December 17, 2019

Mr. Peter Zorba, SSFL Project Director
5800 Woolsey Canyon Road
Canoga Park, CA 91304

Subject: County of Ventura Board of Supervisors Comments on National Aeronautics and Space Administration's (NASA) Draft Supplemental Environmental Impact Statement (SEIS) for Soil Cleanup Activities at Santa Susana Field Laboratory (SSFL) in Ventura County.

Dear Mr. Peter Zorba:

Thank you for the opportunity to review and comment on the subject document. It has been a longstanding position of the County of Ventura to seek that NASA, as an owner of land at SSFL, clean up contamination to the most protective standards, equivalent to background and consistent with NASA's agreed upon 2010 Administrative Order on Consent (AOC). Alternative A in the Draft SEIS is the only alternative that cleans the site to AOC requirements and as such is aligned with Ventura County's position to be protective of the public's health, our first priority.

NASA's November 20, 2019 hearing portrayed the draft SEIS alternatives as having "no discernable differences to health and safety" even though risks would persist if alternatives other than Alternative A were selected. This is because the contamination that would be left on site by the other alternatives would continue to threaten the health and safety of people onsite and offsite during wind, rain, fire and other events. Recently SSFL had 57 violations of pollution standards from stormwater released offsite after the 2018 Woolsey Fire.

The types of contaminants found at SSFL have been linked to an increased risk of disease including cancer, thyroid disorders, lymphoma, and leukemia. Draft SEIS maps show that alternatives other than Alternative A would leave large areas of NASA's SSFL property contaminated. Entertaining any alternative other than Alternative A would break the legally binding terms of the AOC.
Furthermore, the current land use of the NASA property is open space. Section 8104-1.1 Open Space of the Ventura County Non-Coastal Zone Ordinance outlines the purpose and land uses of the Open Space Zone. NASA and Boeing incorrectly conclude that the future land use would be limited to recreational (DEIS, 2019, Executive Summary page 5, and Boeing, 2017a). The Open Space Zone in Ventura County allows for more than recreation, it also allows among other uses, agriculture and housing. Clearly, leaving contaminated soils with the potential for agriculture and housing would pose future health risks.

It is of the utmost importance that the SSFL property be fully cleaned up to protect public health and safety. The Ventura County Board of Supervisors strongly recommends Alternative A (“AOC Cleanup”) and opposes other alternatives that leave contaminants on site that are not consistent with levels stipulated in the AOC.

Sincerely,

[Signature]

Steve Bennett, Chair
Ventura County Board of Supervisors