



ERIC GARCETTI
MAYOR

April 7, 2017

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

Dear Ms. Jennings:

Thank you for the opportunity to comment on the U.S. Department of Energy's (DOE) Draft Environmental Impact Statement (DEIS) for Remediation of Area IV and the Northern Buffer Zone of the Santa Susana Field Laboratory (SSFL), which DOE issued in January 2017.

Attached please find a Resolution passed by the Los Angeles City Council on March 3, 2017 that speaks to the City's concerns regarding three aspects of the DEIS, specifically:

1. The DEIS should be based on remediation of the Department of Energy's SSFL site to the levels stipulated in the Administrative Order on Consent (AOC) with the Department of Toxic Substances Control (DTSC) and not include consideration of alternatives that would violate this Order.
2. The inclusion of ineligible exemptions in the Draft EIS dramatically increases the risk of cancers.
3. The alternate transportation plans have not been analyzed and should include direct conveyance of contaminated materials from the site to rail and other options including the use of fire roads and routes with less impact to residents and reduced traffic impact.

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A cleanup agreement was reached in 2010 and I urge swift action to address these concerns and ensure the most protective remediation as stipulated by the AOC. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Garcetti", with a horizontal line extending to the right.

ERIC GARCETTI

Mayor

cc: The Honorable Rick Perry, Secretary, U.S. Department of Energy
The Honorable Mitch Englander, Los Angeles City Councilmember, District 12
The Honorable Mike Feuer, City Attorney, City of Los Angeles
John Laird, Secretary, California Natural Resources Agency
Matt Rodriguez, Secretary, California Environmental Protection Agency
Barbara Lee, Director, California Department of Toxic Substances Control

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor; and

WHEREAS, the US Department of Energy has released a Draft Environmental Impact Statement for the cleanup of their portion of the Santa Susana Field Lab Property and comments on this draft are due by March 14, 2017; and

WHEREAS, beginning in the 1940s the federal government conducted rocket and nuclear testing activities at the Santa Susana Field Lab in Ventura County with substantial disregard for the environment; one of its nuclear reactors experienced a partial nuclear meltdown in 1959, and two other reactors experienced accidents with significant fuel damage, causing releases of radioactivity into the air; this, in addition to napalm and dioxin incineration in open-air burn pits, dumping of over 500,000 gallons of trichloroethylene and perchlorate, and other contamination from over the 50 years of operations, left the site highly polluted with radioactive and chemical contaminants; and

WHEREAS, the parties responsible for cleaning up the Santa Susana Field Lab are the Department of Energy, NASA and the Boeing Company; and

WHEREAS, in 2010, a legally binding cleanup agreement called Administrative Order on Consent, were entered into by NASA and the Department of Energy with the California Department of Toxic Substances Control which requires all of the detectible radioactive and chemical contamination at their Santa Susana Field Lab operations be cleaned up to background levels similar to those before the site was contaminated; and

WHEREAS, in May, 2012, the Department of Energy issued a notice regarding preparation of an Environmental Impact Statement regarding the cleanup and a draft was released for comment in January 2017 and comments are due on March 14, 2017; however, the Environmental Impact Statement of the Department of Energy does not analyze the impacts of cleaning the Department of Energy site to levels stipulated in the Administrative Order on Consent; and instead, 500,000 cubic yards of soil, some with known significant chemical and radiological contamination that would be covered by the Administrative Orders on Consent, are exempted from remediation; and

WHEREAS, of the options analyzed in the Draft Environmental Impact Statement, Option 1 proposes to leave more than 39% of the contamination - over 1/2 million cubic yards - on site - exposing future users of the site and those in proximity to its runoff and detritus to unacceptable risk of future cancers and other maladies; and this is not, as the document suggests, compliant with the Administrative Order of Consent; and the even more untenable Options 2 and 3 leave up to 91% and 99% of pollution on site, respectively;

NOW, THEREFORE, BE IT RESOLVED, with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby includes in its 2017-2018 Federal Legislative Program sponsorship and support of any administrative action by the US Department of Energy relative to the Draft Environmental Impact Statement for the cleanup of their portion of the Santa Susana Field Lab in Ventura County to incorporate the following comments:

1. The Environmental Impact Statement should be based on remediation of the Department of Energy's Santa Susana Field Lab site to the levels stipulated in the Administrative Order of Consent and not include consideration of alternatives that would violate this Order.
2. Ineligible exemptions utilized in the Draft Environmental Impact Statement that dramatically increase the risk of cancers should be excluded.
3. Alternate transportation plans should be analyzed that include direct conveyance of contaminated materials from the site to rail and other options including the use of fire roads and routes with less impact to residents and reduced traffic impact.

MAR - 3 2017

PRESENTED BY:


MITCHELL ENGLANDER
Councilman 12th District

SECONDED BY:



ORIGINAL


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