



COUNTY OF LOS ANGELES BOARD OF SUPERVISORS

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 383
LOS ANGELES, CALIFORNIA 90012
(213) 974-1411 • FAX (213) 620-0636

LORI GLASGOW
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April 5, 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

Dear Ms. Jennings:

I am writing on behalf of the Los Angeles County Board of Supervisors. The County of Los Angeles has reviewed the draft Environmental Impact Statement (EIS) for Remediation of Area IV and the Northern Buffer Zone of the Santa Susana Field Laboratory (SSFL) proposed by the U.S. Department of Energy (DOE) as lead agency under the National Environmental Policy Act. The draft EIS analyzes the potential environmental impacts of alternatives for conducting cleanup activities in Area IV of the SSFL and the adjoining Northern Buffer Zone, located in the County of Ventura, adjacent to the County of Los Angeles. The County of Los Angeles Board of Supervisors has noted that radioactive and chemical contaminants from the long-closed SSFL have affected the soil, air and water in nearby Los Angeles County communities for decades and have posed serious health risks, such as possible clusters of rare cancers in children and adults, in neighboring communities. The County of Los Angeles therefore urges a full and timely cleanup of the site.

The County of Los Angeles Board of Supervisors submits the following comments on the draft EIS during the public comment period which is currently scheduled to end on April 13, 2017:

1. Lack of Full Cleanup

The EIS does not address the full cleanup of the site, a clear violation of the 2010 Administrative Order on Consent (AOC) between the California Department of Toxic Substances Control and DOE. There are currently four alternatives considered in the EIS: three that address partial cleanups (i.e. "leave in place alternatives") and

one that is the null (no cleanup). The AOC does not allow for consideration of lower levels of cleanup. The EIS should be based on remediation of SSFL to the levels stipulated in the AOC, provide full analysis of Full Cleanup and full restoration back to the site's environmental native state, and not include consideration of alternatives that would violate the AOC.

2. Lack of Full Analysis of Multiple Alternative Routes and Modes of Transportation

The EIS offers limited analysis of routes and transportation methods, and has pre-selected certain routes and methods that may have the most impact on surrounding neighborhoods. The limited analysis and pre-selection are misleading because the EIS makes it appear as though no other options are available that would further minimize impacts on residents and businesses. However, during the 2012-2014 alternatives development period, a number of other routes and transport methods were identified that could further minimize neighborhood impacts. These are not analyzed in the EIS and are dismissed as too time consuming to evaluate and/or implement (Pages 2-11 and 2-12). The lack of comprehensive analysis is a disservice to Los Angeles County neighborhoods, residents, businesses, and travelers. Alternate transportation types, methods, and routes should be analyzed in full including, but not limited to, the direct conveyance of contaminated materials from the site to rail and other options, as well as the use of fire roads and other routes to minimize truck traffic and impacts to residents and traffic.

3. Burden of Proof

The AOC mandates full cleanup with limited exemptions allowed only if based upon a Biological Opinion rendered by the U.S. Fish and Wildlife Service (USFWS). However, even though the Biological Opinion has not yet been rendered, every one of the EIS' cleanup alternatives already exempt several hundred thousand cubic yards of soil. Further, this exemption is contrary to a 2010 USFWS Biological Opinion issued to the U.S. Environmental Protection Agency that stated there were no unavoidable or unmitigable negative biological impacts at SSFL. It is not within the DOE's discretion to make such a determination of exemption. Exemptions utilized in the EIS that violate the AOC, and those that could increase the risk of cancers, should be excluded. The DOE should provide compelling and fact-based evidence rather than assertions as to why it believes certain amounts of soil should be exempt from cleanup.

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4. Additional Public Review Period Between Release of Biological Opinion and Final EIS

The EIS should be recirculated for additional public review and comments after the USFWS Biological Opinion is submitted and all public comments from the current review period are addressed, and before the EIS is finalized.

On behalf of the Los Angeles County Board of Supervisors, your consideration of the above issues related to this critical public health and safety cleanup project is greatly appreciated. The County of Los Angeles looks forward to your response with respect to the comments on the draft EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Glasgow for". The signature is fluid and cursive.

Lori Glasgow
Executive Officer

LG:ls

c: Board of Supervisors