

**Environmental Impact Statement for Remediation of Area IV
and the Northern Buffer Zone of the Santa Susana
Field Laboratory**

Final Scoping Summary Report

August 6, 2014

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List of Acronyms and Abbreviations

2010 AOC	2010 Administrative Order on Consent
2007 Consent Order	2007 Consent Order for Corrective Action
ANOI	Amended Notice of Intent
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CPUC	California Public Utilities Commission
CWA	Clean Water Act
DOE	U.S. Department of Energy
DTSC	California Department of Toxic Substances Control
EIS	environmental impact statement
ETEC	Energy Technology Engineering Center
kV	kilovolt
LUT	Look-up Table
MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NASA	National Aeronautics and Space Administration
NBZ	Northern Buffer Zone
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOI	Notice of Intent
NPS	National Park Service
NRDC	Natural Resources Defense Council
SCE	Southern California Edison
SSFL	Santa Susana Field Laboratory
<i>SSFL Area IV EIS</i>	Environmental Impact Statement for Remediation of Area IV and the Northern Buffer Zone of the Santa Susana Field Laboratory
SSMPA	Santa Susana Mountain Park Association
TCP	Traditional Cultural Property
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
WUS	Waters of the United States

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Final Scoping Summary Report

1.0 INTRODUCTION

In the February 7, 2014 issue of the *Federal Register*, the U.S. Department of Energy (DOE) published the *Amended Notice of Intent (ANOI) to Prepare an Environmental Impact Statement for Remediation of Area IV and the Northern Buffer Zone of the Santa Susana Field Laboratory (SSFL Area IV EIS) and Conduct Public Scoping Meetings*.

By publishing this ANOI, DOE amended its May 2008 Notice of Intent (NOI) to prepare an environmental impact statement (EIS) under the National Environmental Policy Act (NEPA) for cleanup of Area IV, which includes the Energy Technology Engineering Center (ETEC) and Northern Buffer Zone (NBZ) of the Santa Susana Field Laboratory (SSFL) (DOE/EIS-0402), in eastern Ventura County, California. After an initial scoping period in summer 2008, DOE determined the need to further characterize SSFL Area IV for chemical and radiological contamination. These studies have been ongoing since then and are nearing completion. The revised EIS scope identified in the 2014 ANOI is further necessary due to the 2010 Administrative Order on Consent (2010 AOC), which was agreed upon by DOE and the California Department of Toxic Substances Control (DTSC) for soil cleanup. The EIS will also include groundwater remediation consistent with requirements in the 2007 Consent Order for Corrective Action (2007 Consent Order) issued by DTSC.

The 2010 AOC describes the process for establishing soil cleanup standards for Area IV, stipulating that contaminated soil will be cleaned up to local background concentrations or analytical detection limits by 2017. The 2010 AOC identifies all applicable provisions for groundwater cleanup from the 2007 Consent Order and incorporates them by reference.

DOE will complete soil and groundwater cleanup of SSFL Area IV and the NBZ in compliance with the 2010 AOC and the 2007 Consent Order for radiological and chemical contaminants, and in accordance with other applicable regulations, orders, and requirements. DOE needs to remove the remaining DOE structures in Area IV and clean up the affected environment in SSFL Area IV and the NBZ, in a manner that is protective of the environment and the health and safety of the public and workers.

The *SSFL Area IV EIS* will address potential environmental impacts of the proposed action, the No-action Alternative, and a range of reasonable alternatives. DOE is in the early stages of identifying the range of reasonable alternatives for analysis in the Draft EIS. These alternatives will be developed based on current requirements, including the 2010 AOC, results from site characterization, public input received during alternative development workshops held by DOE in 2012, and public scoping comments. The U.S. Army Corps of Engineers (USACE), National Aeronautics and Space Administration (NASA), and the Santa Ynez Band of Chumash Indians are cooperating agencies in the preparation of the *SSFL Area IV EIS*.

The SSFL amended scoping period was initially from February 7 through March 10, 2014, but, at the request of several stakeholder organizations and individuals, was later extended until April 2, 2014. This scoping report presents a summary of the scoping process for the *SSFL Area IV EIS*. The report is divided into three sections and four appendices as outlined below:

Section 1.0 – Introduction. This section includes background information on the project and a brief overview of the *SSFL Area IV EIS*.

Section 2.0 – Scoping Process. This section includes information on DOE’s approach to scoping, cooperating agencies, information on the ANOI, description of alternatives and community concepts, public notification, general summaries of the three scoping meetings held, and scoping participation.

Section 3.0 – Summary of Comments Received. This section describes the comment analysis process and topical and resource area comment summaries.

Appendix A is a compilation of scoping notification materials; Appendix B is a compilation of scoping meeting materials; Appendix C consists of scoping meeting comments, including written comments, scoping meeting transcripts, and comment summaries. Appendix D provides the SSFL Area IV mailing list.

This scoping report summarizes comments, potential issues, and concerns received during the public scoping period which will inform the development of the Draft EIS. The report does not present individual comments received, nor does it present responses to comments. The report also summarizes the issues DOE was informed of throughout the scoping period, during which 309 entities, including individuals, organizations, government agencies, an elected official, a Native American organization, and a Native American Tribe submitted 1,272 comments.

Chapter 1 of the *SSFL Area IV EIS* will include a summary of the comments received and will indicate how the scoping comments impacted the development of alternatives and the issues analyzed in the EIS. In addition to comments, DOE received many questions during the scoping period relative to past activities, transportation, and health and safety. Most of these questions will be responded to in the course of preparing the Draft EIS; others will be addressed in DOE newsletters, fact sheets, and during meetings with the community.

2.0 SCOPING PROCESS

Scoping is a fundamental part of the NEPA process and was conducted in accordance with NEPA; Executive Orders 11541 and 11991; Council on Environmental Quality (CEQ) Regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508); the Environmental Quality Improvement Act of 1970, as amended (42 United States Code 4371 et seq.); DOE’s NEPA implementing regulations (10 CFR Part 1021); and other applicable DOE orders, directives, and guidance.

A key objective of scoping is to actively provide public participation opportunities in order to ensure the EIS is responsive to community concerns. During the scoping period, DOE sought input from government agencies, Native American tribes, organizations, interest groups, and the public on the alternatives to be analyzed and methods to address the contamination at Area IV. This input also assists DOE in determining issues that should be evaluated when comparing alternatives.

In addition to the 55-day scoping period in 2014, DOE conducted public workshops in 2012, resulting in Community-Developed Cleanup Concepts, which will be incorporated to the extent possible as alternatives are developed. These concepts are further described in the ANOI, which is included in Appendix A.

2.1 Notification

2.1.1 Federal Register Notice of Intent

The scoping period began on February 7, 2014, when the ANOI was published in the *Federal Register*. The initial scoping period was scheduled to close March 10, 2014, but was later extended until April 2, 2014.

2.1.2 Interagency, Intergovernmental and Tribal Coordination

In February 2014, DOE distributed letters to potentially interested Federal, state, and local government agencies, and representatives of the federally-recognized Santa Ynez Band of Chumash Indians. Members of other Native American tribes were also actively solicited to participate in the *SSFL Area IV EIS* process. The USACE, NASA, and the Santa Ynez Band of Chumash Indians agreed to participate as cooperating agencies.

2.1.3 Public Notification

Newspaper Advertisements: Approximately two weeks prior to scoping meetings, newspaper advertisements were distributed to the local newspapers listed in Table 1.

Table 1. Newspaper Advertisements

<i>Newspaper</i>	<i>Publication Date</i>
Los Angeles Daily News	February 16, 2014 February 22, 2014
Acorn Newspapers	February 13, 2014 February 14, 2014
Ventura County Star	February 16, 2014 February 20, 2014

Websites: The ANOI, notification letters, and all other materials developed for the scoping meetings were posted to the project website: www.etec.energy.gov/Char_Cleanup/EIS.html to notify the public of the initiation of the EIS and scoping meetings. The website also provided information on how to submit comments. Other agency and organization websites, including the DTSC (http://www.dtsc.ca.gov/SiteCleanup/Santa_Susana_Field_Lab/ssfl_calendar.cfm) and Santa Susana Mountain Park Association (SSMPA) (<http://ssmpa.com/nasa-at-ssfl.php>) provided notifications and updates about the *SSFL Area IV EIS* and scoping meetings.

Mailings: On February 7, 2014, 4,200 scoping notification letters were sent to individuals, agencies, and organizations on the SSFL Area IV mailing list. On February 7 and February 24, 2014 individuals, agencies, and organizations received emails reminding stakeholders to provide input during the scoping period. The SSFL Area IV mailing list and copies of correspondence can be found in Appendix D and Appendix A, respectively.

2.2 Scoping Meetings

DOE held three scoping meetings. Two of the meetings were for the general public; the third scoping meeting was held for Native American tribal members. All scoping meetings shared a common purpose: to gather community input to ensure a full range or “scope” of reasonable

alternatives and methods are considered to address the contamination at Area IV and to assist DOE in determining the issues that should be evaluated when comparing alternatives.

The meetings all had a common format. The first half hour of each meeting consisted of an open house, allowing members of the public to interact with DOE representatives and view materials on the scope of and issues involved with the EIS. Following the open house, DOE’s presiding officer called the formal comment portion of the meeting to order and described the remainder of the scoping meeting format. After the presiding officer’s initial remarks, DOE provided an update on site activities, shared alternative concepts identified by community members that potentially meet the cleanup requirements of the site, and discussed preliminary environmental issues that DOE plans to use to evaluate and compare the alternatives. Following the DOE presentation, members of the public and tribal members were invited to suggest additional alternatives and issues that should be included in the EIS. Oral comments during this formal public comment time were scheduled on a first-come, first-served basis and were initially limited to three minutes. A court reporter was present to transcribe comments. After the presiding officer ensured that everyone who wished to speak had a chance to do so, an opportunity for additional oral comments was provided as allotted meeting time allowed. Participants who did not provide oral comments before the group were given the opportunity to provide written comments or meet privately with the court reporter before or after the meetings. All comments provided during the scoping meetings and throughout the scoping period, regardless of how they were submitted, became part of the EIS Administrative Record.

The dates and locations for the scoping meetings are included in Table 2 below.

Table 2. Dates and Locations of Scoping Meetings

<i>Meeting Date, Time, Description</i>	<i>Location</i>	<i>Number of Attendees</i>	<i>Number of Comments Received</i>	
Thursday, February 27, 2014 6:30 – 9:30 p.m. <ul style="list-style-type: none"> • 6:30 p.m. – Informal open house, discussions with project representatives • 7 p.m. – Project presentations • 7:25 – 9:25 p.m. – Formal public comment period 	Simi Valley, California Simi Valley City Council Chambers Simi Valley City Hall 2929 Tapo Canyon Road	56	<u>Oral</u> 25	<u>Written</u> 3
Saturday, March 1, 2014 9:30 a.m. – 12:30 p.m. <ul style="list-style-type: none"> • 9:30 a.m. – Informal open house, discussions with project representatives • 10 a.m. – Project presentations • 10:25 a.m. – 12:25 p.m. – Formal public comment period 	Agoura Hills/Calabasas, California Community Center 27040 Malibu Hills Road	42	<u>Oral</u> 26	<u>Written</u> 3
Monday, March 3, 2014 2:00 to 4:00 p.m. <ul style="list-style-type: none"> • Informal open house, discussions with project representatives • Project presentations • 3:40 – 3:55 p.m. – Formal comment period 	Simi Valley, California U.S. Department of Energy 4100 Guardian Street, Suite 160	13	<u>Oral</u> 1	<u>Written</u> 0

Scoping meeting materials can be found in Appendix B.

2.3 Scoping Participation

SSFL Area IV EIS commenters had one of five ways to submit comments: surface mail, fax, email, or orally or in writing at the scoping meetings. Over the 55-day comment period, a total of 1,272 comments were submitted from 309 entities, including individuals, organizations, government agencies, an elected official, a Native American organization, and a Native American Tribe through the various mechanisms as shown in Table 3.

Table 3. Scoping Participation by Source

<i>Source</i>	<i>Number of Commenters</i>	<i>Percent of Total</i>
Surface mail (including fax)	29	9.4
Email	222 (185 form)	71.9
Oral (received at scoping meetings)	52	16.8
Written (received at scoping meetings)	6	1.9
Total	309	100.0

3.0 SUMMARY OF COMMENTS RECEIVED

Comments received during the public scoping period were evaluated and entered into a database to be categorized and analyzed. The scoping comment database will be used to track comments received and issues identified during scoping for use by EIS authors in writing their sections.

For analysis purposes, comment submissions containing multiple comments were tallied and coded by topic per comment. For example, within a single document (i.e., email, letter, oral comment), a commenter might have included comments on alternatives, air quality, or transportation, thus providing multiple comments that contained specific suggestions to be used during the environmental analysis or were general comments on policy. Out of the 309 submittals, 1,272 comments were extracted and coded across 21 broad categories.

Table 4 below summarizes and categorizes the content of comments received. In most instances, the wording of the summaries is intended to capture the substance of the comments rather than reproduce the exact content of individual comments. The order in which the issues are presented is not intended to reflect their relative importance. This summary does not evaluate the comments. Because of the wide range of interests and opinions about remediating SSFL Area IV, many of the comments in each category illustrate the varied, and perhaps contradictory, issues, concerns, and desired future conditions expressed by individuals, organizations, government agencies, elected officials, and Native American tribal groups.

Table 4. Summary of Key Scoping Comments on the SSFL Area IV EIS

<i>General Topic</i>	<i>Issue</i>
Alternatives/ Alternative Development	<p>As stated in Section 1.0, Introduction, in 2010 DOE signed the AOC with DTSC for soil cleanup. The 2010 AOC stipulates that soils exceeding the contamination cleanup standard will be remediated to local background concentrations or analytical detection limits. The soil cleanup standards are listed in a “Look-up Table” (LUT) as not-to-exceed concentrations in the soil. Soil used for backfill after cleanup must also conform to local background concentrations or analytical detection limits. Cleanup requirements for groundwater continue to be governed by the 2007 Consent Order issued by DTSC.</p> <p>Most comments received from community members related to alternatives and alternative development and largely indicated two opposing approaches to cleanup. A substantial number of commenters expressed support for strict compliance with the AOC, including adherence to the 2017 deadline and a clean up to background levels. They suggested DOE analyze only two</p>

<i>General Topic</i>	<i>Issue</i>
	<p>alternatives: 1) complete cleanup to background in accordance with the 2010 AOC, and 2) the No-action alternative (analysis of a No-action alternative is a NEPA requirement). These commenters noted the necessity for DOE to follow the “law,” referring to the need to follow the 2010 AOC and clean up to background levels as indicated by the legally-binding agreement. Several commenters further stated that the numerous alternatives and “concepts” included in the ANOI would violate the AOC, and result in most of the contamination that was promised to be cleaned up remaining behind (e.g., in situ) on SSFL. A number of commenters, including the Natural Resources Defense Council (NRDC) said that DOE appears to be “backtracking” from its earlier commitment to not analyze additional EIS alternatives that are a violation of the cleanup agreement requirements, with the exception of the standard No-action alternative. The EIS must not include alternatives that would violate the AOC, according to form letters and comments received from stakeholders.</p> <p>The other approach to cleanup, proposed by a sizeable number of community members, is for DOE to develop and analyze a full range of alternatives for SSFL Area IV cleanup. Excluding other possible cleanup alternatives except the AOC-mandated approach would be in violation of NEPA, they said. Many supporting an analysis of a full range of alternatives indicated the belief that the AOC is illegal, violates NEPA, is pre-decisional, and would eventually be challenged in court and thrown out.</p> <p>The U.S Environmental Protection Agency (USEPA), SSMPA, California Native Plant Society, and other individuals commented that NEPA and California Environmental Quality Act (CEQA) both set standards for environmental considerations that must be addressed in environmental documents. They added that contracts inconsistent with those laws do not trump NEPA and CEQA provisions and further, that NEPA and CEQA analyses must consider all options, not a “single path” set by the AOC. The SSMPA’s comments continued, saying exclusion of any possible cleanup alternatives, except the AOC-mandated cleanup approach, would be a detriment to the usefulness of the EIS, and likely invalidate it under NEPA. The EIS must not exclude from consideration reasonable alternatives supported by authorized standards of the state of California, including: No Project; Cleanup under AOC, Cleanup to Open Space standards, and Cleanup to Suburban Residential standards, the SSMPA said.</p> <p>USEPA and other commenters stated that NEPA requires evaluation of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency (40 CFR Section 1502.14[c]). A robust range of alternatives will include options for avoiding significant environmental impacts, these commenters said.</p> <p>There were also a number of requests from commenters for an evaluation of a risk-based cleanup process and requests for a thorough evaluation of the No-action Alternative.</p> <p>USEPA requested the Draft EIS clearly describe the rationale used to determine whether impacts of an alternative are significant or not. Both USEPA and DTSC requested the Draft EIS provide a clear discussion of the reasons for eliminating alternatives that are not evaluated in detail.</p> <p>Many commenters, including neighborhood associations and organizations, said the proposed deadline for cleanup of 2017 is not feasible and that an extension of the cleanup deadline under the AOC appears necessary, unless a risk-based cleanup is utilized and accomplished by 2017. Other stakeholders requested that for each alternative in the EIS, a comparison of costs, time durations, and all related effects on transportation, biological resources, cultural resources, soil, water, and air quality be presented.</p> <p>Because the AOC requires backfill replacement soil to be at local background concentrations or analytical detection limits, a number of commenters expressed concerns about the EIS’s ability to fully address how appropriate backfill soil will be sourced. They further suggested that DTSC provide guidance on how to identify soils that must match the specific background levels for SSFL. Commenters also indicated that source sites from which sufficient quantities of such soils can be obtained must be identified. Otherwise, a decision could be made to ‘permanently reduce’ the thousands of cubic yards of replacement soil that would be needed to mitigate excavation since backfill meeting AOC requirements may be difficult to obtain. Several commenters emphasized the importance of the issue, because if adequate replacement soils cannot be located, alternative solutions, including on-site treatments, should be allowed, and the overall approach to the cleanup may need to change.</p> <p>Some commenters stated that DOE soil calculations prepared by a Boeing contractor were</p>

<i>General Topic</i>	<i>Issue</i>
	<p>incorrect, and were intentionally inflated to scare people. A number of people did not believe the volume of soil to be remediated is correct (1.7 million cubic yards), but others expressed that if the volume of contaminated soil is correct, it should be cleaned up. The NRDC suggested an examination of ways to reduce the volumes of soil requiring removal. The organization recommended better delineation of the extent of the contamination and careful work to assure that contaminated soil is removed instead of large amounts of soil not above background.</p> <p>Some commenters suggested that DOE’s Draft EIS must commit to complete protection for all communities along transport routes from the contaminated material that the AOC requires to be removed. Commenters mentioned that effective measures need to be developed and implemented for dust reduction from transport trucks as well as measures to ensure the containment of all materials, including dust from bumps as the material is trucked. Several commenters noted that using multiple routes would reduce the impacts to people near any one route and asked DOE to consider the option of improving existing fire roads leading off SSFL or building new roads to accommodate cleanup activities. Still others asked DOE to consider an alternative for transporting contaminated soil that utilizes a railroad tunnel and rail cars, instead of moving trucks full of contaminated soils through residential areas.</p> <p>Several commenters had concerns about cost and suggested that the Draft EIS address how the effort will be funded and if funding would last for the entire lifespan of the project.</p> <p>Finally, as the EIS process proceeds, USEPA recommends DOE consult resources such as: <i>Principles for Greener Cleanups</i>, <i>Best Management Practices for Greener Cleanups</i>, <i>Methodology for Quantifying the Environmental Footprint of a Cleanup</i>, <i>ASTM Standard Guide for Greener Cleanups</i> and DTSC’s Advisory for Green Remediation.</p>
<p>Comments on the AOC</p>	<p>DOE received several comments on the content of the AOC. Several individuals and organizations stated that the AOC gives DTSC oversight authority for the cleanup. Therefore, DTSC must provide DOE with a binding, authoritative interpretation of requirements in the AOC that are vague and/or ambiguous.</p> <p>The SSMPA specifically noted the “ambiguous” requirement under the AOC that at least 95 percent of any soil containing any amount of contamination over background level must be removed. This requirement has pervasive impacts on other aspects of EIS development, the organization noted.</p> <p>Other comments discussed the need to coordinate cleanup schedules as the DTSC Environmental Impact Report is prepared. The commenters indicated that this report could be used in decision making and in determining the feasibility of the AOC-mandated completion date of 2017 for the DOE-managed cleanup. Commenters suggested this coordination is necessary because of a disparity between a DOE-published report in 2013 that projected up to 12 years for the removal of contaminated soil.</p> <p>Commenters suggested the AOC cleanup deadline needs to be extended, while another organization, the San Fernando Valley Audubon Society, along with several individuals, stated the AOC standard is unsustainable and that it should be repealed or, at the very least, re-negotiated. The commenters said the AOC subverts public concerns over health by imposing an arbitrary standard of cleanup to background without considering the health risks either from the contamination itself or from the efforts to clean it up, which contradicts the purpose of NEPA.</p>

General Topic	Issue
Air Quality	<p>The USEPA offered several comments on air quality standards and requirements that should be considered in the Draft EIS analysis. The agency said the Draft EIS should provide a detailed discussion of ambient air conditions (baseline or existing), National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts). This should include a description and estimates of air emissions from potential construction, cleanup, and maintenance activities, as well as proposed mitigation measures to minimize those emissions. USEPA also indicated that the Draft EIS should specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. This source-specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention. The Draft EIS should include a draft Construction Emissions Mitigation Plan to reduce impacts associated with emissions of particulate matter and other toxics from construction-related activities, including fugitive dust source controls, mobile and stationary source controls, and administrative controls.</p> <p>The USEPA further stated that the Draft EIS should address the applicability of Clean Air Act Section 176 and USEPA's general conformity regulations at 40 CFR Parts 51 and 93 for those pollutants that do not exceed the NAAQS. DOE should work with the appropriate air quality management districts in developing the Draft General Conformity Determination for the project in order to include all indirect and direct emissions associated with the project, and to identify additional mitigation measures that would be necessary to ensure conformity. The Draft EIS should also commit to using on-road heavy duty diesel trucks that meet or exceed USEPA's emissions standard for 2010 and raise awareness of California's anti-idling rule among drivers.</p> <p>Another commenter suggested using natural-gas-powered or electric-powered trucks (or other "green technologies") to reduce diesel emissions and global warming gases.</p> <p>Several neighborhood groups commented on the need to control dust and mitigate the potential for respiratory illnesses and valley fever as cleanup occurs. Commenters suggested the suspension of work on windy days to prevent possible spread of dust-borne contaminants. Another commenter suggested that the Draft EIS should address the possibility of air quality samples being taken on site and in the surrounding communities during cleanup in order to ensure public safety.</p>
Biological Resources	<p>DOE received many comments from USEPA, the National Park Service, Santa Susana Mountain Park Association, the San Fernando Valley Audubon Society, and other organizations concerning the protection of threatened, endangered, and sensitive species.</p> <p>The USEPA suggested the Draft EIS discuss how DOE will comply with the Endangered Species Act. The agency also recommended coordination and consultation as necessary with the U.S. Fish and Wildlife Service, and California Department of Fish and Game to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in protection and mitigation efforts. The agency suggested the Draft EIS include baseline conditions of habitats and populations of the covered species and avoidance, mitigation and conservation measures. Finally, the USEPA recommended DOE monitor and report on these efforts to ensure species and habitat conservation effectiveness.</p> <p>Commenters, including the SSMPA and Santa Ynez Band of Chumash Indians, asked for the Draft EIS to include what management steps DOE will take and over what period of time to regenerate, restore and monitor sensitive species and their habitats. The California Native Plant Society said in-situ mitigations would be optimal for Braunton's milkvetch (<i>Astragalus brauntonii</i>) and the Santa Susana tarplant (<i>Hemizonia minthornii</i>). Commenters from the SSMPA and Chatsworth Neighborhood Council asked DOE to outline the steps it will take to eliminate introduction of non-native/invasive species as off-site soil is brought in as part of the soil replacement. Concerns were also raised about the segmented cleanup and backfills. Specific concern was raised about how cleanup and backfill would affect the overall health of the habitat, since SSFL contributes to habitat connectivity by way of contiguous open space and park land, as well as the diversity and overall quality of on-site native habitat, including wildlife corridors. Commenters also said that feasible mitigation measures should be based on a complete description for each cleanup methodology proposed in the Draft EIS.</p>

<i>General Topic</i>	<i>Issue</i>
Climate Change	USEPA requested that the Draft EIS consider how climate change could potentially influence the proposed project, specifically within sensitive areas, and assess how the projected impacts could be exacerbated by climate change.
Cumulative Impacts	<p>Many comments on Cumulative Impact analyses were received. Several of those commenting, including USEPA, the Santa Ynez Band of Chumash Indians, the SSMPA and individuals asked for a detailed, specific review of the combined impacts of all concurrently operating SSFL projects, including projects led by NASA, Boeing, and DOE, regarding traffic and transportation-related pollution, especially in light of the limited number of transportation routes currently available. USEPA, the Santa Ynez Band of Chumash Indians and individuals continued on to say that the Draft EIS should quantify cumulative impacts across resources areas, as well as describe and evaluate feasible mitigation measures to avoid and minimize the identified adverse cumulative impacts.</p> <p>The SSMPA requested that the Draft EIS disclose the number of trucks on all projects traveling on Woolsey Canyon during daylight hours as well as twilight and night truck traffic volumes by each hour of the day, seven days per week, to present a realistic understanding of the traffic impact. The organization suggested including worker arrivals and departures from the site as part of the cumulative impacts.</p> <p>The San Fernando Audubon Society noted a number of other major projects occurring in the neighborhoods of West Hills, Chatsworth, Canoga Park, and Woodland Hills. Examples of coincident major projects given included the Village project by Westfield fronting on Topanga Canyon Boulevard and straddling Victory Boulevard, a 20,000 unit housing development on the old Rocketdyne site at Canoga Avenue and Victory Boulevard, a housing development along Woolsey Canyon Road, a housing development in proximity to the Ronald Reagan Freeway (California State Route 118) near Porter Ranch, and a housing project that may be rejuvenated in Dayton Canyon.</p>
Cultural Resources	<p>Several individual commenters and one organization requested DOE require DTSC to interpret and clarify the language appearing in the AOC on handling Native American cultural resources. The commenters said the AOC language is vague in its definition of Archaeology, which they said, defines it as “Artifacts.” Commenters asked for clarification of the statement, “...artifacts that are formally recognized as cultural resources.” The commenters continued, saying interpretive guidance is critically needed, because where archaeological surveys on DOE property have been done (Area IV and NBZ), perhaps 20 archeological sites have been located that have not been formally recorded. The future of Native American areas has not been articulated by DTSC. The commenters requested that DTSC provide an explanation of how sites found on the DOE property will be treated that and this explanation be included in the Draft EIS.</p> <p>Commenters also stated that in addition to the issues described above, the Agreements in Principle addressing this area for the AOC indicate that no more than five percent of the total soil cleanup volume can be excluded and any acceptance of an exception is subject to DTSC’s oversight and approval. A request was made by commenters for an explanation of what that means on a specific basis, naming sites under consideration and the boundaries of each site (or artifact), particularly since there is significant sampling data now available with which to make appropriate decisions.</p> <p>Commenters requested that the Draft EIS provide details on determining the boundaries of the archaeological sites on the property. Types of details requested included defining survey methods, techniques, when surveys occurred, and what was found on the site. A comprehensive survey was also requested, using soil sampling techniques to determine the true size of the Burro Flats Archaeological District, which extends outside the borders of Area II, and could possibly extend into Area IV. Commenters said this site should not be segmented between the three responsible parties, (NASA, Boeing and DOE), but should be looked at holistically as part of the entirety of the Cultural Resources of SSFL.</p> <p>The SSMPA requested information on groundwater and surface water impacts to cultural resources due to soil mitigation activities. They asked that the Draft EIS analysis review and disclose the impacts anticipated to cultural resources from removal of soil from parcels within a designated archaeological site. The SSMPA further requested the impacts anticipated to cultural resources due to removal of soil from parcels outside of the designated archaeological site, but within the cleanup study areas, be reviewed and disclosed as well. The San Fernando Valley Audubon Society requested professional archeologists and Native American monitors to assure that such sites are not</p>

<i>General Topic</i>	<i>Issue</i>
	<p>adversely impacted by cleanup operations and suggested retaining a trained paleontologist during cleanup operations for salvaging paleontological resources, if any such resources are found.</p> <p>The Santa Ynez Band of Chumash Indians (The Tribe) said DOE is an original signatory to the Interagency Coordination and Collaboration for the Protection of Indian Sacred Sites (2012) and the Action Plan to Implement the Memorandum of Understanding (MOU) Regarding Interagency Coordination and Collaboration for the Protection of Indian Sacred Sites (2013). The Tribe believes the MOU and Action Plan should be applied to the SSFL site because DOE and Department of Interior (and the National Park Service as part of Interior) signed the MOU. The Tribe requested DTSC be added as a Non-federal Partner under Section IV.</p> <p>The Tribe said the Draft EIS should address Cultural Resources as directed by 40 CFR 1508.14, 1508.8, 1508.27; Executive Order 13007, distinguish it from Section 106 of the National Historic Preservation Act (NHPA), and discuss how DOE will avoid adversely affecting the physical integrity, accessibility, or use of sacred sites, and develop a Cultural Resources Management Plan. The Tribe stated the UN Declaration on the Rights of Indigenous Peoples must now be followed (as of December 2010).</p> <p>The Tribe also stated that Area IV should be considered as a Traditional Cultural Property (TCP), eligible for protection on the National Register and applicable to provisions from National Register Bulletin No. 38 – Guidelines for Evaluating and Documenting Traditional Cultural Properties under NHPA. Applicable provisions include: 1) locations for traditional ceremonies are defined as TCPs; 2) mountain tops and rock outcroppings like those at SSFL are TCPs; 3) engaging specialists as part of its TCP study; 4) specific events like the Solstice ceremony at SSFL qualify as TCPs; 5) Native American ceremonies qualify as TCPs; and 6) lack of use does not make a property TCP ineligible.</p> <p>The Tribe requested the following environmental and cultural factors be considered when assessing the overall cultural sensitivity of the SSFL: 1) areas with high viewshed or visibility such as ridgelines, peaks, ledges, outcrops, benches, or prominent hills; 2) areas with a relatively high density of sites in the vicinity; 3) areas where past ethnographic studies have revealed associated place names; 4) other areas near known sites; 5) areas near known rock art sites or rocky outcroppings of the type where rock shelters and art have traditionally been located; 6) areas in or near known gathering areas; and, 7) named, ethno historically documented village sites be of the highest priority and warrant the greatest amount of protection possible.</p> <p>The Tribe requested consultation with the State Historic Preservation Office and the federally-recognized tribes if new archaeological sites are discovered. They requested this consultation be completed before cleanup begins and if any site is affected by soil cleanup activities. They further requested additional research within the boundaries of Burro Flats (CA-VEN-1072) and that the site be protected from trespassers and vandals. The Tribe requested subsurface archaeological reviews for all areas scheduled for any excavation. They further stated that significant, negative, and unmitigated impacts to sacred sites and cultural resources would result from soil cleanup to background.</p>
<p>Environmental Justice</p>	<p>Several commenters said the Draft EIS should review Environmental Justice issues and look at impacts to lower income and minority populations that could be affected by soil hauling activities. Furthermore, the Draft EIS should address such demographics in the areas that are proposed to receive, and then permanently live with possible effects from, contaminated material, such as Buttonwillow, Kettleman, and Beatty. Commenters also mentioned that the Draft EIS should address potential opportunities to foster public participation by these populations.</p> <p>USEPA, the Chatsworth Neighborhood Council, and individuals suggested that the Draft EIS analyze the potential impact of truck traffic on school children, including childcare centers, preschools, and parks, and recreation centers. It was also suggested that the Draft EIS discuss measures that would mitigate unavoidable impacts on children’s safety and provide target outreach material to schools, childcare centers, and residents, including senior citizens, about the construction schedule and truck routes.</p> <p>The San Fernando Valley Audubon Society suggested transportation of soils and all other materials to or from the site should take place only between, before, or after - not during - rush hours or school openings and closings. The Woodland Hills Warner Center Neighborhood Council requested an analysis of, impacts the proposed haul routes will have on school traffic. The</p>

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	organization also requested proposed mitigation measures be identified.
General	A commenter requested the use of larger scale maps in the Draft EIS in order to include the names of the communities/cities around SSFL.
Geology and Soils	<p>According to comments from the San Fernando Valley Audubon Society, deliberate removal of rock outcrops or blasting geological features should be avoided in order to preserve the aesthetic qualities and unique flora and fauna in the area.</p> <p>Commenters, including the Chatsworth Neighborhood Council also mentioned that the Draft EIS should consider the adverse impacts on soils under various cleanup scenarios. Woodland Hills Warner Center Neighborhood Council expressed concerns that if an average of five feet of top soil is removed from all of Area IV and the NBZ, there will be no top soil remaining that contains the microbes necessary to degrade contaminants naturally. The unstable soil left behind after clean up would be subject to wind and water erosion and would be transported down to the communities below. This represents a potential health hazard, and should be addressed, several commenters stated. Another commenter mentioned that impacts may be reduced somewhat by utilizing advanced technologies such as bioremediation, phytoremediation, and soil vapor extraction.</p>
Groundwater	<p>The USEPA stated the ANOI does not clearly define the scope of the EIS. The agency said it is not clear whether the EIS will include the full nature and extent of contamination associated with historic activities within Area IV. USEPA stated concern that some issues remain undefined, including the extent of contaminated groundwater. The agency said the EIS should disclose whether or not there is any evidence that releases of hazardous substances have migrated beyond SSFL Area IV; describe the full nature and extent of any such contamination; and incorporate cleanup alternatives that address any off-site impacts. Cleanup actions to address contaminated groundwater, as well as the potential for contaminated groundwater to migrate off site, should be described.</p> <p>The agency recommended the Draft EIS describe groundwater cleanup in the same level of detail as it does demolition and soil removal. If a current cleanup system is being used, the Draft EIS should show the location of any current extraction wells, the lateral or vertical volume the wells are intended to capture, the volume of water removed from the aquifer, as well as the treatment method for extracted groundwater or identify its discharge location. The Draft EIS should also provide detailed mapping for contaminants, including their degradation products, and discuss the thickness of groundwater contaminant plumes. The agency and several individuals suggested the Draft EIS include: 1) a thorough discussion of the No-action Alternative that discusses any current groundwater extraction and treatment systems, their energy use and a discussion of their effectiveness, as applicable; 2) a thorough discussion of the site's geology; 3) an explanation of three-dimensional groundwater flow and contaminant migration at the site; 4) a thorough description of source areas (e.g., test stands, evaporation ponds, landfills, leach fields, etc.) and vadose zone contamination; 5) a description of the interaction of groundwater and surface water, including the location of surface seeps and any subsurface movement or flow that would affect the remediated site's hydrology; 6) an estimate of air emissions (priority pollutants and greenhouse gases) associated with each treatment technology; 7) a map of conceptual well networks necessary to implement potential groundwater cleanup technologies; 8) the groundwater cleanup levels, based on a standardized risk assessment methodology; 9) the goals or criteria that will be used in evaluating the vadose zone and groundwater cleanup technologies; 10) a brief summary comparison of the advantages and disadvantages of each technology; and, 11) identification of DOE's preferred groundwater cleanup technology.</p> <p>According to one commenter, groundwater contamination could be made worse by vegetation clearing and road building designed to set the stage for the removal of contaminated soils that contribute to ground water pollution. Thus, the more excavation of "contaminated" soils is planned, the greater the adverse impact on groundwater.</p> <p>Several individual commenters inquired whether groundwater and soil samples will be taken in surrounding communities during the cleanup.</p> <p>The Woodland Hills Warner Center Neighborhood Council suggested the Draft EIS explain why there is a tritium plume in Area IV, and if it is stable. The organization stated the plume should be allowed to decay through natural attenuation.</p>

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Human Health	<p>Many commenters, including the Susana Knolls Homeowners Association, the Aerospace Contamination Museum of Education and individuals, expressed general concerns about the health of residents in communities surrounding SSFL. Many stated in form letters that SSFL contaminants include radionuclides such as cesium-137, strontium-90, plutonium, tritium, and chemicals known to have adverse health impacts. These letters also stated that Federally-funded studies have found evidence that on-site exposures to these contaminants have resulted in significantly elevated cancer death rates among exposed workers and there have been indications of increased cancer rates in nearby populations associated with their proximity to the site. The commenters suggested that summaries of these studies should be included in the Draft EIS.</p> <p>According to comments received from Physicians for Social Responsibility and individuals, the Draft EIS must include a thorough discussion of the radioactive and hazardous substances at SSFL, the types of toxicity associated with each substance, and what communities have been affected by site activities. Commenters also said the Draft EIS must not ignore or minimize the contamination its environmental practices created at the site and focus on the environmental harm it created by its pollution, which the cleanup is designed to remedy.</p> <p>A commenter suggested DOE consider creating maps and overlays showing major chemical groups and what areas would be considered contaminated if: 1) The LUT or detect/background criteria were applied; 2) Rural Residential criteria were applied; 3) urban residential criteria were applied; and, 4) open space criteria were applied. Others suggested that risk from radionuclides should be treated the same as risk from any other type of chemical, as opposed to the cleanup to background standard for radiological contaminants and cleanup according to risk-based standards for chemicals. It was further stated that the natural decaying process of cesium-137 and strontium-90 will reduce their risk significantly over a relatively short period of time. Many of the exceedances over background levels will disappear with a few years, the San Fernando Valley Audubon Society said.</p> <p>Several commenters suggested the Draft EIS include maps that show radionuclides present and radionuclides that are above local background levels. The commenters requested the map be color coded and clearly delineate which areas are just slightly above background levels, and which areas are clearly well above local background levels. They further requested comparison of risks posed by those radionuclides as compared to the local background radionuclides that would be disturbed, and most probably disbursed, with any remediation actions. Commenters also requested the Draft EIS include maps of Area IV and the NBZ that show all of the chemical contamination based upon the risk based scenarios – to the AOC, suburban residential, industrial/commercial, and parkland standards. Still other commenters suggested the Draft EIS include chemical and radiological contaminants ranked by their toxicity.</p> <p>Many commenters said the Draft EIS must consider the likelihood of accidents under various cleanup scenarios, including accidents involving on-site workers (including those potentially resulting in injury or death), accidents during transport of materials (some involving only transportation personnel, while others involve multiple vehicle collisions, overturned rigs resulting in releases of contents, struck pedestrians, etc.), accidents at landfills, equipment pick-up points, commuting trips, and many others. In addition, commenters mentioned that emergency response measures should be addressed and that the public along any transport routes must be notified and continually updated concerning the transport of potentially hazardous materials through their area.</p> <p>The West Hills Neighborhood Council and many individuals expressed general concern with dust from SSFL cleanup resulting in an increased number of cases of valley fever.</p> <p>One organization and several individuals stated the Draft EIS must evaluate the likelihood of destructive acts occurring under various alternative cleanup scenarios. The Draft EIS must evaluate the costs of security or law enforcement presence under various alternative cleanup scenarios, they said.</p>
Infrastructure	<p>Southern California Edison (SCE) commented that it maintains electrical transmission and distribution facilities, as well as substations and supporting appurtenances, with Los Angeles County. SCE has existing 66 kilovolt (kV) transmission lines in the vicinity of Area IV. If the proposed project results in the need to relocate or build new SCE electrical facilities that operate at or above 50 kV, SCE may be subject to California Public Utilities Commission’s (CPUC) General Order 131-D. If construction of SCE’s facilities results in significant environmental impacts, those impacts should be analyzed in the Draft EIS. SCE will consult with the CPUC to determine</p>

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	<p>whether they would allow for the project to proceed exempt or if SCE would instead be required to file a Permit to Construct application at the CPUC to which SCE would attach the final NEPA document in lieu of its own Proponents Environmental Assessment.</p> <p>A commenter noted that the need for electrical lines, sewer lines, and water supply lines that will be necessary even after the soil is remediated to run the groundwater and surface water treatment systems, among other things, should be considered.</p>
<p>Land Use and Visual Resources</p>	<p>The National Park Service (NPS) proposed that the Draft EIS thoroughly describe the greater parkland and open space setting within which the SSFL is situated and consider this setting as a guiding principle when framing and analyzing natural, cultural, scenic, and future land use impacts. They further suggested that the Draft EIS include land use as an impact topic and reference other land use studies or plans that may be affected by proposed alternative actions. As an example, they mentioned that the NPS's Rim of the Valley Corridor Special Resource Study be reviewed during the environmental analysis. The NPS also expressed concerns about the possible disposition of DOE property, which should be considered along with NASA property and conveyance of Boeing-owned portions of SSFL in the context of future recipients and land use possibilities.</p> <p>One organization suggested the Draft EIS consider the impact to the potential level of involvement of land management agencies under various cleanup scenarios. Expected land use following the cleanup is public open space; however, severe alteration of topography, soil quality, vegetation distribution, wildlife habitat, and other features will limit the willingness of wildlife or park management agencies to invest in restoring or maintaining the area. The costs of restoration and maintenance may be unacceptable if the cleanup to the AOC's background standard is followed, the organization stated.</p> <p>The California Native Plant Society recommended that the entire SSFL be preserved as part of the Santa Monica Mountains National Recreation Area, not only for its excellent populations of rare and endangered native plants, but for its outstanding range of plant habitat and niche-filled sandstone formations. The area is an essential part of the wildlife corridor between the Santa Monica Mountains and the mountains to the north; providing food, resting and nesting for a large number of species of fauna.</p> <p>Several commenters noted visual resources of the area would be severely impacted by cleanup activities and that the visual appeal of the area — with its vegetative cover, colorful butterflies, bird life, and mammals, such as deer and coyotes — will be lost. According to comments received, the Draft EIS must consider the adverse impact on visual resources of various cleanup scenarios. These adverse impacts can be reduced somewhat by applying the measures described for other categories of impacts.</p>
<p>Native American</p>	<p>The Woodland Hills Warner Center group and individuals requested that the Native American cultural areas in Area IV and the NBZ be preserved intact. The Burro Flats area has been declared sacred lands by the Santa Ynez Band of Chumash. The commenters said disturbing the soil in this area will permanently destroy the integrity of the site. They further said it is also possible that during soil remediation of nearby areas, new sacred sites could potentially be discovered but harmed or destroyed.</p> <p>The USEPA suggested that the Draft EIS should describe the process and outcome of government-to-government consultation between DOE and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in selecting the proposed alternative.</p> <p>Native American Tribal Consultation Group members stated they would like maps of the cultural resource sites and also additional maps where they overlap with chemical or radiological contamination sites. They further requested that Native American monitors be provided additional protective gear and training, including hazardous materials training, if they are to be present in areas where there is radiological and chemical contamination. The costs for this gear and training should be provided by DOE. Native American monitors should be required where there is any excavation of dirt, including the removal of structures. The Native American Tribal Consultation Group members also said additional archaeological studies are needed in untested areas where there are known sites. Soil samples should be dug by hand; hand augers may be permitted. The agreement not to excavate any dirt, per the State Historic Preservation Office, needs to be revisited. The Native American Tribal Consultation Group suggested DOE work with DTSC and the collective</p>

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	<p>tribes to broadly define the Native American Artifacts Exception located in the exhibit Agreement in Principle to the 2010 AOC. If there is an archaeological site in an area that is contaminated, DOE should first try for a Native American Artifacts Exception with DTSC. If no exception is permitted by DTSC, DOE should implement all necessary data recovery efforts and shall decontaminate whatever is recovered, with the ultimate disposition, either museum or reburial, up to the decision of the collective tribes, the Native American Tribal Consultation Group said.</p> <p>The Santa Ynez Band of Chumash Indians said the Draft EIS needs to officially recognize the areas surrounding Burro Flats as a Native American site. They further said Area IV of SSFL needs additional investigation, including, without limitation, of: 1) numerous flat locations that would be suitable camp sites; 2) locations supporting forests and riparian areas that could be utilized when gathering food; 3) possible ceremonial areas in the southern half of Area IV; and, 4) separate areas for different tribes. If SSFL was an inter-tribal gathering place, each tribe would have congregated separately in different parts of the site.</p>
Noise	<p>Two organizations commented that the Draft EIS should consider the impacts of noise under various cleanup scenarios. Noise at the site is not likely to be a problem if workers use appropriate ear protection; however, noise inevitably interferes with communication and, as a consequence, may increase the likelihood of accidents or improper procedures being followed. One organization said the Draft EIS must consider the impacts of noise to the communities under various cleanup scenarios and suggested the Draft EIS consider controlling the impacts of noise with vehicles that run relatively quietly (such as electric vehicles), are equipped with special noise-reducing tires, or adjusting vehicle loads to optimize their performance and reduce noise.</p>
NEPA	<p>DOE received a wide range of comments related to the NEPA process from organizations and individuals. These comments included the following: the scoping process for this EIS is a failure to keep the promises made by CEQ and assurances made by DOE to follow CEQ directives; the NEPA process so far is lacking in transparency; the scoping and EIS process do not seem to be interested in the concerns of the people – the EIS is moving along a predetermined path; DOE will not listen to the concerns of the public and agencies during the NEPA process; DOE should focus on producing the highest possible quality EIS based on science and consistency with other sites and not political influence; DOE should continue to inform, educate, and communicate with the community beyond the minimum standards; and information being put out to the public by DOE, especially about the alternatives, is deliberately confusing.</p> <p>The following comments were received about the scoping meetings: disappointment that DOE and other personnel would not answer public questions during the scoping meetings; scoping meetings were a waste of time; scoping meetings were not held in appropriate or convenient locations, or in the places most likely to be impacted (West Hills, Bell Canyon, Canoga Park, Chatsworth, Woodland Hills, etc.); general disappointment with scoping meetings and presentation materials at meetings, saying information presented at the meetings was different than information presented at previous meetings and are public relations material or propaganda; and a request that materials presented at scoping meetings be made publically available.</p> <p>DTSC stated it would like to coordinate with DOE in the selection of alternatives that will be evaluated in the Draft EIS.</p>
Socioeconomics	<p>According to comments received from neighborhood associations, the Draft EIS must consider the impact of various cleanup scenarios on the long-term economic viability of surrounding communities. Adverse impacts to the communities of West Hills, Chatsworth, Canoga Park, and Woodland Hills will be especially severe if the AOC background standard for cleanup is adopted. Many commenters held the opinion that people will not want to live or shop in an area where trucks roar down the streets at high speeds carrying contaminated soil, adding to the already significant congestion, including freeway congestion, in the area. They added that the result will be abandonment of the neighborhoods by those who can afford to move, reduction in or stagnation of property values, reduction of area per capita income levels, deterioration of property, increased crime, and other consequences of urban decay.</p>
Surface Water	<p>The USEPA suggested that the Draft EIS discuss any permit violations to date, as well as any interim source removal actions, treatment systems, or best management practices for any associated outfalls, as appropriate. The Draft EIS should include any draft Storm Water Pollution Prevention Plan and Erosion Control Plans, as well as any relevant actions currently in place or to be</p>

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	<p>implemented (i.e., collections of best management practices). Furthermore, USEPA recommended the Draft EIS provide information on Clean Water Act (CWA) Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise total maximum daily loads. The agency said the Draft EIS should describe existing restoration and enhancement efforts for those waters, how the proposed project would be coordinated with ongoing protection efforts, and any mitigation measures that would be implemented to avoid further degradation of impaired waters.</p> <p>The USEPA also stated that DOE should coordinate with the USACE to determine if the proposed project requires a Section 404 permit under the CWA. The Draft EIS should describe all Waters of the United States (WUS) that could be affected by the project alternatives, they continued, and include maps that clearly identify all such waters within the project area. The USEPA recommended that DOE include a jurisdictional delineation for all WUS, including ephemeral drainages, in accordance with USACE guidance.</p> <p>If a permit is required, USEPA will review the project for compliance with Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230), promulgated pursuant to Section 404(b)(1) of the CWA. Pursuant to 40 CFR 230, any permitted discharge into WUS must be the least environmentally damaging practicable alternative available to achieve the project purpose. If, under the proposed project, dredged or fill material would be discharged into WUS, the Draft EIS should discuss alternatives to avoid those discharges.</p> <p>USEPA stated that the Draft EIS should 1) discuss the extent of features, by wetland and non-wetland waters, including any that are manmade, and include a figure that identifies areas of permanent and temporary impacts. If possible, this information should be based on an approved jurisdictional determination from USACE; 2) include an assessment of the conditions and functions of the waters using a USACE-approved assessment method; and, 3) identify potential compensatory mitigation measures that DOE may propose in the CWA 404 permit application to offset unavoidable impacts.</p> <p>The San Fernando Valley Audubon Society commented that the Draft EIS should consider the impacts on surface water of various cleanup scenarios. Surface water would be impacted adversely by vegetation clearing, excavation, and road building, leading to erosion that impacts surface water with sediment and whatever pollutants are carried along with it. The best management practice installations already in place could be overwhelmed by significant increases in erosion, reducing their effectiveness and shortening their life span. While erosion control measures can be instituted, the less area that is cleared, excavated, or subject to road building, the lower the likelihood and severity of adverse impacts.</p> <p>According to comments received from Physicians for Social Responsibility, the Draft EIS must disclose that exceedances of pollution standards in runoff from SSFL were reported to the Los Angeles Regional Water Quality Control Board in the last few years, that a trichloroethylene (TCE) plume extends offsite, that perchlorate has been found in numerous wells in Simi Valley, that strontium-90 was found at Runkle Ranch, and that contamination was found at the Brandeis Camp and Sage Ranch.</p> <p>An organization asked that the EIS consider how slight changes in elevation and topography around creeks that could change water volume and flow velocity, resulting in changes in creek bed configurations which might lead to flooding impacts to parklands and communities.</p> <p>Several organizations and individual commenters expressed general concern about waterways in the vicinity of the SSFL, including the Los Angeles River and the Arroyo Simi.</p>
<p>Transportation/ Traffic</p>	<p>The West Hills Neighborhood Council, the Woodland Hills Warner Center Neighborhood Council, and several individuals expressed concern about transport of contaminated materials, including how/on what routes materials will be transported and what steps will be taken to protect the citizens who live along these routes.</p> <p>The USEPA suggested that because of the potentially significant increase in truck trips required to transport soils from Area IV to off-site disposal facilities, the Draft EIS should identify reasonably expected routes to the various waste facilities and impacts on traffic levels. Specifically, the Draft EIS should: 1) designate truck routes, particularly for the largest (Class VIII) trucks; 2) provide explanations for any truck travel not on the most direct route to a given facility; 3) evaluate the possible effects of landfill or other receiving facility selection on the truck route to ensure that all</p>

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	<p>reasonably foreseeable traffic analyses are considered; 4) to the extent possible, based on coordination with Boeing and NASA, DOE should update its traffic analysis to consider cumulative impacts; and, 5) offer rideshare or carpool program for construction workers to further reduce traffic impacts.</p> <p>Organizations and individuals suggested that the Draft EIS include hard numbers on the amount of demolition waste and the number of truck trips required to transport it; a calculation of the number of truck trips required to transport construction, demolition, excavation, drilling or other equipment to and from the site; the types of containers to be used for transport; and ensure the total number of truckloads Draft EIS includes return trips of empty trucks to the site. Commenters requested these figures be added to the number of commuting trips involving workers to accomplish the goals of cleanup in order to formulate the final figure for the number of vehicle trips to and from the site during the cleanup. Commenters further suggested the Draft EIS show all proposed routes, not only the proposed routes for DOE trucks for both demolition and soil removal, but also the truck routes proposed by NASA and Boeing for their separate remediation actions. In addition, commenters said, potential accident scenarios should be factored in.</p> <p>The Chatsworth Neighborhood Council and individual commenters requested the Draft EIS include a schedule showing how many trips for the various types of containers used (presumably, varied based on contaminant level); and a table showing the number of truckloads per day along with proposed transportation routes. Commenters mentioned that analysis must include on- and off-site risks and address any potential liability issues resulting from accidents. Damage to roads, effects of greenhouse gasses, traffic congestion, and delayed emergency responses must be calculated from SSFL to the disposal sites and back to Area IV. These impact analyses must allow for inefficiencies and unavoidable variances and overruns. For example, calculations need to consider different trucks that must be used for “contaminated soil and structures” versus those used for clean fill; the two load types cannot be co-mingled.</p> <p>The NRDC recommended the Draft EIS look at ways to reduce the above-mentioned impacts while still fully complying with the requirement to cleanup to background levels of contamination.</p>
Waste Management	<p>To ensure waste shipments from the site are appropriate for receiving facilities, USEPA recommends as much transparency in the matter of waste composition and management as possible. The Draft EIS should include, or commit DOE to develop and publicly release, best management practices that address 1) a description of debris and soil screening or testing procedures for radiation and chemical contamination, and 2) a decision matrix that identifies specific facilities or types of facilities (e.g., solid waste landfill, hazardous waste landfill) for debris and soil based on the screening or testing protocol.</p> <p>USEPA also commented that DOE should consider shipment to multiple facilities as a means to reduce impacts at the receiving facilities. To the extent possible, DOE should coordinate with Boeing and NASA on their remediation projects (e.g., scheduling, disposal facilities, and changes in soil volumes).</p>