogens that may now be more hazardous than the sum total of what was initially introduced. These new molecular compounds may be resistant to present filtration methods (requiring new technology), and may result in sending more waste to the dumps as untreatable and potentially volatile hazardous materials. Have any such “super compounds” been discovered/identified? If so, what action, if any, has been taken to attempt to neutralize them? If action was taken, what were the results?

Nobody knows exactly how much hazardous waste remains in the soil or the groundwater at this point. How will you know when you've finished removing it? If you didn't get it *all*, the material will move upwards and effectively recharge the area (Nature abhors a vacuum). Within a few years you'll have

contaminated soil again, or possibly unsafe water from a contaminated water table. What filtration and/or monitoring methods will be kept in place to insure this doesn't occur?

Item 2—I recall during the session (Wednesday, August 28) a presenter (Allen Elliott?) mentioned that commercial hauling trucks could carry 19 cubic yards of material, with a potential for some 26,000+ loads being hauled. However, on Page 2 of the "FieldNOTES" we were provided (April, 2013), it was stated in paragraph 2 (bottom of page) that ..."**Typical commercial U.S. dump trucks carry about 10 cubic yards**" (emphasis mine). Given that this capacity is approximately half of what the presenter indicated could be carried per truck, and that there will likely be a combination of the two sizes used, I would suggest that the number of truck loads may increase substantially. Additionally, it wasn't known how many such trucks are available locally for this type of activity. As a consequence, calculations of the number of loads, drivers, trucks needed, increased traffic pattern disruptions, the potential for increased hazards/accidents and damage to the roadways and other concerns will also have to be figured into the total cost. **What efforts are underway, if any, to line up the additional trucks and to train the additional drivers needed?**

Item 3—I listened closely, but never heard a statement that the hazardous waste soil would be “containerized in 55-gallon drums” for the haul to the dump site. One lady questioned if the soil/rock would be packed loose in the truck and suggested it should be carried in trucks that had more than a fabric or nylon tarp (i.e., a metal cover). None of the presenters corrected her, nor did they reassure the audience by explaining what procedure(s) **would** be followed. I can’t imagine putting that much loose waste material in a truck, with the only protection being a flimsy tarp to contain the contaminated soil and dust that would inevitably be released from each truck in the course of its long journey. And what would contain the hazardous soil in the event of a roadway accident? (*and it **will** happen*).

Will the soil be placed in 55-gallon drums inside of a metal-sided dump truck or trailer, or will it be dumped loose inside of a 10- or 19-cy truck with a tarp for the long haul to the waste sites? You wouldn’t (shouldn’t) haul liquid hazardous waste in anything less than 55-gallon drums; so-called “dry waste” (soil, rock and other media) must be treated the same. If nothing else, hauling these hazardous wastes in containers will minimize the amount of time and expense in cleaning/decontamination of the trucks once their load has been delivered. Those same trucks will likely bring back loads

of sanitized fill dirt to avoid “deadheading”, so it makes sense to keep them as clean as possible throughout this process.

Item 4--While we're at it, have cost/safety comparisons been made regarding short-hauling the material in trucks to train depots and letting the nation's railway system transport this material to the hazardous waste repositories? That keeps it off the roadways and away from major metropolitan areas for the majority of the trip. There is an active train station located in Chatsworth, CA, just ten minutes away from the SSFL. If that doesn't work for some reason, there were other loading points identified in the DEIS within a reasonable distance. The nation's railway system was designed for and is capable of hauling heavy materials. This minimizes most of the negative impacts of hauling the full distance using small-load, over-the-road (OTR) trucks and their impacts on the roadways and traffic patterns. If trains can haul coal, they can haul hazardous wastes just as efficiently. While the trains are transporting waste, the trucks can be loaded with sanitized fill dirt obtained locally, minimizing interruptions in present traffic patterns.

Item 5—As you may know, late fall/winter weather patterns bring the Santa Ana winds to this area. These are cold, stiff winds that hang around for two to three days at a time, blowing at around 45-50 m.p.h. They occur at other times of the year as well and can be very warm, depending upon their

source. More detailed information can be obtained from the National Weather Service (Department of Commerce). What happens to on-site work during those days? Do you suspend all work until the wind falls below 1-2 m.p.h., or will you continue regardless? If you continue, what safeguards will be put in place to minimize fugitive dust from being blown around? This will affect not only the on-site workers' exposures, but the community at large (local residents, children playing at home and at school, people operating businesses, etc.).

Item 6—It sounds like there will be a good deal of work in the other Areas as well at some point. There may be so much work in progress that trucks and other mechanized equipment will be raising a substantial amount of dust, as well as causing traffic (both on- and off-site) and noise problems. What efforts will be made to minimize the footprint of vehicles moving around the site at any given time? Too many vehicles, workers, dust and noise leads to accidents. There are so many back-up beepers going at clean-up sites that the workers eventually tune them out. I was at a FEMA-managed clean-up site in Virginia a few years back when a contractor, in a hurry to finish a job one day, accidentally backed over his son with a large Cat, killing him; no one wants to read about that type of accident occurring at the SSFL. There will be a maximum number of vehicles, workers and noise levels on-site that can

prevent such a tragedy from happening. I would encourage you to investigate those “golden” numbers and incorporate them into your on-site performance program. Stiff fines should be levied against contractors that exceed the maximum numbers of people, noise, dust and equipment without the express written consent of the Site Superintendent. Safety first, last and always.

Item 7--How will dust be contained during the excavation process (removal and containerizing)? When removing lead or asbestos, the area must be tented in to prevent the material from becoming airborne or, in the case of lead paint on a bridge, dropping onto a waterway. What procedure(s) will be in place for these and other hazardous materials? I assume you intend to use excavators and loaders with water sprayed to keep the dust down as material is removed and stored for loading. If using water to keep the dust down, how will they capture and contain this now-contaminated media?

Item 8—What process/procedures will be used to decontaminate hauling trucks, bulldozers, loaders and other equipment used at the jobsite? How frequently will decontamination be carried out, especially on the trucks hauling the material?

Item 9—Who will perform oversight of day-to-day operations? You'll need a Toxicologist to characterize liquid waste materials,

to catalog them for site records and to advise workers how to handle them. An on-duty nurse with Emergency Room (trauma) experience would be desirable, but perhaps is not cost-effective. Many emergencies can probably be handled by the Safety Officer (see below). Staff members will also need to know the locations and telephone numbers for all local area hospitals, fire departments and the Los Angeles Police Department (LAPD).

Site Inspectors are needed at each work area to insure work is done correctly. He/She will be the first point of contact with the contractor(s) and its (their) employees. A Safety Officer will be needed to insure workplace safety, investigate accidents, perform first aid, offer morning safety talks and suggest safer means of accomplishing work with the contractor(s)' employees. He/She will also advise the Site Superintendent whether to allow work to continue in the event of storms or other issues which could compromise safety. Remember, these operations are being conducted in a seismically-active zone; what safeguards will you have in place to protect the workers and the public in the event of an earthquake? Local hospitals could be overrun with patients seeking medical help, and may even be taken out of service by the event itself.

The Site Superintendent will supervise/monitor overall operations and insure goals are met; determine how to proceed if problems arise; to stop work if necessary for safety issues (high winds or lightning storms; unexpected chemical contamination that bubbles up), negotiate change orders, etc. The Superintendent may already have an Asst. Superintendent on staff to take over in his/her absence, or may elect to appoint someone else based on their construction knowledge and engineering skills. Administrative (Secretarial) Staff will be required to take care of preparing correspondence and other lower-tier administrative matters. An Administrative Officer and a clerk should be present to handle payroll matters, run cost sheets for the Superintendent's use and authorize necessary purchases.

You'll need an on-site Cultural Specialist for those zones where Native American or other remains, structures or religious artifacts are discovered. He/She will coordinate matters with the SHPO and advise the Site Superintendent to curtail operations if significant cultural remains are discovered during the course of work.

Item 10—There has been some discussion about leaving one of the Test Stands in place as a historic reminder of the space program and the part Rocketdyne played in that. While visually appealing, the concept of leaving one Test Stand in

place absent all of the other support buildings and structures doesn't make much sense. The stand may restrict removal of the liquid hazardous waste and contaminated soil, which is the focus here. Beyond that, removing the soil, storage tanks, etc., beneath it may lead to the stand's collapse. There are plenty of photos and videos extant showing what the Test Stands looked like during their heyday if an on-site museum/memorial is contemplated.

Item 11--Finally, I cast my vote for the Alternative 1 Cleanup: Demolition, soil cleanup to suburban residential cleanup goals and groundwater cleanup.

The surrounding area is now firmly entrenched as a residential zone, and the public must be protected from any further exposure to hazardous waste. That includes radioactive objects and structures in Area IV and the myriad chemical contaminants that remain from the rocket engine testing and related activities conducted in Areas I, II and III at Rocketdyne (SSFL).

The guiding principle should be: When in doubt, take it out.

This concludes my comments for the Draft Environmental Impact Statement (DEIS) for NASA's holdings within the SSFL.

Thank you for the opportunity to comment and express my concerns as you move forward.

Sincerely,

Stephen C. Reo

Mariah Mills

From: Stephen Schwartz [20stephen04@earthlink.net]
Sent: Saturday, February 08, 2014 2:32 PM
To: DTSC_SSFL_CEQA
Subject: Comments on Environmental Impact Report on Santa Susana Field Laboratory Cleanup

Having followed the situation at the Santa Susana Field Laboratory for many years now, I was disturbed to discover that recent actions by the DTSC appear to rank the interests of public health and safety well behind those of Boeing Corp., the current owner of the majority of the polluted site. These actions suggest DTSC has bowed to Boeing's powerful lobbying efforts and is now working to back away from its legally-binding commitment to clean up the facility.

The Environmental Impact Report now under consideration must fully comply with the 2010 cleanup agreements, which require all detectable radioactive contamination must be removed. It must not allow--as was the practice until recently--radioactive materials to be dumped in landfills not designed to handle them or to be sold for recycling. Either practice risks spreading the contamination far beyond the facility and creating numerous health and safety risks for people at every step of the process. Anything less would be a direct abdication of responsibility by the DTSC to the people of California.

Stephen Schwartz

STRUMWASSER & WOOCHEER LLP

ATTORNEYS AT LAW

10940 WILSHIRE BOULEVARD, SUITE 2000
LOS ANGELES, CALIFORNIA 90024

TELEPHONE: (310) 576-1233
FACSIMILE: (310) 319-0156
WWW.STRUMWOOCHEER.COM

FREDRIC D. WOOCHEER
MICHAEL J. STRUMWASSER
GREGORY G. LUKE †‡
BRYCE A. GEE
BEVERLY GROSSMAN PALMER
RACHEL A. DEUTSCH
PATRICIA T. PEI
ADRIENNA WONG

†Also admitted to practice in New York
‡Also admitted to practice in Massachusetts

February 10, 2014

Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826
Fax: 916-255-3734
Email: DTSC_SSFL_CEQA@dtsc.ca.gov

Re: DEIR Scoping Comments

On behalf of Consumer Watchdog, Strumwasser & Woocher LLP submits the following written comments on the Department of Toxic Substance's (DTSC's) Notice of Preparation (NOP) for a Draft Program Environmental Impact Report (DEIR), Santa Susana Field Laboratory (SSFL), Ventura County, California. These comments focus on two issues of primary concern with respect to the scope and contents of the DEIR: (1) that the scope of the DEIR include demolition of the remaining structures on site and proper disposal of the debris; and (2) that the project analyzed in the DEIR, as well as the alternatives to that project, recognize and be limited by the commitment of DTSC to the clean-up requirements established for SSFL Area IV, the Northern Buffer Zone, and the NASA portions of SSFL in the 2010 Administrative Orders on Consent (2010 AOCs). The 2010 AOCs are binding agreements between DTSC and the United States Department of Energy that establish clean-up requirements for chemically and radiologically contaminated soils in Area IV. The 2010 AOC for the DOE portions of the site is available at: http://www.dtsc-ssfl.com/files/lib_correspond%5Cagreements/64791_SSFL_DOE_AOC_Final.pdf. The 2010 AOC for the NASA portion of the site is available at: http://www.dtsc-ssfl.com/files/lib_correspond/agreements/64789_SSFL_NASA_AOC_Final.pdf. Through these hyperlinks, the documents are incorporated by reference into this comment letter as though fully set out as an exhibit to the letter.

The DEIR Must Include Analysis of Demolition and Disposal

The California Environmental Quality Act (CEQA) requires that an environmental impact report analyze the environmental effects of any "project" being undertaken by an agency, which the CEQA Guidelines explain must include "the whole of an action." (CEQA Guidelines, § 15378.) The NOP

states that “[t]he proposed project includes the activities necessary to implement soil and groundwater remediation.” Under the terms of the 2010 AOCs, “soils” includes “debris, structures, and other anthropogenic materials.” (See 2010 DOE AOC, 1.8.4. and parallel provision in the NASA AOC. Hereafter we shall cite just to the DOE AOC provisions, but in each case there is a parallel provision in the NASA AOC.) The 2010 AOCs require that soils be remediated to background levels. (See 2010 AOC, 2.1.) Accordingly, a fundamental aspect of the present remediation efforts is, of necessity, the removal or remediation of all structures on site such that contaminants are not present above background levels. Additionally, the AOCs require that all waste with radioactivity above background be disposed of in an offsite licensed Low Level Radioactive Waste (LLRW) disposal facility or an offsite authorized Department of Energy disposal facility. (See 2010 DOE AOC, Attachment B, p. 3) Because CEQA requires that an agency analyze the impacts of the entire course of action, not just the impacts of each governmental approval, the manner in which DTSC intends to demolish and dispose of the structures on the site is a part of the current remediation project. The EIR must therefore include an analysis of the full scope of the agency’s activities, including the demolition and disposal of the remaining on-site structures.

The 2010 AOC Establishes Clean-Up Requirements That Define the Scope of the Project

Definition of a project and its objectives is a critical component of an environmental impact report, as it is through such definition that the public and decisionmakers are informed precisely what is being proposed and which impacts are being evaluated, toward what objective. (See, e.g., *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454.) The project description must include, among other things, “a statement of objectives sought by the proposed project,” because “a clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding consideration, if necessary. The statement of objectives should include the underlying purpose of the project.” (CEQA Guidelines, § 15124, subd. (b).)

The DEIR must define the project being evaluated in the DEIR as, for the DOE and NASA parts of the property, the cleanup of the site to background as required by the 2010 AOCs. The 2010 AOC specifies that “[t]he cleanup of soils at the Site shall result in the end state of the Site after cleanup being consistent with ‘background’ (i.e., at the completion of the cleanup, no contaminants shall remain in the soil above local background levels, with the exception of the exercise of exemptions that are specifically express in the [Agreement in Principle].” (Section 2.1.) The 2010 AOC contains a key requirement of the SSFL cleanup, and it is one that must constrain the project description, and project objectives of the DEIR. Without identifying the cleanup to background as the project objective, the EIR’s analysis would ignore the fact that it is legally obligated to adhere to the 2010 AOC’s objectives and could present a potentially misleading project description, and, as discussed below, an inaccurate alternatives analysis.

The Alternatives Evaluated in the DEIR Should Not Include Alternatives that Cannot Meet Basic Project Objectives, So Alternatives that Do Not Meet the Remedial Objectives of the 2010 AOC Need Not Be Analyzed in the DEIR

The DEIR's alternatives analysis must reflect the project's remedial goals, and thus the scope of the alternatives should be constrained (with the exception of the no-project alternative) to activities that will satisfy DTSC's binding legal obligation under the 2010 AOC to remediate contaminants at the site to naturally occurring background levels. An analysis of alternatives that will not satisfy the 2010 AOC's clean up goals would be meaningless under CEQA, as any remedial program that does not satisfy the 2010 AOC would be infeasible for DTSC to implement, as DTSC is legally obligated to adhere to the 2010 AOC in its site cleanup activities.

The purpose of an environmental impact report's alternatives analysis is to analyze feasible alternatives to a project that may achieve most of the project's objectives while lessening the project's significant effects. (CEQA Guidelines, § 15126.6, subd. (a).) An alternative that is not feasible need not be analyzed in detail, though alternatives that impede the achievement of project objectives, to a degree, must be studied. A feasible alternative is one which can be "accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1.) "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the projective and could avoid or substantially lessen one or more of the significant effects." (CEQA Guidelines, § 15126.6, subd. (c).)

The cleanup of the SSFL site is governed, in part, by the dictates of the legally-binding 2010 AOC. Alternatives to the cleanup goals established in the 2010 AOC are therefore not feasible alternatives: DTSC cannot approve such a project without breaching a legal commitment. It is therefore inappropriate for the DEIR to evaluate alternative cleanup goals for the site, as such goals would be in violation of the 2010 AOC and therefore would not be "feasible" alternatives to a project that complies with the 2010 AOC. Moreover, the site is zoned for by Ventura County for agricultural use, which requires clean up to the most stringent standards. The existing zoning of the site also compels a cleanup to background levels, contributing to the infeasibility of any alternative that does not clean up to such levels. Instead of discussing infeasible alternatives that do not clean up the site to background, the DEIR should focus on alternatives that meet the cleanup objectives of the 2010 AOC.

If DTSC would like to further discuss these scoping comments with me or with my clients, please let me know. Thank you for your consideration as you prepare the DEIR.

Sincerely,



Beverly Grossman Palmer

Mariah Mills

From: Sue Buckley [Ssbuckley@sbcglobal.net]
Sent: Monday, February 10, 2014 3:24 PM
To: DTSC_SSFL_CEQA
Subject: An Oak Park Resident's Comments on PEIR for SSFL Cleanup

Follow Up Flag: Follow up
Flag Status: Completed

I live near the Santa Susana Field Laboratory (SSFL) in Oak Park and want to make sure that SSFL is thoroughly cleaned up. I feel there is a strong link between the contamination at SSFL and the increase in cancer appearances and deaths in our local area, to include some dear friends and family members.

In 2010, DTSC signed Agreements on Consent (AOCs) with NASA and DOE that they will cleanup their portions of SSFL to background levels of contamination. It is critical that DTSC now keep its word and make sure that its Program Environmental Impact Report FULLY COMPLY with the AOCs. In addition, the EIR must include contaminated structure and disposal material, because those too have been shown to be contaminated. A court recently issued a preliminary injunction against DTSC allowing any more contaminated debris from such structures being disposed of in recyclers and dumpsites not licensed for radioactive material.

It is also very important that DTSC require that Boeing follow the law and clean up to the standard for which the site is zoned, agricultural/rural residential, which is the most protective of public health. Boeing should not be allowed to walk away from cleaning up most of the contamination on the site, which is what will happen if DTSC allows it to get away with the weak cleanup standards it wants. And DOE and NASA must be required to live up their cleanup agreements.

The project the EIR considers must be compliant with the AOCs, and any alternatives must likewise. In other words, the project to be examined must be cleaning up the DOE and NASA portions of the site to background, as required by the AOCs, and any alternatives must be possible ways to clean up to background, not options that would break the AOC requirements.

I want my community and all nearby communities to be protected from SSFL contamination, and the only way to make sure of that is for the contamination at the site to be fully cleaned up. DTSC's PEIR must fully comply with the AOCs, and DTSC must also make sure that Boeing cleans up its property to the most protective standards.

If this was your neighborhood I'm sure you would be requesting the same. If have full confidence that you will see this clean up project completed. It isn't hard to understand as I'm sure you would tell your kids the same thing, as I do mine...if they make a mess, they need to clean it up. This is just the same but the parents are the public and the child is Boeing and companies involved. They need to take responsibility and clean up their mess.

Sincerely,

Sue Buckley

Sue Buckley

January 9, 2014

Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

E-mail: DTSC_SSFL_CEQ@dtsc.ca.gov

Subject: Contaminated Soil and Groundwater Remediation Projects at Santa Susana
Field Laboratory

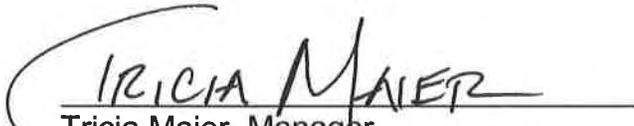
Dear Mr. Malinowski:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,


Tricia Maier, Manager
Planning Programs Section

Attachments

County RMA Reference Number 13-027



county of ventura

January 8, 2014

Mr. Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

SUBJECT: Response to the Notice of Preparation (NOP) for the Draft Program Environmental Impact Report (EIR) for Contaminated Soil and Groundwater Remediation Projects at the Santa Susana Field Laboratory Site (SSFL), Ventura County, California

Dear Mr. Malinowski:

Thank you for the opportunity to review and comment on the scope and content of the environmental information to be included in the Program Environmental Impact Report (PEIR) that the DTSC will be preparing. Collectively, the Ventura County Planning Division (Planning Division) is submitting comments organized into four sections:

- A. General Comments
- B. Long-Range Planning Section/Land Use
- C. Residential Permits Section/Biology
- D. Planning Programs Section/Cultural Heritage Board

Please also note that the County of Ventura submitted lengthy comments to NASA on a wide variety of issues in September 2013 regarding their Draft Environmental Impact Statement (DEIS) for demolition and cleanup activities on NASA SSFL property. These comments are attached (Attachment 1) for your information and reference.

A. General Comments

As you are no doubt aware, some of the local regulatory requirements that do not apply to cleanup activities on federally-owned property (i.e. the NASA-owned areas at SSFL) will in fact apply to the portion of the SSFL where The Boeing Company (Boeing) is the responsible party. Because DTSC will be the lead regulatory agency for making determinations on the soil and groundwater investigations, as well as the selection of necessary project design and/or mitigation measures for the Boeing sites, the County's regulatory requirements will apply to the CEQA analysis DTSC will be conducting. Those requirements, which are further articulated in the County's response to the NOP, include an evaluation of the proposed action's consistency with the Ventura County General Plan and use of the County's Initial Study Assessment Guidelines (April 26, 2011) (ISAGs) when preparing the PEIR.



For each topic area within the PEIR (e.g., air quality, water, noise, etc.), the ISAGs include a reference to applicable General Plan goals and policies, criteria to establish thresholds of significance, methodology for assessing project and cumulative impacts, and mitigation measures. The County's ISAGs are available online:

http://www.ventura.org/rma/planning/pdf/ceqa/current_ISAG.pdf

The DTSC's NOP seems to include only a partial list of topics and potential impacts to be evaluated in the Draft PEIR. However, it appears that the slide show prepared for the December 2013 scoping meeting (available on the DTSC website) includes a more complete list of potential impacts. Specifically, the Planning Division believes that the list of topics shown on slide #30 (see Attachment 2) is the most complete, and we encourage DTSC to include all of these issues in its CEQA analysis. However, given the broad topic categories on this list, it is not clear whether the following important issues will be included in DTSC's impact evaluation:

- Scenic resources
- Archaeological and Paleontological resources
- Solid Waste Management
- Water Supply

In order to ensure that DTSC's Draft PEIR adequately considers all relevant issues, the Planning Division strongly recommends that DTSC consult the County of Ventura's Initial Study Assessment Guidelines (ISAG).

B. Long Range Planning Section

The comments below focus mainly on General Plan and land use issues for SSFL, and comments from the Long Range Planning Section are also addressed in the "general comments" section above.

Scope of Draft PEIR

As part of a comprehensive project description, the Planning Division recommends that DTSC describe and evaluate a reasonable range of future land use options and ownership scenarios (e.g., passive open space use, active recreational use, residential development, private ownership, National Park Service ownership, etc.). It is worth noting that one of the primary deficiencies of the NASA DEIS was its failure to identify reasonably anticipated future (i.e., post-cleanup) land use options. Without such an analysis, it is impossible to determine whether remedy selection would be protective of human health and the environment or whether it would be consistent with future land use. Developing a reasonable range of alternatives in the PEIR will allow DTSC to appropriately evaluate environmental impacts and determine the most appropriate mitigation measures for the SSFL property.

Land Use in the General Plan and Zoning Ordinance

The County's General Plan land use designation for the SSFL is "Open Space." General Plan Section 3.2, (Land Use Designations) defines the purpose of the Open Space and articulates several applicable goals and policies. In general, Open Space goals/policies support retaining open space lands in a relatively undeveloped state for recreation purposes and scenic value. As noted in the General Plan, open space is recognized for its intrinsic value and should not be regarded as "areas waiting for urbanization." The County has identified two zones that are consistent with an Open Space land use designation¹:

- Open Space zone (OS), which has a 10-acre minimum parcel size; and
- Agricultural Exclusive zone (AE), which has a 40-acre minimum parcel size.

DTSC must consider these General Plan and zoning land use designations as it proceeds with its CEQA analysis and any final remedy selection must be consistent with these land uses. To view the County's General Plan and the Non-Coastal Zoning Ordinance (NCZO), click on the following links:

<http://www.ventura.org/rma/planning/pdf/plans/Goals-Policies-and-Programs-6-28-11.pdf>

<http://www.ventura.org/rma/planning/pdf/zoning/VCNCZO%2006-28-11%20revised..pdf>

Articles 4 and 5 of the NCZO provide information about the purpose of zones and the allowable uses within zones.

As noted above, the County of Ventura prepared extensive comments for NASA's DEIS, which are attached herein as Attachment 2. These comments contain summaries of additional County standards and ordinances (e.g. the Tree Protection Ordinance) that are not summarized again here but should be reviewed by DTSC as they will be applicable to your project.

C. Residential Permit Section

As noted previously, because the excavation area for the proposed project (and presumably the fill excavation sites) are located within unincorporated Ventura County, the potential project impacts must be evaluated in accordance with the County's CEQA environmental thresholds of significance and the County's environmental policies and ordinances.

The EIR and appendices must contain all information required under Ventura County's Standards for Initial Study Biological Assessments (October 9, 2012) (ISBA), available online:

<http://www.ventura.org/rma/planning/conservation/bio-report-procedure.html>

¹ The existing zoning for the SSFL is Rural Agriculture [RA-5], which has a 5-acre minimum parcel size and is not consistent with the General Plan.

NASA Area II EIS Comments

For general guidance and examples of the County's concerns regarding biological analysis and mitigation measures, please refer to the attached letter from Chris Stephens to Mr. Allen Elliot, dated September 27, 2013. Pages 5 through 12 of the letter pertain to biological analysis and mitigation measures. Page 5 summarizes the Ventura County General Plan *Goals, Policies and Programs* (2011) Biological Resource Policies that must be thoroughly evaluated as part of the EIR. The NASA Area II EIS comments are not exhaustive, and the EIR will be more closely reviewed given that Ventura County has permitting authority over the project.

Biological Resource Analysis

The EIR should also explore in depth potential project specific and cumulative direct and indirect impacts to special status species, wetland habitat, and wildlife movement that would result from the proposed project or alternatives. The following is not exhaustive, but rather sets forth examples of some biological issues that should be addressed in the technical analysis.

- a. Ventura County Locally Important Species. Impacts to Ventura County Locally Important Plant Species identified on-site should be evaluated and mapped (e.g., *Allophylum divaricatum* and *Crassula aquatic*). For a complete listing of Locally Important Species, please see the following link:

<http://www.ventura.org/rma/planning/conservation/locally-important-species.html>

- b. Ventura County Locally Important and Sensitive Plant Communities. Impacts to locally important and sensitive communities (e.g., Venturan coastal sage scrub, and oak woodlands) should be acknowledged in the EIS. The EIS should evaluate direct and indirect (e.g., dust) impacts to locally important and sensitive communities. The ISAGs define a locally important community as one that is considered by qualified biologists to be a quality example characteristic of or unique to the County or region, with this determination being made on a case-by-case basis.

The County has not developed a list of locally important communities, but has deemed oak woodlands to be a locally important community through the County's Oak Woodland Management Plan. The California Department of Fish and Wildlife (CDFW) natural communities list (2010) assigns rankings for communities of special concern.

- c. Seed Bank and Soil. The EIR should clearly quantify the area and amount of the topsoil proposed for removal, as well as at replacement soil locations. The EIR should evaluate impacts from the removal of the entire seed bank, including special status species such as Braunter's Milkvetch—which has an extensive and long-lived seed bank. Excavation will permanently change the topography and hydrology of the landscape on which the existing native vegetation occurs, as well as remove the topsoil within which the seed bank for the vegetation and microorganisms necessary to the nutrient cycle reside.

Even with careful restoration, the diversity of habitats and species and biological function of site will be lower as a result of loss of topsoil.

- d. Pathology. If the EIR will conclude that site clean-up will have beneficial effects on wildlife (like the EIS), the EIR should substantiate with studies how current levels are affecting wildlife mortality. The EIR should demonstrate why the proposed removal is in fact necessary, and how existing contamination would affect the proposed end use.
- e. Vegetation Mapping. According to the Vegetation Classification Santa Monica Mountains (2006), the project is in the Nations Park Service ecological interest area, and has been mapped in the Santa Monica Mountains National Recreation Area Photo Interpretation Report (2007). Vegetation mapping and analysis should be completed to the association level using the Santa Monica Mountains Vegetation Classification.
- f. Wildlife Movement. Because of the contiguous open space and park land and diversity and overall quality of the on-site native habitat, the EIR should thoroughly analyze impacts to this major link in regional habitat connectivity. The southeastern half of the project site is located entirely within a regional landscape linkage that connects habitats between the Sierra Madre Mountains and Santa Monica Mountains, mapped by the South Coast Missing Linkages Project (2006). Additionally, local wildlife corridors should be mapped, described, and evaluated in the EIR. Impacts to the wildlife corridor from lighting, noise, fencing, and increased human activity during both project implementation intended end use should be considered in the EIR.
- g. Coastal California Gnatcatcher. Suitable coastal California gnatcatcher (*Polioptila californica californica*) (CAGN) habitat is found on-site. In recent years, CAGN has been observed in coastal sage scrub habitats in Ventura County that were previously thought to be unoccupied, including Simi Valley (U.S. Fish and Wildlife Service Letter to Kim Prillhart, June 20, 2012). Extensive surveys during the spring breeding season should be completed to confirm non-detection of this species.
- h. Protected Trees. The EIR should contain detailed information on tree removal consistent with the Tree Protection Ordinance (Ventura County Non Coastal Zoning Ordinance Section 8107-25 et seq.), Ventura County Oak Woodlands Management Plan, and Ventura County Tree Protection Guidelines. In general, the Ventura County Tree Protection Ordinance requires discretionary approval for the removal of five or more protected trees, or the removal of a "heritage" or "historical" tree (*Ibid*, § 8107-25.2, definition of "Heritage Tree" or "Historical Tree"). Therefore, the Ventura County Planning Division (for the tree permit) and Ventura County Public Works Agency (for the grading permit) would be responsible agencies that would rely upon this DEIR to issue the required discretionary grading and tree permits.
- i. Water and Wetland Impacts. The proposed site excavation could potentially impact watercourses in two different watersheds downstream of the sites, including Bell Creek (a tributary of the Los Angeles River) and Meier Creek (a tributary of Calleguas Creek). The EIR should evaluate the direct loss of watercourses within the excavation area,

potential downstream effects, and potential erosion and sedimentation, in accordance with the Ventura County ISAGs.

Mitigation Measures

The NOP states the DTSC is soliciting input on possible mitigation measures. In the absence of data and analysis, it would be premature for the County to recommend specific biological resources mitigation measures. All proposed mitigation measures must be consistent with the guidance in the ISAGs (page 42) and ISBA standards. Mitigation Monitoring and/or Mitigation Reporting is always required for mitigation measures (Pub. Res. Code § 21081.6; CEQA Guidelines § 15097). All of the mitigation measures that are developed must contain a "Monitoring and Reporting" section. The mitigation must identify who, how, and when monitoring or reporting will occur, and performance measures that must be achieved. Recommended timing requirements for mitigation measures include prior to the County's issuance of a zoning clearance, issuance of a grading permit, issuance of a building permit, completion of final inspection, or issuance of a Certificate of Occupancy, depending on the objective of the mitigation measure.

D. Planning Programs Section/Cultural Heritage Board

The significant historic architectural resources in the project area comprise the three historic districts (Alfa, Bravo and Cocas Test Areas) and their contributing elements, as well as with the nine individual structures within those districts as being eligible for listing on the National Register of Historic Places (NRHP). The significant archaeological resources in the project area comprise the Burro Flats Painted Cave site listed on the NRHP and Sites CA-VEN-1800 and CA VEN-1803 eligible for listing on the NRHP. The decisions presented in the EIR should first consider project avoidance and minimization of effects, and should not be driven by the legal proceedings of the AOC. In addition, the EIR should develop mitigation measures in conformance with the Secretary of Interior's Standards for Rehabilitation that would result in the retention of the greatest amount of historic fabric, along with the building's historic form, features, and detailing as they have evolved over time.

Identified Cultural Resources

The historic architectural resources identified in the NASA Draft Environmental Impact Statement (DEIS) and Appendix C (Draft Cultural Resources Study for the Environmental Cleanup and Demolition at Santa Susana Field Laboratory, Areas I and II) consist of three historic districts (Alfa, Bravo and Cocas Test Areas) and their contributing elements, as well as with the individual eligibility of the nine structures within those districts. The archaeological resources identified in the NASA DEIS consist of the Burro Flats Painted Cave site of approximately 10 acres that is listed in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Sites CA-VEN-1800 and CA VEN-1803 are being considered potentially eligible.

As part of the Draft EIR, the State Department of Toxic Substance Control should continue to work with the Department of Energy (DOE), Boeing, and NASA to integrate the

information described in the May 2008 Historic Resources Survey and Assessment of the NASA facility, the Traditional Cultural Property and Cultural Landscape Assessment ("TCP Assessment"), Chumash Sacred Site boundary identification and past cultural resource field work completed by professional cultural resources consultants on behalf of Boeing and DOE to identify cultural resources. In addition, a Cultural /Historic Resources Survey and Assessment, and Traditional Cultural Property and Cultural Landscape Assessment should be completed to identify cultural and historic resources on the Boeing and DOE properties similar to what NASA completed for Areas I and II as part of the NEPA process.

Ventura County General Plan Policies Related to Cultural Resources

The County's General Plan establishes goals and policies for paleontological and cultural resources of Ventura County (including archaeological, historical and Native American resources) for their scientific, educational and cultural value. The Ventura County General Plan Policies which apply to cultural resources are as follows:

- *1.8.2.1 - Discretionary developments shall be assessed for potential paleontological and cultural resource impacts, except when exempt from such requirements by CEQA. Such assessments shall be incorporated into a Countywide paleontological and cultural resource data base.*

In accordance with the above policy, the potential impacts to cultural resources should be disclosed to the general public and considered by the decision makers in their determination to implement the project.

The purpose of the EIR is to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project. The EIR should disclose the full magnitude of the property disturbance. Delineation of the contaminated areas should be completed prior to circulating an EIR document.

- *1.8.2.2 - Development shall be designed or re-designed to avoid potential impacts to significant paleontological and cultural resources. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data.*

Decisions presented in the EIR should first consider project avoidance and minimization of effects, rather than mitigation. Mitigation measures should be developed to save all three historic districts and the nine structures within those districts, Burro Flats Painted Cave site, and Sites CA-VEN-1800 and CA VEN-1803 and their contributing elements.

- *1.8.2.5. During environmental review of discretionary development, the reviewing agency shall be responsible for identifying sites having potential archaeological, architectural or historical significance and this information shall be provided to the County Cultural Heritage Board for evaluation.*

- 1.8.2.3 - *Mitigation of significant impacts on cultural or paleontological resources shall follow the Guidelines of the State Office of Historic Preservation and the State Native American Heritage Commission, and shall be performed in consultation with professionals in their respective areas of expertise.*
- 1.8.2.4. *Confidentiality regarding locations of archaeological sites throughout the County shall be maintained in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.*

In accordance with the policies above, staff recommends that the EIR incorporate feasible mitigation measures identified by the Santa Ynez Band of Chumash Indians and the Native American Heritage Commission through consultation with the State for the protection of the nationally significant Burro Flats Painted cave archaeological site, the not-yet defined Chumash Sacred Site as well as Sites CA-VEN-1800 and CA VEN-1803. As part of the consultation, the location of the archaeological sites shall remain confidential. Additionally, feasible mitigation measures identified by the National Park Service, Advisory Council on Historic Preservation, and the State Office of Historic Preservation staff for the protection of the NRHP eligible historic architectural resources during the Section 106 consultation should be incorporated into the EIR.

To conclude, we would like to once again thank you for the opportunity to review and comment on the scope and content of the environmental information to be included in the Program Environmental Impact Report (PEIR) that will be prepared by the DTSC.

Sincerely,

A handwritten signature in blue ink that reads "Kim L. Prillhart for". The signature is written in a cursive style.

Kim L. Prillhart, Director
County of Ventura Planning Division

Attachments:

Attachment 1 – NASA EIR Comments
Attachment 2 – DTSC NOP List

RMA Reference Number 13-027

Code Compliance Division
Jim Delperdang, Director

Building and Safety Division
Jim MacDonald, Building Official

Operations Division
Jennifer Padre, Director

Planning Division
Kimberly L. Prillhart, Director

Environmental Health Division
William C. Stratton, Director

September 27, 2013

Mr. Allen Elliot, SSFL Program Director
NASA MSFC AS01
Building 4494
Huntsville, AL 35812

E-mail: msfc-ssfl-eis@mail.nasa.gov

Subject: County of Ventura, California Comments on Draft Environmental Impact Statement (DEIS) for demolition and cleanup activities at Santa Susana Field Laboratory (SSFL) in Ventura County, California pursuant to the National Environmental Policy Act (NEPA), as amended (42 U.S.C. §4321 et seq.) and the National Historic Preservation Act (NHPA), as amended (16 U.S.C. §470 et seq.)

Dear Mr. Elliot:

Thank you for the opportunity to review and comment on the subject document. As a potential regulating governmental agency over portions or aspects of the above-referenced project and in response to the Notice of Availability of the DEIS (78 FR 47007, 08/02/2013), the County of Ventura (COUNTY) provides the National Aeronautics and Space Administration (NASA), the NEPA lead agency for this project, the following comments pursuant to NEPA, as amended (42 U.S.C. § 4321 et seq.), the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (40 CFR Parts 1500-1508), and NASA's NEPA policy and procedures (14 CFR Part 1216, subpart 1216.3).

The COUNTY, by and through its constituent agencies, departments and divisions, reviewed the July 2013, DEIS for the SSFL project with a focus on whether the DEIS sufficiently identifies and analyzes the proposed SSFL demolition and cleanup project's environmental impacts and adequately discusses measures in which such impacts may be mitigated or avoided. To that end, the COUNTY provides the following comments based upon its duties and responsibilities under California state law and local ordinance:



A. Public Works Agency, Integrated Waste Management Division (IWMD)

Pursuant to IWMD review and responsibilities, the following contract specifications pertain to all uncontaminated materials generated during demolition and environmental cleanup activities on NASA's portion of the SSFL site.

The IWMD requests that NASA comply with Ventura County Ordinances 4445 (solid waste handling, disposal, waste reduction, and waste diversion) and 4421 (the diversion of construction and demolition debris from landfills by recycling, reuse, and salvage) to assist the County in its efforts to comply with the waste diversion mandates of Assembly Bill 939 (AB 939) which mandates all cities and counties in California to divert recyclable solid waste from landfills. Both of these Ordinances may be viewed in their entirety on the IWMD's website at: www.wasteless.org/landfills/ordinances.

The following contract specifications shall apply to uncontaminated materials generated by this project:

Recyclable, Uncontaminated Construction & Demolition (C&D) Debris
Contract specifications for this project must include a requirement that C&D debris generated by the demolition of uncontaminated buildings on the project site must be diverted from the landfill. Recyclable C&D materials include, but are not limited to, concrete, asphalt, rebar, wood, and metal. These materials must be recycled at an appropriate, permitted C&D debris recycling facility. A complete list of permitted C&D debris recycling facilities in Ventura County is available at: www.wasteless.org/construction&demolitionrecyclingresources. All uncontaminated, non-recyclable, materials shall be disposed of at a permitted disposal facility.

Uncontaminated Soil - Recycling & Reuse
Contract specifications for this project must include a requirement that uncontaminated soil that is not reused on-site during the C&D phase(s) of this project shall be transported to an authorized and/or permitted organics facility for recycling or reuse. Illegal disposal and landfilling of uncontaminated soil is prohibited. A complete list of facilities in Ventura County that recycle uncontaminated soil is available at: www.wasteless.org/construction&demolitionrecyclingresources.

Uncontaminated Green Materials - Recycling & Reuse
The Contract Specifications for this project must include a requirement that uncontaminated wood waste and vegetation removed during the C&D phase(s) of this project must be diverted from the landfill. This can be accomplished by on-site chipping and land-application at the project

site if deemed appropriate by NASA, or by transporting uncontaminated materials to an authorized and/or permitted greenwaste facility in Ventura County. A complete list of authorized greenwaste facilities is located at: www.wasteless.org/greenwasterecyclingfacilities.

Recyclable, Uncontaminated Construction & Demolition (C&D) Debris – Required Reports per Ventura County Ordinance 4421:

1. Contractors selected to demolish uncontaminated buildings/structures at the Santa Susana Field Laboratory site are required to submit a completed *Form B – Recycling Plan* to the IWMD for approval. The *Form B – Recycling Plan* must specify how uncontaminated, recyclable C&D debris generated by the project (e.g., concrete, asphalt, wood, soil, greenwaste, metal) will be diverted from the landfill. A copy of IWMD's *Form B – Recycling Plan* is available at: www.wasteless.org/recycling/greenbuildingCD.
2. Contractors selected to demolish uncontaminated buildings/structures at the Santa Susana Field Laboratory site are required to submit a completed *Form C – Recycling Report* to the IWMD at the conclusion of the project. The *Form C – Recycling Report* must have original recycling facility receipts and/or other documentation attached to verify that recycling, NASA approved on-site reuse, or salvage of uncontaminated C&D debris occurred. A copy of IWMD's *Form C – Recycling Report* is available at: www.wasteless.org/recycling/greenbuildingCD.

B. Public Works Agency, Transportation Department, Traffic, Advance Planning & Permits Division

This project will generate approximately 39,000 trucks over an estimated 650 working days. The project will require 34 construction workers during the 150-day demolition phase and 15 construction workers during the 500-day excavation and disposal phase.

The COUNTY Transportation Department reviewed several documents in regard to the SSFL cleanup. Our previous comments are still valid and applicable.

Transportation Department staff offers the following comments on the DEIS for the demolition and cleanup activities in the NASA-administered areas of the SSFL:

1. According to the Truck Route Map (Figure 4.5-1), the project proposes to access the SSFL via Santa Susana Pass Road and Box Canyon Road in the County of Ventura and Woolsey Canyon Road in the County of Los Angeles.
 - a. The project proponent should be aware that Santa Susana Pass Road from Katherine Road to Rocky Peak Road has a "No Trucks Over 2 Axles" Truck Restriction adopted by the Ventura County Board of Supervisors (BOS) February 4, 1986.
 - b. The project proponent should be aware that Box Canyon Road from Santa Susana Pass Road to the Ventura County and Los Angeles County jurisdictional boundary has a "No Trucks 3 Or More Axles" Truck Restriction adopted by the BOS September 28, 1999.
 - c. If the project proponent plans to use trucks that are not restricted on Santa Susana Pass Road or Box Canyon Road, then please include these roads in the survey of road conditions as described in Traffic MM-2 on Pages 6-3 of the DEIS.
 - i. Proper precautions should be taken to protect all County road facilities in the unincorporated areas.
 - ii. If, in the opinion of the Transportation Department, any portion of a County road is damaged by the project's operations, then it should be repaired in accordance with current standard construction details and/or in a manner acceptable to the Transportation Department.
 - iii. An Encroachment Permit is required for any work in the public right-of-way.
 - d. The Transportation Department will not allow/permit hauling on Black Canyon Road north of the project site.
2. Please notify the Transportation Department when the Final EIS is ready for review and comment.

Transportation Department review is limited to the impacts this project may have on the County's Regional Road Network.

C. Resource Management Agency, Planning Division, Biological Resources

The following comments address biological resource issues associated with the Proposed Action at the NASA SSFL, including issues related to COUNTY regulations and the adequacy of impact analysis and proposed mitigation measures within the DEIS. Specific areas of comment address the following:

- General Plan goals and policies related to biological resources
- Ventura County Locally Important Species and Communities
- DEIS Data and Analysis Corrections
- Impacts and Mitigation Measures

Ventura County General Plan

Currently, the DEIS does not discuss the Proposed Action with respect to General Plan goals and policies for biological resources. Several policies in the County's General Plan support the protection of biological resources as follows:

- (1) Wildlife migration corridors, threatened or rare species and their habitats, and locally important species/communities are considered to be significant biological resources that should be preserved and protected from incompatible land uses and development (GP Goal 1.5.1);
- (2) Biological resource policies include wetland protection policies, such as a 100 foot setback from significant wetland habitat for all discretionary development (GP Policy 1.5.2.4) and a requirement to evaluate biological impacts for discretionary projects within 300 feet of waters and wetlands (GP Policy 1.5.2.3); and
- (3) The Santa Susana Field Laboratory is identified as an area with a "Significant Biological Resource" under Figure 1.5.6.2, *Biological Resource Map*, in the General Plan Resource Appendix.

The DEIS should be revised to discuss consistency with General Plan policies in identifying impact intensity, type, context, and duration. Mitigation measures should be developed that preserve and protect SSFL biological resources and incorporate recommended wetland protections.

Ventura County Locally Important Species and Communities

Section 4.4 and Appendix E Section 2.1 of the DEIS do not include an analysis of Ventura County Locally Important Species, and the DEIS does not consider them as "special status species" under Section 4.4.1.1. Impacts to Ventura County Locally Important Plant Species identified on-site should be evaluated and mapped (e.g., *Allophylum divaricatum* and *Crassula aquatic*). For a complete listing of Locally Important Species please see the following link:

<http://www.ventura.org/rma/planning/conservation/locally-important-species.html>

Impacts to Locally Important Communities (e.g., Venturan coastal sage scrub, oak woodlands) should be acknowledged in the EIS. The EIS should evaluate direct and indirect (i.e., dust) impacts to Locally Important Communities.

DEIS Data and Analysis Corrections

The list below, which is not exhaustive, identifies examples of biology-related issues that need to be further addressed in the EIS analysis.

- (1) Evaluation of Presence of the Californian Gnat Catcher (CAGN). The CAGN should be discussed in Section 4.4.1.1, and included where applicable throughout the DEIS biological resource analysis. On-site Venturan coastal sage scrub, and potentially other unidentified vegetation alliances absent the DEIS analysis, provides suitable habitat for the CAGN, a **federally listed threatened bird**. In recent years, CAGN has been observed in coastal sage scrub habitats in Ventura County that were previously thought to be unoccupied. Many of these occurrences, which are near Thousand Oaks, Camarillo, Simi Valley, and Moorpark, are located in habitats similar to the habitats on the project site. Given that suitable habitat is present, and no protocol presence/absence surveys were conducted, potential exists for the presence of the CAGN. Page E-38 Appendix E describes the potential for CAGN to occur on the project site as "unlikely" based the transition from coastal sage to chaparral and the dense brush cover. This evidence is inadequate for three reasons: (a) the project site was never surveyed for CAGN, (b) suitable habitat exists on the project site, and (c) several new occurrences of CAGN were identified in the region.

Given this additional evidence, protocol surveys should be conducted within suitable habitat in the areas proposed to be directly and indirectly impacted by the project to adequately evaluate the potential impacts of the project on CAGN.

- (2) Wildlife Corridor. A significant biological resource located adjacent to the project site is the regional wildlife movement corridor that connects habitats within the Simi Hills and Santa Susana Mountains with the western portion of the Santa Monica Mountains. This corridor, identified and mapped by the South Coast Missing Linkages Project (2006), is located immediately east of the project site. However, modeled corridor strands should not be taken as absolute limits to the areas of the landscape on SSL that wildlife use for movement, as nearby areas outside the modeled corridor that appears on the South Coast Missing Linkages map are likely still utilized.

The project site contains significant habitat connections and movement patterns for both transitory and permanent wildlife populations. Direct impacts from habitat destruction, fencing, and equipment can create physical barriers to wildlife movement while indirect impacts from lighting, noise, and increased human activity may also discourage wildlife use of the area. Impacts to the regional wildlife corridor, including temporary and long-term introduction of barriers to gene flow, should be considered in the DEIS. In addition, the "no impact" assessment in Section 4.4.1.3 should be corrected to reflect the appropriate intensity level, duration, and context. Additionally, Figure 4.4-2 and 3.4-2 should be updated to include on-site specific connectivity features and impediments to connectivity that would result from the project.

- (3) Vegetation Mapping. Vegetation types and sensitive communities, which are briefly categorized in the Appendices and in Section 3.4, should be mapped to the alliance level consistent with the *California Manual of Vegetation* (2010) and included in the DEIS. The entire site, and any off-site affected area (e.g., groundwater basins), should be mapped to the alliance level, which would provide an analysis of sensitive communities and habitats and a baseline for mitigation opportunities such as habitat restoration.

The EIS analysis, including Figure 4.4-1, only describes two types of communities affected by the project. Detail on the amount of vegetation

removed and the area of *all* native vegetation alliances impacted needs to be depicted and discussed in the DEIS and its appendices.

- (4) Native Soil Import Impacts. Page 4-35 states that 39 acres of native soil would be removed as a result of the Proposed Action, and that an unknown amount of replacement native soil would be imported. The DEIS should specify the off-site locations where imported, replacement native soil would be obtained and provide an analysis of potential impacts associated with the removal of soil from that property.

If the excavation areas for the native soil fill for the proposed project are located within unincorporated Ventura County, it is presumed that a discretionary permit from Ventura County would be required, and the potential project impacts associated with the removal of native soil within the unincorporated County must therefore be evaluated in the DEIR in accordance with the County's thresholds of significance. Those thresholds are found in the *Ventura County Initial Study Assessment Guidelines*. In addition, the removal of off-site soil must be evaluated for consistency with the County's policies and ordinances.

- (5) Oak Woodlands Preservation. Absent from Appendix B, *Applicable Laws and Regulations*, is the California State Oak Woodland Conservation Act (OWCA) (PRC §21083.4, Fish and Game Code §1361). The Ventura County Oak Woodland Management Plan was developed in response to the OWCA, and oak woodlands have also been acknowledged as a Locally Important Community by the Ventura County Board of Supervisors. Oak Woodlands were also identified as a sensitive community by the California Department of Fish and Wildlife, and impacts to the two oak woodlands on-site should be included in the DEIS. Figure 4.4-1 only shows two communities in the context of soil clean-up boundaries. The two types of oak woodlands need to be shown on Figure 4.4-1, and the acreage removed should be quantified in the DEIS. The DEIS does not provide adequate detail to know whether direct or indirect impacts would occur to the approximately 22.5 acres of oak woodland habitat identified onsite (Appendix D, Table 10), and the document should be revised to address impacts to oak woodlands and individual oak trees.
- (6) Groundwater Clean-up: The DEIS currently lacks adequate information on potential impacts to biological resources that could result from proposed changes to hydrology. Section 4.4.1.4 (Page 4-41) of the DEIS should include more information regarding impacts both on-site and offsite related

to the following changes associated with the Proposed Action: (a) changes to the water table, (b) additional topsoil removal “outside the soil clean-up footprints”, (c) on-site wetlands, and (d) effects on regional hydrology. In addition, the DEIS should include impacts to off-site and on-site native vegetation alliances that would be affected by changes to hydrology as shown in Appendix Figure 2.2-4.

- (7) Protocol Surveys. Additional protocol surveys are needed for special status species found within the SSFL study area. In the absence of protocol surveys for special status species (e.g., riverside shrimp, red-legged frog), actual impacts to wildlife from the implementation of the project are speculative.

Impacts and Mitigation Measures

The proposed project would result in extensive impacts to biological habitat for numerous special status species. The biological resource mitigation measures within the DEIS are generally inadequate under the requirements of NEPA (40 CFR 1508.20) for addressing significant regional impacts that affect sensitive biological resources. As defined under the Council of Environmental Quality (CEQ) guidance document (dated January 4, 2011), NEPA mitigation measures should include documentation, monitoring, and performance standards. The proposed BMPs and mitigation measures lack details on requirements, timing, monitoring, and success criteria. The list below, which is not exhaustive, contains examples of suggested revisions to the EIS impact assessment and mitigation measures:

- (1) Removal of Native Vegetation Communities: The removal of approximately 39 acres of native vegetation (impact biology 2a) would be regionally significant and long-term, especially in the absence of adequate mitigation as discussed below. The proposed best management practices mitigation measures would have minimal effect on mitigating this impact. Additionally, removing developed areas (biology impact 2b) would not have a beneficial effect on native vegetation, unless these previously developed areas were carefully restored. Planting an “approved seed mix” without performance criteria or an effective invasive plant removal program would not constitute restoration.
- (2) Pre-Construction Wildlife Surveys, Monitoring, and Relocation. Appendix E, Section 4.2, recommends preconstruction surveys and the development of a breeding season schedule for listed and protected

species. However, the Draft EIS Section 4.4.2 only recommends avoidance if protected species are discovered by workers (BMP-4), and it includes a vague reference to red-legged frog monitoring (MM-5). Pre-construction protocol surveys and relocation should be required for all special status wildlife, including Locally Important Species that may be expected to occur, and as recommended in Appendix E, Section 4.2. Additionally, surveys should include species that are present in the vicinity, but are not identified in the DEIS as having the potential to occur (e.g., ring-tailed cat).

Typically, a biological monitor, with any appropriate permits needed, should survey the construction area prior to construction and relocate special-status wildlife outside the construction area. In addition, the construction area should be fenced to prevent the return of wildlife to the construction area. The biological monitor should also be present during project implementation.

- (3) Pre-construction Santa Susana Tarplant Surveys and Monitoring. The proposed mitigation (MM-2) and BMPs (BMP-4) are inadequate to address what should be considered a significant regional impact to the State-listed rare Santa Susana Tarplant (Impact Biology 1a and 1g). Avoidance and worker awareness (MM-2) is *not a recognized mitigation measure*. Likewise, BMP-4 is not considered an acceptable strategy for the management of this plant. The mitigation measures should be revised to include preconstruction surveys, biologist monitoring during project implementation, and relocation of impacted species.
- (4) On-site Habitat Restoration and Monitoring Plan. The proposed removal of seven (7) acres of the sensitive Ventura Sage scrub, of 0.05 acres southern willow scrub, and of unspecified impacted oak woodlands should be mitigated through on-site restoration. In addition, the on-site restoration should be implemented through mitigation that requires a Habitat Restoration and Monitoring Plan with timing and success criteria. The DEIS should include mitigation measures that require restoration at different ratios for each habitat type, as developed in consultation with the California Department of Fish and Wildlife.

The proposed BMP to reseed with a "approved mix" (BMP-1) is not adequate, and permanent restoration should be conducted with a compatible plant pallet that is derived from reference sites specific to each impacted alliance. In order to maintain the genetic integrity of the local

flora, Native plants and seed stock used during the revegetation process should be locally collected or propagated from locally collected seed or cuttings (from the Simi Valley area or same watershed). An attempt should be made to restore some of the diversity of the existing native plant community by specifically including some of the less common native species currently found on the project site. For temporary revegetation, the DEIS should provide specific information that identifies seed mix, seed application, seeding methods, timing of monitoring, and reporting and performance criteria.

- (5) On-site Habitat Preservation. The loss of habitat for locally important wildlife species should be mitigated through the preservation of existing, intact plant communities and through the restoration and preservation of disturbed plant communities at an appropriate ratio in the project vicinity.
- (6) Off-site Mitigation Measures. The DEIS should include mitigation measures that require preservation of off-site biological habitats that offset the destruction of native habitat and underlying soils.
- (7) Nesting Bird Mitigation. The mitigation that would protect nesting birds (Biology MM-4) is incomplete. Proposed mitigation measures should include nesting and breeding considerations for any special status birds identified onsite, including the Least Bell's Vireo and the Loggerhead Shrike.
- (8) Dust. Indirect impacts to biological resources from dust would vary greatly depending on the amount of excavation required. The DEIS should consider impacts and mitigation measures from dust based on the excavation to 20 feet.
- (9) Wetlands. The DEIS must disclose all mitigation measures and related impacts in the current document. Currently, the DEIS (Page 4-39) states that the project could affect two (2) acres of wetlands, and it identifies this loss as moderate, regional, and long-term. The DEIS further states that "NASA would work with the USACE during the permitting process to mitigate the disturbance to waters of the U.S". Impact 6a and b of the DEIS should therefore be updated to reflect that the loss of 2 acres of wetlands is significant, regional, and long-term *unless clearly defined mitigation measures would explicitly reduce impacts*. Additionally, groundwater impacts (Biology impact 2k) to wetlands would not be "no impact" if changes in groundwater were to affect surface water availability.

- (10) Deferred Mitigation. Impacts Biology 1b, 1f, 1i,1l, 1o, 1r, , 6a, and 6b were considered (or should be considered, in the case Impacts Biology 6a and 6b) to be “regionally significant”. However, the DEIS does not identify appropriate mitigation measures but instead defers the development of mitigation measures to future USFWS review. It is critical that mitigation measures be defined within the DEIS in order to disclose to the public whether (or not) the project under review does (or does not) have potentially significant regional impacts following the application of mitigation measures. Accepted standards for environmental review include the development of mitigation measures within the DEIS, and prior to project approval and implementation. The impact analysis is not clear and clearly defined mitigation is needed within the DEIS.

D. Resource Management Agency, Planning Division, Long Range Planning

The Ventura County Planning Division (Planning Division) Long Range Planning Section evaluated the NASA DEIS for the Proposed Demolition and Environmental Cleanup Activities at the SSFL for consistency with the Ventura County General Plan and the Non-Coastal Zoning Ordinance. This consistency evaluation provides an opportunity for the Planning Division to identify key issues of concern related to land use, and to notify NASA of local regulatory requirements that would be applicable for a non-federally owned property.

This section identifies General Plan land use issues related to the County’s Open Space land use designation as well as ordinance-level land use regulations. Additional General Plan issues related to biology and cultural resource issues are identified in separate topic areas.

General Plan Land Use

The County’s General Plan land use designation for the entire NASA property is “Open Space”. General Plan Section 3.2, Land Use Designations, defines the purpose of the Open Space land use designation, and that definition includes the following:

- Preserve natural resources, (plants, animals, water courses, etc.);
- Manage the production of resources (forest lands, rangeland, agricultural land, etc.);
- Preserve outdoor recreation opportunities including those areas of “outstanding scenic, historic, and cultural value; areas particularly suited for park and recreation purposes”; and

- Preserve areas necessary for public health and safety including those areas, "which require special management or regulation because of hazardous or special conditions..."

The County's General Plan also includes goals and policies for the Open Space land use designation. The Planning Division review identified relevant goals/policies as follows:

- (1) Retain open space lands in a relatively undeveloped state so as to preserve the maximum number of future land use options.
- (2) Retain open space lands for outdoor recreational activities, parks, trails and for scenic lands.
- (3) Recognize the intrinsic value of open space lands and not regard such lands as "areas waiting for urbanization."

While the proposed cleanup at the SSFL is intended to remove the groundwater and soil contamination present at the site, and thus return the site to its "background" condition, the proposed cleanup will occur in a manner that is not consistent with the Open Space goals of the County's General Plan. For example, the project includes significant clearing of native vegetation and soil, which is not consistent with the County's goals of preserving natural resources, using such lands for recreational purposes, or retaining the scenic value of the land. In addition, while the proposed cleanup levels may bring the contaminant levels down to "background," the site would not be returned to "its natural state prior to the introduction of contaminants" (NASA Audit Report No. IG-13-007, pg. 6; NASA SSFL Fact Sheet) given NASA's plan to remove such large amounts of soil and vegetation.

Furthermore, the Planning Division questions the elimination of future "land use" as a consideration for cleanup. Table 2.5-1 of the DEIS states the following:

"The proposed demolition and environmental cleanup activities would not result in a change in land use on the NASA-administered property; implementation of the Proposed Action or action alternatives would not require a change in zoning and no easements or land encroachments would be necessary. No land use acquisition or transfers would be required. Existing and proposed land uses do not conflict with federal or state land use plans, policies, regulations, or laws. Therefore, no impacts to land use would occur."

Although the Proposed Action may not require a change to the County's land use classifications, and would presumably not affect minor land use issues such as easements, that does not lead to a conclusion that "existing and proposed land uses do not conflict with...state land use plans, policies,

regulation, or laws. The State of California requires that local jurisdictions prepare a General Plan, and (as noted previously) the Proposed Action is not consistent with the purpose or goals associated with the property's Open Space land use classification.

In addition, the Planning Division is concerned that remediation alternatives were not developed in a way that reasonably anticipates, or even discusses future land use. In fact, as part of NASA's response to comments, they state that, "(a) decision about future land use is not within NASA's purview, nor part of NASA's EIS" (Appendix K, Pg. K-7). Given the lack of analysis in the EIS, NASA's conclusion that land use can be eliminated as a cleanup consideration appears to be unfounded and premature. Without an examination of land use options (e.g. park use, recreation use, residential use, or other types of land use), it is impossible to state what effect the proposed demolition and cleanup activities will have on future land use of the property. Although not a federal Superfund site, the U.S. Environmental Protection Agency's guidance with respect to remedy selection at Superfund sites is instructive. An EPA 2010 Directive state:

"In carrying out Superfund response actions that protect human health and the environment, EPA typically considers the reasonably anticipated future land use of a site in the remedy selection process" (EPA OSWER Directive 9355.7-19).

Without an analysis of "reasonably anticipated future land use", it is difficult to conclude that remediation decisions are, indeed, consistent with existing and/or future land uses.

Zoning

In addition to the General Plan, future land use for the SSFL site will be dependent upon zoning. The SSFL site, which includes properties owned by Boeing, is also subject to a 1947 Special Use Permit issued by Ventura County. It should be noted that the current zoning for the NASA property, which is Rural Agricultural, or RA-5 acre, is not consistent with the General Plan land use designation of Open Space, which has a 10-acre minimum lot size. Consistent zones would be as follows:

- Open Space (OS), which has a 10-acre minimum
- AE (Agricultural Exclusive), which has a 40-acre minimum

The Zoning Matrix (pg. 44 of the Non-Coastal Zoning Ordinance) shows minor differences in allowable uses between the current zone and the two consistent zones. However, the minimum lot size would change from 5 acres to either 10 or 40 acres, depending on the selected zone.

Tree Protection Ordinance

In addition to the County's General Plan, the County's Non-Coastal Zoning Ordinance (NCZO) guides land use actions. Notably, the NCZO includes a tree protection program (NCZO Sec. 8107-25). Tree protection regulations are a relevant local land use regulation that are not noted among the other applicable regulations listed in Appendix B of the DEIS. The County's tree protection regulations apply to the removal of protected trees in unincorporated areas of Ventura County. Within the NASA property, protected trees include all oak and sycamore tree species as well as any tree that is ninety inches (90") in circumference or larger, which are classified as heritage trees.

The NCZO requires a discretionary permit and offsets for the removal of more than four (4) oak trees. Based on the information provided in Appendix D of the DEIS, there are over 20 acres of oak woodland on the NASA property (Appendix D, Pg. D-17). Although this resource is mapped on Figure 3.4-1 (Vegetated Cover Types), these oak woodlands do not appear in Figure 4.4-1, which is the map showing the Biological Resources that will be impacted by NASA's proposed actions.

The Planning Division recommends that oak woodlands be added to Figure 4.4-1, as it appears that the remediation will remove a portion of the oak woodlands. Moreover, the Planning Division assumes that NASA's remediation plan will remove far more than four oak trees, and hence would have required a discretionary permit and commensurate offsets (such as in-lieu fees) as mitigation for the loss of this resource. In addition, Appendix B of the DEIS should be revised to include the Tree Protection Ordinance and appropriate mitigation should be included in the DEIS to account for the loss of oak woodlands that result from cleanup activities.

Noise Standards

After a review of County noise standards within the General Plan and Noise Ordinance, staff concluded that none of the standards apply to the Proposed Action as follows:

- *Noise Ordinance:* Appendix B of the DEIS refers to the County's Noise Ordinance as an applicable regulation (Pg. B-18), and the document states that it provides relevant night-time noise standards. However, the Noise Ordinance only applies in residential neighborhoods between the hours of 9:00 p.m. to 7:00 a.m. of the following day. Given that NASA's remediation activities will not occur in residential neighborhoods and are scheduled between the hours of 7:00 a.m. and 7:00 p.m. (DEIS, Section 4.11, Pg. 4-140), the night-time noise standard would not apply. The

Planning Division recommends that the reference to this noise ordinance be removed from Appendix B, as it does not appear to be applicable.

- *General Plan:* The General Plan does contain policies related to noise (General Plan, Section 2.16.2), but the policies that would otherwise be relevant to the Proposed Action apply only when the noise being generated occurs near noise sensitive uses - which the County defines as dwellings, schools, hospitals, nursing homes, churches, and libraries (Ventura County Initial Study Assessment Guidelines, pg. 120). Given that most proposed noise-generating activities (such as demolition) will take place on-site away from noise sensitive uses, the General Plan policies would not apply.

General Plan noise policies do apply to truck traffic generated by the Proposed Action that occurs near noise sensitive uses. The DEIS discusses noise impacts generated by the trucks that will transport materials generated by proposed cleanup activities. As shown in Figure 3.11-1, one of the haul routes, Box Canyon Road, is located in Ventura County. However, Box Canyon Road is part the County's 2020 Regional Road Network (Figure 4.2.3 of the General Plan - Public Facilities Appendix), and the General Plan excludes traffic-general noise on the Regional Road Network from noise policies/standards within the General Plan (General Plan, Section 2.16.2(4)).

The County recommends that NASA clarify its truck trip calculations so that noise impacts can be properly evaluated. Currently, there's an inconsistency within the report regarding the amount of additional truck traffic that could be generated by the Proposed Action. On page 4-119 of the DEIS, it states that 3,476 trips associated with demolition hauling would take place over the course of approximately one year. However, on page 4-139 of the DEIS, it says that the "analysis assumed that up to 142 trucks per day would use the designated haul routes." Assuming 260 work days in a year, these 142 daily truck trips add up to almost 37,000 annual truck trips, which is considerably more trips than the 3,476 trips estimated elsewhere in the DEIS. In addition, in Section 4.11.1.1 (Demolition) of the DEIS (pg. 4-140), it states that demolition activities would take place between 2014 and 2016. Of course, demolition activities would result in additional truck trips and those trips do not appear to be accounted for in the 37,000 truck trips noted above.

E. Resource Management Agency, Planning Division, Cultural Heritage

Planning Division Cultural Heritage Board staff (CHB Staff) is aware of and acknowledges that NASA intends to use the NEPA process and this DEIS in lieu of procedures set forth in 36 CFR §§ 800.3 through 800.6 to review the cultural heritage impacts of the SSFL demolition and cleanup project in order to comply with the directives set forth in section 106 of the NHPA. Particular attention has been placed on Sections 3.3 and 4.3 of the DEIS and DEIS Appendix C: Section 106 Findings of Effect Consultation Report, Ventura County, California.

The CHB staff comments seek to evaluate whether ““most or all of the primary structures, sites, and other improvements . . . could be considered potentially eligible for listing on both the National Register of Historic Places and the California Register of Historic Places. (Calvit and Barrier 2006:1)” (NASA, Historic Resources Survey and Assessment of the NASA Facility at Santa Susana Field Laboratory, Ventura County, California (March 2009 ver.) p. i.; see also 36 CFR Part 60) and whether the proposed project significantly affects existing cultural resources, including sacred sites and historic properties in the project’s region of influence or area of potential effects.

Identified Cultural Resources

The historic architectural resources identified in the DEIS and Appendix C (Draft Cultural Resources Study for the Environmental Cleanup and Demolition at SSFL, NASA Areas I and II) consist of three historic districts (Alfa, Bravo and Cocas Test Areas) and their contributing elements, as well as the individual eligibility of the nine structures within those districts.

The archaeological resources identified in the DEIS and Appendix C include the Burro Flats Painted Cave site of approximately 10 acres that is listed in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Sites CA-VEN-1800 and CA VEN-1803 are being considered potentially eligible for purposes of this undertaking.

CHB staff concurs with the NRHP eligibility of the three districts and their contributing elements, as well as the nine individual eligible structures and the NRHP eligible archaeological sites as described in the May 2008 Historic Resources Survey and Assessment of the NASA facility at SSFL.

Area of Potential Effects (APE)

The Area of Potential Effects, as shown in Figure 3.3-1 of the DEIS text, is also referred to as the Region of Influence (ROI). The APE includes approximately 490 acres, including 182.6 ha (451.2 acres) of NASA-administered property, 16.9 ha (41.7 acres) in Area I, and 165.7 ha (409.5 acres) in Area II. An additional 15.7 ha (39 acres) of Boeing property are included in the APE, because these areas likely would be part of NASA's remediation activities.

CHB staff believes the APE boundary is inadequate. As shown in Figure 2 of Appendix C, additional soil remediation cleanup areas are located outside of the existing APE. The APE should be adjusted to include these sites. Furthermore, the Traditional Cultural Property and Cultural Landscape Assessment ("TCP Assessment") has not been completed, so it is unknown whether these sites would be within the current APE. Once the Assessment has been completed, the results and recommendations should be incorporated into the DEIS for recirculation to the public and if necessary, the APE adjusted to incorporate these sites.

Ventura County General Plan Policies Related to Cultural Resources

The COUNTY's General Plan establishes goals and policies for paleontological and cultural resources of the COUNTY (including archaeological, historical and Native American resources) for their scientific, educational and cultural value. The Ventura County General Plan Policies which apply to cultural resources are as follows:

1.8.2.1 - Discretionary developments shall be assessed for potential paleontological and cultural resource impacts, except when exempt from such requirements by CEQA. Such assessments shall be incorporated into a Countywide paleontological and cultural resource data base.

In accordance with the above policy, the TCP Assessment and the Chumash Sacred Site boundary identification should be completed so that the full scope of the project is known. Once the assessment and the boundary identification are completed, the potential impacts to such resources can be disclosed to the general public and considered by the decision makers in their determination to implement the project.

The purpose of the DEIS is to "inform decision makers and the general public of the environmental consequences of a proposed federal action." The DEIS doesn't disclose the full magnitude of the property disturbance. Delineation of

the contaminated areas is still underway so it is premature to circulate a NEPA document when the full scope of the project is unknown.

1.8.2.2 - Development shall be designed or re-designed to avoid potential impacts to significant paleontological and cultural resources. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data.

Decisions presented in the DEIS should first consider project avoidance and minimization of effects, rather than mitigation. Mitigation measures should be developed to save all three test stands, and their contributing elements, as well maintaining the individual eligibility of the nine structures within the three historic districts.

1.8.2.5. During environmental review of discretionary development, the reviewing agency shall be responsible for identifying sites having potential archaeological, architectural or historical significance and this information shall be provided to the County Cultural Heritage Board for evaluation.

1.8.2.3 - Mitigation of significant impacts on cultural or paleontological resources shall follow the Guidelines of the State Office of Historic Preservation and the State Native American Heritage Commission, and shall be performed in consultation with professionals in their respective areas of expertise.

1.8.2.4. Confidentiality regarding locations of archaeological sites throughout the County shall be maintained in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.

In accordance with the policies above, CHB staff recommends that the DEIS incorporate feasible mitigation measures identified by the Santa Ynez Band of Chumash Indians and the Native American Heritage Commission through consultation with NASA for the protection of the nationally significant Burro Flats Painted cave archaeological site, the not-yet defined Chumash Sacred Site, as well as Sites CA-VEN-1800 and CA VEN-1803. As part of the consultation, the location of the archaeological sites shall remain confidential. Additionally, feasible mitigation measures identified by the National Park Service, Advisory Council on Historic Preservation, and the State Office of Historic Preservation staff for the protection of the NRHP eligible historic architectural resources during the Section 106 consultation should be incorporated into the DEIS.

Mitigation Measures (Cultural MM-1, MM2, MM3, MM4 and MM5 under Section 4.3 – Cultural Resources)

The identified Mitigation Measures “MM-1 Retaining one Test Stand,” “MM-2 HABS/HAER documentation” and “MM-3 In-depth ethnographic study” for the impacts on cultural and historic resources from proposed demolition, excavation, soil removal and groundwater cleanup do not reduce the significant adverse effects of the project to a less than significant level.

MM-1 Mitigation Measure for retention of one test stand does not meet the *Secretary of Interior’s Standards and Guidelines for Preservation* which requires retention of the greatest amount of historic fabric, along with the building’s historic form, features, and detailing as they have evolved over time.

MM-2 and MM-3 Mitigation measures of HABS/HAER documentation recording and the completion of ethnographic studies would avoid the loss of historical information, but do not prevent the physical loss of historically significant resources. It should be noted that photographic documentation to HABS standards of a historic building or structure is not sufficient mitigation for its demolition (*Architectural Heritage Assn. et al v. County of Monterey*, (2004) 122 Cal.App. 4th 1095.)

CEQA requires that all feasible mitigation be undertaken even if they do not mitigate the project below a level of significance. Therefore, additional mitigation measures should be developed to save all three test stands, and their contributing elements, as well as the nine structures within the three identified historic districts.

CHB staff concurs with using the following Mitigation Measures:

- Avoidance of excavation within the boundaries of Burro Flats (CA-VEN-1072) and CA-VEN-1803 to diminish or eliminate adverse impacts to known archeological sites and reduce the impacts to negligible.
- All three Test Stands and their contributing elements, as well as with the individual eligibility of the nine structures should be retained in-situ or relocated elsewhere on the same project site.
- Use Monitored Natural Attenuation (MNA) to monitor soils or groundwater to evaluate the reduction in contamination over a period of time once another treatment technology had been implemented or the naturally occurring attenuation processes had proven effective in reducing contamination in the subsurface.

- Use of Institutional Controls including deed restrictions, fencing, signage, and other security measures to eliminate public access to the most significant sites.

Project Alternatives

The DEIS alternatives (“No Action” and 100% Demolition) discussion is inadequate. The alternatives analysis is considered the “heart” of the EIS and should discuss a range of alternatives, including all “reasonable alternatives.” CHB staff recommends that the DEIS include additional alternatives that are feasible from an economic, technical, and future land use standpoint that provides for the preservation of the most significant historic resources at SSFL. The DEIS should develop mitigation measures in conformance with the *Secretary of Interior's Standards for Rehabilitation* that would result in the retention of the greatest amount of historic fabric, along with the building's historic form, features, and detailing as they have evolved over time. Other cleanup alternatives consistent with the potential future use of the land should be considered.

F. Resource Management Agency, Environmental Health Division

The Ventura County Environmental Health Division (EHD) does not have jurisdiction over the cleanup activities at Santa Susana Field Laboratory (SSFL). Nevertheless, the EHD provides the following comments upon the DEIS and the activities referenced therein:

1. The information in the DEIS indicates that the handling of solid waste and hazardous materials encountered or created in the cleanup activities appears to be in conformance with applicable regulations regarding these materials.
2. Two known closed solid waste landfills exist within the general area of the SSFL. These are identified as Area 1 Landfill Solid Waste Information System (SWIS) #56-CR-0051, and Area 2 Landfill SWIS #56-CR-0052. The EHD understands that the cleanup activities proposed in the DEIS will not impact these closed solid waste landfills, however, in the event that changing conditions during the cleanup occur which results in disturbance of either of these landfills, the EHD, as Local Enforcement Agency for Solid Waste must be contacted prior to any disturbance. Also, the EHD will continue to monitor the condition of these solid waste landfills, in conformance with State minimum standards.
3. The EHD oversees testing requirements for specified projects in proximity to the SSFL for perchlorate and trichloroethylene. The EHD does not anticipate any change to this testing protocol related to the cleanup.

Mr. Allen Elliot
September 27, 2013
Page 22 of 22

Thank you for the opportunity to review and comment on the DEIS. Additional comments may have been sent directly to you by other County agencies, such as the Ventura County Air Pollution Control District.

Please note that responses to Public Works Agency comments should be sent directly to the commenter, with a copy to Laura Hocking at the Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009. Memos from the Public Works Agency Transportation Department and Integrated Waste Management Division with their comments are attached for reference.

General questions on this letter may be directed to Laura Hocking, RMA Planning Division, at (805) 654-2443 or via email at Laura.Hocking@ventura.org, using County RMA Reference Number 13-019.

Sincerely,



Chris Stephens
Director

cc: Laura Hocking, RMA Planning Division

Attachments:

Response to DEIS from County of Ventura Public Works Agency Integrated Waste Management Division dated August 21, 2013

Response to DEIS from County of Ventura Public Works Agency, Transportation Department dated August 20, 2013



**County of Ventura
Public Works Agency
Integrated Waste Management Division
MEMORANDUM**

Date: August 21, 2013

To: Allen Elliott
National Aeronautics & Space Administration (NASA)

From: Derrick Wilson, Staff Services Manager
Integrated Waste Management Division

Subject: **Non-County Project – RMA No. 13-019**
Draft Environmental Impact Statement (DEIS) for Proposed Demolition
and Environmental Cleanup Activities at Santa Susana Field Laboratory

Lead Agency: National Aeronautics & Space Administration (NASA)
Lead Agency Contact: Allen Elliott, 256/544-0662

Summary:

NASA has announced the availability of a Draft Environmental Impact Statement (DEIS) to evaluate the potential environmental impacts of proposed demolition and environmental cleanup activities on property administered by NASA at the Santa Susana Field Laboratory (SSFL) in Ventura County. NASA is preparing land they administer at the SSFL for disposition, or "excess," through the Department of General Services (GSA). NASA's preparation of the land for disposition includes consideration of the possible demolition of all structures on land they administer at the SSFL. The purpose of the DEIS is to inform NASA decision makers, regulating agencies, and the public of potential environmental consequences of the proposed demolition of buildings and structures at the SSFL, and the proposed environmental cleanup actions for groundwater and soil on NASA administered land at the SSFL. The DEIS will consider a range of remedial technologies that might be implemented to achieve the proposed groundwater and soil remediation goals. NASA will use the DEIS to consider the potential environmental, economic, and social impacts of proposed remediation actions.

Pursuant to RMA's request, the Integrated Waste Management Division (IWMD) has reviewed NASA's July, 2013, DEIS pertaining to the proposed demolition and environmental cleanup at the SSFL. The IWMD appreciates this opportunity to provide our comments.

The following contract specifications pertain to all **uncontaminated** materials generated during demolition and environmental cleanup activities on NASA's portion of the SSFL site. The IWMD requests that NASA comply with Ventura County Ordinances 4445 (solid waste handling, disposal, waste reduction, and waste diversion) and 4421 (the diversion of construction and demolition debris from landfills by recycling, reuse, and salvage) to assist the County in its efforts to comply

with the waste diversion mandates of Assembly Bill 939 (AB 939) which mandates all cities and counties in California to divert recyclable solid waste from landfills. Both of these Ordinances may be viewed in their entirety on the IWMD's website at: www.wasteless.org/landfills/ordinances.

Pursuant to IWMD review and responsibilities, the following contract specifications shall apply to uncontaminated materials generated by this project:

Recyclable, Uncontaminated Construction & Demolition (C&D) Debris

Contract specifications for this project must include a requirement that C&D debris generated by the demolition of uncontaminated buildings on the project site must be diverted from the landfill. Recyclable C&D materials include, but are not limited to, concrete, asphalt, rebar, wood, and metal. These materials must be recycled at an appropriate, permitted C&D debris recycling facility. A complete list of permitted C&D debris recycling facilities in Ventura County is available at: www.wasteless.org/construction&demolitionrecyclingresources. All uncontaminated, non-recyclable, materials shall be disposed of at a permitted disposal facility.

Uncontaminated Soil - Recycling & Reuse

Contract specifications for this project must include a requirement that uncontaminated soil that is not reused on-site during the C&D phase(s) of this project shall be transported to an authorized and/or permitted organics facility for recycling or reuse. Illegal disposal and landfilling of uncontaminated soil is prohibited. A complete list of facilities in Ventura County that recycle uncontaminated soil is available at: www.wasteless.org/construction&demolitionrecyclingresources.

Uncontaminated Green Materials - Recycling & Reuse

The Contract Specifications for this project must include a requirement that uncontaminated wood waste and vegetation removed during the C&D phase(s) of this project must be diverted from the landfill. This can be accomplished by on-site chipping and land-application at the project site if deemed appropriate by NASA, or by transporting uncontaminated materials to an authorized and/or permitted greenwaste facility in Ventura County. A complete list of authorized greenwaste facilities is located at: www.wasteless.org/greenwasterecyclingfacilities.

Recyclable, Uncontaminated Construction & Demolition (C&D) Debris – Required Reports

Per Ventura County Ordinance 4421:

1. Contractors selected to demolish uncontaminated buildings/structures at the Santa Susana Field Laboratory site are required to submit a completed **Form B – Recycling Plan** to the IWMD for approval. The **Form B – Recycling Plan** must specify how uncontaminated, recyclable C&D debris generated by the project (e.g., concrete, asphalt, wood, soil, greenwaste, metal) will be diverted from the landfill. A copy of IWMD's **Form B – Recycling Plan** is available at: www.wasteless.org/recycling/greenbuildingCD.
2. Contractors selected to demolish uncontaminated buildings/structures at the Santa Susana Field Laboratory site are required to submit a completed

Form C – Recycling Report to the IWMD at the conclusion of the project. The **Form C – Recycling Report** must have original recycling facility receipts and/or other documentation attached to verify that recycling, NASA approved on-site reuse, or salvage of uncontaminated C&D debris occurred. A copy of IWMD's **Form C – Recycling Report** is available at:
www.wasteless.org/recycling/greenbuildingCD.

Should you have any questions regarding this memo, please contact Pandee Leachman at 805/658-4315.



**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division**

MEMORANDUM

DATE: August 20, 2013

TO: RMA – Planning Division
Attention: Laura Hocking

FROM: Transportation Department

SUBJECT: REVIEW OF DOCUMENT 13-019 Draft Environmental Impact Statement (DEIS) for Proposed Demolition and Environmental Cleanup Activities for NASA-administered portion of the **Santa Susana Field Laboratory (SSFL)**. Simi Hills, Ventura County (State)
Lead Agency: **California Department of Toxic Substances Control (DTSC)**

Pursuant to your request, the Public Works Agency – Transportation Department has completed the review of the Draft Environmental Impact Statement (DEIS) for Proposed Demolition and Environmental Cleanup Activities for the National Aeronautics and Space Administration (NASA)-administered portion of the Santa Susana Field Laboratory (SSFL) located in the Simi Hills south of the City of Simi Valley and west of the Ventura and Los Angeles County jurisdictional boundary.

Site activities at the 2,850-acre SSFL have included research, development, and testing of liquid-fueled rocket engines and components for various governmental space programs. Rocketdyne (predecessor to Boeing) began operations in the late 1940s for the Air Force and then NASA. NASA gradually discontinued testing in the 1980s, with final tests conducted in 2006. The site consists of four administrative areas known as Areas I, II, III, and IV and two undeveloped areas or buffer zones.

This project proposes a demolition of approximately 100,000 CY of debris (tests stands and other structures) and 500,000 CY of soil in the NASA-administered areas, approximately 41.7 acres within Area I and all 409.5 acres of Area II. The Boeing company manages the remaining area of the property (2,398.8 acres). This project will generate approximately 39,000 trucks over an estimated 650 working days. The project will require 34 construction workers during the 150-day demolition phase and 15 construction workers during the 500-day excavation and disposal phase.

The California DTSC oversees the comprehensive environmental investigation, monitoring, and cleanup program of contamination at the SSFL. The process for actual cleanup includes: (1) Resource Conservation Recovery Act (RCRA) Facility Investigations (RFI) Reports; (2) a Feasibility Study; (3) a Risk Assessment; (4) a draft Remedial Action Plan (RAP); (5) a draft Environmental Impact Statement (EIS); (6) final RAP; and (7) final EIS.

We have reviewed several documents in regard to the SSFL cleanup. Our previous comments are still valid and applicable.

We offer the following comments on the DEIS for the demolition and cleanup activities in the NASA-administered areas of the SSFL:

1. According to the Truck Route Map (Figure 4.5-1), the project proposes to access the SSFL via Santa Susana Pass Road and Box Canyon Road in the County of Ventura and Woolsey Canyon Road in the County of Los Angeles.
 - a. The project proponent should be aware that Santa Susana Pass Road from Katherine Road to Rocky Peak Road has a "No Trucks Over 2 Axles" Truck Restriction adopted by the Ventura County Board of Supervisors (BOS) February 4, 1986.
 - b. The project proponent should be aware that Box Canyon Road from Santa Susana Pass Road to the Ventura County and Los Angeles County jurisdictional boundary has a "No Trucks 3 Or More Axles" Truck Restriction adopted by the BOS September 28, 1999.
 - c. If the project proponent plans to use trucks that are not restricted on Santa Susana Pass Road or Box Canyon Road, then please include these roads in the survey of road conditions as described in Traffic MM-2 on Pages 6-3 of the DEIS.
 - i. Proper precautions should be taken to protect all County road facilities in the unincorporated areas.
 - ii. If, in the opinion of the Transportation Department, any portion of a County road is damaged by the project's operations, then it should be repaired in accordance with current standard construction details and/or in a manner acceptable to the Transportation Department.
 - iii. An Encroachment Permit is required for any work in the public right-of-way.
 - d. The Transportation Department will not allow/permit hauling on Black Canyon Road north of the project site.
2. Please notify the Transportation Department when the Final EIS is ready for review and comment.

Our review is limited to the impacts this project may have on the County's Regional Road Network.

ec: Anitha Balan, Permits, Transportation Department



PEIR Topics

Issues to be addressed in the PEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils & Seismicity
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology, Groundwater & Water Quality
- Land Use
- Noise
- Population & Housing
- Public Services
- Traffic & Transportation
- Utilities
- Project Alternatives



**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division**

MEMORANDUM

DATE: December 9, 2013

TO: RMA – Planning Division
Attention: Laura Hocking

FROM: Transportation Department *GBW*

SUBJECT: REVIEW OF DOCUMENT 13-027 Notice of Preparation of Draft Program Environmental Impact Report (NOP/DPEIR) for Contaminated Soil and Groundwater Remediation Projects at the **Santa Susana Field Laboratory (SSFL)**.
Simi Hills, Ventura County (State)
Lead Agency: **California Department of Toxic Substances Control (DTSC)**

Pursuant to your request, the Public Works Agency – Transportation Department has completed the review of the above subject document.

According to the Notice, the California Department of Toxic Substances Control (DTSC) is preparing a Draft Program Environmental Impact Report (DPEIR) to assess alternatives for environmental cleanup at the Santa Susana Field Laboratory site in Ventura County. The DTSC will host two public scoping meetings in December to provide information on the PEIR preparation process and to invite public comments on the scope of the environmental issues and the alternatives to be considered in the DPEIR. The Groundwater Characterization and Cleanup Program is one of many programs at the SSFL and consists of ongoing groundwater monitoring of existing wells, sampling of new groundwater locations, and treatment of contaminated groundwater when needed.

We offer the following comment:

The Transportation Department has received and will continue to receive notices regarding the activities at the SSFL. We have reviewed several documents in regard to the SSFL cleanup and our previous comments are still valid and applicable. We understand that we will receive the DPEIR when it becomes available, therefore we will not reiterate our previous comments. Our previous comments are provided in memorandums for the following twelve (12) RMA reference numbers: 10-024; 10-027; 10-031; 10-035; 11-008; 11-009; 11-016; 11-021; 12-027; 13-010; 13-019; and 13-027.

Our review is limited to the impacts this project may have on the County's Regional Road Network.



VENTURA COUNTY WATERSHED PROTECTION DISTRICT
PLANNING AND REGULATORY DIVISION
800 South Victoria Avenue, Ventura, California 93009
Tom Wolfington, Permit Manager – (805) 654-2061

M E M O R A N D U M

DATE: January 3, 2014

TO: Laura Hocking, RMA/Planning Technician

FROM: Tom Wolfington, P.E., Permit Manager *TW*

SUBJECT: RMA 13-027 – NOP for a DPEIR Regarding Contaminated Soil and Groundwater Remediation at Santa Susana Field Laboratory

Pursuant to your request, this office has reviewed the subject Notice of Preparation of a Draft Program Environmental Impact Report at the Santa Susana Field Laboratory Site in unincorporated Ventura County.

PROJECT LOCATION

The project site is located in the Santa Susana Field Laboratory and is composed of four administrative areas (Areas I, II, III, IV), each with Solid Waste Management Units and Areas of Concern; and two buffer zones (Northern Buffer Zone and Southern Buffer Zone).

PROJECT DESCRIPTION

The California Department of Toxic Substances Control (DTSC) is requesting input from agencies, organizations, and the public in the preparation of a scope and content of environmental information of a Program Environmental Impact Report for contaminated soil and groundwater remediation projects at the Santa Susana Field Laboratory (SSFL) site in unincorporated Ventura County. The study area is illustrated in the Project Notice of Public Comment Period - Figure 2: Regional Location Map, prepared by ESA/Parus Consulting, Inc., dated November 18, 2013, as follows:

- Area I – northeastern section (672-acres) owned and being investigated by Boeing, and 41-acres in the northwestern section that is owned by the federal government and administered and being investigated by NASA.
- Area II – north-central section (404-acres) that is owned by the federal government and administered and being investigated by NASA.
- Area III – western section (119-acres) that is owned and being investigated by Boeing.
- Area IV – northwestern section (290-acres) owned by Boeing, with a 90-acre section leased to the U.S. Department of Energy (DOE). The entirety of Area IV is being investigated by DOE.

January 3, 2014

RMA 13-027 – NOP for a DPEIR Regarding Contaminated Soil and Groundwater Remediation at Santa Susana Field Laboratory

Page 2 of 3

- Southern Buffer Zone – (1,143-acres) located southerly of Areas II, III, and IV, and being investigated by DOE.
- Northern Buffer Zone – (182-acres) located northerly of Areas II, II, and IV, and being investigated by DOE and NASA.

The anticipated remediation approaches and methodologies for contaminated soils will be defined further in an upcoming Corrective Measures Study (CMS) and upcoming Soils Remedial Action Implementation Plans. The anticipated remediation approaches and methodologies for groundwater will be defined further in an upcoming Groundwater Remedial Investigation and CMS.

WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:

The northerly area of the Santa Susana Field Laboratory is traversed in part by Burro Flats Canyon which is a Ventura County Watershed Protection District (District) red line jurisdictional channel. Southerly and southwesterly portions of the site are traversed by Bell Canyon and Bell Canyon Tributary; also District jurisdictional red line channels. The District exercises its permitting authority over any activities conducted within the bed, banks and overflow areas of jurisdictional red line channels in accordance with Ordinance WP-2 effective October 10, 2013. The District hereby requests that the following items be addressed in the DPEIR and subsequent environmental documents:

1. Please identify and label on all maps, figures, and exhibits, all Ventura County Watershed Protection District red line channels that are located near the areas of proposed work.
2. In accordance with Ventura County Watershed Protection District Ordinance WP-2 effective October 10, 2013, no person shall impair, divert, impede or alter the characteristics of the flow of water running in a watercourse, or establish any new drainage connection to a District jurisdictional channel, without first obtaining a written permit from the District. Where applicable, Watercourse or Encroachment Permit applications must be submitted to the District for any proposed work.
3. It is the Ventura County Watershed Protection District's standard that the peak flow after development cannot exceed the peak flow under existing conditions for any frequency of event.

Please reference in future project notices and correspondences to the County of Ventura the applicable pages in subsequent project documents where the District's above noted comments have been addressed.

January 3, 2014

RMA 13-027 – NOP for a DPEIR Regarding Contaminated Soil and Groundwater
Remediation at Santa Susana Field Laboratory

Page 3 of 3

Thank you for the opportunity to comment regarding compliance with the requirements of the District relative to this project. Feel free to contact me for any further information or if you have further questions.

END OF TEXT

Mariah Mills

From: William Preston Bowling [williamprestonbowling@yahoo.com]
Sent: Monday, February 10, 2014 2:26 PM
To: DTSC_SSFL_CEQA; Malinowski, Mark@DTSC
Subject: Comments for the Record Please Confirm

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr. Malinowski,

A cleanup to background is the best possible way to protect several watersheds from the radiological and chemical contamination that continues to migrate offsite from the Santa Susana Field Laboratory. This is a concern as the said property is the headwaters of the L.A. River and and it's potential for migration is possible without a proper cleanup. As you already know, the Los Angeles Regional Water Quality Control Board has fined the landowner annually for discharging into Bell Creek through their National Pollutant Discharge Elimination System Permit. Leaving significant amounts of contamination behind will place the health of the nearby communities at continued risk, including millions of river go-ers as the future plans of the river include areas in the San Fernando Valley. Contaminated soil cannot be left behind as when the wind blows or in rain events it has the potential to migrate offsite as seen in past reports. The Department of Toxic Substances Control (DTSC) should not be considering alternatives to the laws that are already in place. The Administrative Orders on Consent signed by the United States Department of Energy (DOE) and the National Aeronautics and Space Administration (NASA) should be the only method of cleanup to be considered for a safe and healthy Los Angeles River Watershed.

Looking forward to DTSC's Response to Comments and The Community looks forward to a continuing relationship with DTSC to Ensure a Proper Cleanup of the Santa Susana Field Laboratory, it's Related Facilities and their Surrounding Communities.

Thank you in advance for consideration of these comments into the record.

William Preston Bowling
Founder ACME
Aerospace Contamination Museum of Education
<http://www.acmela.org>

Appendix F2

Public Scoping Meeting Comment and Speaker Cards



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Simi Valley Senior Center Multi-Purpose Room – December 14, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
William Preston Bowling	ACMEVA.org	williamprestonbowling@yahoo.com
Del Ray	NA	dbiggera@gmail.com
DAVID DASSLER	BOEING	david.w.dassler@boeing.com
Sharon Ford	SFV Audubon/Self	sharon_ford1@att.net
John L...	SSMFA	johnblue11-
Leah Segedie	Bookieboo LLC	bookieboo78@gmail.com
STEVE RANDALL	WHNC	stevkr2000@aol.com
ALEC UZEMECK	WHNC CAG	ALECMU@AOL.COM



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report
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Simi Valley Senior Center Multi-Purpose Room – December 14, 2013

Name (Please print)	Affiliation (If applicable)	Mailing Address (Street, City, State, Zip)
Barbara Tejada	Los Angeles-Ventura Cultural Research Alliance	btejada75@yahoo.com
Jazmin Bell	U.S. DOE	
CHRISTINA WALSH	CLEANUPROCKETDOME.ORG SSFL CAG	8463 MELBA AVE, WEST HILLS CA 91304
Gary Hartung	private citizen	5198 Munera Canale Ct Simi Valley 93063



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Simi Valley Senior Center Multi-Purpose Room – December 14, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
BETSEY LANDIS	CALIFORNIA NATIVE PLANT SOCIETY	betseylandis@sprintmail.com
BRIAN LINDQUIST	SCFS	—
Stephie Jennings	DOE	
Tom Nachtrab	SSMPA	
Liza Tucker	Consumer watchdog	
Wendy Lowe	P2 solutions	wendy@P2-solution.com
Poly Georgiats	CAG SSFL	therealest8guy@hotmail.com
David Lowenthal		



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report

Scoping Meeting

Simi Valley Senior Center Multi-Purpose Room – December 14, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Mohan Thakeri		mlhaker38@yahoo.com
Dean Kunchi		thecommiss1@roadrunner.com



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report

Scoping Meeting

Simi Valley Senior Center Multi-Purpose Room – December 14, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Holly Huff		
Karen DiBiase	Woodland Hills Resident	DiBiase @ Tamrac . com
Michael W. Kuhn		hannahmike@me.com
Arlene Matthews		
Davis Gortner		davisgortner@gmail.com
Candi Gordon		
Lyn Harris Hicks	CREED+UNA	3908 Calle Arriana San Clemente 92672
Robert Dodge	PSR LA	robert@dodge@gmail.com



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Simi Valley Senior Center Multi-Purpose Room – December 14, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Bruce Spick		- on record -
Wayne Fishback	neighboring property owner	waynefishback@yahoo.com
NANCY KIDD	Consultant Section 106	nkidd@shcglobal.net
FRU Weniger		
De Anna Goldberg	living in Simi Valley	deagoldberg@verizon.net
TIM DAWSON	CHATS WORTH	
Phil Chandler	TREASURER	philipb.chandler@earthlink.net



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report

Scoping Meeting

Simi Valley Senior Center Multi-Purpose Room – December 14, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Richard M. Mathews	North Valley (Chatsworth) Democratic Club	richard@alumni.caltech.edu
Denise Duffield	PSR - LA	dduffield@psr-la.org
Michael Collins	EnviroReporter.com	contact@enviroreporter.com
Dorothy Boberg		
RL MILLER	Ventura Dems, St Dem Party Enviro Caucus	envirocaucus@ gmail.com
Kristin Storey	Physicians for Social Responsibility LA	"
ALICE STERLING		
ALICE STERLING	RESIDENT	

ALICE STERLING
SIMI VALLEY
RESIDENT



COMMENT FORM

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Comments must be postmarked or received by **5 p.m., January 10, 2014** to be considered in the Draft Program Environmental Impact Report. Comments may be submitted at the scoping meetings, or postmarked, faxed or emailed to the address below.

Meeting Location: SN Date: 12-14-2013

Please Print

- 1) CHAIN OF CUSTODY - SOIL ; DESCRIBE THE "INTEGRITY" OF THE PROCESS INCLUDING CHECKS FOR VERIFICATION AT CRITICAL POINTS OF TRANSPORTATION + DISPOSAL.
- 2) DISCUSS IN SITU STORAGE + CONTAINMENT INCLUDING WIND DISPERSAL (OFF SITE MIGRATION)
- 3) DISCUSS DILUTION OF SOIL TO ACCEPTABLE LEVELS FOR US AT ADC @ LANDFILLS (E.G. SVLRC)
- 4) PLEASE NOTE WIND CONDITIONS IN S.V (E.G. TOPAY) CUMULATIVE IMPACTS ON AQ W/ TASN ADC.
- 5) NOTICE TO PUBLIC ABOUT TOXIC MATERIALS OPTIONAL: THAT MAY HAVE BEEN TRANSPORTED TO LOCAL DUMPS OR SITES IN PAST HISTORY. (E.G. GRANDMA PRIBREYS BOTTLE VILLAGE)
- 6) ON-GOING AIR QUALITY TESTING - PROVIDE DETAILS

Please give this form to one of the project team representatives or submit by **5 p.m., January 10, 2014** to:

Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826
Fax: 916-255-3734
Email: DTSC_SSFL_CEQA@dtsc.ca.gov



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Meeting Location: Simi Valley Senior Center Date: 12-14-13

Please Print

- ① There needs to be consideration given to "risk based" clean up. Disturbing the soil and hauling it to offsite areas will now impact all communities along the various routes (Woosley Canyon Rd., Topanga Canyon Blvd, Ventura Fwy, Simi Fwy, etc). The NASA proposed 80,000 truck trips go past schools, community centers, shopping malls and expose everyone to exposure to the contaminants in the trucks.
- ② The future use of the site should be considered as to the level of cleanup required. "Background" is excessive and costly and spends funds ~~in~~ inappropriately.
- ③ Consideration of keep at least one of the Test Sites for historical significance needs to be done. The valley →

OPTIONAL:

Name: Karen DiBiase

Affiliation (if applicable): Woodland Hills Resident

Mailing Address: 20525 Aetna St.
Woodland Hills, CA 91367

Email Address: DenKarDiB@msn.com and DiBiase@Tamrac.com

Please give this form to one of the project team representatives or submit by **5 p.m., January 10, 2014** to:

Mark Malinowski, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826
Fax: 916-255-3734
Email: DTSC_SSFL_CEQA@dtsc.ca.gov

cont. K. DiBlase

contributed much to the space and military technology and should be preserved for future generations. A National Park/State Park would preserve this history.

- ④ Different areas of the "Project" contain more contaminants than others, and therefore the clean up levels should be different. Health and safety should be maintained ~~and~~ during this clean up. ~~Disturbing~~
- ⑤ Consideration to treat soil "on site" instead of hauling it away will help to keep non-native plants from being introduced to the SSFL site. Future cleanup of these newly introduced contaminants will need to be done. Do not add to the existing problem but clean up on site.
- ⑥ The SSFL Project timeline suggests that the ~~CEQA~~ CEQA Assessment will be completed ~~after~~ before the soil and Groundwater Clean up Plan Decision Document/Approved Cleanup Plan is completed. The timing of the CEQA Assessment should be revised.
- ⑦ The Native American Burro Flats site should be protected. Soil removal will decimate this area. Potential ~~new~~ new historical sites will be eliminated if ~~the~~ the soil is removed for "background" ~~site~~ unintentionally.

(i)

SPEAKER CARD



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Santa Susana Field Laboratory
Program Environmental Impact Report
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If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/14/13

Name: William Preston Bowling Affiliation: ACMELA.org

Question/Comment:



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Department of Toxic Substances Control
Santa Susana Field Laboratory
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Date: 12 14 13

Name: BRIAN LINDQUIST Affiliation: SCFS

Question/Comment: Brian Lindquist

3

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Department of Toxic Substances Control
Santa Susana Field Laboratory
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If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-14-13

Name: Liza Tucker

Affiliation: Consumer Watchdog

Question/Comment: Liza Tucker

(4)

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If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/14/13

Name: ALEC UZEMECK Affiliation: _____

Question/Comment: Alec Uzemeck
CEQA



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Date: 12-14-13

Name: Holly Huff

Affiliation: _____

Question/Comment: Holly Huff

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Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
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Date: 12/14/13

Name: DAWN KOWALSKI

Affiliation: LOCAL RESIDENT IN KABLUS

Question/Comment: (Kowalski)

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Date: 12-14-13

Name: Dr. Michael W. Kuhn

Affiliation: _____

Question/Comment: (Kuhn)



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Date: 12/14/13

Name: Richard M. Mathews

Affiliation: _____

Question/Comment:

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Date: 12/14/13

Name: CHRISTINA WALSH
Christina Walsh

Affiliation: CLEANUPROCKETSDAY.ORG
SSFLCAG

Question/Comment:

10



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Date: 12-14-13

Name: John Luker

Affiliation: SSMLPA

Question/Comment: John Luker
Dept of Scoping.

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Date: 12/14/13

Name: Arlene Mathews
Arlene Mathews

Affiliation: _____

Question/Comment:

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Date: 12-14-13

Name: Dr. Robert Dodge

Affiliation: PSR-LA

Question/Comment:

13



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Date: 12-14-13

Name: Denise DuArd

Affiliation: PSR-LA

Question/Comment: (Denise Duffield)

Round 1
14



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Date: 12-14-13

Name: Michael Collins

Affiliation: Edwiroreporter.com

Question/Comment:

15

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If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-14-13

Name: Harvey Hartung

Affiliation: private citizen

Question/Comment:

How close is the DTSC to meeting the
remediation levels required to meet the
Administrative Order of Consent?

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Date: 12/14/2013

Name: RL MILLER

Affiliation: Ventura Dem. Party
Cal Dem Party

Question/Comment: (RL Miller)

Support full clean up to background

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Date: 12/14/13

Name: Davis Gortner

Affiliation: Teens against Toxins

Question/Comment:



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Date: 12-14-2013

Name: Dorothy Baberg

Affiliation: _____

Question/Comment:



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Date: 12/14/2013

Name: Barbara Tjiada

Affiliation: Los Angeles-Ventura Cultural
Research Alliance

Question/Comment:

^{should be}
DTSC defining "Native American artifacts" according to PRC 5024.1

How will DTSC rectify having two different cleanup standard alternatives w/in the
same project?

Why was a combined EIS/EIR not prepared for this project?



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Date: 12/14/2013

Name: BETSEY LANDIS

Affiliation: CALIF. NATIVE PLANT SOCIETY

Question/Comment:

- 1) WHO OWNS WOOLSEY CANYON ROAD (THE ONLY ACCESS TO SSFL)? WHO KEEPS IT IN REPAIR? WHO IS LIABLE FOR ANY ^{IMPACTS,} ACCIDENTS, OR OTHER ~~UNFORTUNATE~~ INCIDENTS THAT HAPPEN ON WOOLSEY CYN. RD? ~~WHAT~~ THIS WILL AFFECT HOW SOME OF THE PROPOSED MITIGATION/REMEDIATION PLAN ARE DESIGNED AND HOW SUCCESSFUL THESE PLANS MAY BE.
- 2) Biological, geology; cumulative impacts, alternatives-



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Date: 12/14/13

Name: Sharon Ford

Affiliation: SSFL-CAG
San Fernando Valley Audubon
California Native Plant Soc.
Sierra Club

Question/Comment: I have great concerns that the cleanup is based on "background levels" instead of a "health risk assessment," with no plans for end use. The SSFL site is about the last open space that provides an important wildlife corridor and habitat. It is rich with cultural, historical and archaeological resources, worthy of protection as a park and wildlife corridor. The biggest issue of community concerns is health risks. Cleanup to background will cause health + safety issues: noise

air quality, water quality, traffic + transportation, green house emissions.
Defects above background can be lower than what is considered to be a health risk. More soil will be removed + transported increasing ^{more} health risks than if no action is taken. Soil removal will result in unstable soil, subject to erosion, more vulnerable during fires. Valley Fever is a real threat, and no agency has addressed whether or not soil disturbance will increase the threat of Valley Fever. Cleanup to background is more costly, plus it would result in mixed waste that will be dumped in someone else's backyard. ~~There has~~ Plus cleanup to background will damage cultural, historical, and archaeological, making it unsuitable for parkland by any agency. Background will not remove health risks, ~~it will create more~~ Humans subject themselves to health risks + cancer risks everyday - Xray, CT Scans, etc. + cooking + eating or drinking from plastic containers which are known to cause cancer.
Base Clean-up on Health risk

- > Develop alternatives for testing + cleanup on + off site
- > reduce the numbers of truckload



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Round 1
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Date: 12-13-13

Name: Fred Weniger

Affiliation: _____

Question/Comment:

Fukushima



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State of California
Department of Toxic Substances Control
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Program Environmental Impact Report
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Round 1

26

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: Dec. 14, 2013

Name: Dee Goldberg

Affiliation: Homeowner - SMO Valley

Question/Comment:

To have all agencies/companies to clean
up to background the Santa Susana Field Lab
Site & Boeing & NASA. Clean up rocket fuel &
weapons contaminants & Nuclear waste.



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Round 1
27

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Santa Susana Field Laboratory
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Date: Dec 14 2013

Name: NANCY KIDD

Affiliation: Section 106 consultant

Question/Comment:

5 stories disagree



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Department of Toxic Substances Control
Santa Susana Field Laboratory
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If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 14 December 2014

Name: Brian SUJATA

Affiliation: _____

Question/Comment:



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State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: _____

Name: Lyn Harris Hicks

Affiliation: CREED - UNA -

Question/Comment:

Coalition for response of physical
environmental damage



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Program Environmental Impact Report
Scoping Meeting

Round 2
Optional

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-14-13

Name: Michael Collins

Affiliation: EnviroReporter.com

Question/Comment:



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Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Round 27

2

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-14-13

Name: CHRISTINA WALSH

Affiliation: _____

Question/Comment:



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$\frac{2}{3}$



If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/14/13

Name: ALEC UZEMECK

Affiliation: WHNC SSFL CAG

Question/Comment:

CEQA SCOPING.



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~~23~~
2
4

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12 14 13

Name: Brian Lindquist

Affiliation: SCFS

Question/Comment:



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$\frac{2}{5}$

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Date: 12-14-13

Name: Michael Kuhn

Affiliation: See previous testimony

Question/Comment:

further comments



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6

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-14-13

Name: Denise Duffield

Affiliation: PSD-VA

Question/Comment:



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If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-14-13

Name: Fred Weniger

Affiliation: _____

Question/Comment:

Futile?

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Date: 12/14/13

Name: Sharon Ford

Affiliation: SSFL-CAG
SEV Audubon
Sierra Club & CA Native
Plant Society

Question/Comment:

If we want SSFL site cleaned-up for now + future generations it must be based on health risk. Unfortunately, much of this clean up is being pushed by fear.

To cleanup the site to the way it was originally will not be accomplished by clean-up to background - The AOC needs to be modified to allow for other technologies & health care



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~~Round 3
(Optional)~~

- Declined

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-14-13

Name: Michael Collins

Affiliation: EnviroReporter.com

Question/Comment:



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Did not
Speak

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12.13.2013

Name: poly GEORGILAS

Affiliation: CAG SSFL

Question/Comment:

Are the AOC's Flexible or Dynamic enough
to accommodate new technologies, community input/
feedback or reasonable, rational changes that
may arise during the cleanup effort?



State of California
Department of Toxic Substances Control

①

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Abraham Weitzberg	Self - CAG	aweitzberg@att.net
ALEC UZEMEK	CAG	ALECMU@AOL.COM
JOHN SOUTHWICK	Self	REVJOHN98@ROADRUNNER.COM
Albert J. Saw	—	alsawr@igc.org
Bruce M. Rowe	Self	
Stephie Jennings	DOE	
Christopher Park	CDM Smith	Parkce@cdmsmith.com
Marye Brown	@@@	probation@dena@yahoo.com



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State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Bob Dager	SSMPA	bobdager1@gmail.com
DAVE DASSLER	BOEING	david.w.dassler@boeing.com
Shel Plotkin	RCC	splotkin@ca.gov.com
Teena Takata	SSMPA Chatsworth Neigh Cnc'l	teena@besttax.com
Bob Brostoff	West Hills Neighborhood Council	Bob.Brostof1@westhillsnc.org
Merrilee Fellows	NASA	mfellows@nasa.gov
Tom Eisenhauer	RRG	teisenhauer@renewablegroup.com
JELINA GARY	CNE	beb@social.rp.com



State of California
Department of Toxic Substances Control

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Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Paulius Ziedas	Chatsworth High school	Paulius.Ziedas@yahoo.com
Brian Linnquist	SCF S	B490403@Tadcoo.com
Cassandra D. Wells	ARRW&CB	cwells@waterboards.ca.gov
Kathleen Wong	Boeing	Kathleen.h.wong@boeing.com
John Luker	SS-21P	
PAUL CARPENTOR	DTSC	
Peter Zorba	NASA	john.zorba@nasa.gov
Jason Glasgow	CHAMHILL	Jason.glasgow@chdm.com



State of California
Department of Toxic Substances Control

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Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Rick Brandlin	SSFL CAG	branprop@aol.com
DORRi Raskin	Rockwell Cleanup PSE	bunnyraskin@yahoo.com
Jeanne Londe		
Liza TUCKER	CONSUMER WATCHDOG	Liza@consumerwatchdog.org
Denise Duffield	Physicians for Social Responsibility	dduffield@psr-la.org
Beth Hake	SARC	farrellhake@sarc.com
John Wandolke	CDM	wandolkejt@cdmsmith.com
Andrea Vasquez	Chatsworth HS Student	krzyntandrea@aol.com



State of California
Department of Toxic Substances Control

(P)

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Catherine Wahlgren	CTBTG	CatWahlgren@aol.com
Yesica Sevilla		yesicasevilla1645@gmail.com
Jose Sevilla		
Nancy Wahlgren		nwahlgren36@gmail.com



State of California
Department of Toxic Substances Control

24

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
John Alford	Office of Rep. Brad Sherman	john.alford@mail.house.gov
Michael Collins	EnviroReporter.com	
Kamara Sams	Boeing	
Colleen Smith	Chats HS	



State of California
Department of Toxic Substances Control

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
ELEANORE REMBAUM	REBAUM	ELAPRINT@SOCIETY.COM
George Rembaum	resident	
Don Hirsch	CBT	dhirsch1@cuozio.com
William Preston Bowling	ACME LA.org	williamprestonbowling@yahoo.com
Chris Rowe		
Jazmin Bell	U.S. DOE	
Sandy Enyeart	Leidos	enyearts@leidos.com
Bonnie Klex	Self	



State of California
Department of Toxic Substances Control

8

Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Helen S Murphy	CNC	hsmurph@yahoo.com
Carla Ballinger	SSMPA Section 106	carlamamay@aol.com
RONALD ZIMAN	BELL CANYON SECTION 106	rbziman@gmail.com
Wayne Fishback	Section 106	waynefishback@yahoo.com
DIXIE HAMBRECK	MUTT	—
MARGIE GONZALEZ	—	hrm357@juno.com
Tom Skaug	DTSC	tstkaug@DTSC.CA.GOV
LOUISE RISHOFF	SEN. PAVLEY	LOUISE.RISHOFF@SEN.CA.GOV



State of California
Department of Toxic Substances Control



Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

Chatsworth Charter High School Chancellor Hall – December 10, 2013

Name (Please print)	Affiliation (If applicable)	Email Address
Glenn Smith	Student	

State of California
 Department of Toxic Substances Control

Santa Susana Field Laboratory
 Program Environmental Impact Report
 Scoping Meeting

Chatsworth Charter High School Chancellor Hall - December 10, 2013



⑧

Name (Please print)	Affiliation (if applicable)	Email Address
DIANA DIXON-DAVIS	SSFL-CHG, C 31st DISTRICT CARR, N.C. SSM PA	dixon-davis@ Autism.org.com
CHRISTINA WASH	CLEANWATERPROTECTION.ORG SSFL CHG	ON FILE
Marie Oskow	San Francisco Valley Academy Society	watt.oskow@stravelho.n.org
Cheri Orgel	Congresswoman Bounley	cheri.orgel@mail.house.gov
Cory Berman		berman-covenant@kafmail.com
Kim Hudson	DTSC	
Eric Sogef		
Sam Cohen		scohen@sybml.org

①



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: ABE WEITZBERG

Affiliation: Self - CAG

Question/Comment:

WAIT & SEE

2



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: ALEC UZEMECK

Affiliation: CAG, WITAC

Question/Comment:

CERCLA RCRA



SPEAKER CARD

3

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: LIZA TUCKER

Affiliation: CONSUMER WATCHDOG

Question/Comment:



SPEAKER CARD

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State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: Chris Rowe

Affiliation: _____

Question/Comment:

5



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-15

Name: William Preston Bowling

Affiliation: ACMELA.org

Question/Comment:



SPEAKER CARD

6

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/2013

Name: Jeanne Londe

Affiliation: Rockledge in concert + PSR

Question/Comment:



SPEAKER CARD



State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-19

Name: Denise Duffield

Affiliation: Physicians for
Social Responsibility -
Los Angeles

Question/Comment:

Would like to comment



SPEAKER CARD



State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/2013

Name: JOHN SOUTHWICK

Affiliation: SELF

Question/Comment:

9



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: Dora Raskin Affiliation: _____

Question/Comment:

10



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-2013

Name: Margery Brown

Affiliation: Red Hat Wine Company

Question/Comment:

Concern

Margery Brown



SPEAKER CARD

11

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: Bonnie Klea

Affiliation: Self

Question/Comment:

12



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12 10 13

Name: BRIAN LINQUIST

Affiliation: SCFS

Question/Comment:

13



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: Shel Plotkin

Affiliation: RCC

Question/Comment:

14



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-9-0

Name: ELEANORE REMBAUM Affiliation: ROCKETDYNE CLEANUP GROUP

Question/Comment: I WOULD LIKE TO ~~SPEAK~~ SPEAK!
WOULD LIKE THE CLEANUP TO PROCEED AS
ORIGINALLY AGREED TO, OUR COMMUNITY IS
AT RISK

15

SPEAKER CARD



State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/2013

Name: Bruce M. Rowe

Affiliation: _____

Question/Comment:

Need to clean up based on health risks,
not on non-scientific assumptions.

16



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: RONALD B. ZIMAN, MD Affiliation: SSFL CAG, BELL CANYON

Question/Comment:



SPEAKER CARD

16

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: Michael Collins

Affiliation: EnviroReports.com

Question/Comment:



17



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

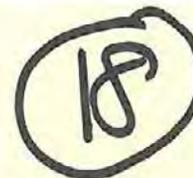
Name: Richard M. Mathews

Affiliation: North Valley Democratic Club

Question/Comment:



SPEAKER CARD



State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 10 Dec 2013

Name: DIANA DIXON-DAVIS

Affiliation: CAG & CNC etc.

Question/Comment:



SPEAKER CARD

19

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: _____

Name: John Laker

Affiliation: SCALPS

Question/Comment:



SPEAKER CARD

20

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: CHRISTINA WALSH

Affiliation: SSFLCAG
CLEANUPROCKETDOME

Question/Comment:

CONCERNS WITH AOC IMPACTS



SPEAKER CARD

21

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: Mark Osokow

Affiliation: Southern Valley Audubon Soc.

Question/Comment:

Don't know yet



SPEAKER CARD

22

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: _____

Name: Sam Cohen

Affiliation: Santa Ynez

Chumash Tribe

Question/Comment:

Protection of sacred &
Cultural resources

23

SPEAKER CARD



State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: _____

Name: Dan Hirsch

Affiliation: CSC

Question/Comment:



SPEAKER CARD

24

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-2013

Name: JELENA CSANYI

Affiliation: CWC, CHS, FPSSN, SAVE CHS/IS/WSL
etc.

Question/Comment:



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

25 25
2-1

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: Richard M. Mathews

Affiliation: _____

Question/Comment:



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

26
2-2

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/13

Name: Chris Rowe

Affiliation: West Hills resident

Question/Comment:



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

27
2-3

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: _____

Name: ARE WE IT FRBR

SPEAK AGAIN

Affiliation: _____

Question/Comment:



SPEAKER CARD

28
2-4

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: Mark Osdan

Affiliation: San Fernando Valley Audubon

Question/Comment:

General



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

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If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: _____
Name: CHRISTINA WALSH Affiliation: _____

Question/Comment:



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

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2-4

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: Denise Duffield

Affiliation: Physician for
Social Responsibility

Question/Comment:



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

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2-6

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/2003

Name: James Lee

Affiliation: Robert Dwyer & PIR

Question/Comment:

Deerup

32
2-7



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: _____

Name: RONALD ZIMMERMAN

Affiliation: _____

Question/Comment:



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

33
2-8

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 10 Dec 2013

Name: DIANA DIXON-DAVIS

Affiliation: SSFL-CAG
CNC

Question/Comment:



SPEAKER CARD

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

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2-9

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12/10/2012

Name: George Brown

Affiliation: West Hills neighborhood
owners

Question/Comment:



SPEAKER CARD

~~33~~ ~~34~~ 35
3-1

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 12-10-13

Name: Mark Osokow

Affiliation: San Fernando Valley Audubon Soc.

Question/Comment:

General



SPEAKER CARD

36
3-2

State of California
Department of Toxic Substances Control
Santa Susana Field Laboratory
Program Environmental Impact Report
Scoping Meeting

If you plan to ask a question or make a statement, please fill in the information below and submit the card when requested to do so. If you would like us to read your question or statement, please let us know. When speaking, please limit your comments to three minutes. Thank you.

Date: 10/2 12-10-13

Name: Denise Duffield

Affiliation: PSR-LA

Question/Comment:

Appendix F3
Transcripts of Verbal Comments from
Public Scoping Meetings

Chatsworth Meeting

**Scoping Meeting For Santa
Susana Field Laboratory PEIR December 10, 2013
Public Comments**

CHATSWORTH, CALIFORNIA

December 10, 2013

Reported by: Sheba Cohen

CSR No. 13715

Peterson Reporting Video & Litigation

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Public Scoping Meeting For Santa
Susana Field Laboratory PEIR December 10, 2013
Public Comments

Public Meeting, commencing at the hour of
6:03 P.M. on Tuesday, December 10, 2013 at
10027 Lurline Avenue, Chatsworth, California,
before Sheba Cohen, Certified Shorthand
Reporter No. 13715, State of California.

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Public Scoping Meeting For Santa
Susana Field Laboratory PEIR December 10, 2013
Public Comments

JOAN ISAACSON: This is a scoping meeting that's being conducted by the State of California Department of Toxic Substances Control. The scoping meeting is being held here in the (inaudible) commentary for Program EIR, and you're going to hear a lot of information about what the Program EIR is in a few moments.

The primary purpose of a scoping meeting like this is to hear your comments, for the project team to listen and, importantly, to document your comments. This is the first of two scoping meetings that we're conducting this week. The second meeting is Saturday in Simi Valley.

I just want to review some ground rules. We just want to make sure the meeting is productive for everyone who's here and that everyone has a chance to participate and provide a comment in a way that they feel comfortable.

So some very basic things. If you can make sure that your phones are on silence or any other electronic gadgets that we all carry around with us. If you can limit your conversations during the meeting so that everyone can hear the speaker. It's especially important to hear the person who's making a comment. Treat other

1 people with the same level of respect that you would want
2 them to treat you.

3 And we also want you to know that there could be
4 some recording of sound, video and photography by parties
5 other than DTSC. And if anyone has concern with that, the
6 protocol is that if you see someone recording and you
7 don't want to be recorded to let that person know not to
8 do so.

9 FEMALE ANONYMOUS: Can we identify those people
10 who are recording?

11 JOAN ISAACSON: If anyone is recording the
12 meeting here this evening, you can raise your hands.

13 MALE ANONYMOUS: Would you get a little closer to
14 that mike because I'm not hearing you very well.

15 JOAN ISAACSON: Yes. Thank you for reminding
16 me. My apologies. We do have a court reporter here who
17 is working on behalf of DTSC. So it looks like we don't
18 have any other parties doing recording. So let me
19 overview the agenda for you. Personal introductions of
20 the team that's leading the scoping meeting.

21 We have presentations for you. We want to make
22 sure that we give you some information about the project
23 background. And especially important -- we want to give
24 you information about the CEQA process. The CEQA is
25 California Environmental Quality Act, and we want to talk

1 about the provisions of CEQA as it relates to the Program
2 EIR that DTSC is going to be preparing.

3 We then will hold the verbal comment period where
4 you all will have the opportunity to provide verbal
5 comments. And we'll have a protocol for that -- speaker
6 cards and the types of things that you're used to at
7 public meetings.

8 What we're going to do then after everyone's had
9 a chance to participate -- everyone who wants to
10 participate has a chance to participate in a verbal
11 comment period -- is we're going to formally conclude the
12 scoping meeting. And if there's still time remaining, we
13 then will do some Q and A and focus on the CEQA process.

14 So if you have questions about what CEQA is, what
15 is EIR, what's the process of preparing an EIR -- those
16 types of questions -- the project team can answer those
17 questions after we conclude formally the scoping meeting.

18 We have a couple of housekeeping items for you.
19 We want to make sure the handouts are available in case
20 you need them. We have the speaker card which is the
21 yellow card. And if you do plan to make verbal comment,
22 we need you to complete this. We also have copies of the
23 Notice of Preparation at the front table. So if you
24 haven't seen this yet, you might want to get a copy. We
25 have a community notice information sheet about the

1 project, and it's going to be posted on the Web site.

2 And, then, importantly -- the comment form. And
3 you can complete and submit the comment form in different
4 ways; so don't feel pressure to fill this out tonight.
5 You can take it home with you and mail it back later. And
6 I'm going to talk about that more in detail. It's
7 important that I'm going to give you some other material
8 first. There's water on the back table, and the restrooms
9 are in the back of the room as well.

10 Next slide. Let me introduce you to the meeting
11 team. We have Ray Leclerc, who is the project director
12 for DTSC. And Mark Malinowski, who's the DTSC project
13 team manager. And Deanna Hansen is also going to make a
14 presentation. She's with the Environmental Science
15 Associates private consultant team.

16 And my name is Joan Isaacson. I'm also on the
17 consultant team, and I am a facilitator, and I help out
18 with these types of meetings to make sure that the
19 discussion is productive and meets the objectives of the
20 meeting. So you'll be seeing me up here a bit.

21 We have other project team members here. And
22 what I'd like them to do -- if they can stand up and put
23 their hands up so we can see who they are.

24 All right. So let me first introduce up to the
25 microphone Ray Leclerc, who is going to provide background

1 information and then a little bit more information about
2 the scoping meeting.

3 RAY LECLERC: Good evening. Thanks everyone for
4 taking time out of your evening to come and participate in
5 our scoping meetings tonight. This is the initial phase
6 of the CEQA process; so our primary mission here is to
7 listen to what the community cares about.

8 So really, in a nutshell, the scoping meeting is
9 an opportunity to provide comments -- for the community to
10 provide comments to DTSC -- the agency for cleanup at
11 Santa Susana Field Lab -- about things that are important
12 to you. And this will be the first of many opportunities
13 you'll have to provide input.

14 And also, we will provide a very short update --
15 sort of a primer on the facility and a little bit about
16 the CEQA process. But because of time constraints, we're
17 not going to be able to provide a comprehensive update on
18 all the activities of the facility.

19 We will do that sometime in late January or
20 February. We'll have an opportunity for a very
21 comprehensive update on the facility with the opportunity
22 for the public to ask about what progress we're making on
23 various arenas on the cleanup. But tonight we're focused
24 on the CEQA process, and we look forward to hearing your
25 input on the process. And first and foremost, we're here

1 to listen to what your concerns are. So after this, we'll
2 listen to Mark.

3 JOAN ISAACSON: So let me give you some
4 information about the purpose of a scoping meeting like
5 this under the California Environmental Quality Act. The
6 types of input that is specifically being solicited during
7 the scoping process is input on the types of environmental
8 effects, the types of environmental issues and topics that
9 you would like the team to consider in the EIR analysis.

10 Another important subject matter for scoping is
11 input on the types of alternatives that you think should
12 be considered as well as potential mitigation measures.
13 All these comments that will be received during the
14 scoping period will be included in the Draft Environmental
15 Impact Report.

16 Next slide. I'm going to go through this, but
17 I'm going to come back to that during the presentation.
18 So I want to hit on this twice because it's important
19 material in this slide.

20 How do you provide a comment during the scoping
21 period? There's a couple of different ways. You can
22 provide public comments during this meeting. You can do
23 it verbally, by filling out a speaker card. And speakers
24 will be asked to limit their remarks to three minutes.

25 We have a court reporter here who will document

1 verbal comments so we have that record of your comment.
2 You also can complete the hard copy of the comment card,
3 and that can be mailed in, or you can drop it off here.
4 If you want to fill out a comment card and have it read at
5 this meeting so that others hear your comment, give your
6 comment card to me, and I will read it for you.

7 FEMALE ANONYMOUS: Can we speak it?

8 JOAN ISAACSON: Absolutely. Some people aren't
9 comfortable getting up in front of a group of people; so
10 we wanted to give those people an opportunity to still
11 have their comment heard by everyone if they don't want to
12 get up and read it themselves.

13 We also have laptops set up in the back with the
14 comment forms. So if it's convenient for you just to sit
15 down and crank out your comment while you're here before
16 you leave, we have those laptops available for you. We
17 have a staff member in the back to help you with the
18 laptops.

19 And the last line here. Your comments need to be
20 submitted by January 10th. That's the deadline for
21 comments. So if you're interested in providing something
22 after this meeting, make sure we get it by the 10th. All
23 right. Mark is going to give us more background about the
24 project.

25 MARK MALINOWSKI: Thank you, Joan. I appreciate

1 it. I tend to project, though, too; so I don't want to
2 overwhelm people, but let me know if it's too loud or too
3 soft. I want to give kind of a 30,000-foot overview of
4 the activities at Santa Susana Field Lab, a little bit
5 about the history and a little bit about where we are in
6 the investigation and efforts like that along those lines.

7 So, again, there's a general map that shows the
8 general location of Santa Susana Field Lab and select
9 neighboring communities around there. Obviously it's not
10 all the communities but key ones, I think, because of your
11 familiarity with the area you know where Santa Susana
12 Field Lab is if you have this map in your hand.

13 Next slide. So Santa Susana Field Lab is a
14 former rocket engine test and nuclear power research
15 facility. About 2,850 acres. I'll head back a little bit
16 later and kind of show you how it's broken apart and
17 broken in pieces.

18 And currently we are conducting or having the
19 responsible parties -- that is Boeing Company, Department
20 of Energy -- DOE -- and NASA -- completing their
21 investigations for the contaminants on the site. It is
22 comprehensive -- the investigation. We've been doing this
23 for quite some time. And, then, cleanup in the
24 investigation is all overseen by DTSC.

25 The one thing I do want to mention in the

1 community fact sheet that you have -- there is one error
2 that we found and needs to be corrected, and that is on
3 Page 2. And we will make this correction before it gets
4 posted. On the fourth bullet where it says Area IV at the
5 very end it says, "Area IV is being investigated by" --
6 it's not Boeing. It's DOE. DOE is responsible for the
7 cleanup of Area IV under the Administrative Order on
8 Consent. We apologize for that. Just making sure that
9 that's correct.

10 So Santa Susana started in 1947 by North American
11 Aviation. And by '45 (sic), the majority of the
12 scientific employer property had been acquired. There
13 were boundaries. You'll see these on the maps as well.
14 I'll show you just a couple of slides of what we call
15 northern and a southern buffer zones. Those were
16 (inaudible) at a later date.

17 And, again, research, development and testing of
18 liquid-fueled rocket engines and structures about 1950 to
19 2006. And then there was nuclear research and development
20 conducted on the site '54 through 1988.

21 Next slide, please. So as you can imagine with
22 any facility that we deal with, there is a lot of
23 manufacturing activities, major industrial components.
24 Rocket engine test stands that were being used and tested
25 the rocket engines. As part of the maintenance of those

1 fire engines, they run trichloroethylene or a solvent
2 through (inaudible) to make sure that there was no oxygen
3 damaging so they could prevent explosions.

4 It was also used, in some sense, as a degreaser.
5 So you have these correlated solvent contaminants that are
6 out there. There were also other areas like landfills.
7 There were -- again, the maintenance activities. So you
8 have metals -- heavy metals. Things like that are the
9 chemicals that we are concerned with. They had bird pits
10 and other laboratory operations. So it's a lot of
11 different chemicals that we are looking for or having the
12 responsible parties look for during the investigation.

13 There was also Department of Energy's Energy
14 Technology Engineering Center -- what they refer to as
15 ETEC -- where nuclear reactors and related liquid metals
16 testing that was conducted. And so USEPA about a year and
17 a half ago now just completed their -- or a year ago --
18 completed their sampling and provided their report on
19 radiological testing and sampling for the Area IV portion
20 or the DOE portion of the facility. The photos that you
21 see there kind of give you a sense of what it was like
22 back in the operational period of the facility.

23 Go to the next slide, please. So this is the map
24 I was referring to. So this, again, is about the
25 boundaries of the Santa Susana Field Lab. It's broken

1 into areas. Area I is the entire area here. And as you
2 can tell by the colors, Boeing has these sites that are
3 identified in the green outlines, NASA's are in blue, and
4 DOE's are in brown.

5 So Area I -- which includes this little 41-acre
6 portion up here -- this is identified as NASA. They
7 handle liquid oxygen, but they're LOX tanks and
8 manufacture them in that area. The Area II -- this
9 portion Area II and this portion in the box area is owned
10 by the federal government and administered by NASA; so
11 that's why NASA is doing the investigation for Area II and
12 the box plant area.

13 The remaining portion of the area is all owned by
14 Boeing -- outside of Area II and this 41-acre portion
15 here. DOE, though, is responsible for the cleanup, as we
16 said, in Area IV and in what we refer to as east northern
17 buffer zones. It's two buffer zones here.

18 There is a southern buffer zone down here in this
19 area where there was no active -- I'll say there was no
20 manufacturer, there was no buildings per se in those
21 areas. But, again, there is some sampling that's been
22 done in the buffer areas to make sure we know where
23 contamination is.

24 So the proposed project -- the activities include
25 what we're going to do in order to clean up the site to be

1 protected both of human health and the environment. And
2 so our project has to deal with soil cleanup, and it has
3 to deal with the groundwater contamination that's
4 associated with it.

5 The chlorinated solvents that I was talking have,
6 in some cases, gone into the groundwater, and there is
7 groundwater contamination that has to be cleaned up.
8 There obviously is also soil contamination with both
9 chemical and radionuclides that need to be addressed.

10 Go to the next slide, please. This is a
11 compressed generalized schedule, and I'm going to step
12 through this from the top line down. So as I talked about
13 earlier, the EPA has completed its sampling for the
14 radionuclides up in Area IV, and that final data report
15 came out in 2012 -- the end of 2012.

16 There is currently a chemical investigation for
17 all three responsible parties ongoing out there. That
18 work -- that investigation work is scheduled to be
19 completed in 2014 for all three responsible parties. All
20 three responsible parties are doing their own set of
21 investigation; so there's going to be separate reports --
22 one for Boeing, one for DOE, one for NASA -- that talk
23 about their contaminants in their respective areas. There
24 are treatability studies in soils that are going on.

25 When we get the investigations complete, we get

1 to what we call cleanup plans and decision documents.
2 These are the documents that are -- and the reason I call
3 them decision documents is that they say how the cleanup
4 is going to go for that particular portion of the site.
5 That cannot be done without having CEQA interacting with
6 it.

7 These three areas that go up and down are
8 intended to say that CEQA informs our decision, our
9 decision is informed by CEQA, and there is a balance that
10 has to occur between the decision document and the CEQA
11 effort.

12 And we are here to talk about this, and you can
13 see we are just getting started on our CEQA scoping
14 efforts, and we are just starting off in our CEQA. And
15 that's why you're here today, and that's why we want to
16 have these meetings is to scope the meeting early to get
17 that input.

18 For the groundwater investigation below the
19 timeline -- groundwater work -- we are still conducting
20 investigations. When that is complete, there will be an
21 investigation report that comes out and a Corrective
22 Measures Study that looks at different alternatives with
23 input from CEQA on how to address the groundwater issues.

24 That will have a decision document associated
25 with it. That information also needs to fit into the CEQA

1 document we are talking about. It's related. And again,
2 it informs -- CEQA informs our decision.

3 Next slide, please. So since 1991, DTSC has had
4 the responsibility for the -- it's called RCRA, Resource
5 Conservation Recovery Act. And the investigation that's
6 being done is being done under the authority of RCRA or
7 Resource Conservation Recovery Act.

8 And so what has happened is that there has been a
9 Consent Order in 2007 with all three parties. The soils
10 portion for Boeing is addressed within that Consent Order
11 about how that process is going to occur and what that
12 cleanup is going to be.

13 And all three -- Boeing, DOE and NASA --
14 groundwater is covered by that Consent Order as well. The
15 soils for DOE and NASA are covered under a different
16 region. I'll get to that on the next slide, but right now
17 I just want to focus on the Boeing portion.

18 And, again, Boeing is under the Consent Order for
19 the soils, cleanup to acceptable risk levels. And within
20 the Consent Order when it was established, it said we
21 would have cleanup under way or completed by 2017. And
22 I'm generalizing there.

23 That's why the 2017 date that you see on our
24 schedule is there, and that's why you see the 2017 date
25 here. And that becomes a very key thing for us especially

1 when we're talking about CEQA and what can we be and how
2 we can continue to move forward. Again, the groundwater
3 actions will all be in place by 2017 as well.

4 Next slide, please. For both DOE and for NASA,
5 we have separate agreements that are called Administrative
6 Orders on Consent. We throw out an acronym called AOC; so
7 99 percent of the time when you hear AOC, it means
8 Administrative Order on Consent. But like a technical
9 group, AOC has many different meanings. It could be area
10 of contamination and things like that.

11 Administrative Order on Consent is the order that
12 we have with the Department of Energy to say how the
13 investigation and how the cleanup would occur the same way
14 we have one with NASA to deal with. Okay? It requires
15 the soil cleanup to background for reporting levels. And
16 groundwater, as I said before, is the responsibility of
17 all three responsible parties, and that is covered under
18 the Consent Order.

19 Go to the next slide, please. 19. So we have
20 been working with Department of Energy and NASA on
21 intergrading their NEPA information as we start developing
22 our CEQA information. Much of the information that is
23 collected for their NEPA effort is similar, the same as
24 what we need for our CEQA effort.

25 And rather than duplicating a lot of the work, we

1 are taking that information in and using that information
2 to aid us. But it won't be the only thing. As our CEQA
3 contractors are looking at this project, if they identify
4 data needs, things that we need for CEQA -- we will direct
5 the responsible parties to go out and collect that
6 information so we can make sure that our CEQA document is
7 complete.

8 And with that -- again, is kind of a 30,000-foot
9 overview of Santa Susana Field Lab, a little bit of
10 history, a little bit about the contamination, a little
11 bit about the cleanup process. And I'm going to turn it
12 over to Deanna with ESA, our consultant.

13 DEANNA HANSEN: Good evening. My name is
14 Deanna Hansen. I work for ESA. We've been hired by DTSC
15 to prepare their Program EIR. And for this portion of the
16 presentation, I'd like to provide a quick overview of the
17 CEQA process. Under CEQA as Mark had mentioned, DTSC must
18 prepare an EIR for any project that has a potentially
19 significant impact on the environment.

20 So in general, CEQA does two important things.
21 It informs the public and the decision makers about
22 potential environmental impacts, and it also identifies
23 ways to reduce those impacts.

24 Next slide. So this is a very simplified chart
25 of the CEQA process. And the process starts with the

1 issuance of the NOP. As mentioned before, the NOP was
2 published on November 22nd, and comments will be accepted
3 until January 10th. Per CEQA, a 30-day scoping period
4 is required. But in this case, DTSC has chosen to extend
5 that scoping period due to the holidays and the interest
6 of the public in the process.

7 CEQA has also decided to have two public meetings
8 -- one tonight and the next one on Saturday. And the
9 comments collected during this process will help us to
10 define the issues that would be considered in the
11 preparation of the Program EIR. We will be getting a
12 Program EIR early next year and anticipate completing it
13 Fall of 2014.

14 The Draft Program EIR will disclose all potential
15 environmental impacts associated with the project and will
16 also outline alternatives to reduce any potential
17 significant impacts. Once the Draft EIR is published, it
18 begins that 45-day comment period that will give agencies
19 and the public a chance to review the document, provide
20 comments, and we'll have another public meeting during
21 that period.

22 Once the comment period closes for the Draft
23 Program EIR, we'll start the next stage of the CEQA
24 process, and that's preparing the final Program EIR. All
25 comments received on the draft will be responded to in the

1 final. We anticipate publishing the final EIR in 2015.
2 And once the final EIR is published, DTSC will begin the
3 certification process and will ultimately lead to the
4 Notice of Determination project.

5 Next slide. So as Mark mentioned, the Program
6 EIR will analyze the effects associated with the soil and
7 groundwater cleanup activities at Santa Susana.

8 Next slide. So an EIR is a document that
9 describes and analyzes the significant impacts of proposed
10 projects. So what is a Program EIR? So Program EIR is
11 prepared when there's a series of related actions that can
12 be characterized as one project. These actions can be
13 related geographically as parts of related actions or
14 individual activities that are implemented under the same
15 regulatory authority.

16 So for example, the Santa Susana Program EIR is
17 going to analyze two different remediation programs --
18 soils and groundwater -- that will be implemented by three
19 different parties -- Boeing, DOE and NASA -- within one
20 large geographic area. And each remedial action is all
21 required for approval by the same regulatory agency, DTSC.

22 Next slide. And there are advantages in
23 preparing a Program EIR. It provides the opportunity for
24 a more exhaustive analysis of cumulative impacts. And the
25 Program EIR will discuss the goal of the action -- what

1 everything that Boeing, DOE and NASA's cleanup activities
2 will impact. A Program EIR also allows the lead agency to
3 consider program-wide mitigation early in the process.

4 Next slide. So as you can see on the slide, the
5 Program EIR will evaluate potential impacts for the
6 following topics: Aesthetics -- what's it going to look
7 like? -- air quality, biological and cultural resources,
8 geology, greenhouse gas emissions, hazards, hydrology,
9 land use, noise, population and housing, public services,
10 traffic and transportation, and utilities.

11 And this is where we're really looking for your
12 input tonight. What do you think needs to be analyzed in
13 this program EIR? What of these issues are important to
14 you? Or is there something else here that maybe we
15 haven't touched on?

16 Go to the next slide. In addition to the
17 environmental topics, CEQA also requires that you evaluate
18 a range of reasonable alternatives. These alternatives
19 should attain most of the project objectives and, most
20 importantly, avoid or substantially lessen any significant
21 effects of the project. CEQA does not require that you
22 evaluate an alternative that is infeasible to implement
23 but requires that you provide a rationale explaining why
24 that alternative was rejected.

25 CEQA also requires that you evaluate alternatives

1 of the same level of detail as the proposed project. Many
2 of you I know have reviewed the NASA DEIS and are familiar
3 with alternatives under NEPA. Under CEQA it's different
4 in that the alternatives are included to reduce potential
5 impacts of a project. They're not just another option to
6 implement the project. And this is another area where we
7 really look for your input. What alternatives do you
8 think should be analyzed in the Program EIR?

9 Next slide. And as Mark mentioned, the Program
10 EIR will include information from many sources. This is a
11 short list. Treatability studies. Groundwater
12 investigations performed by Boeing and DOE and NASA.
13 Ongoing monitoring efforts at the site. Site-specific
14 resource studies -- biological and cultural.

15 And Mark also mentioned that we, as the CEQA
16 consultants, feel that if the studies that have been
17 completed need some additional work, we will let DTSC
18 know, and they will inform the responsible parties. Input
19 from other responsible agencies, input from tribes and, of
20 course, input from the public like what we're asking for
21 tonight.

22 So I guess I'll hand it back to Joan for the
23 purpose.

24 JOAN ISAACSON: So you've already seen the slide
25 before but just as a reminder of what a scoping meeting

1 like this is. We want to hear your comments, your
2 perspectives on the types of environmental issues and
3 topics that should be addressed in this Program EIR and
4 also obtain your input on alternatives and mitigation
5 methods as well.

6 Go to the next slide. So we're going to start
7 the public comment portion in a few moments. First, as a
8 reminder, we would like you to complete speaker cards.
9 And I wanted to ask if anybody needs a speaker card -- a
10 blank one -- to fill it out. If you do, raise your hand,
11 and we will give them to you.

12 And also, if you have a completed speaker card,
13 hold it up, and one of our team members will come by and
14 pick it up from you right now. And I'm going to pause for
15 a minute so we can take care of that. Okay. I think we
16 got the speaker cards turned in. We have a good stack as
17 you can see; so many people want to speak. Good because
18 that's what the purpose of this meeting is -- so we can
19 collect everybody's. One of the ways we can do that
20 during the NOP public review comment period.

21 I want to give you some information about how
22 we're going to conduct the public comment portion. First
23 off, we will bring a microphone to you. So Karen and
24 Marina are back there waving. They're going to be roaming
25 with cordless microphones.

1 And I will call names according to the speaker
2 cards. They've been numbered as they've been submitted;
3 so the first card that was turned in would be the first
4 speaker. And we will be keeping time. As I said, we are
5 asking you to limit your comments to three minutes. And I
6 am going to enforce the timing on the comments to be fair.
7 If some people are going to be diligent about keeping to
8 the three minutes, it's fair that other people are asked
9 to keep to the three minutes as well.

10 And this is how we're going to do it. I have
11 Sara up here who's going to help me out, and she's going
12 to be keeping time on her phone. And she has a yellow
13 sign and a red sign. So when you get to two minutes and
14 30 seconds, she's going to hold up the yellow sign to let
15 you know you have 30 seconds left. At three minutes,
16 she's going to hold the red sign up, and I'll give you a
17 reminder to wrap up.

18 And I know that maybe one or two people will
19 continue on. It's in their nature. And in that case, I
20 will ask them -- our microphone coordinators -- to go to
21 the next person so we can take that comment. Know that
22 after everyone has a turn that people can speak again. So
23 if you don't get everything in the three minutes, you will
24 have an opportunity to speak again.

25 Is there a question about the process?

1 MALE ANONYMOUS: Yes. An objection really. We
2 have more than ten people here, and we have a prepared
3 commentary. And what we would prefer is that we are able
4 to read the whole of the commentary and --

5 THE REPORTER: I can't hear.

6 MALE ANONYMOUS: -- instead of having three
7 minutes per person, allow up to 30 minutes to make a whole
8 presentation.

9 JOAN ISAACSON: So we established the rules for
10 this meeting with the intent of making sure that everyone
11 has equal time in tonight's meeting. If your group wanted
12 to break the presentation into three-minute pieces and
13 take turns with it, that's one way to accomplish your
14 presentation.

15 MALE ANONYMOUS: Very good. Thank you.

16 JOAN ISAACSON: All right. Let's see if there's
17 any other logistics. We're ready to start.

18 FEMALE ANONYMOUS: I have a question.

19 JOAN ISAACSON: Yes.

20 FEMALE ANONYMOUS: You know, it's frustrating to
21 get up there and have much more to say. How will the
22 comments that are submitted in writing or by e-mail be
23 given equal weight in terms of analysis?

24 JOAN ISAACSON: So the question is will the
25 comments that are provided verbally here versus comments

1 being mailed in or e-mailed in -- will they have equal
2 weight. All of the comments will be put into the same
3 pool of data for the project team to be considered. So if
4 it's really -- we provide these different ways to provide
5 a comment so that you have a way that's comfortable and
6 works for you.

7 All right. So let's start. And our first
8 speaker is going to be Abe Weitzberg. And I'm really
9 sorry if I mispronounce your name.

10 ABE WEITZBERG: My name is Abe Weitzberg, and I'm
11 a former worker, resident of Woodland Hills and a member
12 of the SSFL Community Advisory Group. The issue before us
13 is very clear. The proposed SSFL Cleanup Project is well
14 defined by 2007 Consent Orders covering all of the site
15 groundwater and the soil in the Boeing area and the 2010
16 Consent Orders covering soils in the NASA and DOE areas.

17 The environmental impacts of the proposed project
18 can be well understood from the recent NASA DEIS and the
19 2003 DOE Environmental Assessment. The NASA DEIS shows
20 the severe environmental impacts of a 2010 AOC cleanup in
21 their area with 500,000 cubic yards of soil removal and
22 trucking, destruction of the ecosystem and Native American
23 Cultural Resources plus health effects to neighboring
24 communities.

25 EPA commented that such soil waste was excessive

1 and NASA should consider a risk-based cleanup. Recent DOE
2 information indicates that the soil removal numbers for
3 their 2010 AOC cleanup would be much larger than NASA's
4 numbers. Adding in the estimates for Boeing and DOE soil
5 removal, it is likely that the proposed project would
6 require the removal of about 2 million cubic yards of
7 soil. This is clearly unacceptable.

8 The 2003 DOE EA showed that a cleanup essentially
9 to Suburban Residential -- such as required by the 2007
10 agreements -- would have far less impact. Similarly, the
11 NASA DEIS stated that a Suburban Residential cleanup would
12 greatly reduce the amount of soil removal.

13 A letter from Dan Hirsch and his workgroup
14 supporters to Debbie Raphael on September 24th, 2012
15 credits Rick Brausch with negotiating the 2010 AOCs for
16 DTSC. What it doesn't say is that the AOCs were signed
17 without considering or, more accurately, by ignoring the
18 significant technical concerns of the staffs of DTSC, DOE
19 and NASA.

20 The validity of these concerns is now evident
21 from the consequences of the proposed 2010 AOC cleanup.
22 It should also be noted that in sworn testimony during the
23 SB-990 lawsuit, both Rick Brausch and Mark Malinowski of
24 DTSC stated that the 2007 agreements were protective. In
25 other words, the 2007 agreements to clean to Suburban

1 Residential would allow the construction of houses and
2 full-time residency at SSFL.

3 CEQA requires the evaluation of the environmental
4 effects of a proposed project and states that a project
5 may not be approved as submitted if feasible alternatives
6 or mitigation measures are able to substantially lessen
7 the significant environmental effects of the project.

8 In the case of SSFL, a cleanup to the 2007 orders
9 is clearly feasible, and it will significantly reduce the
10 environmental impacts of the cleanup. As such, it must be
11 included in the DTSC Environmental Impact Report. We know
12 that there are community and political forces advocating
13 exclusion of any alternatives other than the 2010 AOCs for
14 NASA and DOE soil.

15 I see this as a direct violation of the CEQA
16 requirements. I strongly request that all viable
17 alternatives be evaluated and documented in the
18 forthcoming Environmental Impact Report.

19 JOAN ISAACSON: Thank you. Our next speaker is
20 Alec Uzemeck.

21 ALEC UZEMECK: My name is Alec Uzemeck, and I'm
22 the chair of the SSFL Community Advisory Group, I'm the
23 chair of the Environmental Committee of the West Hills
24 Community Council, and I am a member of the West Hills
25 Community Council, and I live in Simi.

1 We desperately need a legitimate CEQA EIR. We
2 need one that covers the entire site, visits Boeing, NASA
3 and DOE and provides the public with information that was
4 lacking in NASA's EIR. There's no comparison in the DEIS.

5 ALEC UZEMECK: Can I continue?

6 JOAN ISAACSON: Yes.

7 ALEC UZEMECK: So I think we need this
8 information, and particularly we need to look at the
9 alternatives of this space going against the cleanup to
10 background and other methods to evaluate what the impact
11 is on the environment, the historical, cultural,
12 archaeological but also the community impact. I estimate
13 that there's going to be about 500,000 tons of material
14 taken off that site. Tons. Not pounds. Tons. And
15 that's going to go through West Hills. And I have an
16 objection to that.

17 And then NASA -- you know, I asked, and they said
18 there's going to be increased danger to children. I
19 object to that. I don't want increased danger to
20 children. I don't want all this soil being carried out
21 particularly if it can be reduced by some alternative
22 method.

23 And that's one of the CEQA requirements. It is
24 to evaluate the process which reduces the impact on the
25 environment. It's very important to us. I hope that you

1 will not preclude doing this analysis because the AOCs
2 have been signed. And the CEQA laws or regulations
3 require you to take a look at all alternatives. And if
4 that means that the AOCs have to be changed, then that
5 will be the case. AOCs have been changed throughout
6 California. It's not a surprise.

7 On December 18th, the CAG will be holding a
8 meeting. I left the press releases and the agenda at the
9 table in the back. We will have the project director
10 speak. There will be no debate, but there will be
11 question-and-answer period. And we will get the four
12 sides of the cleanup as those (inaudible) can see.

13 So please come to the meeting. And as I said,
14 the paperwork is on the table in the back. Thank you.

15 JOAN ISAACSON: Thank you. Our next speaker is
16 Liza Tucker.

17 LIZA TUCKER: I'm Liza Tucker, and I'm from --
18 consumer advocate with Consumer Watchdog in Santa Monica,
19 California. And I want to keep my remarks short but to
20 the point. It's very clear that there was a goal set out
21 or standards set out for the cleanup of the site entirely.

22 The video seems to have laid those out -- that
23 the portions that belong to DOE and NASA must be cleaned
24 up to background and that Boeing's portion must be cleaned
25 up to rural residential, agricultural use.

1 And I'd like to point out that the public notice
2 for these scoping hearings fails to point that out. The
3 discussion should be about how to achieve those goals in
4 the safest and most effective manner, and the public
5 notice completely skips that and doesn't mention the fact
6 that we actually have a goal and that we need to be
7 discussing how to achieve it.

8 I think this needs to be corrected. It certainly
9 gives the impression that the DTSC would like to maybe
10 perhaps break out of legally binding agreements. The AOCs
11 are legally binding and more regulatory and legal
12 standards. And I object. Consumer Watchdog objects very
13 strongly to that. Many communities around the state have
14 reason to distrust the DTSC.

15 A study done by my organization as well as many
16 media reports talk about the pattern of the DTSC's
17 willingness to protect polluters over the public health
18 and the public interest, and their mission is to be
19 protective of the public health in terms of protecting it
20 from toxic harm.

21 Time and again we have seen DTSC ask how high to
22 jump when a company says jump. It's not just Boeing.
23 You've seen it with XI Technologies, (inaudible) recycler
24 that extensively contaminated surrounding neighborhoods.
25 We see it with other companies like Chevron -- the

1 reluctance to step in there and exercise their proper
2 role.

3 And lastly, I really want to say that we must
4 include the cleanup of structures and buildings and other
5 structures at that site in the overall EIR. The cleanup
6 of all of that debris and its disposal are a part of EIR
7 under CEQA.

8 The structures are not separable from the soil.
9 The AOCs actually set that out when they took part of the
10 soil. We have foundations. We have piping. And it's all
11 buried in the soil. It's integral to the soil. And at
12 the same time, the DTSC is allowing Boeing to demolish and
13 dispose of radiologically contaminated debris in an
14 unlicensed facility.

15 JOAN ISAACSON: Please wrap up.

16 LIZA TUCKER: -- (inaudible) hazardous waste
17 facilities that are not licensed and (inaudible) shops.
18 And we think it should be part of the EIR. Thank you.

19 JOAN ISAACSON: Our next speaker is Chris Rowe.
20 You can raise your hand.

21 CHRIS ROWE: In May 2013, the Camarillo Springs
22 fire burned 28,000 acres. Some of this is state property.
23 The DTSC required that area be cleaned up to background,
24 but the state legislature isn't funded. The end use of
25 the Santa Susana Field Laboratory, SSFL, site should be

1 (inaudible) based upon its significance in terms of its
2 prehistory, recent history and significance as a wildlife
3 quarter. Why should this site be cleaned up to background
4 levels?

5 It is my opinion that the decision makers of the
6 Santa Susana Field Lab cleanup for the SSFL site -- in
7 order to be adequately informed about the SSFL site --
8 need to have the following information: These decision
9 makers include not only DTSC, Boeing, NASA and the
10 Department of Energy, for NASA and DOE remediations --
11 they also include Congress. We needed the 2005
12 (inaudible) Acts for the SSFL site, a GLS overlay of the
13 dioxins found at the SSFL site prior to remediation.

14 Next, it shows risk-based cleaning levels and
15 their associated costs. The decision makers need to
16 understand the associated risks from the site today for
17 all areas as well as the risks from the site after
18 remediation has been completed.

19 The remediation costs of the soil and groundwater
20 need to be separated due to the fact that under the 2007
21 Consent Order, the groundwater treatment systems only need
22 to be in place by 2017. The groundwater remediation is
23 not scheduled to be completed by that time. It is my
24 opinion that the AOCs (inaudible) underneath the CEQA.

25 In reference to the last statement by Ms. Tucker

1 the rural residential standard was SB-990, and it was
2 overturned by the courts. They did not clean up to the
3 rural residential standard. CERCLA -- which DTSC is under
4 CERCLA authority -- requires the (inaudible) criteria.

5 EPA did recommend a risk-based cleanup. DOE was
6 sued by parties because of an EA that lacked sufficient
7 and insufficient -- or had insufficient information, and
8 DOE now has to do (inaudible). So we need to inform the
9 community of all different types of standards --
10 alternative standards. Thank you very much.

11 JOAN ISAACSON: Thank you. Our next speaker is
12 William Preston Bowling.

13 WILLIAM PRESTON BOWLING: I'm William Preston
14 Bowling from Aerospace Contamination Museum of Education
15 whose mission is to ensure proper cleanup of the Santa
16 Susana Field Lab, and I'd like to talk about the
17 Administrative Orders on Consent. And what we're looking
18 at now are different alternatives that should not be
19 looked at. There's already a law in place that we need to
20 abide by.

21 Also, there's a lot of talk about the cleanup
22 destroying the natural resources up there. I've provided
23 a slide that shows recent cleanup by the NASA Corporation
24 -- how they carefully cleaned up around these oak trees
25 and saved them and removed all the contamination and

1 trucked it offsite, and I think that's great. And don't
2 fear the cleanup is my message tonight.

3 And also, the trucking of the soil and all that
4 stuff needs to get out of there because every time it
5 rains, it's coming down in the communities down here. You
6 read Thomas Mack's book, Cancers in the Urban Environment,
7 and you look at where all the cancers are -- it's in this
8 neighborhood. It's in West Hills. It's all over this
9 site.

10 So we need to get that contaminated soil off the
11 mountain before any more health problems arise in the
12 neighborhoods. Thank you.

13 JOAN ISAACSON: Our next speaker is Jeanne Londe.

14 JEANNE LONDE: My name is Jeanne Londe, and I'm a
15 member of the Rocketdyne Cleanup Coalition.

16 THE REPORTER: I can't hear.

17 JEANNE LONDE: And I have been sitting through
18 all of --

19 JOAN ISAACSON: I've been asked --

20 JEANNE LONDE: -- (inaudible) since 1989.

21 JOAN ISAACSON: You need to hold the microphone
22 closer to the speaker. Thank you.

23 JEANNE LONDE: I've been sitting through all of
24 this stuff since 1989, and there's a lot of new stuff
25 that's been added that I really don't understand or know

1 anything about. All I know is that Boeing had signed and
2 made it the law. They were supposed to sign a commitment
3 with the OAC, and they refused to do it. And they're
4 still refusing to do it.

5 And this is what I'm here for -- is to see why
6 nothing can be done about that. And nobody has really
7 addressed it. Plus the fact that to be going over
8 alternative solutions for the cleanup is just irrelevant
9 because everything is in place. We shouldn't be having to
10 listen to alternatives to the AOC.

11 I think -- are my three minutes up? Because I
12 can go on a lot longer.

13 JOAN ISAACSON: You have a bit more.

14 JEANNE LONDE: It's just appalling after all
15 these years to think that we have to sit through this
16 again when in 2008 everything was signed and sealed with
17 the AOC. And it's just so frustrating to have to give up
18 our time to be going through this again, and I just hope
19 that somehow something can be done with Boeing violating
20 the law. Okay.

21 JOAN ISAACSON: The court reporter has asked me
22 just to make sure that the microphone is being held close
23 to people. And also, if you can make an extra effort to
24 enunciate and speak clearly, we'll get a better record.

25 The next speaker is Denise Dulfield.

1 DENISE DULFIELD: My name is Denise Dulfield.
2 I'm the associate director of Physicians for Social
3 Responsibility in Los Angeles. Our organization has been
4 involved in the cleanup of the Santa Susana Field
5 Laboratory for nearly 30 years.

6 Our organization mission is to protect public
7 health from nuclear and environmental toxins, and that's
8 why we're here today. I think there are probably people
9 here who are new to the cleanup. Maybe you've heard some
10 things about cleanup. Possibly damage in the community.

11 Let me tell you what will damage the community
12 and what will affect your health. And that is the
13 contamination that exists on this site. We're talking
14 very dangerous radionuclides: Strontium-90, Cesium-137,
15 Plutonium-239. Very toxic chemicals, TCE, heavy metals,
16 dioxins. And these contaminants have severe affect on
17 public health.

18 They do get off the site. We have found
19 Perchloric off-site. Strontium-90 has been found
20 off-site. There's TCE that's off-site. And what DTSC
21 needs to do in its Environmental Impact Report, include
22 the potential impacts of contamination on-site. From a
23 public health perspective, risk assessment is highly
24 inadequate. Someone falls through the cracks. Are you
25 feeling lucky?

1 There have been many, many federal studies about
2 health affects near the site from the chemicals that are
3 on the site. We know there was a retinal (inaudible)
4 cluster near the site. Last year, the Public Health
5 Institute found that this area has the highest rates of
6 breast cancer in the state.

7 And what happened is -- and I think it's
8 outrageous to ask for alternatives to this project. The
9 DTSC signed an agreement on intent to cleanup to
10 background. The EIR needs to focus on how to cleanup to
11 background. Not whether to cleanup to background. And
12 Boeing under current law needs to cleanup to the land that
13 it's zoned for which is agricultural and rural
14 residential.

15 If all the contamination is not cleaned from the
16 site, it will continue to migrate and affect communities.
17 You can't have a park called Montgomery Perchloric Park.
18 It's not going to work if the contamination is not cleaned
19 up.

20 And there has been a lot of misinformation going
21 around. I do not want to see DTSC's EIR mimic what NASA
22 did which was purposely misleading the public about
23 truckloads, purposely misleading the public about harm to
24 habitat, purposely misleading the public about what would
25 happen if the contamination is not cleaned up.

1 What happened is when the AOCs are signed and now
2 that there's a change of leadership in DTSC, Boeing wants
3 to come to the state and set up a package or bending over
4 backwards for Boeing. They purpose PR companies to
5 greenwash the community with people who say they are from
6 the community but really who've got strong ties to Boeing.

7 So if someone from the community is telling you
8 "I don't want this cleaned up," you need to ask yourself a
9 question: Why? Thank you.

10 JOAN ISAACSON: Our next speaker is John
11 Southwick.

12 JOHN SOUTHWICK: I'm a longtime resident of
13 Simi Valley. I'm very concerned about the contaminants on
14 the hill. They are continually coming down. We have
15 numerous cases of cancer in Simi. I have a very good
16 friend who currently has six months to live. It is just
17 disgusting. We have to stick with the AOC. Those laws
18 that are in place have to stay in place.

19 I look around the DTSC folks. I hardly recognize
20 you because everybody has changed from the people that
21 were here a year ago. And I'm very concerned that DTSC is
22 in Boeing's pocket, and Boeing has some extremely deep
23 pockets.

24 They have a plan to build the 777X here in Los
25 Angeles. It's very important for them to achieve a

1 political power to get that here and that Boeing has a
2 tremendous leverage. So I just don't understand why we
3 can't keep things the way they are.

4 I've been to so many of these meetings. The only
5 person I recognize anymore is Mark. The rest of you are
6 strangers. I don't know why that happened. We used to
7 have good friendships with the DTSC folks. It doesn't
8 exist anymore. We're not even allowed to touch that
9 microphone. That's all I got. Thank you.

10 JOAN ISAACSON: Our next speaker is Dorri Raskin.

11 DOORI RASKIN: Hi. I'm Dorri Raskin. I've been
12 coming here for over 24 years, and my hair is getting
13 gray, and I feel that we need to get the site cleaned up
14 completely. I'm concerned about the public health. I'm
15 concerned about the contaminants that are coming off of
16 that site causing various cancers, and I'm concerned about
17 the people who are living below.

18 I have a lot of friends who have cancer, and it's
19 not fun having cancer or taking care of someone who has
20 cancer. If my parents were alive, they would be out here
21 saying the same thing. That the site needs to be cleaned
22 up completely to the agreement on consent.

23 Boeing needs to clean it up completely based on
24 what the zoning is which is rural and agricultural. We
25 need to get that cleaned now. The Santa Ana winds are

1 blowing like mad. I get a lot of stuff coming into my
2 driveway, and I live right across the school. I get all
3 the kids' homeworks and everything else.

4 Well, what's happening to off-site is happening
5 to the community where stuff is just coming off, and it
6 has to be cleaned up. I'm disappointed with DTSC, the
7 fact that they signed this agreement with NASA and DOE,
8 and now they're kind of like dragging their feet.

9 And you need to do it now. Not "Boeing shouldn't
10 exist" or "We should do that" or this or this or that.
11 No. No. No. You need to -- instead of sitting on your
12 tuchas or the tush, you need to clean -- and force
13 cleanup. Get Boeing to clean up all their crap. Get NASA
14 and DOE to clean up all their crap. Now.

15 Thank you.

16 JOAN ISAACSON: Thank you. Our next speaker will
17 be -- okay. It's M-A-R -- and I think it's a P-Y. And
18 last name -- it looks like it's G-R -- maybe it's Gruen?
19 Oh, that's Margery Brown.

20 MARGERY BROWN: Hi. I'm Marge Brown. And for
21 the last seven years, I've been a member of the West Hills
22 Neighborhood Council Environment Committee which
23 eventually got me onto the Board of the West Hills
24 Neighborhood Council.

25 In spite of all that, I reside in Chatsworth, and

1 I reside at the bottom of Simi Hills two blocks from the
2 hills. And two miles over on the other side of the hills
3 is the field lab which when I moved there, I discovered
4 about the partial nuclear meltdown.

5 Several years ago, I formed an ad loc committee
6 with our board of directors at Rock Point Condominiums
7 because we found that the state parks were about to build
8 Indian buildings and amphitheater and campgrounds in the
9 hills right smack above my head at the end of my street.
10 And the State of California didn't know anything about the
11 Santa Susana Field Lab.

12 And we were visualizing these trucks abrading the
13 soil and all of it falling down on our heads. So I took
14 it upon myself to inform the State of California about the
15 field lab, and they immediately agreed that they would
16 test the soil. And they postponed all of their plans
17 because of money.

18 Now, I am a grandmother. In fact, I'm a great
19 grandmother now, and I don't want to have my grandchildren
20 and great grandchildren having to come up to clean up this
21 field lab because you'll leave 90 percent of the pollution
22 in the soil if you don't clean up the background. It has
23 to be cleaned up to what it's zoned for which is
24 agricultural and residential -- the strictest kind of
25 cleanup.

1 Now, the State Water Board has handled a number
2 of violations, and they all seem to be concerned with
3 migration of the contaminants down off of the field lab.
4 They are concerned about Strontium-90, I think, in Russell
5 (phonetic) Canyon. Dayton Canyon is concerned there's a
6 possible perchlorate (inaudible) hanging above that
7 property. And Simi Valley has found perchlorate in their
8 water and have a high breast cancer rate to deal with.

9 Now, we want you to clean this up. You signed an
10 agreement. AOC expects you to follow it. Thank you.

11 JOAN ISAACSON: Thank you. Next, we have Bonnie
12 Klea.

13 BONNIE KLEA: My name is Bonnie Klea and like
14 Marge, I'm going to talk about the cancers. I was a
15 former worker at Santa Susana and worked in the nuclear
16 portion. And I was diagnosed with cancer in 1995 and
17 became active in work-group meetings and learning about
18 the cleanup.

19 In 2000, President Clinton signed a compensation
20 program for all the nuclear sites in America that harmed
21 the workers and then filed a report, and all of our
22 facilities are on that list. So far, we have 3,700 claims
23 from workers. I get phone calls every day from surviving
24 family members and community members who have cancer.

25 When I was first diagnosed in 1995, I did a

1 survey in my neighborhood sent to my house. Our houses
2 were built in 1959 -- the same year as a partial meltdown.
3 And I found that there were at least two cancers in every
4 house. And I took a notepad and went to every
5 neighborhood around, and it was the same way. And all the
6 houses that were old like mine -- cancers (sic). So I
7 became active.

8 And then in 2000 when the compensation program
9 was passed, I became active with the federal government
10 and Department of Labor and NIOSH (phonetic) to help pave
11 the way for the workers to get compensation. And I can
12 tell you I've seen all cancer studies done with the cancer
13 -- registry of cancers. Maybe three studies show five
14 cancers in my census tract.

15 And the sites closest to the hill are 50 to 55
16 percent higher. We have melanoma. That's 89 percent
17 above what it should be, and that's continuing today. The
18 contamination is running off-site.

19 I don't care for the end use of that land. I
20 don't care at all. I don't care about the beauty of the
21 test stands and the oak trees and the plants and the
22 frogs. What I care about is what's running off-site.
23 It's migrated on all four sides into Rocco (phonetic)
24 Ranch, Simi Valley. There's poor people there. It's in
25 their well water, and they're breathing it.

1 I live very close to Los Angeles side, and the
2 cancer around me is the same -- near as the same kind of
3 cancer that's among the workers at Santa Susana. Santa
4 Susana alone is number one, and (inaudible) is number two.
5 And, then, they cover 22 different cancers.

6 I want the AOCs implemented. Nothing less. I
7 don't want a risk-based cleanup. I don't want
8 alternatives. I want the AOC, and I want the people to
9 clean it. And I'm tired of hearing the scare tactics on
10 the trucks.

11 We're all going to have three trucks maybe an
12 hour. And if you divide that by three different routes,
13 it will be one truck. That's going to be the total
14 according to the NASA EIR. Okay? And we're also being
15 told that they come in end trucks and open trucks. That's
16 not true. They're going to be covered. So quit trying to
17 scare the community into getting rid of the AOCs. We want
18 it.

19 JOAN ISAACSON: Our next speaker is Brian
20 Lindquist.

21 BRIAN LINDQUIST: Brian Lindquist. Southern
22 California Federation of Scientists. I'm appearing today
23 on behalf of SCFS. (inaudible) often in presentation.

24 JOAN ISAACSON: Put the mike closer, please.

25 BRIAN LINDQUIST: Sorry. Thank you. The SCFS

1 was organized in the early 50s as the Los Angeles Chapter
2 of the Federation of American Scientists founded by former
3 Manhattan Project scientists concerned about the nuclear
4 threat.

5 SCFS is an interdisciplinary organization of
6 scientists, engineers, technicians and scholars dedicated
7 to providing independent scientific and analyses and
8 expertise on issues affecting science, society and public
9 policy. SCFS has been involved in matters related to SSFL
10 since 1979 when it provided technical assistance related
11 to a disclosure of the partial nuclear meltdown that
12 occurred in 1959 at SSFL.

13 For over 30 years, SCFS has been involved in
14 providing technical assistance to the communities near the
15 site on matters related to cleanup of the SSFL chemical
16 and radioactive contamination from decades of rocket and
17 reactor testing.

18 An SCFS representative has served for
19 approximately two decades as to the community
20 representative on the SSFL Inter-Agency Work Group
21 overseeing the cleanup of the site and on the SSFL
22 Advisory Panel that oversees health studies of the
23 affected workers and the neighboring communities.

24 SSFL is heavily contaminated from decades of
25 reactor and rocket testing, sloppy practices, improper

1 waste disposal, spills and releases. At least four of the
2 nuclear reactors suffered accidents. The SNAP-8ER and
3 SNAP-8DR reactors experienced substantial fuel damage.
4 The AE-6 released fission gases.

5 And in 1959, the SRE suffered a partial meltdown
6 with one-third of its fuel experiencing a meltdown.
7 Radiation levels went off-scale. None of the reactors had
8 a containment structure to prevent radiation release. In
9 the case of the SRE partial meltdown, radioactivity was
10 intentionally pumped out of the reactor vessel and vented
11 into the environment for weeks.

12 I'll acquiesce to my colleague.

13 JOAN ISAACSON: Shel Plotkin.

14 SHEL PLOTKIN: Well, I don't think I should go
15 through reading the rest of these documents. I understand
16 they're going to get submitted and so forth. I think I'd
17 like to take my time with a personal comment. I've been
18 involved in this whole thing since I can't remember when.
19 A lot of the people -- Jeanne was involved years ago and
20 Dorri and Bonnie, et cetera.

21 We've got a group on the -- the work group
22 committee. There were five community representatives.
23 And meeting after meeting, we fought to get the place
24 cleaned up. And agreements and violations of the
25 agreements. And we're back at it. It's the same thing we

1 were doing two decades ago.

2 DTSC is still sitting there and hasn't enforced.
3 As I understand it, DTSC has the legal authority to force
4 Boeing or to call in some other private group to make sure
5 that this place gets cleaned up like it's supposed to.
6 And as I understand it -- maybe I'm wrong. You'll correct
7 me if I am -- that somebody's got to have the authority to
8 get this place cleaned up.

9 And I think it's DTSC. So do it. You know?
10 Does Boeing have to control everything? That's what it
11 amounts to as far as I'm concerned.

12 And I'm sick and tired of going to these kinds of
13 meetings and all these people. And it is interesting that
14 the DTSC people are different than the ones we've seen in
15 the past. It's like a revolving door. People show up for
16 a while, and then they're gone. Including our coordinator
17 -- facilitator, I guess. I forgot the name of the
18 facilitator we had for many years. You know, this goes on
19 and on. It's time we did what we were supposed to and get
20 the place cleaned up. Enough messing around.

21 JOAN ISAACSON: Thank you. Our next speaker is
22 Eleanore Rembaum.

23 ELEANORE REMBAUM: I live in Chatsworth at the
24 bottom of Simi Hills, and I'm very close to Rocketdyne.
25 I've been involved in the Cleanup Coalition, I would say,

1 almost 25 years at least. For years, we've been going to
2 meeting after meeting talking about the cleanup. When is
3 it going to be cleaned up?

4 We get the recommendations. There's no point in
5 my going to the office because you've heard better
6 information more accurate from other people. The thing
7 that I'm concerned with -- when are they going to clean it
8 up? We'd like it cleaned up to background.

9 This is what it means. People are dying of
10 cancer. There are cancer clusters. We have these
11 meetings one day after another. And like Shel said,
12 there's a revolving door of people from DTSC. And nobody
13 seems to carry through. Nobody's carrying the ball except
14 Rocketdyne, and they're carrying the ball in the other
15 direction. Thank you.

16 JOAN ISAACSON: Our next speaker is Bruce Rowe.

17 BRUCE ROWE: Hi. My name is Bruce Rowe. The
18 AOCs are making the scientific sense for emergency in
19 terms of public health risks. The result -- they are the
20 result of political decision. Not scientific data. Not
21 empirical data. From that being radiological studies and
22 from other scientific studies.

23 In fact, Dr. Mack has been -- brought up several
24 times (inaudible) from USC. He very conclusively
25 stated -- it's been brought up and misquoted two years

1 ago -- that there is -- he could find no correlation
2 between cancer in the areas around Santa Susana and Santa
3 Susana.

4 That they were similar to the percentages of
5 cancers found in other parts of the country and other
6 areas and especially the glioblastoma (inaudible) has
7 started. It's not being clustered. They were from
8 various different areas, and some of those glioblastomas
9 were probably due to genetic disease.

10 So there needs to be good science. I think that
11 there also is confusion between what happened over 50
12 years ago and what is going on currently. There has been
13 already rampant cleanup of the site. It's not cleaned up
14 completely, but there has been ongoing cleanup for the
15 last 25 years. So the risk today is not what the risk was
16 50, 55 years ago. As far as the AOCs being held, laws are
17 modified, changed, overturned all the time.

18 The other thing I'm going to say is the fact that
19 people get cancer. People get cancer every place and to
20 correlate it to a specific cause 50 years after --
21 especially people who have moved into these areas from
22 other areas -- and they are still correlating their
23 cancers to something that happened 50 years ago. That is
24 just an anecdotal type of thing. There's no scientific
25 value to that whatsoever.

1 Okay. So that's it.

2 JOAN ISAACSON: Our next speaker is Ronald Ziman.

3 RONALD ZIMAN: Thank you. My name is Ronald
4 Ziman. I'm a physician, internist and neurologist.
5 Twenty-year resident of Bell Canyon which is the closest
6 community to Santa Susana Field Laboratory being one-half
7 mile from the operational area. I'm also a Section 106
8 member and a vice president of the SSFL Community Advisory
9 Group.

10 My community is both downstream and downhill from
11 Santa Susana Field Laboratory. I'd like to say that our
12 cancer rates in Bell Canyon are no different than average
13 cancer rates elsewhere. We do not have increased cancer
14 rates.

15 The concerns are, in our community, the amount of
16 soil to be removed and extrapolating from the
17 500,000 cubic yards to the NASA DEIS. It will be huge.
18 The consequences related to, quote, "regrading," unquote,
19 an alteration of the topography, the runoff, the
20 groundwater recharge will be significant and
21 unpredictable.

22 Removal of the biota in a critical wildlife
23 quarter will have substantial consequences. We're very
24 concerned about the erosion that will be occurring that
25 will be promoted by the significant removal of soils that

1 will be choking the streams. Ninety percent of the runoff
2 is to the south of (inaudible) in Bell Creek and what
3 those adverse impacts really are unpredicted.

4 Additionally, there will be airborne erosion that
5 develop fugitive dust and health consequences such as
6 increased risk of San Joaquin Valley fever, which is
7 endemic in the area. The change in topography will result
8 in pooling of groundwater with inadequate runoff and
9 mosquito breeding with promotion of diseases such as West
10 Nile virus, Bird flu and encephalitis.

11 The removal of the Native American and
12 archeological resources. There will be the removal and
13 deconstruction of American aerospace history. Trucking of
14 tens of -- hundreds of thousands of cubic yards with soil
15 with the associate safety risks and impacts.

16 Secondary to the large number of trucks, the
17 associated pollution, potential spread of contaminants
18 off-site as a result of this during the transporting
19 process. The removal of the rocket test stands will erase
20 our space history in this area. The destruction of the
21 integrity of the archeological resources without
22 consideration of ultimate land uses in the state.

23 Open space under the National Park Service is one
24 consideration which won't occur if the land is turned into
25 a moonscape with all of its historical and cultural

1 resources removed. There needs to be balance as defined
2 in the --

3 JOAN ISAACSON: Please wrap up.

4 RONALD ZIMAN: -- CEQA process with mitigation of
5 soil removal and looking at other alternatives. Thank
6 you.

7 JOAN ISAACSON: Next, we have Michael Collins.

8 MICHAEL COLLINS: Michael Collins.
9 EnviroReporter.com. Normally, a reporter doesn't make
10 comments, but this isn't a normal department to deal with.
11 And speaking of the Debbie Raphael director in conference
12 calls and having her promise to get me information -- it
13 is never materialized. In finding public records that
14 requests with the department -- they are not fully
15 fulfilled.

16 So as a reporter, I know that there's going to be
17 a question segment, and I'd like to give DTSC a little
18 head's up on what I'm going to ask. What I see in this
19 PEIR -- what I notice is what I don't see. We have all
20 sorts of different contamination coming off the hill for
21 decades.

22 Is the PEIR going to do a study -- like any other
23 environmental impact report would -- on the effects of the
24 people that are off-site? Not the park visitors who can
25 come and go at their own will but the dozens of cities

1 that are along the 52-mile stretch of the Los Angeles
2 River, which the Santa Susana Field Laboratory is the
3 headwater.

4 So are you going to do any kind of study that
5 estimates the cancer impacts on the local population and
6 the not so local population if you go with the alternative
7 of leaving basically 90 to 90-plus percent of the
8 contamination in place? If you are, why would you do
9 that? If you are not, why aren't you?

10 My second point -- since we're in comments here
11 -- if the DTSC is going to break the Agreements on
12 Consent, why did you -- this donkey-pony show? Why would
13 you even bother having meeting here with the public
14 grinding up their taxpayer money when what you say, what
15 you sign doesn't count? I mean, what's the point? I
16 mean, that's why I'm being a little rhetorical, but I do
17 get my chance at these comments.

18 My last point is if you go with an alternative to
19 cleanup with this -- what I think is a specious argument
20 about moonscaping Area IV -- what are you going to do
21 about the EPA's radiation readings that have gotten within
22 the last year. We've got Cesium-137, Strontium-90,
23 Plutonium-239 at thousands of times over background. What
24 are you going to do about that? I've got 30 seconds left.
25 I'll make it this time.

1 If and when the people in this room and the
2 company actually think they can open this site as a park,
3 I guarantee the first person in the front door is me, and
4 I'm going to show my readers just how they (inaudible) the
5 barrier for us. What is DTSC going to do then? Thank
6 you.

7 JOAN ISAACSON: Our next speaker is Richard
8 Mathews.

9 RICHARD MATHEWS: I was a physics major at
10 Caltech. I have used Cesium-137 and the other source of
11 isotopes that are involved in this site, and I am
12 concerned about the possibilities of these things working
13 their way up the food chain. Strontium-90 accumulates in
14 the bones, and Tritium gets into the groundwater, and it's
15 very difficult to remove.

16 And we were told long ago that DDT was not a
17 concern because it was so spread out. But it turned out
18 it accumulated up the food chain and became a very serious
19 problem. And I am very concerned as a physicist about how
20 these isotopes and the various chemicals that are involved
21 could be doing damage.

22 I'm here representing the North Valley Democratic
23 Club. I'm president of the club which is based in
24 Chatsworth and Northridge. And I want you to know that
25 the club has voted unanimously to support as thorough a

1 cleanup as is practical -- a cleanup to background. And
2 we support the AOC. We want to get the site restored as
3 close as possible to its natural state.

4 And I want to remind you that the Los Angeles
5 City Council has voted unanimously for a cleanup to
6 background. The Simi City Council has voted for a cleanup
7 to background. The Ventura County Supervisor, the Ventura
8 County Democratic Party -- they have all supported a
9 cleanup to background.

10 I've been a resident of the area of Chatsworth
11 and the area around it for most of the last 50 years, and
12 I'm speaking for myself both as a resident and as a
13 physicist. I want a cleanup to background. I want to
14 conform to the AOCs, and I would really like to see the
15 Boeing soil also brought in to being able to be cleaned up
16 to that kind of level.

17 I understand comments that some people here have
18 made about the concern about truck traffic, and I would
19 like to see the truck traffic mitigated as much as
20 possible. We can look at on-site decontamination and
21 concentration of the pollutants so that not as much
22 material needs to be taken away.

23 We can look at alternate routes such as bringing
24 the material to the north up to the railroad tracks,
25 reducing traffic past the existing neighborhoods. But

1 whatever you do, don't reduce the level of cleanup.
2 Cleanup to background.

3 What I've heard sometimes from some of the people
4 who want less of a cleanup is that they will say that
5 "Well, there's no real danger to what's up in the hills.
6 I would just leave it up there. But whatever you do,
7 don't bring all that dangerous material back by our
8 houses."

9 And it can't be both ways. The material is
10 dangerous. It has to be cleaned up. Please clean it up
11 as soon as possible.

12 JOAN ISAACSON: Diana Dixon-Davis.

13 DIANA DIXON-DAVIS: My name is Diana Dixon-Davis.
14 I have a Masters in (inaudible).

15 THE REPORTER: I can't understand her.

16 DIANA DIXON-DAVIS: And actually, I'm a member of
17 the North Valley Democratic Club for the last 30 years --

18 JOAN ISAACSON: Could you speak a little bit
19 slower --

20 DIANA DIXON-DAVIS: Okay. I'm sorry. I've been
21 a member of the North Valley Democratic Club for the last
22 30 years. I'm the vice president. I was up there to
23 vote, and I do not agree with the resolution that was
24 passed. I'm also a member of the Santa Susana Field Lab
25 (inaudible). I represent Chatsworth Neighborhood Council.

1 I'm also a member of the SSMPA Community Coordinating
2 Council. I'm also health and safety (inaudible) for SSFL
3 Council PTA.

4 And my concerns are -- I cannot cover all the
5 areas I wish to address tonight, but I want to mention one
6 major thing. Right now the (inaudible) background
7 (inaudible) cleanup is the replacement of all the soil
8 that's removed. I know in Chatsworth we're very concerned
9 about not what's on the trucks but the fact that a truck
10 every three minutes for almost 15 years will be passing
11 through our community.

12 I have a map here showing you the routes, and
13 they go right past several elementary schools, middle
14 schools and Chatsworth Park Elementary, which is literally
15 from me to you how far away the trucks will be. These
16 trucks will be going every three minutes.

17 In addition, there's no way -- there's no
18 identification of soil that is clean enough to replace the
19 soil that's being removed. In fact, DTSC has the right to
20 use, quote/unquote, "contaminated soil less clean than a
21 background to which the rest of the (inaudible) foresee."

22 It's a ludicrous situation. The trucks are going
23 down every three minutes with soil on them taking them out
24 to the Valley or Utah and then bringing back any dirt that
25 is actually more contaminated than the background levels

1 to which you are cleaning up to replace all the soil
2 that's being removed.

3 Frankly, our community really wants to see it as
4 a park and as an open space. We do not want to see it
5 turned into homes or condos or any type of urban
6 development. We'd like to see it as a park.

7 And (inaudible) point of view that has also been
8 supported by many of the councils in the area, and I'm
9 hoping someone else will be speaking. So all the
10 neighborhood councils have already endorsed this starting
11 in West Hills and going all the way across the top of the
12 Valley.

13 I also want to bring up the fact that the traffic
14 mitigation has not been (inaudible). Boeing had
15 accidents. Not only pollution reduced by each of these
16 trucks, and there was a tunnel (phonetic) that has done a
17 major study on lung and asthma damage to children by
18 traffic and pollution from trucks. Let's see. I don't
19 understand why the group --

20 JOAN ISAACSON: I'm going to ask you to wrap up.

21 DIANA DIXON-DAVIS: Let me ask this question:
22 Why can't we figure out what level of health risk is
23 currently at the lab? Right now that is prohibited by the
24 AOC. It makes no sense not to know what the current
25 health risk is and to evaluate the cost-benefit analysis

1 of the mitigation (inaudible). Thank you.

2 JOAN ISAACSON: Thank you. Our next speaker is
3 John Lukas.

4 JOHN LUCKER: Lucker. And (inaudible). I'll say
5 something (inaudible).

6 JOAN ISAACSON: Next is Christina Walsh.

7 CHRISTINA WALSH: Hi. My name is Christina
8 Walsh. I've been involved for a long time. I started
9 cleanuprocketdyne.org in 2001. I live in West Hills at
10 the two-mile mark down from the site.

11 You know, I'm really disappointed to see folks
12 who view the CEQA process as anything but a mandatory and
13 needed process to make sure that we balance the solution
14 with the problem at hand. There's no such thing as a time
15 machine. We're not going back 50 years.

16 If you remove all the soil, you don't have
17 anything to save. The fact is that there are real issues
18 that need to be considered. So I am hoping for the very
19 robust CEQA review that considers all of these issues for
20 the neighboring residents including myself on all four
21 sides of the site.

22 I'd like to point out also I appreciate -- and
23 believe it or not, I agree that the 2010 cleanup that was
24 pointed out by Mr. Bowling was a very protective and
25 well-designed and well-thought, thorough cleanup. The

1 problem is it was not AOC-compliant. It could not be
2 possible to do under this agreement.

3 And that is why we need to make limited
4 modifications and use health risks to the suburban
5 residential level so that people surrounding the site are
6 protected but also the impacts from such a severe cleanup
7 are also considered. Because you have surrounding
8 residents that are breathing in this dust and deal with
9 the traffic conditions not only here but also at the
10 disposal sites where these trucks are going to go.

11 There'll be very small environmental justice
12 communities that are going to be very heavily impacted by
13 this kind of soil coming in. And, then, as Bruce pointed
14 out before -- to find soil that suits and matches to this
15 level to bring in that has the same soil profiles that
16 will support local habitat is very important.

17 We want to protect the natural species that we
18 can. We certainly are concerned with the idea of
19 impacting cultural resources of a thousand years that
20 certainly cannot be replaced. It's impossible to replace
21 them once they are gone; so we need to think carefully as
22 we move forward.

23 We do need to think about alternative methods and
24 treat on-site wherever possible. But unfortunately, as
25 pointed out by the DEIS, the AOC does not allow for that

1 because it doesn't allow the time. So if we really want
2 those things, if we want a workable solution -- I live at
3 the two-mile mark. I want to be safe. I want my kids to
4 be safe. I've done this for a long time for that reason.

5 I want to use (inaudible) guidance by EPA like it
6 was done all over the country, and that is what needs to
7 be done here in order to have a safe, balanced cleanup
8 that protects both today and tomorrow. Thank you very
9 much.

10 JOAN ISAACSON: Thank you. Next, we have Mark
11 Osokow.

12 MARK OSOKOW: Thank you. My name is Mark Osokow,
13 and I represent the San Fernando Valley Audubon Society.
14 I'm a retired alchemist. I'm also the founder and the
15 chief operator of the San Fernando Valley Bird
16 Conservatory and the Bird Monitoring Project at Santa
17 Susana Field Laboratory. First thing I want to do -- I
18 have some very disjointed notes, and I apologize for that.
19 Not much connection directly between these little notes
20 here.

21 The first thing I want to do is call attention to
22 the NASA Office Inspector General Report, which has been
23 referred to a number of times in various documents and
24 including the NASA Draft Environmental Impact Statement,
25 which produced a copy that was highly incomplete.

1 The reason that that OIG report is important is
2 it found a lot of defects in the NASA agreement to cleanup
3 to background as per the AOC, the Administrative Order on
4 Consent. They found, for example, that there would be
5 cost inefficiencies among other things, that the cleanup
6 to background wasn't necessary from the health standpoint.
7 A great variety of problems with that.

8 It's important because that would apply to the
9 overall application of the AOC to the cleanup wherever
10 it's done in Santa Susana Field Laboratory. That's one
11 thing.

12 The other thing is that the Administrative Order
13 on Consent actually led NASA to plan -- at least in the
14 Draft Environmental Impact Report -- what threatens to be
15 a very disastrous cleanup plan for their property at the
16 Santa Susana Field Lab which will cause massive
17 destruction to the environment from the removal of
18 500,000-plus (inaudible) of soil which cannot be replaced.

19 Repeated statements have been made here regarding
20 the lack of impact, (inaudible) cleanup, makers, one
21 wildlife, under oak trees. And I would just say -- to
22 clear that up -- that there has been a serious impact of
23 cleanup in those areas for our wildlife. All the
24 understory vegetation which is prime habitat for wildlife
25 has been removed from those areas. Instead, we've got

1 coming back now weak vegetation which does not support
2 wildlife as well.

3 Another thing I do point out about wildlife is in
4 my years of studying birds at Santa Susana Field Lab -- I
5 have detected no impact whatsoever of contamination on
6 birdlife or any other wildlife at Santa Susana Field Lab.

7 Everyone said the health impacts said there would
8 be health impacts on wildlife as well as the human health.
9 And those impacts on human health have been completely
10 exaggerated, and there's really no solid evidence to
11 support those statements that have been made about cancers
12 and so forth. That's all.

13 JOAN ISAACSON: I'd just like to remind you when
14 other people are speaking if you cannot engage in
15 conversations and comments, I'd appreciate it. Just to
16 make sure everybody gets their fair share of time and
17 attention. Our next speaker is Sam Cohen.

18 SAM COHEN: Good evening. My name is Sam Cohen.
19 I'm the Government Affairs and Legal Officer for the Santa
20 Ynez Chumash Indians. I'm also a member of the CAG. I'm
21 here to offer you ten points for your consideration. I'll
22 follow up in writing to try to make it sound like English
23 when I'm done.

24 My first point: The state's program is only
25 recent history. Much of this site is Native American.

1 Two, the entire site was historically placed for multiple
2 known tribes including -- without limitation -- the
3 Chumash, the Gabrielino and the Tongva.

4 Three, San Dimas Chumash is the only
5 federally-recognized tribe in this region, and we reserve
6 the right to reserve the right to all these Native
7 American communities. Four, San Dimas Chumash has
8 declared the NASA site as sacred pursuant to Executive
9 Order 13007.

10 Five, San Dimas Chumash is evaluating the entire
11 SSFL site for consideration as sacred for the purposes of
12 CEQA. Six, there has not been a comprehensive cultural
13 resource assessment. A: EPA and (inaudible) should meet
14 the National Historic Preservation Act -- NHPA -- 106
15 Consultation already. B: NASA is currently engaging a
16 106 Consultation. C: DOE is contemplating 106
17 Consultation. D: The site is part of the National Park
18 Service (inaudible) trail study, and the National Park
19 Service is initiating 106 Consultation.

20 Seven, to date, DTSC has failed to engage in
21 consultation. Eight, state law requires consultation
22 pursuant to Executive Order B-10-11. Nine, federal law
23 requires a consultation. President Obama, in his
24 executive memo in 2009, has reaffirmed that Executive
25 Order of President Clinton 13175.

1 Ten, in conclusion, the tribes request a robust
2 cultural resource assessment including -- without
3 limitation -- both archeological and sacred site
4 assessment and a broad application of the cultural
5 artifacts exceptions in the AOCs. We reserve the right to
6 provide additional comments in writing at a later date.
7 Thank you very much for your time.

8 JOAN ISAACSON: If you can withhold applause
9 between speakers, I'd appreciate it. I want to make sure
10 everyone feels comfortable speaking, and some people may
11 not want applause. Dan Hirsch.

12 DAN HIRSCH: My name is Dan Hirsch. Community
13 Bridge the Gap. I want to try to get this in the three
14 minutes you permitted us. I'm not saying -- although it's
15 frustrating you took 45 minutes for yourself. I'll try to
16 explain what is going on.

17 In December of 2010, four of the current
18 administrations took office. Binding agreements signed
19 with NASA and DOE have all the contaminations that they
20 created. This was proposed by the Nobel prize winning
21 physicist who was the Secretary of the Department of
22 Energy and the Law and Experience Assistant Secretary as
23 being essential in protecting health in communities
24 (inaudible).

25 Enter the seriousness -- service and public

1 (inaudible) comments. Two comment periods.
2 Ninety-nine percent support the AOC. Boeing and Fields
3 (inaudible) tonight were the one percent. And now we are
4 holding an EIR scoping session -- which is violating those
5 AOCs -- which is saying that we are not going to be
6 complying with the agreements that we signed since doing
7 the EIR will look at all sorts of lesser cleanups that
8 will leave the vast majority of contamination in place.

9 Why? I know we have a couple of government
10 students here from high school. Why? Because the Boeing
11 Company -- which owns most of the property -- is an
12 extremely powerful lobby entity. They have hired as
13 lobbyists people who are contributors of the governor and
14 former aides. So all of a sudden with the administration
15 changing, we now have change of personality and a change
16 in commitment to a legally binding agreement.

17 Why? Boeing can save a ton of money if it can
18 leave that contamination in place. The EIR is required to
19 define the project as compliant with the AOC for DOE and
20 NASA. And this is what, in fact, your own department
21 insisted NASA do -- NASA do -- a year ago. They said that
22 if they didn't do that, they'd violate the AOC today. You
23 are violating the AOC precisely the way you told NASA not
24 to. Why? Boeing is powerful. It can save a lot of
25 money. It can do so if it ends up transferring its cost

1 of business to all of you who live nearby by producing the
2 cancers.

3 One last point -- as I'm being shut up now -- is
4 that the proposals that you're hearing of leaving the
5 material on-site -- if you look at the numbers, the
6 alternative cleanup standards that have incurred some of
7 the Boeing allies (inaudible) would leave all of the 500
8 locations the EPA found as radioactive and uncleaned up.
9 And 90 percent of chemicals would save Boeing a ton of
10 money but would continue to produce lots of cancers in all
11 of you.

12 And the question is what's more important:
13 Boeing money or your (inaudible) --

14 JOAN ISAACSON: Can you please wrap up? Thank
15 you. Next we have Jelena Csanyi.

16 JELENA CSANYI: My name is Jelena Csanyi, and I'm
17 a resident of Chatsworth since 1976 and the Valley since
18 1970. Yes, there are cancers. By the way, my mother and
19 my father died of cancer in Yugoslavia. So cancer is
20 everywhere. My sister-in-law and my brother-in-law died
21 of cancer in Woodland Hills; so it's not Boeing. It's not
22 this.

23 I have a degree in analytical chemistry. I'm
24 aware of the chemicals that are there. I am deeply
25 disturbed by a large amount of people here that have said

1 (inaudible) sentiment. Not in my backyard. Nobody is
2 thinking. By the way, we have one earth. It's not going
3 to harm you. Do those people know what you're bringing
4 there? It's just -- cannot be "Just take it away from me.
5 I don't want to see it."

6 Mitigation. Trucking things. Trucks are
7 covered? You drive behind one of them on a motorcycle,
8 and you see what they lose. Mitigation. One more thing:
9 Water in (inaudible) work. The water -- it goes on where
10 you work, when you work. Not when you don't work and not
11 where you strip the soil all the way already. Right?

12 I know. I live up from Topanga Canyon. A small
13 development of 15 homes have disturbed the soil enough
14 that I contracted Valley fever even though I was wearing a
15 mask nonstop while (inaudible); so I probably know more
16 about mitigation and grading than I care to know or that
17 most of you will ever find out.

18 Water. You are using water to mitigate. What
19 kind of water? Bottled water that we pay high prices for
20 and we have a shortage of. What is that water going to
21 do? Going back in the ducts (inaudible) contaminating no
22 matter how much soil we remove. Right?

23 Why? Do we want to put more water we found in
24 that area in the last 60 years just to mitigate the dust?
25 And afterwards when you're all done and strip it clean or

1 not clean -- whichever way people like to feel about it --
2 it will be stripped, and then you get the dust. No matter
3 how much you think you're not going to have the dust, you
4 will have the dust.

5 We need to think in a -- environment is my
6 passion all my life, and we need to think that this is not
7 a Chatsworth problem, but we need to think in a way how it
8 affects everybody in the world. Thank you.

9 JOAN ISAACSON: We have one more speaker who
10 hasn't yet had a chance to make a comment. And, then, I
11 have a card from someone who has already spoken and wants
12 to speak again. So for the first round, I will call
13 Richard Mathews.

14 RICHARD MATHEWS: I already spoke so --

15 JOAN ISAACSON: You already spoke. Okay. So
16 just to confirm, I have a card from Chris Rowe. And
17 Chris, you spoke previously as well.

18 CHRIS ROWE: I didn't get to speak more than
19 once. Everybody gets to; right?

20 JOAN ISAACSON: Absolutely.

21 FEMALE ANONYMOUS: (Inaudible).

22 JOAN ISAACSON: In the beginning when I was going
23 over the protocol for the comments, I explained that if
24 you wanted to speak a second time, then everyone would
25 have an opportunity. That's why I have two people who

1 have already given cards for a second round. So let me
2 just the ask is there anyone who wants to speak who has
3 not yet spoken?

4 FEMALE ANONYMOUS: (Inaudible).

5 THE REPORTER: I can't hear.

6 JOAN ISAACSON: We should. This meeting is
7 scheduled to go until 9:00, and it's five till 8:00 right
8 now.

9 So Richard, we'll do the same protocol. Three
10 minutes, and we'll give you the warning signs.

11 RICHARD MATHEWS: I'd like to add a personal
12 note. A previous speaker had dismissed the possibility of
13 there being a cluster of glioblastoma multiforme. My
14 brother died of glioblastoma multiforme. He was a track
15 star on the Chatsworth High track team. He ran through
16 those hills with his team. There's no way to tell if that
17 is a cause for his death or not.

18 Glioblastoma is a very, very nasty disease. The
19 diagnosis is basically a death sentence. Most people who
20 get it die within a short time. A lot within months.
21 Most die within a couple years. My brother suffered
22 greatly in the six months that he had. And so -- you
23 know, it's a very difficult situation.

24 The best science that we have says that probably
25 hundreds or thousands of people who will die prematurely

1 will die earlier than otherwise because of pollution from
2 Santa Susana. Now, that doesn't come from looking at
3 clusters of particular cases. There's no way to tie
4 particular cases to this particular pollution.

5 These hundreds to thousands of deaths will be
6 spread over a century, and that will be mixed in with the
7 million -- literally a million natural deaths that we will
8 have during that century in America. And so we'll never
9 be able to measure hundreds or thousands of extra deaths,
10 but that doesn't mean that they aren't there.

11 It's junk science to claim that you do see a
12 correlation, but it's also junk science to say that you
13 don't see the correlation. And that's true when you're
14 looking at a correlation in humans, a correlation in
15 birds. You just can't see it.

16 The way to be able to make the estimate is to
17 look at how much contamination there is and to know the
18 different types of contamination, what the rates are for
19 what deaths those will cause and multiply it out and add
20 it all together. And there's a lot of uncertainty, and
21 that's why we estimate it's hundreds to thousands. It's a
22 big uncertainty.

23 But those people have died and will die, and we
24 need to clean this up as much as we can to try to prevent
25 any more deaths from happening. Thank you.

1 JOAN ISAACSON: Next, we have Chris Rowe.

2 CHRIS ROWE: I'm Chris Rowe. I'm a former public
3 health chair of the West Hills Neighborhood Council. I
4 resigned from that council to focus more on the Santa
5 Susana Field Lab. I spent seven years on this site. I
6 read all of the health studies.

7 DTSC has written a letter to the Simi Valley's
8 mayor stating that there is no known off-site risk at this
9 time. The federal EPA has written in their fact sheet for
10 May 2012 that there is no risk from the radionuclides from
11 the site because the site is restricted.

12 There was a statement a minute ago about the
13 hundreds of thousands of deaths. The one quote was to
14 Dr. Deay (phonetic), who was one of the people that talked
15 about the increased deaths, and Dr. Deay said it in 2006.
16 In 2007, he updated his paper to state he had not seen the
17 wind rose patterns. And there is a statement on --
18 actually, (inaudible) that says that he's changed his
19 rates that he estimated previously; so there is no known
20 studies that predict hundreds of thousands of extra deaths
21 from the site at this time.

22 As my husband stated earlier, Dr. Mack did a
23 presentation to the West Hills Community Council at my
24 request. And for example, the bladder cancer that was
25 mentioned today -- he said it would happen eight or nine

1 other census tracts in Los Angeles County just by chance.

2 As I said, my focus has been on protecting the
3 community in West Hills and the surrounding communities.
4 That is the reason that I have been involved with this
5 site. And I think that with my health background, I'm
6 able to read those things and understand them whereas some
7 people talk about people they know.

8 I have spoken to my own doctors about cancer
9 clusters. A cancer cluster is when you have a whole group
10 in the same area with the same type of cancer. Not that
11 this person has lung cancer in this house and another one
12 has another cancer at another house. Also, there's tox
13 camps (phonetic) that are nationwide that show other sites
14 to be correlated and have releases. So we cannot blame
15 all our exposures just on Santa Susana. Thank you.

16 JOAN ISAACSON: Abe Weitzberg.

17 ABE WEITZBERG: There were a couple of statements
18 that were made earlier that require a little
19 clarification. People who read the AOCs -- they read the
20 fine print that says AOCs, the agencies have to comply
21 with all the state and federal laws. That includes NEPA
22 and CEQA. So doing a good CEQA analysis isn't violating
23 the AOCs. It's conforming to the AOCs. If those clauses
24 weren't in the AOCs, they never would have been signed.

25 Another thing -- people call the AOCs cleanup to

1 background. Well, that's not really true. It's cleanup
2 to background or cleanup to detect. Most of the problems
3 with all the amount of soil that's supposed to be trucked
4 off is because that you're asked to clean up things that
5 you can detect whether or not they pose any risk.

6 Another statement was made about discovering
7 Strontium, Cesium and Plutonium off-site as if it all came
8 from Santa Susana. Over 95 percent of what the EPA found
9 at SSFL were those nuclides, and they're all from
10 radioactive fallout from weapons testing. You will find
11 them all over the world in everybody's backyard, and they
12 didn't come from Santa Susana.

13 One other thing: They talk about cleaning up to
14 background. Santa Susana has very high background in
15 radionuclides. It has a high background in arsenic. The
16 total risk from the background chemicals (inaudible) is
17 about five percent cancer. Cleaning out what you can
18 find -- every chemical has stuff that you find. Dozen
19 (inaudible) to background risk which is going to be there
20 after everything is stripped off.

21 So the net result is what you had before any
22 cleanup and what you have after is essentially the same.
23 And that's a fact. I mean, don't claim that you can be
24 better off when it's been stripped because all the
25 background radiation chemicals are still going to be

1 there.

2 That's enough. By the way, if we're quoting
3 degrees, I got a Ph.D. and a Masters in nuclear
4 engineering, Bachelors in chemical engineering and 55
5 years experience.

6 JOAN ISAACSON: Next, we're going to hear from
7 Mark Osokow again.

8 MARK OSOKOW: Just a couple things I didn't
9 mention before. And since we're here primarily for the
10 purpose of scoping as to what goes in the Environmental
11 Impact Report, that seems to have gotten lost in the
12 shuffle here in large measure.

13 But I just want to say that I believe that the
14 Environmental Impact Report should include a very
15 comprehensive study of the current health risks on the
16 site compared to the -- well, you have to do some
17 guesswork, I suppose.

18 But compared to the past health risk and any
19 future health risk that might remain on the site after the
20 cleanups of the various scenarios including the cleanup to
21 background, the AOC and cleanup to detection -- meth
22 detection limits as mentioned by Abe and any other
23 standards that might be relevant there -- all those things
24 need to be compared to decide whether you're actually
25 going to divide the (inaudible) from this type of cleanup.

1 And that's really what we're looking for -- will
2 this cleanup benefit anybody? If so, how, to what extent
3 and how much money is it going to cost? And so that's
4 what I think the main thrust of the Environmental Impact
5 Report should be or at least in part anyway.

6 Also, I want to just mention that there are lots
7 of good studies that have drawn causal relationships
8 between various toxins and cancer and other types of
9 health impacts. These are not guesswork. There's been a
10 lot of extensive work done in this area. They're not so
11 fuzzy as to be ignored. So I just want to mention that to
12 prove a point, and it particularly applies to birds.

13 In fact, birds are used routinely in toxicology
14 studies. For example, when pesticides are put through
15 testing to determine ecological effects, the birds are
16 used in those particular studies. So there's a lot of
17 very hard data on this. It's not just completely
18 guesswork. Just like any scientific study, there is a
19 conference with the railroads and data points.

20 So what I have seen here at the Santa Susana
21 Field Lab doing my study notes -- contrary to most
22 people's beliefs, more birds seem to be in Area IV where
23 all so-called radionuclide contamination is located. So I
24 just want to mention that. That is actually the southern
25 buffer zone at least in the wintertime.

1 And we have large flocks of migrating species
2 coming from all over the country. This is not a trivial
3 matter when we start talking about taking out 500,000-plus
4 including the rest of the site -- soil from this site and
5 ruining habitats for birdlife and other wildlife as birds
6 are an integral part of the habitat for other species as
7 well. Thank you.

8 JOAN ISAACSON: Next, we have Christina Walsh
9 again.

10 CHRISTINA WALSH: Hi. My name is Christina
11 Walsh. I started cleanuprocketdyne.org, and I'm also a
12 petitioner and Communications Chair Coordinator at SSFL
13 CAG. I would like to reiterate -- first off, I'm very
14 appreciative that we are doing a detailed EIR and to
15 address my needs as a community member -- those at the
16 two-mile mark.

17 I feel that every one of those categories that we
18 see up there aesthetics; air quality; biological
19 resources; cultural resources; geology, soils and
20 seismicity; greenhouse gas emissions; hazards and
21 hazardous materials; hydrology, groundwater; land use;
22 noise; population and housing; public services; traffic
23 and transportation; utilities and project alternatives --
24 all of those categories need to have serious detailed
25 consideration within the Program EIR so that we don't ruin

1 what we're trying to say.

2 I would also like to add a little bit about junk
3 science, but there's also something that we've seen here
4 that I think of as revenge science. This cannot be a
5 punitive result. This cannot be a punitive solution.
6 When we think about people who are demanding "Just take it
7 all away," then we're saying -- we're asking the
8 environment to pay for past actions of polluters.

9 And that's not only corrupt, but it's truly
10 unconscionable. We need to balance those issues. We need
11 to ask ourselves why electives like Boxer, Brown and
12 (inaudible) -- especially Boxer supporting the hunter's
13 point: Cleanup where we can put thousands of residents
14 right on top of it. There is (inaudible). They're not
15 used to this kind of cleanup.

16 So why would you demand a less protected scenario
17 where people who are going to live on the site? We're
18 here. We're trying to balance both very unique and rare
19 recurring habitat with the health risk of the surrounding
20 residents.

21 So I just ask that we look carefully to all of
22 those categories to suit the affected communities that
23 live and are directly affected by the impacts that will be
24 created. Thank you.

25 JOAN ISAACSON: Next, Denise Dulfield.

1 DENISE DULFIELD: Hi. I just want to go back and
2 forth on (inaudible) --

3 THE REPORTER: I can't understand her.

4 DENISE DULFIELD: -- (inaudible) completely
5 false. There have been over a hundred (inaudible) in the
6 last few years. (inaudible) Simi Valley. Yes, I have a
7 lot to say.

8 THE REPORTER: I can't understand a word.

9 JOAN ISAACSON: Would you fill out a comment
10 card? She needs to be able to transcribe.

11 DENISE DULFIELD: Okay. I'll read slower, but I
12 do want (inaudible) card. There have been over 100
13 (inaudible) of pollution standards run off from SSFL
14 reported to the LA Regional Water following (inaudible)
15 just in the last few years. A TCE to be extended
16 off-site.

17 Perchloric has been found in numerous wells in
18 Simi Valley and in Dayton Canyon. Strontium-90 was found
19 in Runkle Ranch. Contamination was found in Brandeis.
20 Camp (inaudible) were tested over 100 times background
21 (inaudible) and Sage Ranch where hundreds of cubic yards
22 of toxic soil were removed. I also want to say that it's
23 quite a fallacy to compare human health to animal health.
24 As a matter of fact, we do have a (inaudible) interest on
25 Runkle Ranch that cows were affected.

1 I also want to say here in my notes regarding
2 tribes -- this land was defiled by DOE, by NASA, by Times
3 International. It should be returned to its native state.
4 Cleanup to background does not mean we need to (inaudible)
5 the environment. As a matter of fact -- hold on. Let me
6 bring it up.

7 The AOCs have revision to protect endangered
8 species. DTSC never corrects people when they make a
9 mistake, and most of the cleanup is happening in places
10 that have already been served based off of NASA's DIS.
11 And assuming the same (inaudible) for DOE, the AOC has
12 been involved in no more than two percent with -- involved
13 no more than two percent of SSFL (inaudible) undisturbed
14 habitat, most of which NASA (inaudible).

15 And only .6 percent is habitat specified by the
16 California Commission of Wildlife, which they identify as
17 having one of two kinds of scrub brush. So DTSC, you
18 really need to correct people when they make claims that
19 you know are false. And that's it for now. I'll fill out
20 the card.

21 JOAN ISAACSON: Next, we have Jeanne again.

22 JEANNE LONDE: My name is Jeanne Londe, and I am
23 with the Background Cleanup Coalition and PSR, Physicians
24 for Social Responsibility. I don't know how many of you
25 subscribe to the Daily News, but recently there was a big

1 headline that the contamination out here was found. I'm
2 almost afraid to say (inaudible) because I'm not sure if
3 that's what it said, but I'm quite sure. And I see
4 somebody who's agreeing with me. That the contamination
5 out there was 1000 times worse than they thought it was.

6 We recently purchased a home in Reseda, and there
7 was a disclaimer there that said that we were in a 15-mile
8 radius of Rocketdyne and -- so I think that's something
9 that's very telling. And I also would like to tell you
10 that I had bladder cancer, and my son who lives in
11 Moorpark also had bladder cancer. I mean, I don't know
12 what the connection is, but that has been one of the
13 illnesses that has been confirmed.

14 And so I really am just so concerned because this
15 radiation, contamination is still running away from the
16 site. It's going into other -- it's going downhill. I've
17 been hearing this for so many years. I should know about
18 it. But it's just really important that this stops.

19 I mean, it's just -- and there are so many
20 statistics from sources that -- about the clusters of
21 cancer. So anyway, I hope that -- and I also have to add
22 that I'm 92 years old, and I just feel like I am not going
23 to stop until this is all settled. I've reached a point
24 of no return, and I'm just not going to give up. Thank
25 you.

1 JOAN ISAACSON: I have two more cards for the
2 second round and two for a third round. So it sounds like
3 the third round is going to be shorter, and what we're
4 going to do after the third round is take about a
5 five-minute break. We'll let the team get up and get a
6 drink of water, and then we'll reconvene for questions and
7 answers related to the CEQA process.

8 So let's finish up our second round. The next
9 will be Ronald Ziman.

10 RONALD ZIMAN: Thank you. The balance that was
11 not evident in the NASA DEIS must be addressed.
12 Mitigation needs to be considered. When we hear about
13 cancer, one has to realize that what we're really talking
14 about is a risk. It's a risk of cancer just like there
15 are other kinds of health risks.

16 And to look at cleanup without taking into
17 account health risks only reaches a point of diminishing
18 returns in terms of the resources that are extended to
19 achieve that cleanup and the resources that are lost in
20 the course of the cleanup.

21 Other techniques that are (inaudible) need to be
22 considered. Ways of preserving soil need to be
23 considered. Looking at the 2017 deadline and modification
24 of that deadline needs to be considered. If we can amend
25 the Constitution of the United States, we can certainly

1 look at amending or modifying the AOCs. The idea is to
2 protect public health and also to preserve a balance with
3 the environment. Thank you.

4 JOAN ISAACSON: Next, we have Diana Dixon-Davis
5 again.

6 DIANA DIXON-DAVIS: Diana Dixon-Davis again.
7 Basically, one thing -- this is counter-correlated with
8 higher socioeconomic status. So part of the higher rates
9 around the lab are pumping through the higher income of
10 the people who have (inaudible). But cancer becomes more
11 expressed the higher level of income of people. That's a
12 basic, well-known fact.

13 Secondly, I wrote a letter concerning the NASA
14 (inaudible) -- if the reason for a cleanup of the Santa
15 Susana Field Lab is to reduce the health risks of
16 community members, then the current level of risk of this
17 field lab as it exists must be measured.

18 The AOCs do not allow that. And that's something
19 that needs to be changed. We must measure the actual risk
20 of the lab as it exists now. Not 50 years ago. Today.
21 And then the efforts of cleanup can be estimated. Without
22 this basic piece of information, we cannot do a
23 cost-benefit analysis.

24 If we find that cleaning up will kill more people
25 than leaving contamination in place and putting it through

1 either cleaning it up or sequestering it, there are many
2 ways that CEQA can work to (inaudible) through mediation
3 and other methods. All those methods could be less
4 damaging to the human health and the community than a
5 cleanup that basically takes (inaudible) and trucks about
6 the area.

7 And third, something that's missing that's needed
8 is a table that shows the level of contamination as each
9 one of these levels of (inaudible). So you have
10 agricultural, you have rural residential, you have urban
11 residential. These are not (inaudible). These need to be
12 (inaudible) right now. We're all working in the vacuum
13 (phonetic).

14 For instance, Abe Weitzberg and I did some
15 estimates. If you drop a quarter of a banana on the
16 ground, that banana would be contaminated radiologically
17 to the point that it has to be trucked out to Utah. If I
18 drop two or three drops of alcohol on the ground --
19 ethanol. I've already broken it down. It's like three
20 drops of ethanol -- of alcohol or beer -- that land will
21 be contaminated to the point that it has to be dug up and
22 carried out to Utah.

23 This is not a reasonable level of cleanup. You
24 have to look at risks that are legal. Not risks that are
25 supposed. Thank you.

1 JOAN ISAACSON: Last on our second round is Marge
2 Brown.

3 MARGE BROWN: I forgot to mention that
4 occupationally and professionally I have been a deputy
5 probation officer for 43 years now with juvenile
6 delinquents. Mostly it's 30 years on the job and up until
7 four years ago working part-time even though retired.

8 As such, I have had an enormous experience of
9 being manipulated by the experts of -- when a kid comes
10 out of the court, he comes out of the court, and the
11 probation officer shall enforce the court order. And not
12 only shall. The kid obey them. When you get the word
13 "shall," that's a court order.

14 Now, NASA and the Department of Energy and DTSC
15 all signed an agreement in which they -- presumably they
16 were sober, and they were sane. Their pens work very
17 well. I have not heard that anybody had a gun to their
18 head. And that agreement needs to be honored.

19 And what I'm seeing happen here now is a whole
20 bunch of manipulation of people trying to present reasons
21 1 through 1000 of why you should consider a risk basis
22 assessment, which is not okay apparently that the DEIS or
23 any kind of CEQA or DEIS. You are supposed to be starting
24 on a basis of obeying the AOCs for the part of the land
25 that's involved here.

1 Now, talk about manipulations. I never met
2 anybody like Boeing before with their millions of dollars.
3 They can buy and sell a whole bunch of us, and that is not
4 okay with me. Perfectly sane, sensible adults, government
5 agencies signed an agreement here.

6 And as far as I'm concerned, there's no question
7 about agreeing with it or disagreeing with it or
8 presenting this point or that point or reasons 1 through
9 25 why we should have risk basis instead of following the
10 AOCs. End of subject.

11 JOAN ISAACSON: We're going to go to the third
12 round, and I have two cards, and then we'll do that short
13 break, and then we'll have a Q and A. And if you have
14 questions for the Q and A, again, the intent is that the
15 project team will address questions related to the CEQA
16 process.

17 So first, we'll hear from Mark Osokow.

18 MARK OSOKOW: A couple points here. Again, just
19 off the top of my head basically. One, every part of the
20 Los Angeles River. I've obtained some data recently
21 from -- I believe it was the Southern California Coastal
22 Water Research Project but also some other agencies that
23 have been involved in analyzing the water quality in the
24 Los Angeles River.

25 And when you look at the patterns of the data

1 that I received concerning the organic contaminants and so
2 forth, there's really no identifiable patterns of
3 contamination at all. Certainly nothing that would
4 indicate that the contamination is coming from Santa
5 Susana Field Laboratory.

6 In fact, the levels of contamination closest to
7 Santa Susana are lower than levels of contamination in
8 many locations among the river; so I think we need to
9 dispense with that foolish idea.

10 The other thing is concerning Cesium-137. Of the
11 field trips that we've taken at the Santa Susana Field
12 Laboratory with EPA representatives, I remember one about
13 a year and a half ago. Don't quote me on the time frame.
14 My memory is not the greatest with the time frame, but
15 several people in this room were on that trip.

16 We visited the area that has the highest level of
17 Cesium-137 contamination on this site. It's located south
18 of the (inaudible). And the levels of contamination are
19 somewhere between 600 and 1000 times of the background
20 level.

21 Our EPA guide at the time was in charge of the
22 analytical work being done there. He was asked a direct
23 question. I think it was by me. Maybe it was by somebody
24 else. It was is it hazardous for us to be there. The
25 direct answer was "No, it's not hazardous to be here

1 unless you eat the soil." Okay. Then he corrected
2 himself a few seconds later and said, "It's probably not
3 hazardous even if you ate the soil."

4 So I just want to make sure that people
5 understand that the levels of contamination -- even though
6 they're above background, and others have pointed out that
7 the background levels of Cesium-137 are mostly due to
8 radioactive fallout -- those levels are not particularly
9 hazardous to people especially in isolating exposures.

10 Now, I don't want to get hung up on whether the
11 environments there are natural or not at Santa Susana
12 Field Laboratory. Those are semantic arguments in
13 general. But those habitats -- whatever they are now --
14 they support very rich wildlife that should not be
15 disturbed.

16 In fact, there are a number of dangerous species,
17 a number of rare species and certainly many, many other
18 species that utilize that habitat, that depend on that
19 habitat that may not be endangered or threatened or some
20 other category that people only seem to be concerned about
21 is (inaudible). But these wildlife need to be protected
22 whether they're abundant or rare. Thank you.

23 JOAN ISAACSON: The next one is Denise Dulfield.

24 DENISE DULFIELD: I just want to say that it's
25 absurd to (inaudible) radiation (inaudible) partial

1 nuclear meltdown. There are ten reactors (inaudible).
2 But the bottom line is the National Academy of Sciences
3 has said that no amount of radiation can be said to be
4 harmless. No amount of radiation -- regardless of what is
5 found -- can be said to not have the negative --

6 JOAN ISAACSON: Denise, can you slow down a
7 little bit?

8 DENISE DULFIELD: Sure.

9 JOAN ISAACSON: Thank you.

10 DENISE DULFIELD: The National Academy of Science
11 has stated that no amount of radiation -- regardless of
12 its source -- can be said to be harmless. No amount of
13 radiation can be said to be safe. That said, it is absurd
14 to suggest that the radiation in Santa Susana by the
15 partial nuclear meltdown at ten reactors and other nuclear
16 reactors is not the source of the radiation at Santa
17 Susana Field Laboratory. Thank you.

18 JOAN ISAACSON: Thank you to everyone who
19 commented. We're going to break for five minutes and
20 reconvene at 8:35.

21 (A short recess was taken.)

22 JOAN ISAACSON: If you're having a conversation
23 -- I hate to ask this because it's so cold outside, but
24 please take it outside so that we can have quiet in here.

25 I just want to recap some opportunities for

1 community involvement. There are the monthly progress
2 reports from Santa Susana that are e-mailed out. There's
3 the web site with information including the ongoing
4 community calendar. We will continue to write information
5 using fact sheets in the community notices.

6 And if you have questions at any time, please
7 e-mail them to marina.perez@dtsc.ca.gov, which you see on
8 this slide. And it's also in the fact sheet that was at
9 the registration table. Next slide. There are
10 repositories with information related to the CEQA process.
11 It's going to be provided. So the notice of preparation
12 of materials are in the repositories right now. We will
13 continue to use the repositories to disseminate project
14 information.

15 So with that, I will formally conclude the
16 scoping meeting itself. At this point, the court reporter
17 will no longer be recording your input.

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1 I, Sheba Cohen, Certified Shorthand Reporter for the State
2 of California, do hereby certify:

3

4 That the foregoing public comments were taken by me in
5 machine shorthand and later transcribed into typewriting,
6 under my direction, and that the foregoing contains a true
7 record of the public comments.

8

9

10

11 Dated: This day of January, 2014,
12 at San Diego, California

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Sheba Cohen

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CSR No. 13715

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Simi Valley Meeting

Public Scoping Meeting For Santa
Susana Field Laboratory PEIR December 14, 2013
Public Comments

SIMI VALLEY, CALIFORNIA

December 14, 2013

Reported by: Sheba Cohen

CSR No. 13715

Peterson Reporting Video & Litigation

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Public Scoping Meeting For Santa
Susana Field Laboratory PEIR December 14, 2013
Public Comments

Public Meeting, commencing at the hour of
9:02 A.M. on Saturday, December 14, 2013 at
3900 Avenida Simi, Simi Valley, California,
before Sheba Cohen, Certified Shorthand
Reporter No. 13715, State of California.

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Public Scoping Meeting For Santa
Susana Field Laboratory PEIR December 14, 2013
Public Comments

JOAN ISAACSON: This meeting -- it's a scoping meeting that's being conducted as part of the commentary for the Notice of Preparation for the Santa Susana Field Lab Program EIR. The primary purpose of this scoping meeting is to collect your input and perspective on topics to be addressed in the Program EIR, and we'll talk more about that in a bit. This is the second of two meetings -- of two scoping meetings that DTSC is conducting.

Before we launch into the main program, let me just review some ground rules. These are all pretty basic to make sure that we have a comfortable environment for everyone to participate. Some first easy ones -- if you can silence your cell phones and any other electronic gadgets you have with you.

And important is that -- especially when we get to the public comment portion of the meeting -- if you can avoid having small conversations or doing anything else that would distract attention from those making their comments. Importantly, just make sure to treat everyone with the same level of respect that you would want to be

1 treated with.

2 And we also want to let you know that sometimes
3 at DTSC public meetings, there are people who come in and
4 want to videotape or take photographs, and DTSC allows
5 that. We want to let you know so in case you do not want
6 to be part of someone's videotape, we want to give you the
7 opportunity now to raise your hand so that if you want to
8 be away from videotaping, we'll keep you out of their
9 lens. Does anyone have that concern? No. Okay. Great.

10 Next slide is our agenda for the meeting. So
11 here's how we'll proceed this morning. We'll have some
12 short introductions of project team members and then
13 presentations covering background about the Program EIR
14 and an explanation and description of the process for
15 preparing and processing the Program EIR per the
16 requirements of the California Environmental Quality Act.

17 The most important part of this public scoping
18 meeting is the verbal comment period. And after the
19 comment period, we'll conclude the scoping meeting. And
20 after we conclude the scoping meeting, we will then have a
21 Q and A period if you're interested. And we'll be taking
22 questions focusing on CEQA and the process for preparing
23 and processing the Program EIR.

24 Next slide is -- and let me give you some
25 introductions to the project team. So we have Mark

1 Malinowski, who is the project team manager. Deanna
2 Hansen is also up here next to Mark, and she is the
3 director for the consultant team with Environmental
4 Science Associates. And I'm Joan Isaacson. I'm part of
5 the Environmental Science Associates Consultant team, and
6 I'm the facilitator for this meeting.

7 We have other project team members here. And
8 team members, if you can stand up and raise your hands so
9 our members of the public can see who you are. Thank you.
10 I'm going to hand this over for a couple of minutes to
11 Mark who's going to talk about DTSC's role as the lead
12 agency for the Program EIR.

13 MARK MALINOWSKI: Thank you, Joan. DTSC is the
14 lead state agency overseeing the investigation of the
15 cleanup of the Santa Susana Field Lab site. And so in
16 that, what we have worked with -- so during the
17 investigations, DTSC reviews work plans and makes sure
18 that the work that is being done is consistent with -- we
19 believe -- are technically sound and scientifically-based
20 decisions and moving forward and also to be consistent
21 with the orders and the other agreements that we have with
22 responsible parties.

23 Today's meeting is the -- as Joan said -- is the
24 CEQA scoping meeting. And we don't have time today to go
25 into and provide an update of the cleanup or the

1 investigation aspects of the Santa Susana Field Lab
2 project, but we will be having a meeting in either late
3 January or February to talk more about that and to have
4 that dialogue with the community. So we'll be doing that.

5 But today's scoping meeting really is the
6 opportunity for you to provide comments regarding the time
7 and extent of the environmental analysis to be undertaken
8 on this. We are just starting in our CEQA effort; so this
9 is very early into the process. And we are soliciting
10 that input from the community at this point.

11 So this is the first of many opportunities that
12 will be made available for the community to provide input
13 in our CEQA process. It's also an opportunity to learn
14 more about the CEQA process with our consultants here with
15 ESA. So with that, I'm going to turn it back over to
16 Joan. Thank you. I'll be back up in just a minute to
17 talk a little bit more about the project.

18 JOAN ISAACSON: Thanks, Mark. I'm going to go
19 over the format for how to provide comments. So what the
20 types of comments that are especially important to provide
21 during the scoping process like this are comments that
22 have to do with the types of environmental effects and
23 issues that you think need to be evaluated in the Program
24 EIR.

25 And another important comment type that we're

1 looking for is your input on alternatives and mitigation
2 measures that you would like the team to be considering as
3 they go through the environmental process. All the
4 information -- all the comments, I should say, that are
5 submitted during the NOP comment period are going to be
6 included in the Draft EIR and considered in the
7 formulation of the EIR.

8 A couple of housekeeping items. There are
9 various handouts at the registration table that I want to
10 make sure that you have a chance to pick up if you need
11 them. So we have copies of the Notice of Preparation
12 itself. That's at the registration table. Importantly is
13 the speaker card. There's also a comment form. It's a
14 white sheet. And there's the community notice which is a
15 fact sheet that provides information about the project.
16 There's water here on the side, and the restrooms are
17 outside the door there.

18 So how do you provide a comment during this
19 scoping process? So you can provide a comment here at
20 this meeting during the verbal comment period. And to do
21 that, you'll need to fill out a speaker card. And I'll
22 give more information about this later on before the
23 verbal comment period itself. But keep in mind that we're
24 asking people to keep their initial comments to three
25 minutes so that we make sure everyone has a chance to

1 provide comments.

2 And then after everyone gets a turn, we'll have a
3 second round of comments where if you want to say more,
4 you can comment again during that second round. You can
5 also fill out the comment form and submit it today, or you
6 can mail it in. And know too that even if you give a
7 verbal comment, it's still a good idea to provide a
8 written comment as a letter or in a comment form. So you
9 can also send letters in. You can e-mail your letters in
10 or mail them in.

11 We have a laptop set up in the back. If it's
12 easier for you to type in your comments on a laptop and
13 complete your comment in that way before you leave today,
14 we have that set up for you. Importantly, know that the
15 deadline for comments is January 10th, 2014. So you need
16 to make sure that you get your comment submitted by
17 January 10th.

18 The e-mail address where you can submit comments
19 is listed here on this slide, and it's also on the NOP
20 itself and also the fax number if faxing is a means that
21 you would like to use to make your comments. But just
22 remember, do it by January 10th.

23 All right, Mark. You're back up to talk about
24 background on the project.

25 MALE ANONYMOUS: Question. May I ask a question?

1 JOAN ISAACSON: Sure.

2 MALE ANONYMOUS: Regarding the comments for the
3 community notice, it seems that you are requiring
4 attendance at one of the scoping meetings to submit
5 comments. That is not (inaudible) --

6 JOAN ISAACSON: Attendance at the scoping meeting
7 is not required to submit comments. All comments accepted
8 via e-mail, mail, verbally here at the meeting will be
9 collected and addressed by the project team.

10 MALE ANONYMOUS: This may be construed
11 (inaudible). I mean, it says attend one scoping meeting
12 to provide oral or written comment and then submit the
13 comment. So -- okay. A little point of clarification.
14 Thank you.

15 MARK MALINOWSKI: The other thing I just wanted
16 to add real quick is that we will post the presentation up
17 on the DTSC Web site so you'll have access to the e-mail
18 address as well so that we move forward.

19 I wanted to give kind of a high-level overview of
20 the Santa Susana Field Lab Project. I don't want to go
21 into too much detail today, but we will give this
22 overview. Next slide. And the regional location relative
23 to many of the -- or some of the other surrounding
24 neighborhoods and locations just so you can see generally
25 where it is located.

1 Here we are obviously up here in Simi Valley
2 area, Santa Susana, Woodland Hills, etc. Next slide,
3 please. So Santa Susana Field Lab is a former rocket
4 agent test cell and nuclear power test facility or
5 research facility. About 2800 and 50 acres of facility up
6 on the hill.

7 And currently, the focus is to complete an
8 investigation for contaminants and to get the cleanup
9 initiated. And the responsible parties that are on Santa
10 Susana and DTSC oversees are the Boeing company,
11 Department of Energy and NASA. So as I said before, the
12 cleanup and the investigation is all going to be overseen
13 by the Department of Toxic Substances Control.

14 Next slide, please. So Santa Susana -- the
15 facility was really started in 1947. By '54, the majority
16 of properties that are Santa Susana Field Lab were
17 acquired. There are things -- and I'll show a map a
18 little bit later that show both a northern buffer zone
19 area and a southern buffer zone area of that facility that
20 were acquired a little bit later.

21 And then, again, the types of activities from
22 1950 to 2006 -- there was a rocket engine testing that was
23 going on. So part of the Redstone projects, the Apollo
24 program, the space shuttle engine test up there as well as
25 other types of rocket engines. Also a portion of the

1 property -- the Department of Energy worked and had
2 nuclear research. They had reactors up there. And there
3 was research on liquid metals that were used as part of
4 that -- a cooling system for those nuclear reactors. So
5 that nuclear research was conducted from '54 to about
6 1988.

7 So as you can imagine with a facility that is
8 like a manufacturing (sic) in a fairly large complex
9 industrial facility, there were contaminants that were
10 associated or chemicals that were used as part of those
11 operations that were released; and so there are soil and
12 what became groundwater impacts.

13 One of those is a solvent that we call
14 trichloroethylene -- or TCE for short -- and that was used
15 to clean out the piping after rocket engine tests; and so
16 that impacted the soils and into the bedrock and into the
17 groundwater. But there were also other activities, as you
18 can imagine, as there are (inaudible) things.

19 The solvent is a degreaser; so they take grease
20 off. And so it was used in several places. But they also
21 had landfills. There's metals. There were burn pits and
22 sheeting operations and testing labs for different types
23 of chemicals.

24 The Department of Energy's Energy Technology
25 Engineering Center -- or, as they refer to it, ETEC -- had

1 the nuclear reactors and, as I said, related liquid metals
2 testing in the facilities. These facilities -- there's a
3 couple pictures of the times during -- when it was
4 operating up on the hill. Next slide, please.

5 This slide gives basically an overview of the
6 2,850-acre facility. In green are Boeing sites that are
7 being investigated. They will need to be cleaned up
8 because of contamination. The blue ones are NASA, and the
9 brown ones are related to DOE activities.

10 I talked about the buffer zones. This is the
11 northern buffer zone -- these two areas here. The
12 southern buffer zone is this large area down here. The
13 site is broken into -- to four areas that we deal with.
14 Area I is Boeing operations with the exception of this
15 41-acre liquid oxygen plant area that is NASA -- that is
16 managed by NASA.

17 Area II is owned by the federal government and
18 administered by NASA as well. And so all these are the
19 engine test cell facilities and several other areas of
20 potential contamination that are being looked at. So Area
21 II and this 41-acre area here are all owned by the federal
22 government, but the investigation of cleanup is being
23 managed and administered by NASA.

24 The remaining portion of the property -- other
25 than this Area II and Area I here -- is owned by Boeing.

1 But Area IV -- this area right here -- the responsibility
2 for the cleanup of Area IV and the northern buffer zone is
3 the responsibility of the Department of Energy. And,
4 then, Boeing does have responsibility for Area III and for
5 the southern buffer zone investigation and cleanup.

6 It's a very complex site because we do have
7 multiple responsible parties. So we have the three
8 responsible parties as you can see. Just the organization
9 of this is how we have to work and manage this project in
10 order to ensure the investigations and the cleanups are
11 done effectively. Next slide, please.

12 So the proposed project really is -- what we're
13 looking for input on are the activities that are necessary
14 to complete the cleanup of the soils and of the
15 groundwater out there. So the alternatives that we're
16 looking for your input on are these types of activities.
17 Again, we're early into the process of the CEQA process,
18 and we have nearly completed the investigation.

19 If we go to the next slide. This is a one-page
20 summary generalized project time line for the facility.
21 We have a timescale right here in the middle. We have
22 soil activities tracked up here. Groundwater activities
23 on the lower part. We've got CEQA here in the orange. So
24 you can see how this timing is coming together.

25 The USEPA went out into Area IV and completed

1 their investigations back in late December of 2012; so
2 there is data out there on the radiological contamination
3 that is out at the Santa Susana Field Lab. Here when we
4 say chemical investigations, you have to remember that all
5 three responsible parties -- Boeing, DOE and NASA -- are
6 continuing and completing their chemical investigations to
7 complete that work.

8 One of the real key things for us is that we are
9 going to have the investigations complete in 2014. That
10 is a major milestone for us. That really is a big step
11 aiding us to get to the cleanup. So in 2014, each of the
12 responsible parties is going to be completing their
13 investigations for where are the areas contaminated and
14 how far does that go. There are treatability studies that
15 are ongoing. How well can we treat this material and
16 actually achieve cleanup levels?

17 When we get the investigation complete, there is
18 what we call a decision document. There will be a
19 decision document for each of the responsible parties and
20 potentially another one that actually goes down here for
21 groundwater. I'll talk about that in just a little bit.
22 But these decision documents are the cleanup decision
23 documents. Okay? How cleanup is going to be done and
24 where.

25 The importance of the CEQA evaluation -- again,

1 we're early on to this -- is that CEQA informs our cleanup
2 decision, and the cleanup decision is informed by CEQA and
3 back and forth. So these three arrows that show the CEQA
4 assessment -- back up to the decision document. This is
5 a -- CEQA has to inform the decision. That's a
6 requirement.

7 So as our CEQA and Program EIR is complete, we
8 will be getting our cleanup plans complete as well. Once
9 we have our cleanup plans approved, then we implement the
10 cleanup actions. So that was the soils portion. On the
11 groundwater portion, we expect to complete the
12 investigations late in 2014. Again, a corrective measure
13 study or a feasibility study. How best can we implement
14 these cleanup opportunities or cleanup of groundwater will
15 be done.

16 Development of that cleanup decision document
17 again. And then once that -- the information from CEQA
18 has to get tied to the groundwater cleanup decision as
19 well, and then we implement the cleanup. So they have
20 very -- are short, brief explanation. That's the time
21 line in how things actually fit together for the cleanup.
22 Next slide, please.

23 For the facility, the site since 1991 has been
24 under a Resource Conservation Recovery Act -- or RCRA --
25 Corrective Action Process. And in 2007, DTSC entered into

1 a Consent Agreement with Boeing, DOE and NASA. And I'll
2 talk a little bit more about the DOE and NASA related to
3 soil, but right now the Consent Order applies to Boeing
4 for the soil cleanup, and the Consent Order has
5 groundwater for all three parties.

6 For the Consent Order for Boeing, the cleanup is
7 to acceptable risk levels. And again, per the Consent
8 Order, the cleanup needs to be -- construction of the
9 remedy needs to be in place by 2017. And groundwater
10 actions -- that is, whatever actions we are going to have
11 for cleanup of the groundwater -- need to be in place by
12 2017.

13 The Consent Order also talks about we need to be
14 consistent with rules and regulations, the laws of the
15 State of California which include CEQA. And so that is
16 how we tie CEQA into the Consent Order, et cetera. I'll
17 go to the next slide, and I'll talk a little bit more
18 about DOE and NASA.

19 For DOE and NASA, we have separate -- what we
20 call -- Administrative Orders on Consent. AOCs. These
21 are the agreements that we have between DTSC and DOE, DTSC
22 and NASA on the cleanup. The AOCs specified that the
23 cleanup is going to be to background levels. Or if there
24 is not a background level, to the reporting limit. And
25 there are some exceptions that are identified.

1 But like the Consent Order, the AOC also says we
2 need to be consistent with and we will apply the rules and
3 regulations -- state rules and regulations that are out
4 there. And that includes CEQA. And as I said before, the
5 groundwater is the responsibility of all three parties,
6 but the groundwater actions are covered under the Consent
7 Order. So the AOCs for DOE and NASA are specific to their
8 soil cleanup.

9 And my final slide here is working with DOE and
10 NASA. So our CEQA document is going to use much of the
11 same information that has already been collected as part
12 of the investigation. But also some of the same
13 information has been collected by DOE and by NASA as they
14 do their National Environmental Policy Act. Their NEPA
15 efforts. So we're making sure that that information is
16 fed into our CEQA group.

17 If additional information is needed for CEQA, our
18 CEQA contractor will identify that. We will tell the
19 responsible party -- the appropriate responsible party
20 what information we need in order to complete our CEQA.
21 That information will be gathered, and then we come back
22 and continue our CEQA. And so again, we are integrating
23 information that already exists. Or anything that does
24 need to be acquired information, we will get that
25 information and be able to move forward with our CEQA.

1 So with that, I'm going to turn it over to Deanna
2 Hansen with ESA, and she's going to talk a little bit more
3 about the EIR and CEQA process.

4 DEANNA HANSEN: Good morning. So as Mark said,
5 ESA has been hired by DTSC to prepare the Environmental
6 Impact Report for the cleanup of the Santa Susana Field
7 site. So for this portion of the presentation, I'll be
8 providing a very quick overview of CEQA. And so under
9 CEQA, as Mark said, DTSC must prepare an EIR for any
10 project that may have a significant impact on the
11 environment.

12 So in general, CEQA does two important things.
13 It informs the public and the decision makers about
14 potential environmental impacts, and it identifies ways to
15 avoid or reduce those potential impacts.

16 So this slide is a very generalized process for a
17 Program EIR. It starts with the NOP. The NOP was
18 published on November 22nd. As Joan had mentioned,
19 comments will be accepted until January 10th. Normally
20 for a CEQA, a 30-day scoping period is required. But due
21 to the interest by the public in this process and the
22 holidays, DTSC has chosen to expand the NOP scoping
23 period.

24 DTSC has also chosen to have two scoping
25 meetings. This is our second. And comments collected

1 during this scoping period will help us define the issues
2 that will be considered in the preparation of the Draft
3 Program EIR; so it's very important. So we anticipate
4 preparing the Draft EIR early in 2014 and anticipate
5 completing it the Fall of 2014.

6 The Program EIR will disclose all potential
7 impacts associated with the project. It will also outline
8 alternatives to reduce potential significant impacts of
9 the project. And once the Draft EIR is published, there
10 will be 45-day review period which will give agencies and
11 the public another opportunity to comment on the project
12 and another public meeting will be held.

13 Once the public comment period ends on the Draft
14 EIR, we'll start the next stage which is the preparation
15 of the Final EIR. All comments received on the Final EIR
16 will be responded to. We anticipate publishing the Final
17 EIR in 2015. Once the Final EIR is published, DTSC will
18 begin the certification process which will ultimately lead
19 to the Notice of Determination.

20 So as Mark said, the Program EIR will analyze the
21 effects associated with the soil and groundwater cleanup
22 activities at the site. And EIR is a document that
23 describes and analyzes the significant impacts of our
24 proposed project.

25 So what is a Program EIR? A Program EIR is

1 prepared when there's a series of related actions that can
2 be characterized as one project. These actions can be
3 related geographically, as parts of related actions or
4 individual activities that are implemented under the same
5 regulatory authority.

6 So for example, the Santa Susana Field Laboratory
7 Program EIR is going to analyze two different remediation
8 programs -- soils and groundwater -- that will be
9 implemented by three different parties -- Boeing, NASA and
10 DOE -- within one large geographic area. And these
11 remedial actions require approval by the same regulatory
12 agency, DTSC.

13 And there are advantages for Program EIR
14 including providing the opportunity for more exhaustive
15 analysis of cumulative impacts as the Program EIR will
16 discuss the whole of the action -- Boeing, DOE and NASA's
17 cleanup activities. A Program EIR will also allow the
18 lead agency to consider program-wide mitigation measures
19 earlier in the process.

20 So I turn on this slide. These are the EIR
21 topics that will be included: Aesthetics or how the
22 project will look when it's completed, air quality,
23 biological and culture resources including tribal
24 resources, geology and soils, greenhouse gas, hazards,
25 hydrology, land use, noise, population and housing, public

1 services, traffic and utilities.

2 And this is where we're particularly looking for
3 your input. What do you think needs to be analyzed in the
4 Program EIR? What issues are really important to you? Or
5 is there an issue that we're missing that you think we
6 need to discuss?

7 MALE ANONYMOUS: Can I ask a question?

8 DEANNA HANSEN: Sure.

9 MALE ANONYMOUS: Where would you put history?

10 DEANNA HANSEN: Well, under CEQA we wouldn't --
11 this is -- these are the impacts sections. So history
12 will be included. We will be discussing the history of
13 the site in the Program EIR, but these are the impact
14 areas. So there's no impact associated with history with
15 the exception of cultural resources and tribal resources.
16 So historic resources will be discussed that are cultural.

17 MALE ANONYMOUS: Well, the test -- they're
18 removing (inaudible) the historical impact.

19 DEANNA HANSEN: Okay. So for example, if
20 historic resources are important to you, then I would
21 encourage you to provide a comment letter saying that
22 these resources are important, and you want us to discuss
23 them in detail in the EIR. And we'll have a Q and A
24 afterwards about the CEQA process for more questions like
25 that.

1 MALE ANONYMOUS: Thank you.

2 DEANNA HANSEN: You're welcome. We can go to
3 the next slide. So in addition to the environmental
4 topics on the previous slide, CEQA also requires that you
5 evaluate a range of reasonable alternatives. These
6 alternatives should attain most of the project's
7 objectives. And most importantly, they should avoid or
8 substantially lessen any significant impacts.

9 CEQA does not require that you evaluate an
10 alternative that is infeasible, but it does require that
11 you provide a rationale explaining why you did eliminate
12 that alternative from further evaluation. CEQA also does
13 require that you evaluate alternatives at the same level
14 of detail as the proposed project.

15 And many of you are aware of the -- and have
16 reviewed the NASA EIS and are familiar with alternatives
17 under NEPA. Under CEQA it's different as alternatives are
18 included to reduce potential impacts of the project.
19 They're not just another option to implement the proposed
20 action.

21 And this is another area where we're really
22 looking for your input. What alternatives do you think
23 should be analyzed in the EIR? And I encourage you to
24 provide either verbal comments or written comments
25 regarding that. Next slide.

1 As Mark mentioned, our analysis will include
2 information from many sources: The treatability studies,
3 the groundwater investigations, ongoing monitoring sites,
4 specific resource studies. For example, biological
5 studies and cultural studies, input from other responsible
6 agencies, input from the tribes and, of course, input from
7 the public like today.

8 So now I can hand it back to Joan.

9 JOAN ISAACSON: The flowchart that Mark had on
10 the screen has a lot of important information in it. I
11 wanted to point out that it's on the back of the community
12 notice handout that's at the registration table. So
13 you've got that with you if you want to take a closer look
14 at it.

15 Our formal presentations have now been concluded;
16 so we're going to enter into the verbal comment portion of
17 the meeting. And again, the types of input that the team
18 is particularly interested in during the scoping process
19 is your input on issues -- environmental issues to
20 evaluate and address in the EIR as well as your input and
21 ideas on alternatives and mitigation measures.

22 Next slide, Jason. So you've seen this slide
23 once before, but it's a really important slide. And as we
24 go into the verbal comment portion, I just want to go
25 through in a little bit more detail the format for verbal

1 comments. If you want to speak, we ask that you complete
2 a speaker card. And we're going to select the speakers
3 according to the order that the speaker cards have been
4 turned in just to be fair.

5 And I'm going to pause for a moment so that if
6 you have a speaker card and you haven't turned it in yet,
7 if you can raise it, and one of our project team members
8 will come over and gather it for you. We have two of our
9 team members -- Karen and Marina -- have microphones. And
10 they will come to you when it's your turn to speak.

11 As you can see, we have a court reporter here who
12 is documenting the comments. And it's very important --
13 especially because of the technical nature of this project
14 -- that you speak clearly and slowly to make sure that she
15 gets your comments into the record.

16 We will be keeping time, and the time limit for
17 individual comments is three minutes. And I will enforce
18 the time limit just to be fair because some people are
19 diligent about keeping within the time, and we want to
20 make sure that the expectation is applied to everyone.

21 The way it's going to work is Sara here at the
22 front has a stopwatch, and she'll be tracking the time.
23 And when you reach two minutes and 30 seconds, she's going
24 to hold up the yellow card, and that will be your warning.
25 And when you reach three minutes, she's got the red card.

1 Red light stop. And at that point, I'll ask you to wrap
2 up, and we'll then move to our next speaker.

3 I want you to know that we will have a second
4 round of comments; so if you don't get everything in in
5 your first three minutes, we'll do a second round where
6 you can speak again. To participate in the second round,
7 we ask that you complete another speaker card so that we
8 can track it. We'll use the same process, and the
9 speakers will have turns to speak according to when their
10 card is handed in.

11 All right. I think -- Jason's asking that I
12 remind you that we do have a laptop set up in the back if
13 you want to type in your comments on a form before you
14 leave. And I think too -- I just want to remind you again
15 that we really hope that even if you provide verbal
16 comments that you submit a comment form or a letter before
17 the close of the NOP comment period.

18 So we'll go ahead and start. And our first
19 speaker is William Preston Bowling.

20 WILLIAM PRESTON BOWLING: Hello. William Preston
21 Bowling. Aerospace Contamination Museum of Education.
22 And the EIR should not assess alternatives to the cleanup.
23 DTSC needs to stick with the legally-binding agreements
24 set forth in the AOCs because the top of the hill up here
25 -- about 1600 feet above sea level. Here in Simi Valley

1 about 700 feet -- everything on top of the hill
2 contaminated washes down in this area on the other side of
3 the hill every time it rains, every time the wind blows.

4 We need it cleaned up so we don't have to worry
5 about the health effects in the surrounding communities.
6 We have a new cancer cluster in Moorpark that was just
7 identified by Erin Brockovich. And the Arroyo Simi starts
8 up here at the Santa Susana Field Lab, comes down in here
9 into Simi Valley, goes down at 500 feet above sea level
10 near Moorpark High School.

11 Is there a connection? We don't know. Let's
12 clean up the field lab, and then we don't have to worry
13 about stuff like this. Thank you.

14 JOAN ISAACSON: Thank you. Our second speaker is
15 Brian Lindquist. For those of you who were at the meeting
16 on Tuesday, the sound system this morning is very
17 different. So when you start speaking into the
18 microphone, you don't even hear yourself on the speaker so
19 that's why it's --

20 BRIAN LINDQUIST: (inaudible) reactor and rocket
21 testing contamination including the first nuclear reactor
22 meltdown in the world. In 1959 it vented radioactive
23 material into our environment. In addition, perchlorate,
24 heavy metals, PCBs, TCE, dioxins and furan have been
25 allowed to contaminate groundwater, soil, surface water

1 and the air we breathe.

2 The contamination has migrated off-site.
3 Elevated cancer death rates have been found in on-site
4 employees and the off-site population as well. Without
5 cleanup, the people in surrounding communities will be
6 continuously at risk. Perpetual increased risk of cancer
7 and other negative health effects is not acceptable. How
8 many people living in Simi or anywhere would trade cancer
9 for a few trucks passing their door?

10 I heard some specious nonsense from a man who
11 claims to be a scientist but then goes on to violate every
12 principle of science. People are not birds. We need not
13 study the bird population. When we studied the human
14 population, we found cancer at higher rates than the
15 general population.

16 Science requires repeatable experiments and
17 controlled circumstances. These are required for proof.
18 The birdwatcher has none of these. He accepted hearsay
19 information that said it would be safe to eat the dirt
20 from Santa Susana Field Lab. I suggest that he should do
21 that. In summation, comply with the law. Protect the
22 public health. Make the polluters clean up the
23 agricultural residential standards.

24 My name is Brian Lindquist. Southern California
25 Federation of Scientists.

1 JOAN ISAACSON: So when it's your turn to speak,
2 if you can get as close to the microphone as possible, and
3 we'll help you with that. Liza Tucker is next.

4 LIZA TUCKER: Hi. I just want to say that
5 already at the outset, the DTSC is really violating the
6 Agreements on Consent in the way that it is formatting the
7 scoping. There is no legal obligation to look at
8 alternatives that are not feasible. The only feasible
9 alternatives are to clean this land up to background. And
10 in the case of Boeing, to clean it up to the rural
11 agricultural standards that it is zoned for. Cleaning it
12 up to the rural residential and agricultural standards.

13 The only other thing that needs to be looked at
14 is no action at all which we know is not feasible. So I
15 would say that, to me, it's clear that this is part of a
16 process to overturn the Agreements on Consent and to give
17 Boeing what it wants. And what Boeing wants is to do a
18 very minimal cleanup of land where we did have a partial
19 nuclear meltdown in 1959. We had other nuclear fires in
20 the hot lab, and we had other nuclear accidents.

21 There is no question -- according to
22 peer-reviewed and well-respected medical studies -- that
23 the incidence of cancer among residents who live closer to
24 the site is elevated above that of people who live farther
25 away from the site. And from the pattern that I see here,

1 it's clear that the DTSC is under great pressure from
2 Boeing, which has used a number of different lobbyists and
3 consultants to create the public perception that this is
4 harmless and that we can just simply have an open park
5 space here while doing minimal cleanup.

6 That land has always been ranch land. There was
7 an exception on it due the testing that was done at that
8 site for decades. But it is actually zoned as ranch land,
9 and there is ranch land all around it. This is happening
10 in a major metropolitan area, and it is the DTSC's mission
11 to protect the public health and not the interest of
12 polluters. Enough is enough.

13 JOAN ISAACSON: I'm going to ask that you not
14 applaud between individual speakers in order to make sure
15 that everyone feels comfortable getting up and speaking.
16 Next we have Alec Uzemeck.

17 ALEC UZEMECK: My name is Alec Uzemeck, and I'm
18 the chair of this SSFL CAG, Community Advisory Group. I'm
19 in the West Hills Neighborhood Council. I'm the chair of
20 the Environmental (inaudible) --

21 MALE ANONYMOUS: Hang on. I can't hear him, and
22 she can't hear him either.

23 ALEC UZEMECK: Those of us who have had cancer do
24 not wish it on anyone. The stress and the anxiety and the
25 treatments -- we wouldn't wish it on anyone, and we think

1 -- and I especially think that the two goals of all of
2 this should be to clean up the area so that there is no
3 danger to human beings. But equally what Deanna is saying
4 -- that we should minimize the damage to the environment.

5 I encourage the CEQA analysis which is required
6 by law to examine alternatives, and that would include
7 risk-based alternatives. I would encourage area averaging
8 for sampling and for confirmation sampling. On-site
9 remediation. And on those areas where there is marginal
10 contamination, I would encourage just covering it over.

11 I think that one of the things that should be
12 examined is we shouldn't be mixing waste because that
13 would require all of the waste to go to a high hazardous
14 site when indeed that's not necessary, and the costs are
15 expensive.

16 And I think -- it's been mentioned numerous
17 times -- I think we need to test off-site. The
18 communities are still anxious. They believe that there is
19 contamination going into the surrounding communities, and
20 I think the DTSC should analyze those areas for their
21 concern.

22 Minimizing damage, I think, is very important,
23 and that includes environmental resources, archeology,
24 history and culture. And I think that that needs to be
25 included in the analysis. Bottom line, though, is that I

1 would hope that you establish criteria to enable the
2 public to understand which of these alternatives should be
3 selected whether that perhaps might be the minimum risk
4 damage.

5 But it's interesting to note when you make your
6 presentation, you don't say as a beginning thing one of
7 the requirements is that it's safe for human beings. And
8 all of these alternatives are moving toward that goal. I
9 think you need to stress that in your presentation. Thank
10 you.

11 JOAN ISAACSON: Next is Holly Huff.

12 HOLLY HUFF: My name is Holly Huff. I'm a
13 resident of the Susana Knolls, which is the closest
14 community -- well, within the two-mile radius on the Simi
15 side. I've been involved with this problem for almost 25
16 years, and we had three goals when we started off. It was
17 the health study, to stop the nuclear work and the
18 cleanup. We fulfilled the first two. We're still working
19 on the last one.

20 I understand -- I mean, I love the nature and the
21 trees and everything. I wouldn't be living in my
22 neighborhood if I didn't. But I also have cancer. And I
23 think that what I've read from the health study that was
24 done in 2007 around the community's two-mile radius is
25 there's a lot of people with cancer. So my goal -- what I

1 want done is I want it cleaned up.

2 I don't want trees to be destroyed, but they're
3 not going to be. There's word out here that there's going
4 to be a moonscape, and all the trees are going to be dead.
5 The Indian artifacts are going to be destroyed, and that
6 is not true. So I just want the cleanup -- to move on
7 with the cleanup. It's like this gentleman said here --
8 I'd trade my cancer for a few trucks any day. So thank
9 you.

10 JOAN ISAACSON: Next we'll hear from Dawn
11 Kowalski.

12 DAWN KOWALSKI: Well, I hear people speak, and
13 the most important thing is the AOCs get followed to the T
14 where cleanup to background. That way we are all
15 guaranteed with background cleanup, that we have safety in
16 our lives. I live where Holly lives down in the Susana
17 Knolls, and I'm a cancer survivor of breast cancer. I
18 don't know if it's from the site or not, but there are a
19 lot of breast cancers on the east end of Simi and the west
20 end of the San Fernando Valley. Who knows?

21 Anyway, I go to meetings up at the site, and I
22 see areas that are 100 times above the level that they
23 should be in chemicals. I see high levels of radiation
24 that needs to be cleaned up. And these are generally
25 around the buildings where the land is already being

1 disturbed; so we're not talking about the beautiful serene
2 areas with the oaks and the beautiful rock formations.
3 This is areas where the buildings are.

4 And it needs to be cleaned up. There is no safe
5 level of radiation. As (phonetic) Stuart, a renowned
6 doctor in England, came up that low-level radiation is as
7 dangerous as high level. We know there was a nuclear
8 meltdown. This is not a new concept. So it needs to be
9 cleaned up.

10 We don't want our children and grandchildren to
11 carry this legacy of cancer through their lives and be
12 disrupted. There's nothing worse when that oncologist
13 tells you you have cancer. Believe me. The people in the
14 room who have suffered that will know as I know.

15 So anyway, let's not DTSC use CEQA to wriggle out
16 of the AOCs. The AOCs are the legal obligation. You
17 clean up to background. Let CEQA help you with
18 establishing the areas of history that do not need to be
19 destroyed. The areas that we can -- we need to be
20 especially careful of. But we cleanup to the AOCs. Thank
21 you.

22 JOAN ISAACSON: I want to thank everyone for
23 speaking clearly and slowly for our court reporter.
24 Dr. Michael Kuhn is next.

25 DR. MICHAEL KUHN: I'm a retired environmental

1 professional. I'm a member of the Santa Susana Field Lab
2 Advisory Committee. I'm an executive chair of the Rancho
3 Simi Trailblazers and an interest in recreation. Member
4 since 1978 of Ventura County Air Pollution Control
5 District Advisory Committee. Board member of Western Rock
6 Art Research, and I'm a member of the Simi Valley
7 Historical Society.

8 However, I'd like to say that I am speaking as an
9 individual today although the comments that I've made are
10 in agreement with the position of the Santa Susana Field
11 Lab Advisory Group. I'm very concerned about -- that we
12 should be designating what the ultimate land use of the
13 site will be. There seems to be a lot of waffling about
14 that.

15 On the flowchart that you have thoroughly
16 reviewed this morning, I'm very surprised that you have
17 the Program EIR being completed before you have the
18 cleanup plan completed. That cleanup plan is the project
19 though you're finishing the Draft EIR before you define
20 what the project is. That's a -- I think -- a major flaw
21 Maybe a technical one where you just simply in reality
22 should have extended (inaudible) a little further.

23 I'm skipping a few things that other people have
24 already addressed here. There are some areas of the site
25 that should be protected and not disturbed. One of those

1 is Riparian habitat (inaudible) feasible. I understand
2 (inaudible) concentrate right there in the habitat. But
3 if it's possible to retain some of that, that would be
4 good. Mature trees and groves of trees should be avoided
5 if at all possible.

6 Archeological and designated historic sites and
7 structures -- such as rocket test stands -- if they are to
8 remain -- should be left by the (inaudible) cleanup. Soil
9 and bedrock removal should be minimized to the extent
10 compatible ensuring health risks with future land users.

11 My concern here is bedrock removal to the extent
12 possible does not unnecessarily result in the destruction
13 of the site resulting in that borrow pit landscape. I can
14 show people pictures of some of the cleanup that is
15 already going on where that is the case. Okay. I'll
16 finish my comments later. Thank you.

17 JOAN ISAACSON: Next is Richard Mathews.

18 RICHARD MATHEWS: Hi. I'm here representing the
19 North Valley Democratic Club which I am president, and I'd
20 like you to know that our club has voted unanimously to
21 support a full cleanup of the site. We support the AOCs.
22 We want to see it cleaned up as thoroughly as possible.
23 We would love to see the Boeing soils brought under a
24 similar standard.

25 I am also a member of the Simi Valley-Moorpark

1 Democratic Club. I'm not here officially representing
2 them, but I believe that club has also supported a full
3 cleanup. I'd like to correct a few of the statements that
4 I have heard here today and previously.

5 One of these statements that was made was that
6 the radiation that is found at the site came from
7 somewhere else. That it's fallout from other things and
8 is not associated with the site. But that's exactly the
9 opposite of what the EPA found. EPA said that they found
10 11 isotopes of radionuclides that they consider to be site
11 related.

12 They made measurements of the radiation inside
13 the site and outside and compared, and you can see that
14 the radiation is higher inside and is definitely
15 site-related radiation. This is not something that comes
16 from somewhere else.

17 Second, it was stated that when you have clusters
18 of cancer caused by pollution that you would expect to see
19 only one type of cancer. And since that's not what people
20 are reporting here, it must not be site related. But that
21 also is a ridiculous argument. Some types of pollution
22 can cause a variety of related cancers.

23 But besides that, we're dealing here with a very
24 complex situation where we have a mix of a lot of
25 different pollutants. We have radioactive pollutants. We

1 have chemical pollutants. And it would actually be a
2 surprise if all of the different pollutants caused the
3 exact same cancer. So what we are seeing does, in fact,
4 match what we would expect to see.

5 Let me just look at my notes here. Oh, yes. We
6 also had a statement from somebody -- who says that she is
7 an expert in epidemiology -- who said that it's well known
8 that cancers are associated with income, and the rise in
9 cancers in the area could simply be because it's a higher
10 income area, that all cancers come associated with higher
11 income. That simply is not true.

12 Some cancers are known to be associated with
13 higher income. Some cancers are known to be associated
14 with lower income. And not all of the areas around Santa
15 Susana are high-income areas. We have a lot of areas
16 around Canoga Park, around Chatsworth, around other areas
17 on all sides of the site that are not high-income areas;
18 and so this argument also falls apart. Thank you very
19 much.

20 JOAN ISAACSON: Christina Walsh is next.

21 CHRISTINA WALSH: Hi. Christina Walsh.
22 Cleanuprocketdyne.org. I live in West Hills on the
23 two-mile mark. I have been involved since 2001 when I
24 started cleanuprocketdyne.org. I'm very interested in
25 having the site cleaned up properly and to

1 health-protected standards.

2 The problem is -- and I agree with what Dawn and
3 Holly said. We do -- we need to look at everything that
4 we have seen there. There's a lot of past history that we
5 need to look very carefully at. We've seen a lot of red
6 dots. About a hundred times and more. We've also learned
7 from Greg Dempsey himself that this is really more of a
8 chemical cleanup and not a radiological cleanup.

9 So we need to think about a category that I
10 believe is missing from there and that is environmental
11 justice. It's just filling hundreds and hundreds and
12 hundreds of trucks and sending them to low-income landfill
13 communities beyond what is needed to protect public health
14 because we want to be safer than them.

15 It's not appropriate, and we need to think
16 carefully about those 400 chemical constituents of concern
17 that all have different exposure pathways and different
18 sets of risks that need to be analyzed carefully so we
19 make the smart decisions that protect both ecological
20 receptors as well as the human receptors. They both need
21 to be considered here, and they need to be balanced.

22 There's been a lot of talk about holding Boeing
23 to -- well, Boeing didn't sign the AOC. That is a
24 risk-based cleanup, and the cleanups that have been touted
25 to be so great -- like the NASA 2010 cleanup -- was also a

1 risk-based cleanup where those considerations to protect
2 the surrounding environment would not be possible under
3 current AOC.

4 I'm not saying throw away the AOC. I'm saying
5 that limited modifications need to occur so that we
6 consider risk when we make smart decisions and we know
7 when to stop bleeding so we don't just send the material
8 to other communities. Traffic, emissions, dust -- all of
9 those impacts that we don't want -- we also shouldn't be
10 sending to other communities because they are there, and
11 they are real, and they take the brunt of everyone's
12 impacts.

13 And frankly, the idea that all of the
14 radiological impacts from California should be sent to
15 Nevada is also inappropriate. We need to think about how
16 to do this responsibly. We need to try to eliminate every
17 truck that we can.

18 We just went to a technical site visit this week
19 where we learned that 8,000 cubic yards resulted in 500
20 trucks going from one side of the site to another for
21 treatment. So those are 500 trucks that didn't go down
22 the hill. But that's 500 trucks for 8,000 cubic yards.
23 What are we talking about when we're talking about half a
24 million?

25 So we need to consider all of these categories

1 and use a balanced approach to be health protected of both
2 humans and the surrounding environment. We don't have a
3 time machine. Nobody's going back 50 years. And
4 certainly if you remove everything, that would be
5 impossible. Thank you very much.

6 JOAN ISAACSON: John Luker.

7 JOHN LUKER: Good morning, everybody. My name is
8 John Luker. I'm the vice president of the Santa Susana
9 Mountain Park Association. I live one mile from the front
10 gates of the site in Box Canyon.

11 I find it interesting that you say you're not
12 required to consider alternatives that are infeasible.
13 That's great. I think the cleanup to background is
14 infeasible, and I don't want you to consider it. I think
15 it's great. The big question that has not been answered
16 -- and this is something I want you to address in the
17 scoping. And most of the people talking here today are
18 just ranting and raving -- what is mitigation?

19 JOAN ISAACSON: I just want to remind everyone to
20 please keep your language respectful of each other.

21 JOHN LUKER: Okay. What is mitigation? That is
22 one thing that has not been answered. I've been asking
23 questions since 2010 regarding the environment, habitat
24 and archeology, and I've gotten a stunning silence from
25 DTSC. Will there be a multiyear multimillion-dollar

1 rebatement program? Will you return the land to its
2 original topography? That's a big deal.

3 The Santa Monica Mountains Conservancy has
4 comments on the NASA DEIS that were politically suppressed
5 -- said that, quote, "What would be left in this cleanup
6 will be a series of flattened, compacted weedy pads all
7 connected by a brand new heavy-duty road that will save a
8 developer millions of dollars in infrastructure that will
9 all be paid for by the American taxpayer."

10 As I look at your Notice of Completion and
11 environmental document transmittal, there are a number of
12 things in here I'd like you to add to it. DTSC has been
13 invited on a number of occasions to participate in the
14 NASA Section 106 conference.

15 We would very much like you to accept that
16 invitation and please participate in that. We've been
17 talking for about two years, and we still have not come up
18 with an answer to the question what is mitigation. It
19 would be very helpful to us.

20 Under project issues discussed in the documents,
21 we would like you to add agricultural land. What is the
22 zoning for the property? Why is it zoned agricultural?
23 And will there be any agriculture on the property?
24 Population and housing balance. Will this place be useful
25 for a developer to come in and build big mansions? I

1 think so.

2 Recreation and parks. The end use of this
3 property universally, people are saying, should be open
4 space and parkland. But you do not have that section
5 checked. And what will be the growth-inducing side
6 effects of this cleanup? It also says in the AOCs there
7 is no risk assessment required. We need a risk assessment
8 done on this property.

9 On reviewing agency's checklist, please add
10 Department of Parks and Recreation and the National Park
11 Service. Please add the Army Corps of Engineers. This is
12 a blue-line stream. The Santa Monica Mountains
13 Conservancy is highly appropriate. But once again, the
14 political forces said that they do not have the expertise
15 to comment on this.

16 I'm going to give you, Mark, this book. It's got
17 comments from NASA DEIS --

18 JOAN ISAACSON: Please wrap up.

19 JOHN LUKAS: -- (inaudible) different agencies
20 and associations. Thank you very much.

21 JOAN ISAACSON: Arlene Mathews.

22 ARLENE MATHEWS: Good morning. My name is Arlene
23 Mathews. I am old enough to have been an adult in the
24 1940s when the United States government promised us -- in
25 the Atomic Age that we had just entered -- that they would

1 protect and take care of the people. That we had nothing
2 to worry about. But I've yet to hear an apology for the
3 neglect. I have yet to find that they have done a study
4 of increased cancer cases in Chatsworth, in the San
5 Fernando Valley, in Simi Valley. They haven't done that.

6 I had a son by the name of Bobby. I had three
7 sons who went to Chatsworth High School. One of them is
8 here -- a physics major from Caltech in case you're
9 wondering about the science that he talked about. Bobby
10 was a champion runner from Chatsworth High, and every
11 organ of his body was perfect. Perfect specimen.

12 Bobby died of brain cancer, and his son developed
13 leukemia. And there have been studies that genes can be
14 injured so that the next generation can get cancer.
15 That's not conclusive, but science thinks that it's a good
16 possibility. And there was never any cancer in our family
17 before for many generations. But Bobby's gone.

18 We are not in this area for our high winds -- our
19 Santa Ana winds. The wind and rain, I understand, is even
20 more dangerous than the earthquakes that we have. This is
21 earthquake country. And disruption in the Santa Susana
22 Mountains is a good likelihood. We have got to go back to
23 bringing the land and water back to the way it was.

24 There are people, I understand, who are concerned
25 about trucks going past their houses carrying radioactive

1 material, and maybe we can mitigate it as much as
2 possible. I understand their concern. But our greatest
3 concern -- our greatest concern has to be for the future.
4 For the Bobbies coming up, for his kids.

5 We have to protect the future, and we can't trust
6 our government anymore. I'm sorry. We cannot. They let
7 us down. At least give us an apology. Please.

8 JOAN ISAACSON: Next is Dr. Robert Dodge.

9 ROBERT DODGE: My name is Dr. Robert Dodge. I'm
10 a family physician in Ventura and a board member of
11 Physicians for Social Responsibility in Los Angeles.
12 PSRLA has been involved for over 30 years in efforts to
13 clean up the Santa Susana Field, the site of a partial
14 nuclear meltdown and numerous other accidents, spills and
15 releases.

16 PSRLA has always advocated for a cleanup that is
17 fully protective of public health. That standard is met
18 by the 2010 Agreements on Consent that stipulate that NASA
19 and DOE's portions of the SSFL shall be cleaned up to
20 background levels. That is, any contamination that is
21 detected will be cleaned up to the land so restored to the
22 way it was before it was polluted.

23 This standard is of critical importance to public
24 health. The SSFL is contaminated with extremely dangerous
25 radionuclides such as Cesium-131, Strontium-90,

1 Plutonium-239 and (inaudible). Last year the EPA found
2 radiation in hundreds of samples at the site up to 1000
3 times the background.

4 Strontium-90 concentrates in bone, teeth of
5 children and can cause bone cancer or leukemia.
6 Cesium-137 is a powerful gamma emitter capable of causing
7 cancer in any organ. Plutonium-239 is one of the most
8 toxic materials on earth. A few millionths of an ounce,
9 if inhaled, will cause cancer for virtually 100 percent
10 statistical certainty.

11 In addition, Santa Susana's field is polluted
12 with hazardous chemicals such as TCE, perchlorate,
13 dioxins, heavy metals and other volatile and semi-volatile
14 organics. These are extremely toxic materials that can
15 cause cancers and leukemias, developmental disorders,
16 genetic disorders, neurologic disorders, immune system
17 disorders and much more.

18 Public health studies have identified elevated
19 rates of certain cancers among the workers on-site
20 associated with their exposures and in off-site population
21 associated with proximity to the site. The UCLA School of
22 Public Health found significant increases in death rates
23 from cancers of lung, lymph and blood systems in the
24 more-exposed workers at the site compared to less-exposed
25 workers.

1 In the study for the U.S. Agency for Toxic
2 Substances and Diseases Registry, Professor Hal
3 Morgenstern found rates for key cancers in members of the
4 nearby public increased by the closer the person lived to
5 the Santa Susana Field. In another study, Professor Yoram
6 Cohen of UCLA found evidence of toxic exposure to the
7 off-site population in excess of EPA standards.

8 Studies by regional cancer registries found
9 elevated rates of bladder cancer associated with the
10 proximity to the field. And an extensive linear study by
11 the UCLA School of Public Health found elevated death
12 rates -- breast cancer, lymphoma and leukemia -- of
13 workers based on their exposures to radioactive chemicals
14 at the site. Furthermore, SSFL contamination continues to
15 migrate off-site.

16 I'm just going to say -- you know, government
17 agencies, representatives, corporations change, but these
18 contaminants remain the same posing significant public
19 health risks.

20 JOAN ISAACSON: Please wrap up.

21 ROBERT DODGE: If the source of contamination is
22 not cleaned up, it will continue to pose a risk to the
23 off-site population. It must -- DTSC must ensure that its
24 EIR defines the scope of the project as being compliant
25 with the AOC Consent.

1 JOAN ISAACSON: Please wrap up. You can take a
2 second turn. Thank you. I need to be fair with everyone.

3 Next is Denise Duffield.

4 DENISE DUFFIELD: Hello. I'm Denise Duffield.
5 Associate Director, Physicians for Social Responsibility.

6 JOAN ISAACSON: Denise, could you kindly face
7 this way. It helps the court reporter so she can
8 (inaudible).

9 DENISE DUFFIELD: Okay. Can you start my three
10 minutes over again?

11 JOAN ISAACSON: We'll start over.

12 DENISE DUFFIELD: So you know who I am.

13 In 2010, it was the secretary -- then Secretary
14 of Energy, Steven Chu, who suggested the Agreements on
15 Consent, and he did this because it is the most simple way
16 to protect the health of the population off-site, which is
17 to clean up all -- not just some -- of the contamination.

18 DTSC must make sure that its EIR defines the
19 scope of the project for the DOE and NASA portion of the
20 lab, is compliant with the AOCs to cleanup to background
21 levels of contamination. In addition, EIR must include
22 contaminating structures and disposable material. Boeing
23 needs to clean up to agricultural and rural residential,
24 the standard for which the land is zoned.

25 The end use of the site is irrelevant. Until the

1 contamination is gone, the off-site population is at risk.
2 But rather than pay for the cleanup, Boeing pays for
3 lobbyists to influence the EPA and DTSC. A PR firm to
4 make over the contamination at SSFL and, in their own
5 words, grow with third-party allies who will blunt
6 allegations of greenwashing.

7 So there's a lot of misinformation about the
8 cleanup. And under Boeing influence, DTSC never corrects
9 this misinformation. They want people to believe that the
10 cleanup is more damaging than contamination, and that's
11 nuts. The worst environmental health impact would be if
12 the contamination is not cleaned up.

13 I think it's interesting to bring up the
14 environmental justice argument. It's very clever.
15 Environmental justice communities and communities of toxic
16 sites throughout the state are talking right know.
17 They're having a lot of conversations.

18 We will not allow our communities to be pit
19 against one another. We will not allow sites where wastes
20 are located to not have waste sites so that other sites
21 are not cleaned up. These are the conversations. The end
22 -- the answer is upstream with the DTSC and how it
23 regulates waste, how it permanent (sic), how it deals
24 with polluters. But we will not allow our communities to
25 be pit against one another.

1 Truck traffic has been brought up a lot. Again,
2 that can be mitigated. If the routes are split up, the
3 traffic is negligible, and DTSC should also explore using
4 the fire road and rail spur. We've also heard a lot about
5 the land being moonscaped.

6 Again -- as has been mentioned before -- most of
7 the cleanup is in areas where the soil has already been
8 scraped away. There's no evidence that any oak trees will
9 need to be removed, and we know it's possible to clean
10 around them. In fact, there are ways to clean up to
11 background that might mitigate any potential negative
12 impacts, and DTSC must do this. Then everyone wins.

13 I look forward to the day when we stop receiving
14 e-mails and phone calls from people wondering if their
15 cancer is from SSFL. There is a human face to SSFL's
16 contamination, and that is why cleanup standards matter.
17 Of course we can't tell anyone that we know where her
18 cancer came from, but we do know what toxic substances are
19 at SSFL.

20 We do know how they harm health. We know they
21 migrate. And if the site were fully cleaned up, people
22 wouldn't have to worry about what they may be exposed to,
23 and potential heartache and loss and grief can be avoided.

24 JOAN ISAACSON: Michael Collins is the next
25 speaker. I want to thank you all for speaking clearly for

1 the court reporter. It makes her job a lot easier.

2 MICHAEL COLLINS: Thank you. I'm Michael
3 Collins. EnviroReporter.com. As I said at the last
4 meeting, it's not usual for a reporter to make comments in
5 a situation like this. But my experience in dealing with
6 the DTSC since 1998 -- it has shown in the last couple of
7 years that the agency isn't responsive to public records
8 request. And even in interviews with the director Debbie
9 Raphael in telling me "I will get back to you" -- she does
10 not.

11 So I wanted to point out a couple of things that
12 EnviroReporter.com has discovered. It recently has found
13 new contamination in Ahmanson Ranch, Runkle Canyon, in the
14 southern buffer zone and in Area IV. We found this
15 contamination. You'll be reading about it soon. There
16 are other reports of this contamination that have come out
17 in reports in Bell Canyon, in Brandeis-Bardin and -- that
18 show contamination coming right up to Area IV's fence with
19 Runkle Canyon.

20 Since I think we have a couple of rounds, I will
21 say, first off, when folks talk about the AOCs and
22 moonscaping the environment -- I'd like to remind folks
23 that the AOCs were not thought up by what are
24 characterized incorrectly as lobbyists for folks who want
25 a full cleanup.

1 But they were actually thought up by the
2 Department of Energy's Secretary Chu, who won a Nobel
3 Peace Prize in Science. He knew that it would be cut
4 through the rigmarole by just clean the place up to what
5 it was, then we would expedite the process instead of
6 continuous delays.

7 What I heard as a reporter is continuous
8 mischaracterizations of the site. At the last meeting, a
9 person claimed that a truck every three minutes for 15
10 years would be needed to clean the site. That works out
11 to be 2.6 million truckloads. This is the kind of stuff
12 that we hear.

13 I have also seen mistakes in facts from the other
14 side that wants a full cleanup according to AOC standards,
15 such as that the data shows exceedance levels as high as
16 1,000 times the radiation trigger levels. Actually,
17 Cesium-137 clocked in at 9,328 times its background as
18 shown in the July of 2011 USEPA Radiological Background
19 Report. That's over 25 times the agency's 2011 background
20 study for subsurface samples of cancer-causing
21 radionuclides.

22 As we have reported -- and I'll wrap this up --
23 as we reported on EnviroReporter.com in our piece
24 Radiation Readings Soar at Rocketdyne, there are numerous
25 overages of high radiation in Area IV. Unless it's

1 cleaned up, folks who use a future park, future housing
2 development, future casino --

3 JOAN ISAACSON: Please wrap up.

4 MICHAEL COLLINS: -- might be affected. Thank
5 you.

6 JOAN ISAACSON: Gary Hartung is next.

7 GARY HARTUNG: I'm just a new resident here.
8 I've lived here for maybe about four-and-a-half years; so
9 I'm new to this controversy. But one thing I'd like to
10 get cleared up is that these trucks that are leaving the
11 site with contaminants -- what contaminants are they
12 carrying, and are these the only contaminants that have
13 been removed or extracted from the soil and the
14 groundwater so far?

15 Somebody answer that?

16 JOAN ISAACSON: Right now we're taking comments
17 and -- for scoping, those types of questions are important
18 comments because those are the types of questions that can
19 be considered in the EIR. We are going to have a Q and A
20 period after the scoping meeting formally ends; and so we
21 can go back to your question at that time when we get to
22 the CEQA process.

23 GARY HARTUNG: All right.

24 FEMALE ANONYMOUS: The microphone isn't working.

25 JOAN ISAACSON: Excuse me?

1 FEMALE ANONYMOUS: That microphone is still low.

2 JOAN ISAACSON: Okay. Thank you for the
3 reminders. Keep reminding me if you can't hear me.

4 Cindy Gortner is next.

5 CINDY GORTNER: I'm Cindy Gortner, and I've lived
6 in Oak Park for 16 years and wouldn't have if I'd known
7 about Santa Susana Field Lab.

8 JOAN ISAACSON: If you can speak louder, I'd
9 appreciate it.

10 CINDY GORTNER: Okay. I'm going to make three
11 points. One, we know that the Santa Susana Field Lab is
12 terribly contaminated. The EPA has spent \$40 million and
13 found 500 soil samples of radionuclides. We know there's
14 known off-site contamination in Runkle Ranch, Brandeis
15 Camp and Sage Ranch. And although Dr. Dodge already said
16 it -- this was shocking when I, a mother of three
17 children, found that I lived close to the site.

18 University of Michigan study from Dr. Hal
19 Morgenstern says that the period of 1988 through 1995, we
20 found the incidence rate -- unless he's talking about
21 specific cancers -- it's more than 60 percent greater
22 among residents living within two miles of Santa Susana
23 versus five. I live three miles. It's not zero. It's
24 60 percent within two.

25 Second point is the worst environmental impact

1 would be to do nothing. It upsets me greatly when I hear
2 about animals and trees and plants and even trucks.
3 Trucks have to take the soil away, and it's not that many
4 trucks. The worst environmental impact is to leave it
5 there where people continue to get sick, where children
6 are playing in the streams.

7 I had a piano teacher of my daughters who just
8 moved very close to the site where there's known off-site
9 contamination. Greg Dempsey had told me "It's fine as
10 long as nobody eats the soil."

11 I said to my friend -- this piano teacher --
12 "Well, it's okay. You don't have any children."

13 He said, "I have a toddler who plays in the
14 backyard in the dirt in a known contaminated area."

15 And the third thing is this room is not
16 necessarily the community. These meetings are not
17 publicized well. There are hundreds of thousands of
18 people who, if they knew about this, would be in here
19 demanding the AOCs be complied with. 3,700 people wrote
20 in support of the Agreement. Less than 20 wrote against
21 it. Where are the thousands of people? Why is this not
22 more well known?

23 And I don't want the DTSC to pat themselves on
24 the back thinking that they have gotten input from the
25 community when they really haven't. The community wants

1 it cleaned up. It's common sense. There was a nuclear
2 meltdown and lots of TCE. We want it cleaned up. We want
3 our children protected, and we want the AOCs complied
4 with.

5 We don't want lobbyists influencing the DTSC.
6 That is wrong. And please, the state government, do the
7 right thing. Protect our families. Thank you.

8 JOAN ISAACSON: RL Miller is next. And I'm going
9 to start letting the next speaker -- give them a head's up
10 that it will be their turn following. So RL Miller is
11 next, and she will be followed by Davis Gortner.

12 RL MILLER: I'm the chair of the California
13 Democratic Party's Environmental Caucus, and I'm an
14 elected delegate to the Ventura County Democratic Party.
15 And I'm here on behalf of the Ventura County Democrats to
16 say that we've already passed resolutions supporting full
17 cleanup to background levels.

18 We support Julia Brownley and her efforts, and we
19 support full cleanup to background levels. Thank you.

20 JOAN ISAACSON: Davis Gortner is next followed by
21 Dorothy Boberg.

22 DAVIS GORTNER: Hi. My name is Davis Gortner. I
23 am the president of Teens against Toxins. We are a group
24 of teenagers who live in and attend school within a few
25 miles of Santa Susana Field Lab.

1 We want to make it very clear that we want the
2 DTSC to keep its commitment of the people, of our
3 community by making sure its EIR defines the scope of the
4 project by complying completely with the cleanup
5 agreement, the AOC and cleaning up to background level for
6 NASA and DOE portions of SSFL.

7 Any alternatives should be discussed by -- any
8 alternatives discussion should be about alternative waste,
9 cleanup to background and not lesser cleanup levels. The
10 EIR should include not just soil and water but also
11 structures to breathe and contaminated structures and
12 disposable material.

13 DTSC's EIR should really not do what NASA's DEIS
14 did which is not to give information about potential
15 harmful effects of cleaning up this very polluted place
16 without serious discussion of the helpful effects of
17 cleaning up the pollution. That is why the cleanup is
18 happening in the first place -- because SSFL is highly
19 contaminated with many dangerous substances that can harm
20 the community's health. Some of the contamination must be
21 discussed.

22 The EIR must address the health and safety
23 effects of all the contaminants at SSFL whether they cause
24 cancer, neurological disorders, birth defects or other
25 health impacts.

1 DTSC should also be misleading -- do not be
2 misleading in trying to scare people about truck traffic.
3 It should disclose how much traffic has occurred at the
4 site over the decades of operation compared to what is
5 predicted for the cleanup. DTSC can make sure the truck
6 routes are split -- the trucks -- that trucks that use
7 natural gas and even using the existing fire road of the
8 nearby rail spur.

9 It is absurd that the issue of trucks would be
10 used as an excuse to impede the removal of environmental
11 health hazards for generations to come. Boeing's cleanup
12 to the standard for (inaudible) zone which is agricultural
13 and rural residential.

14 Even if the land is to become a park using open
15 space standards based on people only being on the site for
16 a short time will do nothing to help the communities who
17 live nearby. If the contamination isn't removed, it
18 remains to be potentially washed down the hill in the rain
19 to harm people.

20 Boeing can save a lot of money by not cleaning it
21 up, but it's those of us nearby who will pay the price.
22 Teens against Toxins and families in their community
23 demand a full cleanup to background. Thank you.

24 JOAN ISAACSON: Dorothy Boberg is next, and
25 she'll be followed by Barbara Tejada.

1 DOROTHY BOBERG: I'm Dorothy Boberg. In the
2 interest of disclosure, my son works for Boeing. However,
3 he's had nothing to do with my opinions. When I first
4 discovered as a employee of Another Mother for Peace that
5 sent me to Seattle -- to Sacramento to study radiation
6 effects, I discovered at that point by reading the Atomics
7 International -- which was before Boeing -- a report to
8 the Health Department that there was a partial meltdown at
9 Santa Susana.

10 And I prepared the information for the report
11 that was completed by Another Mother for Peace. I haven't
12 been active in the subsequent years, but I appreciate what
13 everybody is doing now to bring out all of the problems of
14 that area. And I especially appreciate the Physicians for
15 Social Responsibility members who were here and the others
16 who know what it means to clean up or not clean up all of
17 these pollutants.

18 And I hope that all the reports that are written
19 from now on will stress the necessity to cleanup to
20 background. Thank you very much.

21 JOAN ISAACSON: We'll hear from Barbara Tejada
22 next followed by Betsey Landis.

23 BARBARA TEJADA: Barbara Tejada.
24 Los Angeles-Ventura Cultural Research Alliance. I just
25 wanted to point out a couple of items. There's been a lot

1 of confusion up to this point about the definition of the
2 Native American artifacts that's listed in the AOCs which
3 only govern the federal ownership of properties.

4 DTSC should be defining these exceptions
5 specifically within the CEQA Guidelines according to
6 Public Resources Code 5024.1 as required by CEQA Statute
7 21084.1 specifically dealing with what is a cultural
8 resource, what is a historical resource.

9 Also under CEQA, how will DTSC rectify applying
10 two different cleanup standard alternatives -- one that is
11 risk based and one that has been negotiated -- according
12 to -- that are separated by land ownership within the same
13 project. The CEQA analysis should really take into
14 account how can you apply two different standards to land
15 that is adjacent to each other for one common goal.

16 I also ask that why wasn't a combined DEIS and
17 EIR prepared that encompasses both the CEQA and the NEPA
18 analysis involving all responsible parties. That would
19 have allowed for greater transparency -- especially of
20 cumulative effects such as the massive amount of soil
21 that's going to need to be removed from the site and moved
22 to other communities where environmental justice concerns
23 will be applied.

24 Finally, clearly we need to include
25 epidemiological studies as part of the CEQA analysis.

1 There's obviously a lot of misconceptions and
2 misrepresentations about the causes and effects of
3 contamination from SSFL on the surrounding communities,
4 and I think that really needs to be clarified in a lot
5 more detail in the CEQA analysis. Thank you.

6 JOAN ISAACSON: Betsey Landis is next, and she'll
7 be followed by Brian Lindquist.

8 BETSEY LANDIS: My name is Betsey Landis. I'm
9 representing the California Native Plant Society, and I
10 agree with those who want a risk-based assessment. Risk
11 is the important part. You've heard it from almost every
12 speaker in the room. So let's make it part of that -- of
13 your analysis and in the CEQA.

14 And especially I want to -- I will be putting in
15 comments on native plants and your federally-endangered
16 (inaudible) that's on the site and the fact that this is
17 an important wildlife linkage and also an extremely
18 important cultural resource.

19 But I have a question that has been bothering me
20 every time I drive Woolsey Canyon Road, which is the only
21 paved road in the Santa Susana Field Lab as far as I know:
22 Who owns it? Every time I enter, it says privately owned.
23 I don't know who owns it. It's not that well kept up.
24 And thousands of trucks -- pardon me. Not a few trucks --
25 thousands of trucks will be using it if some of these

1 processes for cleanups are followed through that require
2 removing many, many tons of soil.

3 So who owns it? Who has the liability for things
4 that happen on that road? And what happens if you have
5 accidents that back up the trucks? You have natural land
6 on one side, and you have residences on the other. So all
7 the -- I just got into this a few years in; so I've missed
8 a whole lot of lawsuits and stuff that have gone on. So
9 -- but no one can answer my question. And obviously for
10 CEQA, you have to know who is bearing responsibility for
11 all the parts and the processes that we use to clean up
12 the site.

13 And the other thing that worries me is -- is what
14 a few people have mentioned -- is if a vast removal of
15 material from the site goes on, what is the long-term
16 cumulative impact on the broader -- the greater population
17 of where the material moves through and where it ends up?
18 That's something that has to be considered in your CEQA
19 process.

20 JOAN ISAACSON: Next we're going to hear from
21 Sharon Ford. But I got another card from Brian Lindquist.

22 Brian, I think you went once already so --

23 BRIAN LINDQUIST: I spoke once. Isn't this the
24 second round?

25 JOAN ISAACSON: No. We're still on the first

1 round.

2 BRIAN LINDQUIST: Okay. Hold that card for the
3 second.

4 JOAN ISAACSON: I will. Thank you.

5 Next will be Sharon Ford.

6 SHARON FORD: I've changed what I wrote over
7 there because of listening to everybody here in the room.
8 My name is Sharon Ford. I am not a resident of this area.
9 I am someone who is very much concerned in open spaces and
10 wildlife corridors and place of parklands for people to
11 enjoy.

12 What I am hearing is the background -- to clean
13 up to background -- the problem with this -- and it needs
14 to be, in my opinion, changed to a health risk assessment
15 rather than cleanup to background. Cleanup to background
16 is a cop-out by all agencies of the government. It is an
17 easy way to say "Let's just haul it away to somebody
18 else's backyard and then forget about it."

19 The problem is that there are many detects that
20 would be above background that are not health risks. And
21 because of that, though, they would be hauled out when
22 they're not even a risk to people making it a safety risk
23 and health risk to the communities.

24 We have about three to four schools in the areas
25 where these trucks will go. Yes, they are not supposed to

1 be moving at a time when kids are going to and from
2 school. Life happens. People pick up their kids early.
3 Schools get out. Kids get sick. So you can't base on
4 that.

5 The one thing that I keep hearing -- and I know
6 because I've had many people in my family die of cancer.
7 None of us live in this area (sic). My husband is 90. He
8 has -- in the last few years had bladder cancer and
9 colorectal cancer. We don't know what caused it. But I
10 look around the room, and I can tell you right now every
11 one of us are exposed to cancer-causing material every
12 single day of our lives.

13 I look at the plastic bottles that are toxic and
14 are known to cause cancer. We removed the -- what is it?
15 EPA? Anyways -- from baby bottles. But as soon as the
16 baby is off the bottle, they're drinking out of these
17 bottles again. So we have X-rays. There's all kinds of
18 things.

19 So cleanup to background is unsuitable because it
20 will not allow the park -- it will not allow the land to
21 be suitable for parkland, and it will be more suitable for
22 development and a casino.

23 JOAN ISAACSON: Next is Fred Weniger, who will be
24 followed by Dee Goldberg.

25 FRED WENIGER: Thank you. Hi. My name is Fred

1 Weniger, and I just saw this meeting notice here as I was
2 coming in to do something else; so I apologize, or I would
3 have been a little better prepared since I have been
4 following this and other events very closely.

5 There are those who will tell you that the
6 Fukushima disaster in March 2011 is a potential
7 end-of-life event. The fallout from Los Angeles hit --
8 Los Angeles -- Fukushima hit Los Angeles four days
9 afterwards on 3/11. The plume from it is now approaching
10 the Pacific Coast via our ocean.

11 My question to the committee and everyone: How
12 do you see the Fukushima disaster impacting what the SSFL
13 proposals are and what you would have them do, and how you
14 would you see the Fukushima disaster impacting all of us.

15 And if you had been paying attention to events
16 recently in Japan, one of the members of the legislature
17 there was actually muzzled with a cloth because they are
18 proposing in that legislature to make a reporting of
19 what's going on in Fukushima illegal. So it's something
20 that everyone needs to think about. And presumably you're
21 probably the most concerned group that I could find
22 locally. So that is my -- thank you.

23 JOAN ISAACSON: Dee Goldberg, who will be
24 followed by Nancy Kidd.

25 DEE GOLDBERG: Hi. I'm Dee Goldberg. I'm a

1 resident of Simi Valley. I've gone to quite a few of
2 these meetings, and I felt the same old -- same old thing
3 over and over again. I believe the land should not be
4 used for anything until it's completely cleaned up to
5 background. It's not fair to make it a park for little
6 children to play in the dirt and the water. It's not fair
7 to make it a casino. It's not fair to make it anything.
8 It needs to be cleaned up.

9 As far as the air quality, it's not good now. On
10 a windy day like today, you have all that Cesium and all
11 the particulate matter in the dirt going straight to
12 Agoura, Oak Park, Thousand Oaks, Westlake. People are
13 breathing that. That's not fair to anyone here. It's not
14 fair from previous generations, it's not fair to the
15 generation now and for our future children. It needs to
16 be cleaned up. This is why we're here. It needs to be
17 cleaned up.

18 All these agencies that are sitting here
19 bickering about the little details, about the animals,
20 about the plants -- the plants and animals and people will
21 be healthy once it's cleaned up. It needs to be done.
22 These agencies and companies need to come together. They
23 need to work together and follow the state law and follow
24 what people want. Many people aren't informed. They're
25 not informed enough. They don't take action.

1 And no one's really told not to buy a house next
2 to the area. They have a little slip that says there's
3 been hazardous something here. And we ask the Realtors,
4 and they don't give us a real answer because they know
5 what would happen if we were told there was a nuclear
6 meltdown up there, if there were rocket fuels sent up
7 there. And all those toxins are still there in our water,
8 in our air every time the wind blows. We are receiving
9 it.

10 And this is not fair for the generations -- the
11 trucks are temporary. Our health is permanent. Future
12 generations will continue to get sick. The highest rate
13 of breast cancer is here -- right here in California.
14 Right in this area next to -- in around the site. It's
15 not fair for us. And there's other cancers too. Thank
16 you.

17 JOAN ISAACSON: Nancy Kidd.

18 NANCY KIDD: Good morning. Rules. We're really
19 dealing with rules today. Thank you. I've heard a lot of
20 information. I've attended a lot of these meetings. I
21 have not heard all the information that I have uncovered
22 myself in regard to the ETEC site -- etec.energy.gov,
23 environmental and health community health html (sic) --
24 that talks to the 1990 study that found no link to more
25 cancers at or near SSFL.

1 The '92 study found not only is such a pattern
2 not evident, but the very radiosensitive cancer group
3 appears to be somewhat underrepresented in people living
4 near the SSFL. The '97 study found that cancer incidence
5 risk is similar to the entire Tri-Counties Regional area
6 that includes Riverside County.

7 The 1999 Department of Toxic Substances Control
8 Report stated three studies of cancer incidence in the
9 vicinity of SSFL were reviewed. The combined evidence
10 does not indicate an increased rate of cancer in the
11 regions examined. The 2006 study of the Tri-Counties
12 Cancer Surveillance Program states that Census Tract 75.03
13 and Ventura County does not show any unusual pattern and
14 has actually decreased from 1988 to 2004.

15 The 2007 study by the University of Michigan
16 School of Public Health states that the results show there
17 is little or no association between residential distance
18 from SSFL and the incidence of all cancers in the area.

19 In addition to all of this information about
20 supposed cancer risk, I have to remind people who live
21 here in the southwest that if you move any dirt in this
22 part of the country, you are going to have a problem with
23 Valley Fever.

24 I would like to hear the physicians talk to that
25 issue. That is a very serious condition, and any

1 archaeologist in this state will tell you that there is a
2 high risk of that. If you start removing two feet of soil
3 from that enormous area, you imperil the entire Tri-County
4 Region. Thank you.

5 JOAN ISAACSON: I have no more speaker cards for
6 the first round, but I want to check to see if I missed
7 anyone who wants to speak during the first round. The
8 next speaker is Brian Sujata.

9 BRIAN SUJATA: Good morning. Brian Sujata. I am
10 a resident of Thousand Oaks. I am a former worker of
11 Santa Susana. I spent 17 years up there. I have comments
12 to the document. I would like the DTSC to consider the
13 mitigation of negative project outcomes by performing
14 cleanup consistent with federally-planned future land use.

15 I would like the DTSC to determine and explain
16 the risks of the environment and community -- to the
17 environment and the community of the removal of soil
18 between residential cleanup and recreational cleanup and
19 background cleanup standards. I would like the DTSC to
20 include an assessment of the negative impacts to the
21 borrow site that will be supplying replacement soil to
22 Santa Susana.

23 I would like the DTSC to clarify its ability of
24 the Program EIR to the closure of the radiaric (phonetic)
25 in the facility and post-possible post-closure from that.

1 JOAN ISAACSON: If you can speak a little slower.

2 BRIAN SUJATA: Well, I only have three minutes.

3 JOAN ISAACSON: I know but --

4 BRIAN SUJATA: I'm sorry. Do you need repeating
5 of that?

6 JOAN ISAACSON: She's saying -- actually, could
7 you repeat the last sentence?

8 BRIAN SUJATA: Okay. I'd like the DTSC to
9 clarify the applicability of the Program EIR to the
10 closure of the radiaric (phonetic) materials handling
11 facility and post-closure from it. I would like -- I've
12 asked the DTSC to maintain a science-based program and
13 approach and avoid political influence and nontechnical
14 input.

15 I would ask that the DTSC please communicate with
16 the public above and beyond what is required by law.
17 Recently documents have not been posted as much as they
18 have in the past; so I would like the DTSC to continue
19 posting documents like that.

20 And finally, I'm a member of the Community
21 Advisory Group, which has been formed by the DTSC and --
22 basically community members involved in the site. We are
23 volunteers. We don't have paid interest in any of this so
24 -- other than just being community members and
25 representing our own specific interests for the site.

1 And finally, really what set the balance here
2 is -- just as a commentary -- is the future land use of
3 Santa Susana. You're going to clean this site up to this
4 cleanup standard that are before us in the AOCs. You're
5 basically going to remove everything. Leave the site
6 basically (inaudible) -- for future development, and that
7 means residential land and the houses up there.

8 If that's your goal, then you clean up the site
9 to what your goal is. So I would encourage people to
10 think about what's going on beyond. People that keep to
11 the science and let the process work its work. Thank you.

12 JOAN ISAACSON: I did receive one more card for
13 the first round. Does anyone need to fill out a speaker
14 card for the second round? And if you do, we'll give a
15 speaker card to you right now. All right. So the last of
16 the first round is Lyn Harris Hicks.

17 LYN HARRIS HICKS: I'm Lyn Harris Hicks, and I'm
18 from San Clemente, California. And I'm an advocate for
19 CREED, Coalition for Responsible and Ethical Environmental
20 Decisions, working with some of our people here in the
21 100-mile high-hazard area of San Onofre.

22 And I wanted to make sure that the people here
23 today know that there is much awareness becoming about on
24 the problems that you had here and that you're having and
25 that our effort in CREED is to bring people together so

1 that we support each other and the different groups. So
2 we have the volunteer groups. We're all volunteer.

3 And also United Nations Association of Southern
4 California, Division 10 of ten chapters throughout
5 Southern California are becoming much more aware because
6 we are aware of the problems as being national and
7 international.

8 And so if -- what I wanted to say to you is that
9 when you get the kind of report that you just heard back
10 here about studies done, it's about the same worth as the
11 polls that are taken and then reported on. Because the
12 people who do the polls make it to fit their needs.

13 And I think that most of the people here know
14 that, but we need to communicate to the general public
15 more of these situations because we have found over 50
16 years or so of studying the nuclear problems that -- that
17 protective agencies are so infiltrated that we -- we
18 believe much of what they tell us.

19 And that's a horrible situation, and it's
20 something that is -- that the organizations that are
21 working on trying to repair our constitution and that sort
22 of thing should be aware of because -- it's so defeating
23 that some of the people who were in the very beginning
24 trying to keep out (inaudible) at San Onofre are American
25 Association University people.

1 And just -- they say, "Lyn, what are you wasting
2 your time for?" You know? We really realize that much of
3 our time is wasted just like the man who said that he asks
4 the questions, and then they said they'd get back to him,
5 they never get back and so forth.

6 It's -- and people need to know it because we --
7 the only power we have is in numbers. And many people who
8 are willing to go to the microphones and trying to get a
9 little bit into the newspapers which are also controlled.

10 JOAN ISAACSON: We're going to start the second
11 round. A couple wrote -- maybe just one person wrote
12 optional on their card.

13 Michael Collins, would you like to speak again?

14 MICHAEL COLLINS: I sure would.

15 JOAN ISAACSON: All right. And next after
16 Michael will be Christina Walsh.

17 MICHAEL COLLINS: Michael Collins again.
18 EnviroReporter.com. I'm not going to repeat what I've
19 already said, but I will point out a few things. If the
20 over 500 samples that the EPA found in Area IV that are
21 highly radioactive aren't cleaned up -- which is an option
22 with this PEIR -- and 90 percent of the chemicals aren't
23 cleaned up, then I think it's important people know what
24 that means when it comes to "Let's go to the park. Let's
25 go to the casino. Let's go take a hike."

1 Strontium-90 and Cesium-137 are beta emitters.
2 They're calcium mimickers. They cause blood and bone
3 cancer. DTSC, for some reason, has a radiological trigger
4 level for both these radionuclides. It's the same at both
5 the surface and the subsurface. That's very disturbing
6 because science doesn't support those two numbers being
7 the same.

8 We've had a soil sample of Strontium-90 over 37
9 times its background threshold value, yet the dirt dug a
10 couple of feet below it was 71 times background radiation.
11 We've got a DTSC RTL for Plutonium-239, which is possibly
12 the most poisonous substance on the planet. We've got an
13 RTL that is considerably above background, and we've got
14 several times above background Plutonium-239 in Area IV.

15 As I've said before, we can try to explain away a
16 Nobel Peace Prize-winning Secretary of the Department of
17 Energy's plan to get this site cleaned up. Clean it up
18 now -- whatever its end use is. And I've got to tell you
19 for the people in this room that have cancer -- I think
20 they couldn't give a rat's patoot if this place was
21 developed for homes or made a park or made a casino if it
22 were just cleaned up to the way it were.

23 Now, for the folks who say "You can't do that.
24 The birds. The trees." Well, first of all, we know the
25 trees aren't going to be torn down in this. I think

1 that's been demonstrated quite amply. And if you go to
2 Bill Bowling's site at ACME, you will see a latest report
3 on that.

4 The fact of the matter is why would -- this site
5 has had at least three partial meltdowns. Yes, it's going
6 to change that site to remove the pollution. Why birds --
7 and people want to become rangers and take people on walks
8 in the polluted southern buffer zone -- why they outrank
9 -- that one percent outranks the 99 percent that says
10 "Stick to the AOCs" is beyond me. And I can guarantee you
11 this: That it will be told -- the story will be told no
12 matter how it turns out. Thank you.

13 JOAN ISAACSON: Next is Christina Walsh, who will
14 be followed by Alec Uzemeck.

15 CHRISTINA WALSH: Hi. Christina Walsh. I wanted
16 to follow up on a few things and clarify a few things.
17 The deal that Dr. Steven Chu made for the AOC -- the
18 simple deal was exactly that. It was a simple settlement
19 deal because they failed for 18 months to negotiate
20 properly and incorporate this process within the agreement
21 that they already had. They failed to do that. So this
22 was a simple settlement deal.

23 And what we're learning about Santa Susana --
24 based on the topography, based on the very bumpy
25 operational history, regulatory history and so forth -- is

1 everything but simple. In fact, the issues described by
2 both Ms. Duffield and Mr. Collins about the various
3 radionuclides and their different levels of toxicity harm
4 and hazardous -- as far as really need to go (sic) -- are
5 very, very complicated, and that is why you can't just
6 make a blank slate and say "Do everything like this." It
7 has to be considered. We need health risk to help make
8 those decisions responsibly.

9 We would like to be able to clean up around those
10 things with the AOC. Unfortunately, the way the AOC is
11 written -- it doesn't allow for that, and those are the
12 types of limited modifications that are needed to make for
13 a responsible cleanup.

14 For example, the primary constituent of concern
15 up there is TCE. Half a million gallons in the ground.
16 Okay? So that groundwater has already recontaminated
17 clean soil that was brought in when they cleaned up the
18 Area IV burn pit. So to me, we can't just simply remove
19 soil and forget about it because we have groundwater below
20 it that is going to recontaminate whatever we bring in.
21 So we have to think about this. We have to do it smart.
22 We have to use every possible tool that we have to make
23 those decisions.

24 As far as air quality -- when we think about all
25 of these barren areas that are going to be excavated on

1 whim today, we need to have something that says anything
2 above 15-mile-an-hour winds -- we cover, and we tarp all
3 of these areas. That's a lot of work, and that's a lot of
4 regulatory oversight that's needed that I hope will be
5 carefully examined here. Because when we see wind and the
6 dust that is kicked up and we think about what that dust
7 might contain, that is very, very important.

8 When we talk about land use, population, housing,
9 I think that deed restrictions are necessary. We cannot
10 afford to put houses up there ever because we cannot know
11 based on the topography and the complicated contaminants
12 that are there as far as where they are and how they are
13 sitting -- in some cases more than 1,000 feet below the
14 ground surface -- we need to know how those migration
15 pathways are going to work for the future. Not just for
16 us. Not just for our kids but for future generations that
17 know nothing about this and will know nothing about this
18 when all is said and done.

19 And I have to say that I also would like to ask
20 that between 7:00 A.M. and 3:00 to 4:00 P.M. that no
21 trucks go up and downhill because of children coming out
22 of school. Thank you.

23 JOAN ISAACSON: Alec is next and followed by
24 Brian Lindquist.

25 ALEC UZEMECK: Some arithmetic. NASA estimates

1 that there will be 500,000 cubic yards removed from their
2 portion of the site. Average truck carries nine cubic
3 yards which would suggest 45,000 trucks coming down the
4 two-lane road.

5 Those trucks have to come back, and hopefully
6 they're coming back with backfill which would double the
7 number. And, then, there's a number of trucks associated
8 with DOE and a number of trucks associated with Boeing.
9 I'm trying to say this -- I really don't -- the truck
10 trips are a secondary issue to me. I'm trying to get
11 across the magnitude of what cleanup to background is.
12 It's significant.

13 The other thing is I'm rather surprised that we
14 haven't had a toxicologist involved here because a lot of
15 the things that are being spoken of are a thousand times
16 to background. Well, I don't know if I should run and
17 hide or I should sit down and not worry about it. A
18 thousand times background doesn't tell me anything unless
19 a toxicologist is here to tell me what the risk is.

20 And another thing is I don't think the DTSC has
21 communicated sufficient information about the risks
22 associated with these chemicals. A good portion of the
23 discussion this morning is off-site. Well, we should be
24 telling people what the risks are off-site, and I agree
25 with the epidemiology study. I think that should be done.

1 I feel the DTSC has a responsibility to the surrounding
2 communities in addition to cleaning up SSFL, and I would
3 encourage them to get more involved in that area. Thank
4 you.

5 JOAN ISAACSON: Next is Brian Lindquist followed
6 by Michael Kuhn.

7 BRIAN LINDQUIST: The DTSC people in this room
8 I'm sure -- know that there are days when a bureaucratic
9 (inaudible). I feel sorry for them. I'm sure that the
10 hobgoblins come up to get them in the middle of the night
11 and tell them that they're getting their bottoms flat and
12 pushing a whole lot of manure toward the people of this
13 community.

14 However, they didn't make the system, and they
15 don't control it. They don't have any idea about how to
16 change it. The people who direct them do, and they have
17 contact with those people; so I encourage them to go back
18 to the bosses that direct you who design this program, and
19 tell them this has been inspected and examined into
20 oblivion, and we don't need any more of it. We need the
21 place cleaned up. We need to stop all of this
22 bureaucratic nonsense.

23 JOAN ISAACSON: Michael Kuhn is next followed by
24 Denise Duffield.

25 MICHAEL KUHN: I guess I'll finish up by speaking

1 about archeology. Based upon the stone tools found on the
2 surface at Santa Susana Field Lab over the last 50 years,
3 Native American use of the site has been at least 5,000 to
4 7,000 years. The use of the site likely extended much
5 earlier than that simply because Native Americans were in
6 this hemisphere at least 15 to 16,000 years ago.

7 During the last 1,000 years, the Simi Hills has
8 been an area of major cultural interaction between the
9 Ventureno Chumash, the Fernandenos and the Alliklik. The
10 Santa Susana Field Lab includes a world-class rock art
11 site -- which has gotten most of the attention -- as well
12 as several other rock art sites.

13 CA-VEN-1072 -- it's an archeological site. It's
14 on the National Register of Historical Places and seems to
15 be a large ceremonial complex and has involved the use of
16 several Native American groups. The Chumash have
17 indicated that the entire site of the Santa Susana Field
18 Lab should be considered a traditional cultural landscape.
19 That's (inaudible) of the law.

20 Lead agencies have a duty to avoid substantial
21 adverse changes to historic and cultural resources. Given
22 the long history of Native American use of the field lab
23 area, little is actually known other than CA-VEN-1072.
24 Also, excavation was conducted on that site in 1953 and
25 1954. No report resulted from that study. Fortunately,

1 that material is still present in bags at the Gene Autry
2 Museum and unaware of any other subsurface investigations
3 of the lab's site.

4 In order to determine the significance and extent
5 of sites that would be scheduled for destruction, some
6 surface testing should be concluded on the site so that
7 responsible determination can be made about their
8 significance. We will need a determined significance of
9 Susana subsurface excavation.

10 JOAN ISAACSON: The court reporter has asked that
11 you repeat the last sentence, please.

12 MICHAEL KUHN: I'll give a copy of the text to
13 you.

14 JOAN ISAACSON: Thank you.

15 MICHAEL KUHN: Those determinations cannot be
16 postponed until after the project is approved. It is
17 likely that undiscovered and currently buried or disturbed
18 cultural deposits are present in the Santa Susana Field
19 property is because of all the previous activity that has
20 occurred. All earthmoving activity should be monitored by
21 qualified archeologists and Native American monitors so
22 that those deposits can be identified and investigated --

23 JOAN ISAACSON: Please wrap up.

24 MICHAEL KUHN: -- before determining whether the
25 destruction of those sites should be avoided. Thank you.

1 JOAN ISAACSON: Denise Duffield followed by Fred
2 Weniger.

3 DENISE DUFFIELD: I just wanted to say that
4 generally speaking when you're hearing risk assessment --
5 what you're hearing is code "We're leaving contamination
6 on the site." And if you want to talk about just the
7 samples that the EPA found last year that tested for
8 radionuclides compared to some different standards, I have
9 some numbers for you.

10 When you're talking about Cesium-137 that were
11 cleaned up to background level, 253-253 samples would be
12 cleaned up. Suburban residential -- 253-253. Suburban
13 residential of EPA suburban residential. Boeing suburban
14 residential -- seven out of 253. Open space -- which is
15 what some people say the end use of the spot land will be
16 -- zero of 253 (inaudible). Cesium-137 will be cleaned
17 up.

18 JOAN ISAACSON: Please speak slower when you're
19 giving numbers.

20 DENISE DUFFIELD: Sure. I can also give this
21 information later.

22 For Strontium-90, the EPA suburban residential --
23 85 out of 85 will be cleaned up. The EPA AOC background
24 level -- 85 out of 85 will be cleaned up. For Boeing
25 suburban residential -- zero out of the 87. For Boeing's

1 open space standard -- zero. Plutonium-239 for background
2 -- ten out of ten samples would be cleaned up. For
3 suburban residential -- zero. For open space -- zero.

4 The end use of the site is irrelevant to the
5 cleanup because of the contamination. When you're making
6 a standard based off of hiking across the land or only
7 being there for a short amount of time, that does nothing
8 to protect local communities. Thank you.

9 JOAN ISAACSON: Fred Weniger followed by Sharon
10 Ford.

11 FRED WENIGER: Just a brief follow-up while I was
12 thinking. In following what's gone on since Fukushima,
13 there seems to be two political standards for radiation.
14 One is that all radiation is harmless or -- I should say
15 all radiation is harmful. The other standard is that any
16 radiation that doesn't kill you outright is harmless, and
17 it could because of the anti-cultures, the medicine --
18 those kind of folks.

19 There also seems to -- radiation produced by
20 cronies and friends seems to be the harmless kind and that
21 produced by enemies or potential enemies is always the
22 dangerous one.

23 So at the very least, the DTSC might consider
24 broadening or monitoring since what has happened at
25 Fukushima may totally swamp out anything that may have

1 incurred at SSFL or anything that Al Qaeda or any dirty
2 bomber could ever conceive of because it's happening, it's
3 for real, and it's going to affect everybody. Not just
4 those around us. Thank you.

5 JOAN ISAACSON: Sharon Ford.

6 SHARON FORD: If we want -- and I keep hearing
7 this -- if we want the SSFL site cleaned up now and for
8 future generations, it must be based on health risk. I
9 keep hearing people want to clean up the site the way it
10 was originally. How do we know what it originally was?
11 Hauling out all of this soil certainly isn't making it
12 original.

13 And there are elements, metals -- whatever --
14 that were up there originally that are below -- they are
15 higher than background, but they are below health risk.
16 Disturbing so much soil will make the soil unstable for
17 erosion when there's fires -- wildfires up there.

18 In my first round -- the comments that I turned
19 in -- I didn't say, but I agree wholeheartedly with the
20 woman who spoke back there. I did put in Valley Fever is
21 a real and dangerous threat when we move so much soil. So
22 I really urge everyone to take a look at the AOCs to --
23 and see that they're modified to allow for a health risk
24 assessment and to be able to use other technologies rather
25 than just hauling everything off and make it somebody

1 else's problem. Thank you.

2 JOAN ISAACSON: That's the last of the speaker
3 cards I have for round two. I'm holding one that says
4 optional.

5 Michael, it's from you. Do you want to speak one
6 more time?

7 MICHAEL COLLINS: Well, I don't think it would be
8 fair. Some other people didn't get to speak as well, but
9 yes I would. But if you're not doing a third round, it
10 might be more effective for the meeting if you took
11 questions and gave some answers.

12 JOAN ISAACSON: So here's what we'll do. We're
13 going to take a short break. Actually, I'm going to
14 finish the slides, and we'll formally conclude the scoping
15 meeting. We will then take a ten-minute break, reconvene
16 for an informal Q and A period.

17 I just want to give you some quick information.
18 This slide reviews ways to stay involved. So there are
19 the monthly Santa Susana Field Lab Progress Reports you
20 can sign up for via e-mail, and the Web site address is
21 given here. It's also on this piece of information here.
22 There are other ongoing meetings that you can attend.
23 There are informational pieces. And importantly, Marina
24 Perez's e-mail address is here, and you can send her your
25 questions regarding community involvement, and she will

1 get back to you. And Marina is right there here in
2 person.

3 Documents related to the Santa Susana Field Lab
4 cleanup efforts are available at different repositories
5 around the region. And these repositories are listed in
6 the Notice of Preparation document. But I just want to
7 remind you that if you want to go look at hard copies of
8 materials, you can go to these repositories.

9 And we will now formally conclude the scoping
10 meeting. Again, we're going to take a ten-minute break;
11 so that takes us back here at 11:25 for questions and
12 answers.

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1 I, Sheba Cohen, Certified Shorthand Reporter for the State
2 of California, do hereby certify:

3

4 That the foregoing public comments were taken by me in
5 machine shorthand and later transcribed into typewriting,
6 under my direction, and that the foregoing contains a true
7 record of the public comments.

8

9

10

11 Dated: This 9th day of January, 2014,
12 at San Diego, California

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Sheba Cohen

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CSR No. 13715

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