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December 12, 2017

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

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

To the California Department of Toxic Substances Control:

On behalf of the Ventura County Board of Supervisors, I want to thank you for the opportunity to comment on the Draft Program Environmental Impact Report for the Santa Susana Field Laboratory Project.

In 2010, legally binding cleanup agreements called Administrative Orders on Consent (AOC), were entered into by NASA and DOE with DTSC. The AOC requires all of the detectable radioactive and chemical contamination at their SSFL operations to be cleaned up to levels similar to those before the site was contaminated.

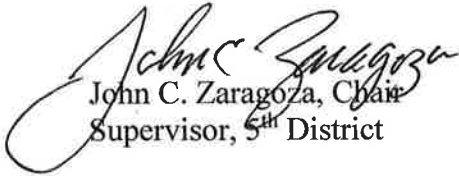
DTSC has indicated that in implementing its cleanup authorities, its normal procedure is to clean up to uses consistent with local government land use plans and zoning, which in this case would be Ventura County's General Plan and zoning. Currently the General Plan designates the SSFL land Open Space and the zoning is a mix of Open Space and Rural Agricultural. Both the Open Space and Rural Agricultural zones allow for a multitude of land uses, including residential and agricultural. However, the DPEIR uses a cleanup standard that neglects to address all of the land uses allowed by the land's zoning and instead restricts cleanup to a lesser "suburban residential" standard that precludes agriculture, despite the fact that every non-coastal zone in Ventura County allows for agricultural crop production.

The Ventura County Board of Supervisors has long supported full cleanup of the Santa Susana Field Laboratory instead of leaving toxic pollutants on site. It is concerning that contrary to the AOC and DTSC's longstanding cleanup commitments, the DPEIR contemplates leaving contaminants in place with a broader use of exceptions than are allowed in the AOC.

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Additionally, the PREIR states that overall site cleanup activities would be inconsistent with Ventura County's General Plan because they would result in the removal of native vegetation and soil, but it ignores that leaving toxic contamination on site is an impact on biological resources. It further fails to acknowledge that biological resources, such as oak trees, can and have been preserved during past SSFL cleanup activities, for example with the Interim Source Removal Action, which was consistent with the County's General Plan and Tree Protection Ordinance. The County's stated overriding goal still remains that all toxic contaminants be removed from the site consistent with the AOC and DTSC's longstanding cleanup commitments. Our Board strongly recommends that the DPEIR be revised to reflect that consistency in remediation of the SSFL site.

Sincerely,



John C. Zaragoza, Chair
Supervisor, 5th District

cc: Secretary Matthew Rodriguez, California Environmental Protection Agency
Director Barbra Lee, Department of Toxic Substances Control