



Santa Susana Mountain Park Association

Dedicated to the Preservation of the Simi Hills and Santa Susana Mountains

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ssmpa.com

December 5, 2017

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

Subject: Comments on Santa Susana Field Laboratory Draft Program Environmental Impact Report (PEIR)

The Board of Directors of the Santa Susana Mountain Park Association (SSMPA) takes this opportunity to register our comments regarding the Draft PEIR (dated September 2017) for cleanup of the Santa Susana Field Lab (SSFL).

The Santa Susana Mountain Park Association recognizes the necessity of cleanup at Santa Susana Field Laboratory and hence heartily supports DTSC in its oversight responsibility for the cleanup.

Nevertheless SSMPA finds the Draft PEIR reveals DTSC's refusal to identify and evaluate any rational soil cleanup alternative that will both:

- protect human health and environment at SSFL, and
- protect the health and safety of surrounding communities, while minimizing disruption of habit and cultural resources at SSFL.

Contrary to SSMPA's guidance in our Scoping Comments dated January 8, 2014, DTSC has disregarded our counsel that:

"The PEIR must include analysis of all practical levels of cleanup, in addition to the "cleanup to the background" alternative..." (summary, item 3, page 1)

SSMPA finds that DTSC's Draft PEIR does not analyze a sufficient range of alternatives. DTSC must not be bound by arbitrary, politically-predetermined constraints, such as the 2010 Administrative Orders on Consent (AOCs), in its selection of effective and executable cleanup alternatives.

SSMPA recommends that DTSC provide a framework that enables all responsible parties at the Santa Susana Field Lab (SSFL) to execute a minimal-impact, risk-based cleanup, protective of human health and environment, to EPA's recreational open space standard.

SSMPA recommends against excessive cleanup of inert, non-hazardous waste; that is, against a cleanup with a risk that may far exceed the "risk" of leaving inert materials in place.

SSMPA's posture on cleanup at SSFL derives from these guiding principles:

1. The cleanup must do more good than harm.
2. The cleanup must protect the health and safety of surrounding community members as well as of future users of SSFL land.
3. The cleanup must preserve as much as possible of SSFL's extraordinary cultural resources, natural habitat, and wildlife.
4. The cleanup must be "doable" and affordable, in financial terms and in terms of human well-being.

Please rework the PEIR by identifying, specifying, and evaluating a rational soil cleanup alternative that meets the above principles.

Sincerely,



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About Santa Susana Mountain Park Association:

Santa Susana Mountain Park Association is a 45 year-old non-profit organization based in Chatsworth, Los Angeles, California.

We represent approximately 700 members and concerned citizens, and we partner with many organizations to promote ecological and recreational quality in Southern California.

SSMPA's mission is to preserve and protect the Simi Hills, Santa Susana Mountains, and regional open space.

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