



Santa Susana Mountain Park Association

Dedicated to the Preservation of the Simi Hills and Santa Susana Mountains

P.O. Box 4831

Chatsworth, CA 91313-4831

ssmpa.com

mail@ssmpa.com

March 6, 2017

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

Re: **DOE/EIS-0402, Area IV and Northern Buffer Zone of the Santa Susana Field Laboratory**

The Santa Susana Mountain Park Association (“SSMPA”) has reviewed the DEIS for Area IV and parts of the Northern Buffer Zone (January 2017) and offers the following comments.

In formulating our comments, we note the property that is the subject of the EIS is owned by Boeing, who has publicly stated on multiple occasions that this property will be used as open space after the cleanup, with restrictions to ensure open space will be the permanent use of the site.¹

The property is located in the Simi Hills on the west side of the San Fernando Valley. The DOE site, combined with the rest of the Boeing and NASA properties, encompasses approximately 2800 acres and serves as a key portion of a wildlife habitat and migration corridor in the western San Fernando Valley and the eastern Simi Valley. This corridor provides significant access points for animals, as well as plants, to move between the Santa Monica Mountains National Recreation Area and the Los Padres National Forest to the north. This site represents one of the largest parcels in the Rim of the Valley study area that is expected to become open space in the future. Long term use of the site will include hiking trails and public use as open space.

All cleanup alternatives (“No Action” Alternative aside) provide for cleaning up soil to suburban residential standards or cleaner.^(S-12) Suburban residential cleanup standards assume residential use by humans who live on the site for life. Therefore the risk statistics cited in the DEIS^(S-38) are considerably higher than would be incurred in occasional recreational use, rather than constant presence on the land. We note cleanups traditionally use risk-based standards such as suburban residential, open space (a lesser level of cleanup), or agricultural (a higher level of cleanup since food is grown on the land), but soil cleanups to background LUT values are extraordinarily uncommon.

The “Cleanup to AOC Look-Up Table Values Alternative” has been shown through the DOE EIS to place a heavy financial burden on taxpayers, and carries significant negative impacts to nearby residents due to haul truck traffic and related pollution impacts over many, many years.^(S-38) We see no rationale for removing background-level chemicals that are not typically tested for, and are not generally viewed as dangerous to humans.

Concerns with the effects of this “Background” level cleanup also include the inability to replace removed soil due to no soil being available that has a composition clean enough to be approved as replacement soil.^(S-28) Although this issue was identified in 2010, no solution has become evident and DTSC has suggested no practical alternative. The AOC requires replacement of the soil that is removed. The DOE DEIS has made it clear that even soil sold commercially for landscaping is not sufficiently clean.^(S-28) We ask what benefit, if any, we all would gain under the “Background” level cleanup compared to a more traditional risk-based standard.

We oppose the “Cleanup to AOC LUT Values Alternative.” It is excessive, with severe negative environmental effects for many years as trucks continue to haul soil with inconsequential contamination through local communities to distant dump sites. As the SSFL shifts to its long term use as open space, it would continue to be impacted by the unresolved absence of “adequate” replacement soil. The removal of additional chemicals under the “AOC LUT Values Alternative,” does not serve any useful purpose, and yet entails many years of traffic and related pollution effects.

We feel that minimizing the proposed action to provide cleanup to suburban residential standards is effective and imposes much milder negative effects on surrounding communities. The long term use of the site as open space, combined with the presence of significant native cultural artifacts and native vegetation on the site, including several uncommon and rare native plants, guides us to a risk-based cleanup approach.

Based on the above discussion, our preferred alternative is the “**Conservation of Natural Resources Alternative.**” This provides the fewest truck trips, the least soil removal, the fewest trips to replace soil, and the least cost to taxpayers.

A valid similar alternative is the “Cleanup to Revised LUT Values Alternative.” We note projected cancer risks are fairly similar under this proposal (1 chance in 100,000 to 270,000) to the extremely lengthy and problematic “Cleanup to AOC LUT Values Alternative,” (1 chance in 100,000 to 310,000).^(S-38) The “Cleanup to Revised LUT Values Alternative” provides the second best opportunity to minimize cleanup impacts to our communities.

We note that cancer risks cited in the DOE EIS ^(S-38) are based on suburban residential standards, not on the lesser exposures that will be experienced by open space users of the site. Consequently the stated cancer risks in the DEIS are significantly above the actual risk anticipated for future users of the site. Cleanups that would be done under all of the presented alternatives are highly protective of human health for the less intense use of this site as open space.

We encourage the DOE to adopt the “**Conservation of Natural Resources Alternative**” to clean up significant contamination, with the most minimal impacts to the site and surrounding communities.

We also urge the DOE to implement the “**Groundwater Monitored Natural Attenuation Alternative**” in conjunction with the “Conservation of Natural Resources Alternative” for soils, thereby adopting what the DOE EIS designates the “Low Impact Combination,” the alternative combination with the smallest environmental consequences.^(S-70)

Sincerely,



Teena A. Takata
President, Santa Susana Mountain Park Association
P. O. Box 4831
Chatsworth, CA 91313-4831

1 http://www.boeing.com/resources/boeingdotcom/principles/environment/pdf/boeing_santa_susana_kuehl_englander_pavley%20letter.pdf

(s-nn) refers to page numbers in DOE/EIS-0402, Area IV and Northern Buffer Zone of the Santa Susana Field Laboratory

About Santa Susana Mountain Park Association:

Santa Susana Mountain Park Association is a 45 year-old non-profit organization based in Chatsworth, Los Angeles, California.

We represent approximately 700 members and concerned citizens, and we partner with many organizations to promote ecological and recreational quality in Southern California.

SSMPA's mission is to preserve and protect the Simi Hills, Santa Susana Mountains, and regional open space.

SSMPA Board of Directors:

Teena Takata, John Luker, Vanessa Watters, Bob Dager, Darlene Brothers-Wageman,
Warren Stone, Donna Nachtrab, Tom Nachtrab, Wendi Gladstone, Sharon Shingai, Dean Wageman