



On September 7, 2017, the California Department of Toxic Substances Control (DTSC) released a draft Environmental Impact Report (EIR) for the cleanup of the Santa Susana Field Laboratory, pursuant to the California Environmental Quality Act (CEQA). The purpose of an EIR is to inform the public about a proposed project and outline reasonable alternatives that would reduce or eliminate significant environmental impacts, as well as identify feasible mitigation measures that would reduce or eliminate environmental impacts of the project. Environmental remediation and building demolition at Santa Susana will be performed by Boeing, the U.S. Department of Energy (DOE) and NASA.

In 2007, Boeing, DOE and NASA entered into a comprehensive Consent Order for Corrective Action (2007 Consent Order) with the DTSC that requires a site-wide investigation and protective risk-based cleanup of contaminated soil and groundwater. In 2010, DOE and NASA entered into separate Administrative Orders on Consent (AOC) with the DTSC that imposed additional requirements applicable to their cleanups. Under both of these Orders, the responsible parties are required to provide all information necessary to facilitate DTSC's evaluation of the proposed cleanups under CEQA.

In response to questions from the community regarding Boeing's position on the draft EIR, we prepared and circulated a preliminary analysis. Since our initial review, we have updated our analysis with the following information:

The EIR must recognize that Boeing's property has been permanently preserved by a conservation easement as undeveloped open space habitat.

- The future use of Boeing's property is controlled by a conservation easement, not zoning. The conservation easement recorded on April 24, 2017 forever prohibits any residential and agricultural development or uses of Boeing's property. This land may only be used for activities – such as hiking and bird watching, wildlife research and education – that are consistent with the conservation easement's purpose to preserve the property as natural, open space habitat.
- Boeing is committed to performing a cleanup that is fully protective of human health and the environment, consistent with the site's future as undeveloped open space habitat. In other words, it will be safe for people using the site, for neighboring communities, and for the wildlife that live there and pass through this vital habitat linkage.

The EIR must accurately describe Boeing's proposed project as a cleanup based on the future use of the land as undeveloped open space habitat.

- The EIR should evaluate a cleanup scenario that protects future potential users of the Boeing property – such as hikers, and scientists and educators performing environmental research – while minimizing the destruction of habitat and cultural resources, and limiting the amount of heavy traffic and dust affecting nearby communities.
- The EIR includes a proposed residential cleanup that assumes someone will live onsite and grow and eat 25% of their fruits and vegetables onsite. This assumption is invalid and incorrectly applied to Boeing's land, which will be preserved as open space habitat. A recreational cleanup should be evaluated to reflect the actual future use of the land.

A recreational cleanup by Boeing is consistent with the DTSC-approved Standardized Risk Assessment Methodology workplan ("workplan") and the 2007 Consent Order.

- The DTSC-approved workplan includes analysis of both residential and recreational scenarios and the EIR should evaluate the recreational scenario. Boeing submitted an updated workplan and the EIR should acknowledge this document which describes how risk assessments will be performed and which land use scenarios will be evaluated.

- Boeing is committed to performing a cleanup that is fully protective of human health and the environment, consistent with the site's future as undeveloped open space habitat. In other words, it will be safe for people using the site, for neighboring communities, and for the wildlife that live there and pass through this vital habitat linkage.

The EIR must evaluate a reasonable range of feasible cleanup alternatives, as required by CEQA.

- CEQA requires consideration of feasible alternatives to a proposed project that would avoid or lessen adverse impacts, regardless of agreements between parties, such as the Agreements on Consent (AOC). The AOC does not serve as the basis for this CEQA evaluation.
- CEQA requires that a recreational cleanup be evaluated. This evaluation would show that significant impacts to biological and cultural resources and transportation would be reduced or eliminated. It would also show that the recreational cleanup is fully protective of human health and the environment.
- Failure to include an evaluation of the recreational cleanup violates CEQA and denies the public an opportunity to evaluate a cleanup that will be protective of future recreators but results in far less impact to the community and the environment.
- The conservation easement applies to Boeing-owned land at Santa Susana, which includes Area IV and the Northern Undeveloped Area, and permanently restricts the future use of this land to open space habitat. The EIR must also evaluate the alternative of a recreational cleanup by the U. S. Department of Energy, who is responsible for cleaning up these portions of Santa Susana.

The EIR should reflect the extensive information about the site provided to the DTSC.

- Boeing has made significant progress and has generated extensive information about soil and groundwater conditions critical to the development of cleanup options. For example, Boeing has provided more than 38,000 soil and groundwater sample results and installed 260 groundwater monitoring and extraction wells.
- This information needs to be reflected and fully evaluated in the cleanup options described in the EIR.

The EIR does not provide an assessment of the human health risks from any of the cleanup scenarios to demonstrate that they are protective of human health and the environment.

- A fundamental purpose of the EIR is to demonstrate to the public that the proposed cleanup is protective of human health and the environment.
- A recreational cleanup is fully protective of human health and the environment, consistent with the site's future as undeveloped open space habitat. It will be safe for people using the site, for neighboring communities, and for the wildlife that live there and pass through this vital habitat linkage.

The EIR does not consider appropriate and feasible mitigation measures. This is required by CEQA.

- The EIR identifies significant impacts to the community from truck traffic and air quality, but fails to consider feasible alternatives that could avoid or lessen these unnecessary and unacceptable impacts on the community (air pollutant emissions, GHG emissions, traffic and noise).
- The EIR doesn't include sufficient information on how unacceptable impacts to the wildlife and habitat can be avoided. The public deserves to have this information in order to consider whether the recreational cleanup is a superior environmental option, and to provide meaningful input to decision-makers.