



**BOARD OF SUPERVISORS  
COUNTY OF VENTURA**

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December 17, 2019

Board of Supervisors  
County of Ventura  
800 South Victoria Avenue  
Ventura, California 93009

**SUBJECT:** Recommendation of Supervisor Parks to Request the Board of Supervisors Submit a Comment Letter to National Aeronautics and Space Administration (NASA) Draft Supplemental Environmental Impact Statement (SEIS) for Soil Cleanup Activities at Santa Susana Field Laboratory (SSFL) in Ventura County.

**RECOMMENDATION:**

It is recommended that the Board of Supervisors submit a comment letter on NASA Draft SEIS for soil cleanup at SSFL reaffirming its position for full cleanup to background levels.

**DISCUSSION:**

The SSFL site, located at the eastern edge of Ventura County, is highly contaminated from activities related to large rocket engine testing, burning of toxic wastes in sodium burn pits, nuclear research, and a 1959 partial core meltdown of a small nuclear reactor on site. Toxic chemicals, Trichloroethylene (TCE), perchlorate, dioxins, radionuclides, mercury, lead, cadmium, asbestos, and other hazardous wastes have been found in soils, groundwater, and/or surface waters of the SSFL. These types of contaminants have been linked to increased risk of disease including cancer, thyroid disorders, lymphoma, and leukemia. According to the California Department of Toxic Substances Control (DTSC), potential exposure to toxic contaminants can occur from direct contact with soils, sediments, weathered bedrock, surface water, air, and groundwater at SSFL.

The 2,850-acre SSFL site has been divided into four (4) areas for purposes of regulatory clean-up efforts and each area has been found to have contaminants in the soil, groundwater, and/or surface water. The contaminants found at the SSFL site pose a threat to human health and safety. These threats are well documented.<sup>1</sup> Additionally, the 2018 Woolsey Fire that

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<sup>1</sup> State of California, Environmental Protection Agency, DTSC August 2007 Consent Order for Corrective Action (P3-07/08-003); Order to Perform Interim/Source Removal Action (ISRA) of Soil from the Los Angeles Regional Water Quality Control Board (RWQCB), December 3, 2008; Cohen, Y., et. al., 2006, "The Potential for Offsite Exposures Associated with Santa Susana Field Laboratory, Ventura County, California"; Morgenstern, H., J. Beebe-Dimmer, and S. Yu, 2007, "Cancer Incidence in the Community Surrounding the Rocketdyne Facility in Southern California."



originated at the SSFL site posed additional threats to health and safety related to smoke, ash and stormwater runoff.

The Ventura County Board of Supervisors represents constituents in the vicinity of SSFL and oversees land use, and public health and safety aspects over portions of SSFL. In response to the Notice of Availability of NASA's Draft SEIS (84 FR 57,490, 10/25/2019) for its soil cleanup activities on SSFL, it is timely for our Board to provide comments pursuant to NEPA (National Environmental Policy Act).

It has been a longstanding position of the County of Ventura to seek that NASA, as an owner of land at SSFL, clean up the site they own to the most protective standards, equivalent to background. As the Draft SEIS stands, Alternative A is the only alternative that aligns with the County's position. Furthermore, NASA entered into a legally binding Administrative Order on Consent (AOC) and has a legal obligation to implement Alternative A.

In early November 2019, NBC4 news reported that toxic runoff from SSFL exceeded safety standards. Test results show that the Woolsey Fire and the heavy rains that followed, allegedly spilled dangerous water, contaminated with toxic waste, into nearby neighborhoods. The Los Angeles Regional Water Quality Control Board has been monitoring runoff. Records showed that 57 times in the three months after the Woolsey Fire, chemicals and radioactive contamination spilled from SSFL at levels exceeding safety standards set by the State. These included dioxins, cyanide, arsenic, lead, and gross alpha radioactivity. According to NBC4, one day in December 2018, traces of lead were found to be 17 times the state safety limit in water leaving the site and entering Bell Canyon. Another record showed lead 10 times the legal limit leaving the site entering into Dayton Canyon. Lead and radiation have no known safe levels of exposure, underscoring why SSFL must be fully cleaned up as promised because until the contamination is fully cleaned up at its source, the public will remain at risk of exposure via offsite migration especially during wind, rain, and fire events.

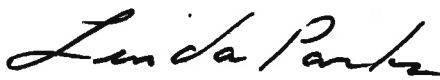
NASA's November 20, 2019 hearing on its Draft SEIS portrayed the draft SEIS alternatives as having "no discernable differences to health and safety." Yet despite this claim, health risks would persist in alternatives other than Alternative A because of the amount of contamination the other alternatives would leave on site. The attached maps from the Draft SEIS show the areas where contamination would be removed, with Alternative A (labeled "AOC Cleanup") removing contaminants from a significantly larger area than the other alternatives, including Alternative D "Recreational Cleanup."

Furthermore, the current zoning for the four NASA SSFL sites is open space. Section 8104-1.1 Open Space in the Ventura County Non-Coastal Zone Ordinance outlines the purpose and uses of the Open Space Zone, which allows for, among other uses, agriculture and housing. Clearly, leaving contaminated soils with the potential for future housing and agricultural uses, poses health risks. Boeing and NASA incorrectly conclude that the future land use for SSFL is limited to recreation (DEIS, 2019, Executive Summary page 5, and Boeing, 2017a).

It is recommended that the County Board of Supervisors send the attached comment letter expressing our long-held position for full cleanup of SSFL to levels equivalent to background, support for Alternative A ("AOC Cleanup") in the Draft SEIS, and opposition to the other alternatives that leave the site contaminated.

This letter has been reviewed by County Counsel, the Resource Management Agency, and the County Executive Office.

Sincerely,

A handwritten signature in cursive script that reads "Linda Parks".

Linda Parks  
Supervisor, District 2

Exhibit 1: Letter to National Aeronautics and Space Administration

Exhibit 2: Draft SEIS Maps, Alternatives A to D



MEMBERS OF THE BOARD

STEVE BENNETT, Chair  
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**BOARD OF SUPERVISORS  
COUNTY OF VENTURA**

GOVERNMENT CENTER, HALL OF ADMINISTRATION  
800 SOUTH VICTORIA AVENUE, VENTURA, CALIFORNIA 93009

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.

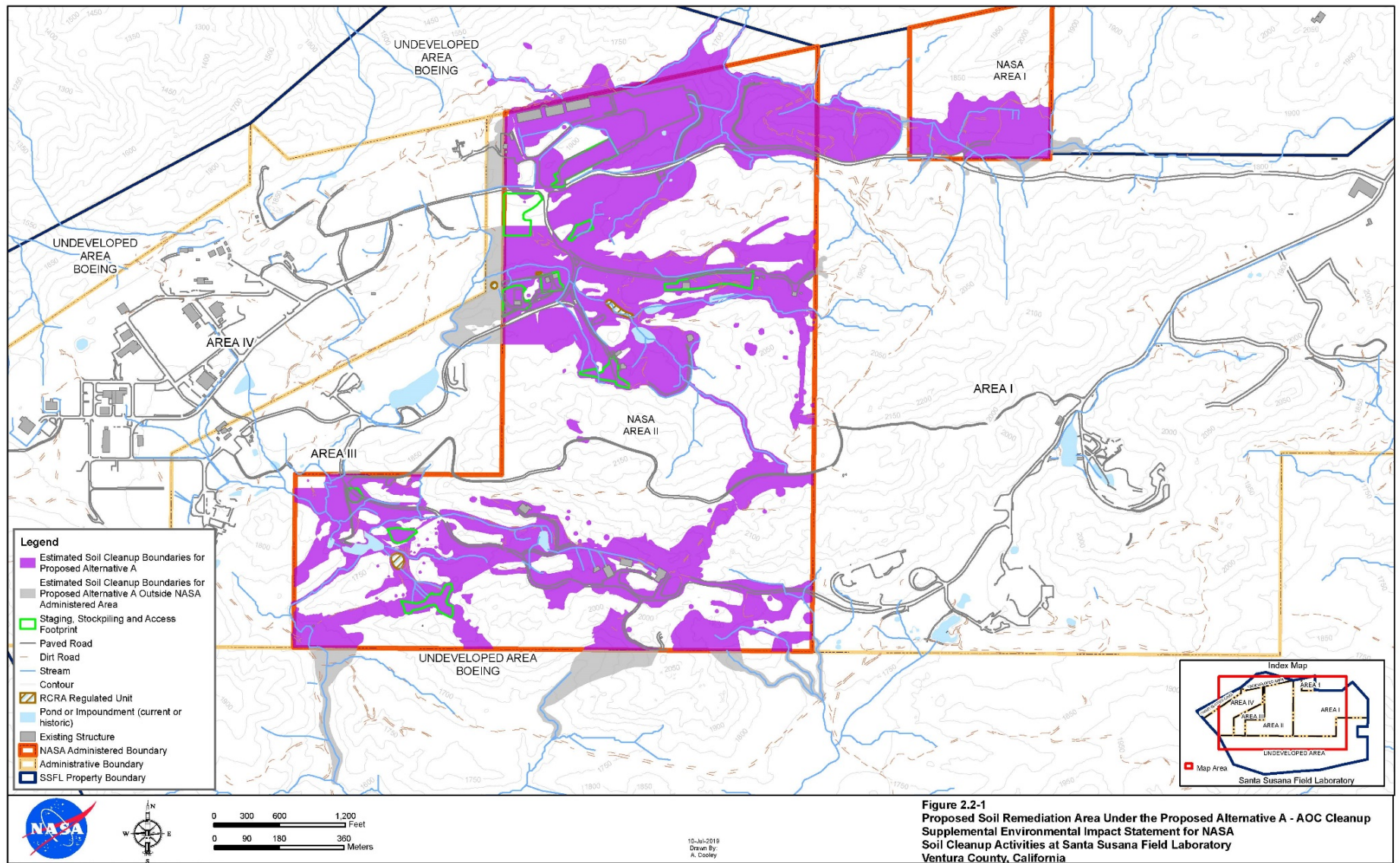
It is of the utmost importance that the SSFL property be fully cleaned up to protect public health and safety. The Ventura County Board of Supervisors strongly recommends Alternative A ("AOC Cleanup") and opposes other alternatives that leave contaminants on site that are not consistent with levels stipulated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

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Bennett". The signature is fluid and cursive, with the first name "Steve" and last name "Bennett" clearly distinguishable.

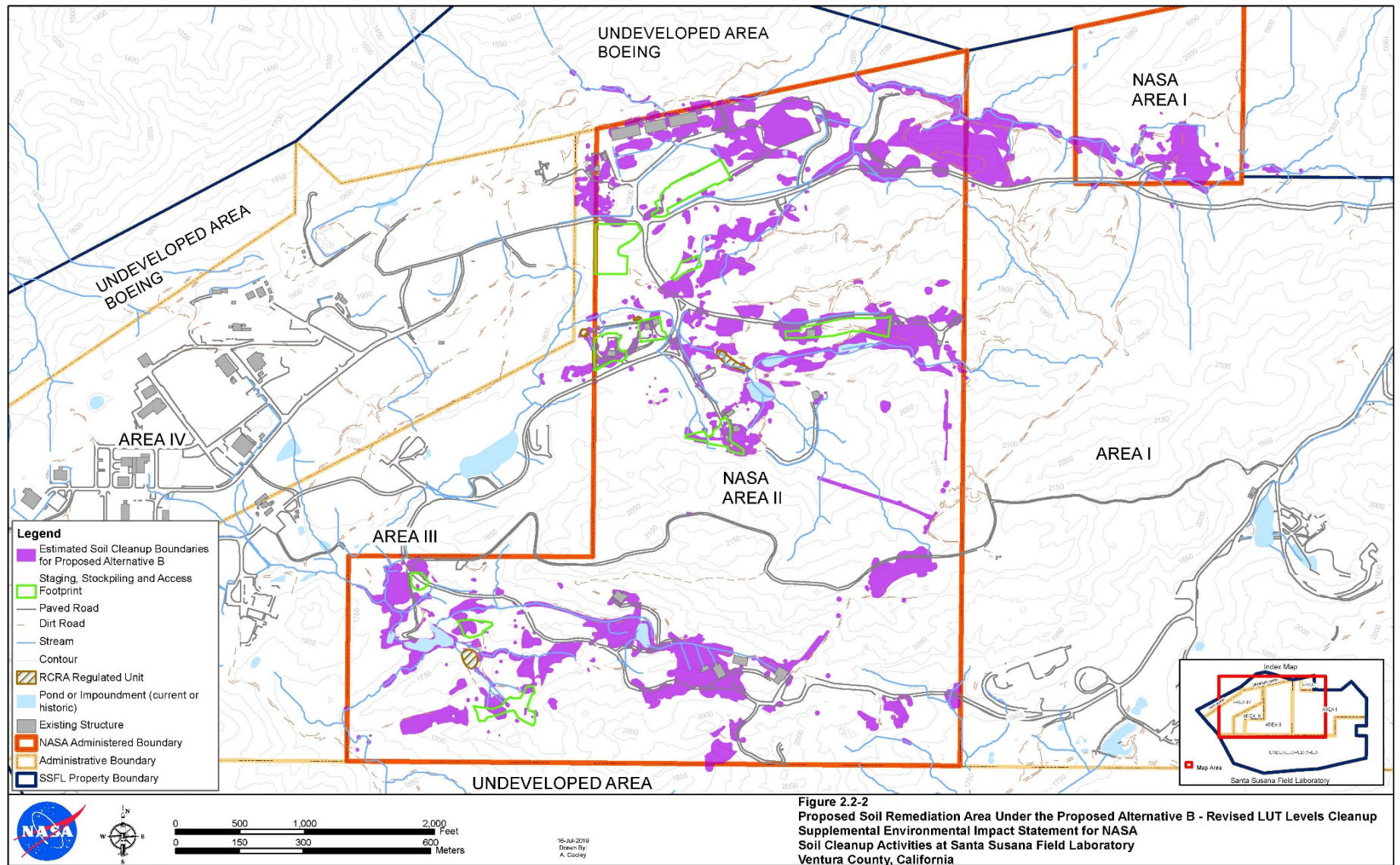
Steve Bennett, Chair  
Ventura County Board of Supervisors





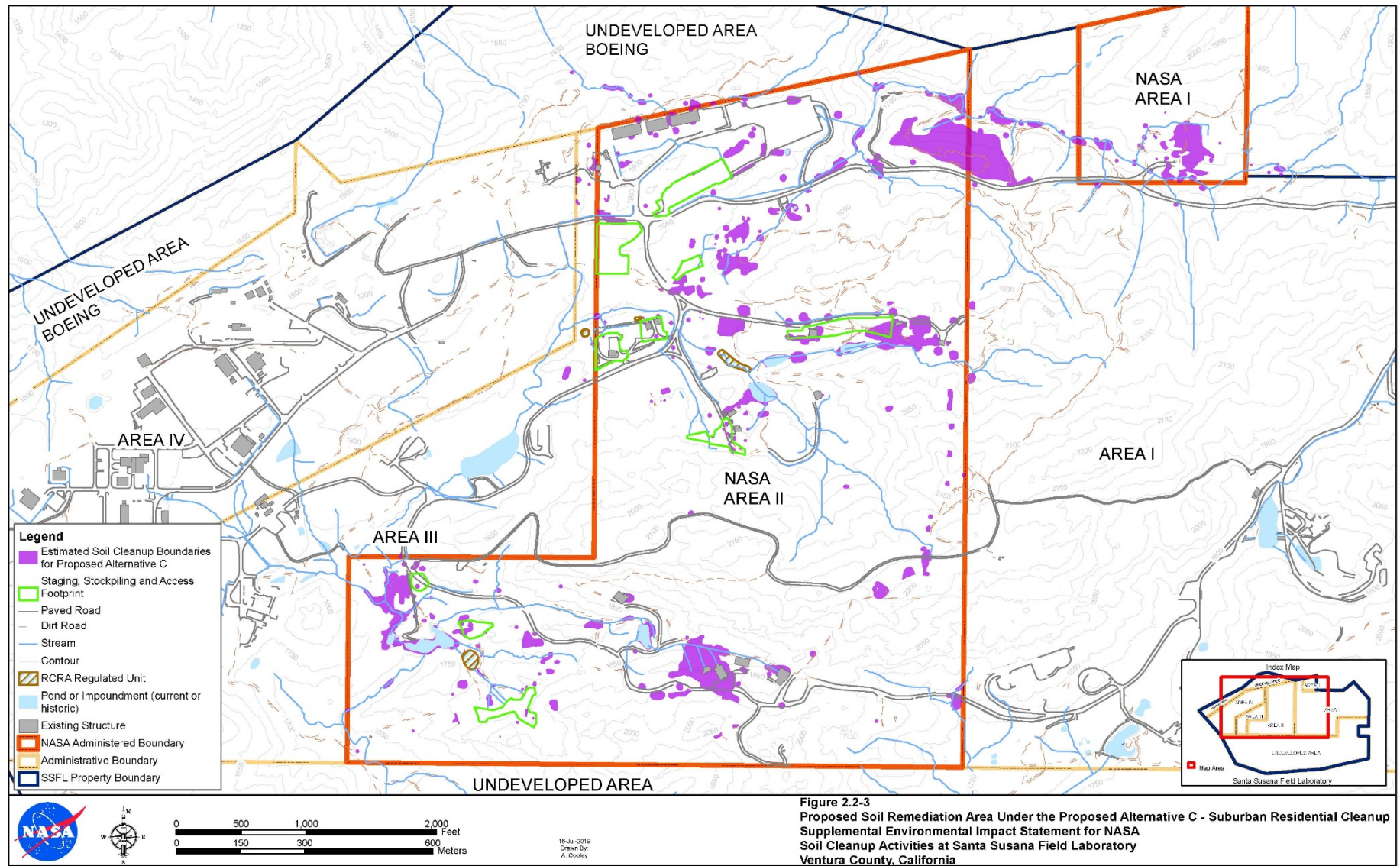
## Alternative A - "AOC Cleanup"





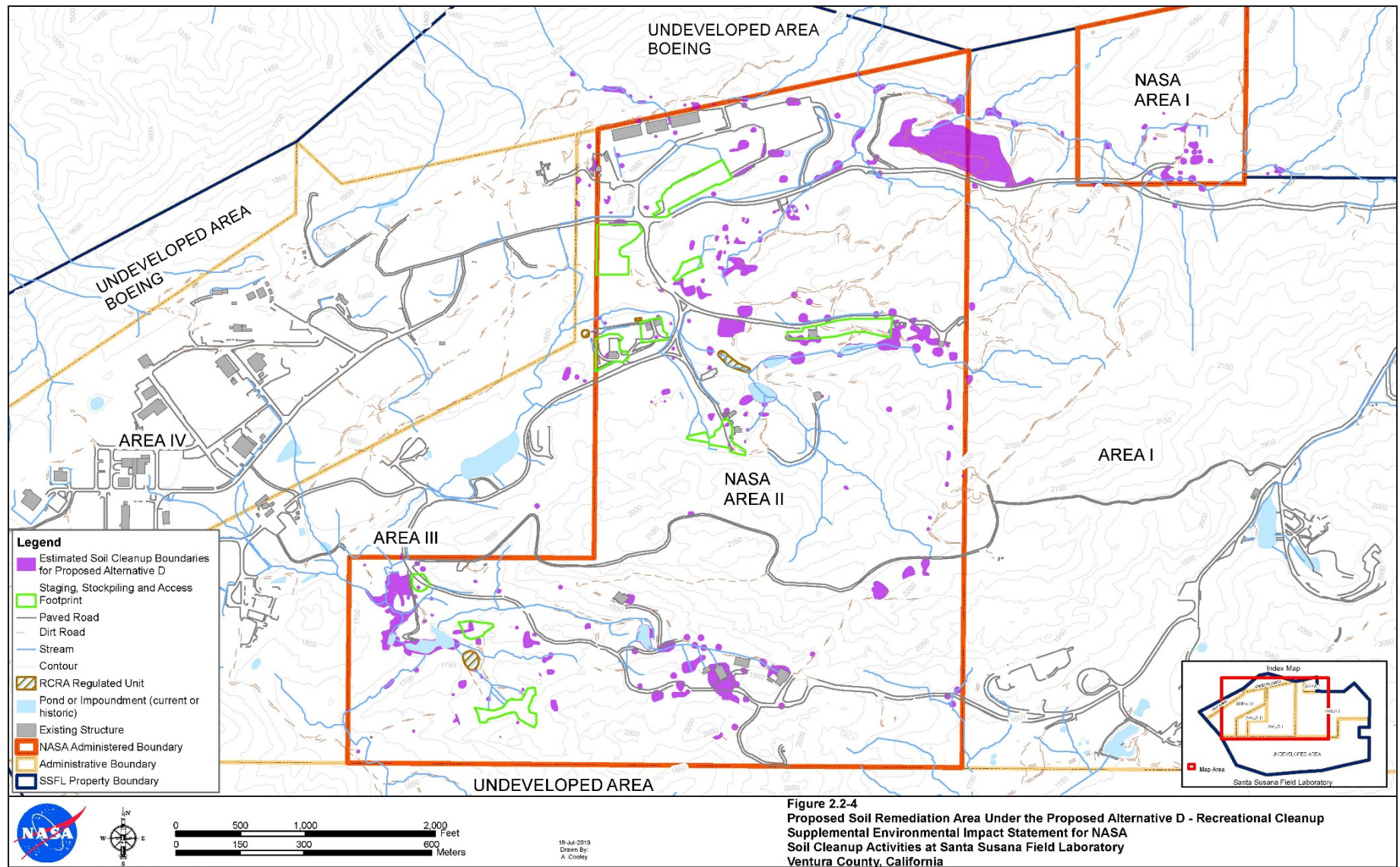
### Alternative B "Revised LUT Cleanup"





### Alternative C "Residential Cleanup"





## Alternative D - "Recreational Cleanup"