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April 15, 2007

Senator Joe Simitian, Chair
Committee on Environmental Quality
State Capitol
Sacramento, CA 95814

**Re: The Boeing Company Statement in Opposition to SB 990 (Kuehl)
April 2007**

Dear Senator Simitian:

It has recently come to my attention that the Boeing Company has submitted a statement to your Committee, regarding Senator Kuehl's bill dealing with the cleanup of the Santa Susana Field Laboratory in Ventura County.

Their statement contends, "In contrast to the accusations made against The Boeing Company that falsely claim increased cancer rates in the communities surrounding SSFL, a recent study conducted by the University of Michigan School of Public Health just concluded the opposite." Although the authors of the Boeing statement do not cite the source of that study, they then quote three brief passages from my final research report on *Cancer Incidence in the Community Surrounding the Rocketdyne Facility in Southern California*, which was submitted in March to the Eastern Research Group and the Agency for Toxic Substances and Disease Registry (ATSDR).

I would like to make it clear to your Committee that Boeing's claim made about the conclusion of our study is false. We did *not* conclude that there was no excess cancer in the communities surrounding SSFL. Furthermore, Boeing's quotes from our report were taken out of context, and they failed to report our specific findings that contradicted their claim.

In the main analyses of our study, we compared the incidence rate of specific cancers in adult residents living within 2 miles and 2-5 miles from SSFL with adult residents living more than 5 miles from SSFL in both Ventura and Los Angeles Counties. For the period 1988 through 1995, we found that the incidence rate was more than 60% greater among residents living within 2 miles of SSFL than among residents living more than 5 miles from SSFL for the following types of cancer: thyroid, upper aerodigestive tract (oral and nasal cavities, pharynx, larynx, and esophagus), bladder, and blood and lymph tissue (leukemias, lymphomas, and multiple myelomas).

For the period 1996 through 2002, we found that the incidence rate of thyroid cancer was more than 60% greater among residents living within 2 miles of SSFL than for residents living more than 5 miles from SSFL. The magnitude and consistency of the thyroid finding for both periods is especially provocative because of evidence from other studies linking thyroid cancer with environmental exposures originating at SSFL and found in the surrounding communities.

In their statement, Boeing ignored these results and focused instead on our discussion of the methodologic limitations of our study. It is true that we did not measure environmental exposures, relying instead on residential distance from SSFL, and that we were not able to link excess cancer rates with exposures originating at SSFL. Nevertheless, it does not follow—as implied by Boeing’s statement—that we did not find excess rates of cancers near SSFL, nor can we conclude that Boeing-related exposures did not cause cancers in the nearby communities. For the record, the conclusion in our summary of the final report (p. 4) starts as follows:

“Despite the methodologic limitations of this study, the findings suggest there may be elevated incidence rates of certain cancers near SSFL that have been linked in previous studies with hazardous substances used at Rocketdyne, some of which have been observed or projected to exist offsite.”

We went on to acknowledge that further research would be necessary to determine whether these provocative findings reflect the effects of environmental exposures originating at SSFL and that it is not clear at this time whether such additional analyses or studies would be sufficient to resolve the matter.

In summary, Boeing’s assertion that we found no increased cancer rates in the communities surrounding SSFL is false. We did, in fact, find increased incidence rates of certain cancers associated with proximity to the facility, the significance of which would require further research.

Please let me know if I can be of further assistance to your Committee.

Sincerely,

A handwritten signature in black ink that reads "Hal Morgenstern". The signature is written in a cursive, flowing style.

Hal Morgenstern, Ph.D.
Professor and Chair