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SENATOR
HENRY STERN
TWENTY-SEVENTH SENATE DISTRICT

December 6, 2017

Director Barbara Lee
SSFL CEQA Comments
California Department of Toxic Substances Control
8800 Cal Center Drive Sacramento, CA 95826
Delivered via the online comment form

RE: Draft Program Environmental Impact Report for the proposed soil and water remediation activities at the Santa Susana Field Lab

Dear Director Lee:

As the State Senator who represents the Santa Susana Field Lab and the neighboring communities, I know firsthand how imperative it is that all responsible parties complete a full and expeditious cleanup of the contamination. The communities near the Santa Susana Field Lab (SSFL), and the Los Angeles region more broadly, have been waiting for this cleanup for a long time. The enormous complexity of the cleanup, the ongoing public health risks, and the glacial pace of progress in removing the contamination have made it paramount that the program environmental impact report (EIR) provide the community with viable options and a clear path forward. Unfortunately, this draft PEIR leaves too many questions unanswered, not least of which is the state's commitment to enforcing the 2007 Consent Order and the 2010 Administrative Orders on Consent (AOCs), raising the specter that a full cleanup remains years and years away. My constituents deserve a speedy cleanup that protects the environment and public health and they have waited too long already.

One major concern is the inadequate assessment of the full context of the cleanup. Leaving contamination on the site poses a serious risk to the public and all of the options discussed in the draft PEIR fail to fully evaluate these risks. In the absence of this discussion, the draft PEIR initially concludes the No Project Alternative is the environmentally superior alternative, although that option is set aside because it fails to meet state and federal requirements. The draft PEIR ultimately concludes Alternative 2, with the use of cleanup exemptions for cultural and biological resources, is the preferred alternative. In each option the risk to human health ought to be fully evaluated and discussed.

In addition, the draft PEIR is vague on how much soil will be left on site. To accomplish the remediation, the draft PEIR relies heavily on an unknown amount of soil that will need to be treated through "natural attenuation" – the breakdown of the contaminants over time. How that will occur, however, remains unclear. In addition, the draft PEIR's preferred alternative, Alternative 2, leaves an unknown amount of soil on the site to protect "cultural or biological resources," which, without specifics, tells us nothing about what level of contaminants would remain onsite and the extent to which the cleanup plan will follow the obligations agreed to under the 2007 Consent Order and the 2010 AOCs.

Another major concern is the lack of a thorough exploration of alternative transportation options in order to minimize negative impacts on the surrounding neighborhoods. While I appreciate there are numerous logistical, technological and permitting challenges to any transportation option, the draft PEIR dismisses many sensible options and even fails to consider other alternative routes and transportation modes that could speed up the cleanup and limit the impact to my constituents. DTSC and all responsible parties must think more creatively.

As the draft PEIR states, DTSC will present more details to the public in subsequent documents. Unfortunately, until that time, too many gaps remain, making it difficult to understand the potential environmental impacts on and off the site for each cleanup option.

I look forward to further discussions with DTSC, the community, and all stakeholders. Thank you for taking this letter into consideration.

Sincerely,

HENRY STERN
State Senator, District 27