



P.O. Box 411301
Los Angeles, California 90041-8301

December 5, 2017

SSFL CEQA Comments
California Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Submitted online at: <http://SSFL.DTSC.commentinput.com/>

Re: Draft Program Environmental Impact Report for the Santa Susana Field Laboratory
(SCH# 2013111068)

To Whom It May Concern:

Los Angeles Audubon Society has been a voice for birds and conservation in Los Angeles for 107 years. Our mission is to promote the study and protection of birds, other wildlife, and their habitats. We have over 3,500 members and supporters, most of whom live in Los Angeles. Our founding principles include a commitment to fostering “a proper conservation of our native birds, other animals, wild flowers, trees, shrubs, soil and water.” It is in this context that we offer comments on the proposed plans for remediation of the significant contamination at the Santa Susana Field Laboratory (SSFL).

As is established in the Draft Program Environmental Impact Report (DPEIR), the Santa Susana Field Laboratory is the site of both radioactive and chemical contamination as a result of a long history of industrial and governmental use. State and federal agencies, including the Department of Energy (DOE) and Department of Toxic Substances Control (DTSC), committed in 2010 to a cleanup of the site to background levels of contamination. The options presented in the DPEIR include an alternative where DTSC and the landowners would step back from the agreed upon 2010 cleanup standards and leave an undisclosed amount of contaminated soil and water on the site.

Los Angeles Audubon Society has previously stated its opposition to abandoning the cleanup to background standard, which was understood to reflect a risk-based approach to remediation of the contaminants on the site:

Los Angeles Audubon opposes this approach and endorses cleanup to the standards agreed upon in 2010. It would be unacceptable to leave radioactive and chemical

contamination on a site that might be used for birding and other recreation. We recognize that a cleanup to background standards would itself result in environmental impacts, but once completed, the site can be actively restored and even without active restoration the site would continue to function as a crucial linkage for wildlife. Santa Susana Field Laboratory presents an extraordinary circumstance; the contamination at the site is an environmental disaster that must be remedied before moving forward with any other use (Los Angeles Audubon Society Board of Directors, September 25, 2016).

We have reviewed the elements of the DPEIR and offer the following comments.

In the alternatives analysis in Chapter 6 of the DPEIR, the preparers designate Alternative 2 as the environmentally superior alternative. Alternative 2 is a scaled back cleanup that could leave as much as 99% of some contaminants on site, developed under the guise of avoiding impacts to sensitive cultural and biological resources. Although it is true that a cleanup to a much more permissive standard that avoids impacts to certain biological features would have less impact than a cleanup to background levels, the DPEIR does not contain any information about the ecological impacts of leaving the contaminants on the site. In other words, the alternatives analysis only evaluates the impacts of the cleanup, not the adverse impacts to biological resources of not doing the cleanup.

Any credible analysis to identify the environmentally superior alternative would need to quantify the impacts of allowing contamination to remain indefinitely on the site. The DPEIR makes the vague statement that Alternative 2 would achieve all project objectives, but this statement is conclusory and unsupported by evidence. In fact, the essential elements necessary to draw this conclusion are completely absent from the DPEIR.

The partial cleanup proposed in Alternative 2 has a reduced footprint, although the details of that reduction are not specified. To conclude that a partial cleanup would be environmentally preferable, the DPEIR would need to weigh the reduced footprint of the partial cleanup against the increased impacts to ecological systems of leaving contamination on site. The method to do this would be to use ecological Risk-Based Screening Levels (RBSLs) for plants and wildlife, which were developed by Boeing for this project.¹ Although these levels are provided in the appendices to the DPEIR (Appendix B), they are not used in the analysis of alternatives. These ecological RBSLs were developed for an array of terrestrial plants, soil invertebrates, and terrestrial vertebrates, chosen to be representative of ecosystem impacts. Acceptable levels for “No Observable Effect” should be taken from those thresholds and used to evaluate whether contaminants that would remain would have a significant adverse impact on the environment (i.e., exceed any of the ecological RBSLs). If the remaining contaminants after Alternative 2 cleanup exceed the lowest of the ecological RBSLs, then the conclusion that Alternative 2 is the environmentally superior alternative would not be supported. The DPEIR provides no such analysis and does not include the hazard of allowing contamination to remain in its conclusion about Alternative 2 or Alternative 1 (No Project).

¹ Narloch, B.A., D. Hambrick, V.C. Chen, and K.M. Rettmann. 2014. Final Standardized Risk Assessment Methodology Revision 2 Addendum; Santa Susana Field Laboratory, Ventura County, California. Prepared for The Boeing Company. MWH Americas, Inc., Pasadena, California.

It should be evident that any cleanup alternative that does not meet all of the ecological RBSLs cannot be identified as the environmentally superior alternative. The DPEIR does not even reveal the amounts and levels of contamination that would remain following implementation of Alternative 2 or provide a definitive map of the location of impacts from Alternative 2, so on its face the DPEIR lacks the information necessary to make an assessment of whether the alternative is superior or not.

Los Angeles Audubon Society recognizes that implementing the full cleanup that was promised by DTSC and DOE would have temporary impacts on the environment, but shares the view expressed by the U.S. Fish and Wildlife Service in its previous Section 7 consultation regarding this site that those impacts are acceptable in the interest of properly remediating the land. The potential impacts of a full remediation to background levels are the consequence of past industrial actions and not a new impact to be avoided. If anything, the impacts of the cleanup on biological resources should be mitigated by the polluters through additional compensatory mitigation above and beyond the restoration of the site following the cleanup.

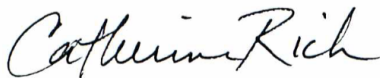
We urge DTSC to pursue a full cleanup of the SSFL site and recognize that this will have environmental impacts. The cleanup will not result in development of the site and therefore will have a lower impact in the long run than the residential subdivisions that are routinely approved in open space in southern California. The site furthermore can be restored to minimize the impacts of the cleanup and set the property on the trajectory of continuing to serve a valuable role as open space in the region.

Questions about these comments can be directed to Dr. Travis Longcore, Conservation Chair, at (310) 247-9719.

Sincerely,



Travis Longcore, Ph.D.
Conservation Chair



Catherine Rich, J.D., M.A.
Conservation Co-Chair



Margot Griswold, Ph.D.
President

Cc: Matthew Rodriguez, CalEPA Secretary