



Community Involvement Plan

Area IV Santa Susana Field Laboratory



Prepared for
U.S. Department of Energy
Energy Technology Engineering Center

Prepared by
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ACRONYMS AND ABBREVIATIONS

AEC	Atomic Energy Commission
Air District	The Ventura County Air Pollution District
Boeing	The Boeing Company
CalEPA	California Environmental Protection Agency
CBG	Committee to Bridge the Gap
CDPH	California Department of Public Health
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIP	Community Involvement Plan
D&D	Decontamination and Decommissioning
DOE	U.S. Department of Energy
DTSC	California Department of Toxic Substances Control
EA	Environmental Assessment
EIS	Environmental Impact Statement
ESA	Endangered Species Act
ETEC	Energy Technology Engineering Center
FONSI	Finding of No Significant Impact
LARWQCB	Los Angeles Regional Water Quality Control Board
LMEC	Liquid Metal Engineering Center
NASA	National Aeronautics and Space Administration
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NPDES	National Pollutant Discharge Elimination System
NRDC	Natural Resources Defense Council
OHP	Office of Historic Preservation
PCB	polychlorinated biphenyls
PI	Public Involvement
RCRA	Resource Conservation and Recovery Act
SB990	California Senate Bill 990
SHPO	State Historical Preservation Officer
SHRC	State Historical Resources Commission
SRE	Sodium Reactor Experiment
SSFL	Santa Susana Field Laboratory
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VCEHD	Ventura County Environmental Health Division

INTRODUCTION: MESSAGE FROM THE MANAGER

To Our Community Members and Other Stakeholders:

We truly appreciate the time so many community members and representatives of organizations have taken to meet with us to share ideas, thoughts and concerns about the cleanup of Santa Susana Field Laboratory (SSFL) Area IV. We recognize the benefits that an engaged public brings to this project and are committed to partnering with you to co-create meaningful public involvement.

The U.S. Department of Energy (DOE) is committed to cleaning up SSFL Area IV in a safe and protective manner. We are equally committed to an open and transparent process that encourages the community to provide input on critical issues at every phase of the process. In keeping with that commitment we have developed this plan based upon our community interviews and dialogue received from you at various meetings and workshops.

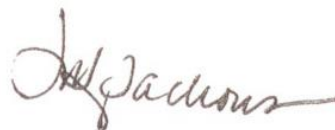
Consistent with the vision of this plan and through the use of the tools described here, we will work to enhance and supplement your understanding of the project and just as important, we will ensure there is adequate time and opportunity for you to provide meaningful input.

Again, thank you to everyone who has assisted us by participating in interviews and workshops and providing thoughtful comment on our documents and process. This document is the result of your input. We hope you will continue to be involved. Let's work together on our shared path forward toward the safe closure of SSFL Area IV.

Sincerely,



Stephanie Jennings
DOE NEPA Document Manager



William H. Backous, P.E.
ETEC Federal Project Director

1.0 EXECUTIVE SUMMARY

As a result of the 2007 ruling by the U.S. District Court of Northern California that the DOE must prepare an Environmental Impact Statement (EIS) to evaluate alternatives for cleanup of Area IV of the SSFL, DOE has implemented major changes in its management of SSFL Area IV. As an initial step, this community involvement plan (CIP) outlines a series of activities and programs that intend to engage the public, establish transparency in DOE actions and decisions, and increase input from the community.

This CIP is the foundation for the DOE's SSFL Area IV comprehensive communication and engagement strategy for public involvement activities. DOE anticipates this strategy will draw upon community experience and wisdom in conducting the scientific studies, risk assessment activities, and the *Environmental Impact Statement for Remediation of Area IV of the Santa Susana Field Laboratory (SSFL Area IV EIS)*.

DOE expects that successful execution of this plan for community involvement will ensure that the results of the risk assessment studies and completion of the *SSFL Area IV EIS* will lead to a cleanup that protects the workers, the public and the integrity of the environment. This plan will facilitate the integration of National Environmental Policy Act (NEPA) requirements with other planning and environmental review requirements by state and federal law. It also builds upon DOE's efforts with the public for meaningful dialogue about environmental matters, which include public participation, community and environmental group involvement, agency accessibility, proactive media relations, and grassroots relationship building.

The plan:

- Establishes a process to maximize public involvement in the near term;
- Defines procedures for ensuring comprehensive public input to scientific and technical studies;
- Describes activities to be conducted in support of the environmental studies; and
- Promotes cooperation and coordination with other federal and state entities involved with the environmental studies.

This document is organized into six sections:

- Section 1.0, Executive Summary;
- Section 2.0, Site Background;
- Section 3.0, Roles of Key Agencies and Organizations;
- Section 4.0, Community Background Summary;
- Section 5.0, Community Involvement Program; and
- Section 6.0, Upcoming Program Activities and Involvement Opportunities, including plans for specific activities for the next 2 years (2009-2011).

Six appendices identify DOE, regulators, and other interested parties and provide a summary of the *Report on Community Interviews: Community Concerns and Preferences for Public Participation in the Cleanup of Area IV Santa Susana Field Laboratory*.

2.0 SITE BACKGROUND

2.1 Site Description

The Boeing Company (Boeing) operates all and owns most of the land that comprises the SSFL, a 2,852-acre area in the hills of southeastern Ventura County, California, near the northwestern part of Los Angeles County. Boeing and its predecessor companies (North American Aviation, Atomics International, and Rocketdyne) have provided direct support and assistance to the National Aeronautics and Space Administration (NASA) for research on static-firing large rocket engines and later to DOE and its predecessors for nuclear research.

The entire SSFL is divided into four administrative areas, Areas I, II, III, and IV, and two undeveloped land areas (see **Figure 1**).

Area I consists of 713 acres, including 671 acres that are owned and operated by Boeing and 42 acres that are owned by NASA and operated by Boeing.

Area II consists of 410 acres that are owned by NASA and operated by Boeing.

Area III consists of 114 acres that are owned and operated by Boeing.

SSFL Area IV consists of 290 acres that are owned by Boeing. The DOE and its predecessors leased 90 acres in the western portion of SSFL Area IV to establish the Energy Technology Engineering Center (ETEC).

Boeing also owns a contiguous undeveloped land area of 1,143 acres to the south and a contiguous undeveloped land area of 182 acres to the north.

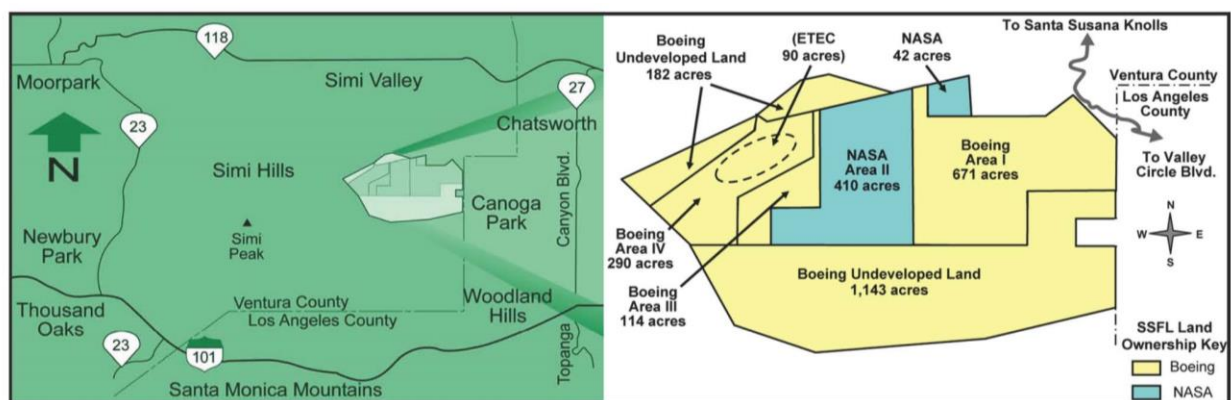


Figure 1. Site Location

2.2 SSFL Area IV Site History

Beginning in the mid-1950s, DOE and its predecessors were responsible for a broad range of energy-related research and development and, eventually, operation of ETEC until its closure in 1996. Located in SSFL Area IV and originally called the Liquid Metal Engineering Center (LMEC), ETEC included a group of facilities owned by DOE. DOE was engaged in or sponsored nuclear operations at ETEC involving the development, fabrication, testing, disassembly, and

examination of nuclear reactors, reactor fuel, and other radioactive¹ materials (see **Figure 2**). These activities produced the majority of radionuclides² remaining at SSFL Area IV and included the following:

- operation of ten nuclear reactors;
- operation of seven criticality test facilities;
- manufacture of reactor fuel assemblies;
- disassembly and inspection of reactors and used reactor fuel assemblies;
- preparation of radioactive material for disposal; and
- on-site storage of nuclear material.

In addition, smaller quantities of radionuclides were associated with small-scale laboratory work that included the following activities:

- fabrication, use, and storage of radioactive sources;
- research focused on reprocessing spent nuclear fuel;
- operation of particle accelerators;
- research using radioisotopes; and
- miscellaneous operations and commercial items that used radioactive materials.

Over the years of operation, the Sodium Reactor Experiment (SRE) was an experimental sodium-cooled nuclear reactor, operated between April 1957 and February 1964. This was the first commercial nuclear power plant to provide electricity to the public. An accident in July 1959, caused by accidental blockage of sodium coolant, led to a partial meltdown of the nuclear fuel and the release of radioactive gases to the environment. The remaining gases were contained and later vented over a short period of time from the SRE facility to the environment. The facility was decontaminated, refueled, and restarted in August 1960. It was shut down in February 1964.

In addition, the ETEC performed a variety of non-nuclear energy research for the DOE. Among other things, ETEC engaged in solar, geothermal, energy conservation, coal, and ocean energy conversion research. DOE and its contractors also used non-radioactive chemicals and other hazardous materials such as polychlorinated biphenyls (PCBs), solvents, and lead-based paints in its SSFL operations.

When it terminated all nuclear research in SSFL Area IV in 1988, DOE shifted its focus in Area IV to facility decontamination and decommissioning (D&D), and environmental cleanup. DOE's mission at the site now is to identify, evaluate, and clean up radiological materials and chemicals that remain in the environment as a result of DOE's past operations at SSFL Area IV.

¹ *Radioactive: atoms that have an unstable nucleus that emit energetic particles or electromagnetic waves.*

² *Radionuclide: an atom with an unstable nucleus that will eventually undergo radioactive decay.*

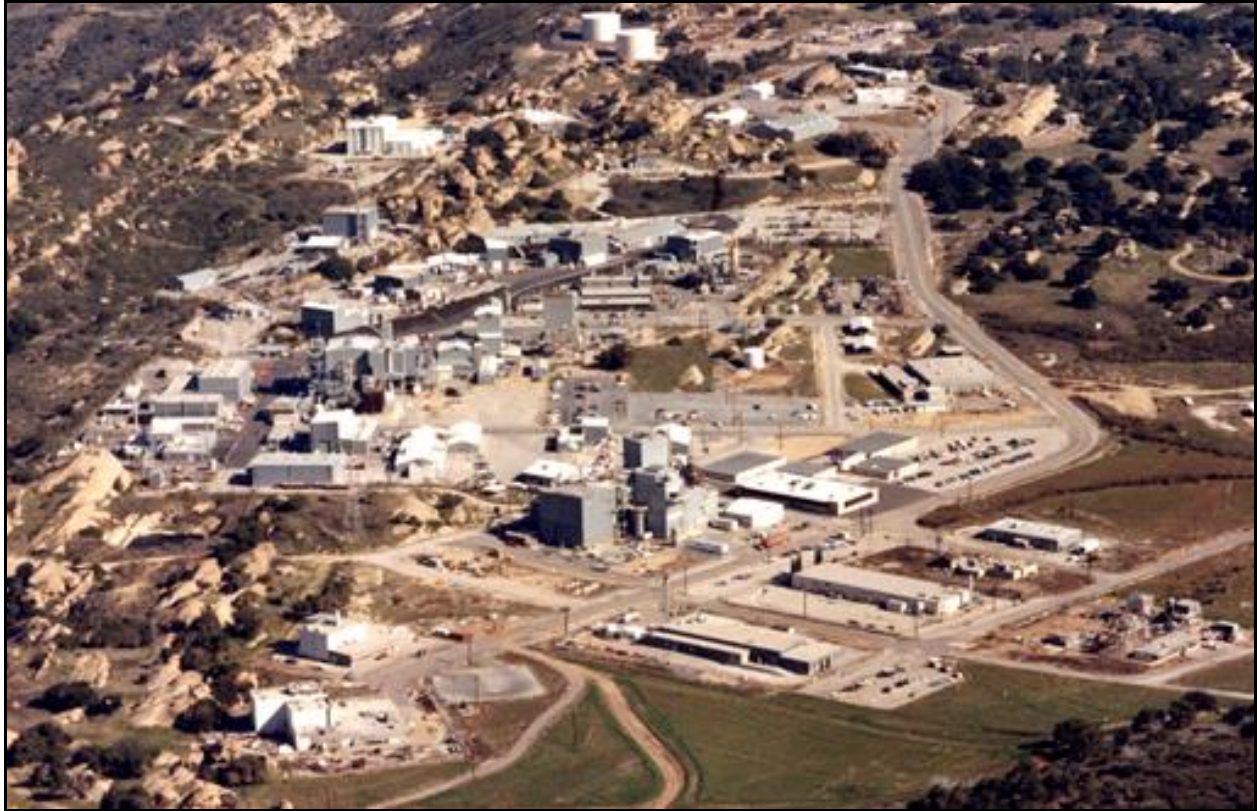


Figure 2. SSFL Area IV and ETEC Site, 1985

Prior to 2000, DOE operated under the authority of the Atomic Energy Act of 1954 to decontaminate and demolish DOE structures and facilities in SSFL Area IV, and used a categorical exclusion under NEPA to evaluate potential environmental impacts of cleanup and removal of the structures.

In January 2002, DOE issued and made available for public comment the *Draft Environmental Assessment for Cleanup and Closure of the Energy Technology Engineering Center (ETEC EA)*. DOE prepared the *Final ETEC EA* in March 2003, issued a Finding of No Significant Impact (FONSI), and proceeded with D&D (see **Figure 3**).

In October 2004, the Natural Resources Defense Council (NRDC), the Committee to Bridge the Gap (CBG) and the city of Los Angeles challenged the FONSI in federal court, and in May 2007, the U.S. District Court of Northern California ruled that DOE's decision to issue a FONSI and conduct cleanup and closure on the basis of the *ETEC EA* was in violation of NEPA. At the request of the state and members of the Congressional delegation, DOE stopped all D&D work and initiated steps in 2007 to prepare the *SSFL Area IV EIS*. That process is now underway.



Figure 3. SSFL Area IV and ETEC Site, 2005

There are 24 structures remaining in SSFL Area IV. DOE owns 15 and Boeing owns 9. Of the 24 existing structures, 17 have a radiological history, including 10 that belong to DOE.

The U.S. Environmental Protection Agency (USEPA) is preparing to conduct radiological background and characterization studies. (For additional information see Section 3.2.1.1.)

Boeing, under contract to DOE, is managing site operations and conducting work under DOE direction and California Department of Toxic Substances Control (DTSC) regulatory authority pursuant to the Resource Conservation and Recovery Act (RCRA) corrective action order to investigate and evaluate the magnitude and extent of hazardous materials (chemicals) that were released to the environment.

NASA is conducting work under DTSC direction and oversight pursuant to the RCRA corrective action order.

A site history timeline is shown in **Figure 4**.

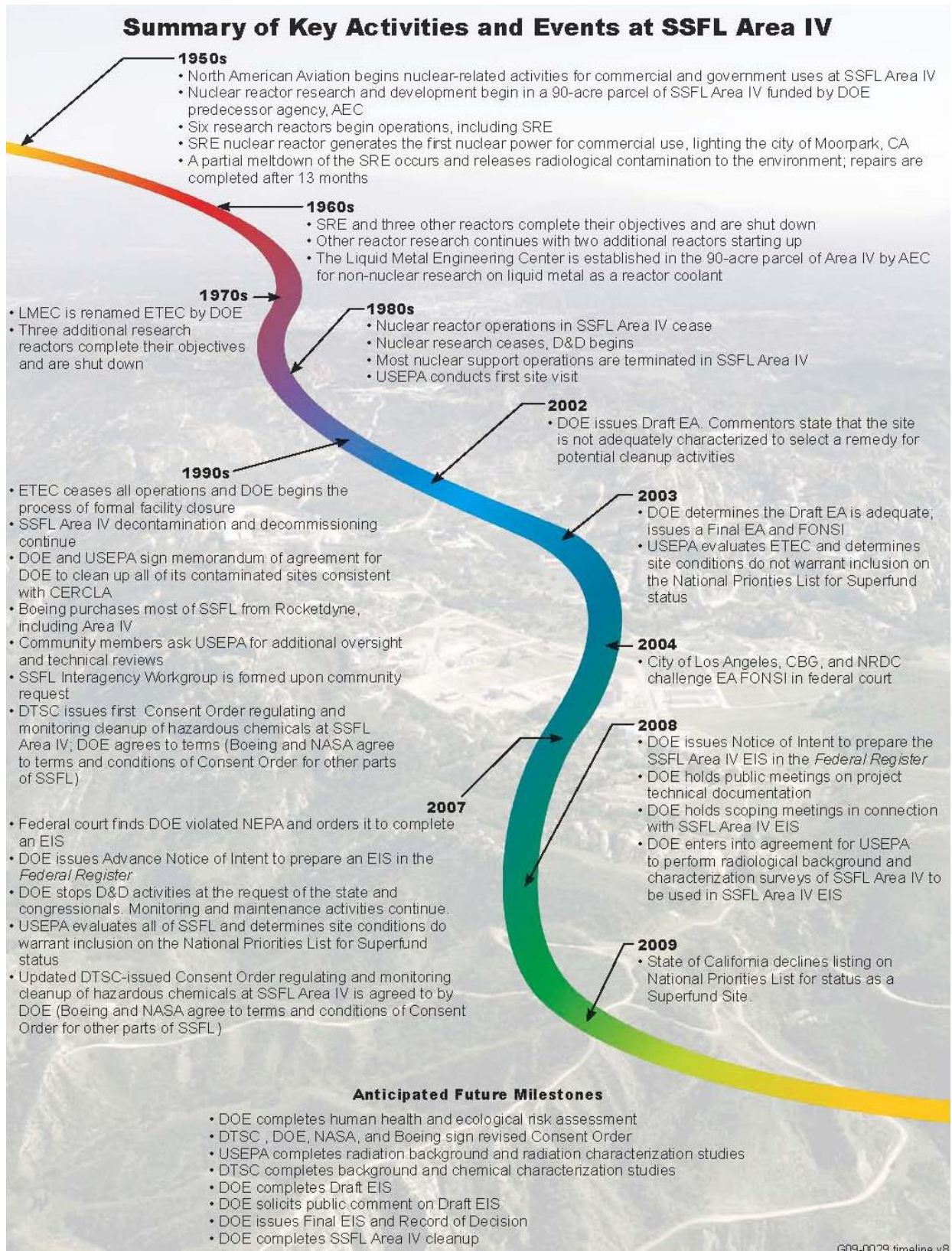


Figure 4. SSFL Timeline

3.0 ROLES OF KEY AGENCIES AND ORGANIZATIONS

3.1 Overview of Agency Interactions

Due to the long history and the nature of the activities that took place on SSFL, a complex regulatory structure governs the site. Boeing, NASA, DOE, and their predecessors conducted research and development on the site for more than 50 years. These operations resulted in chemical and radiological contamination in the soil and water. Boeing and NASA, the owners of SSFL land, and DOE, which operated facilities on Boeing-owned land, have committed to clean up the portions of SSFL impacted by their programs. Cleanup activities involve several federal, state, and local agencies responsible for public and environmental health. Agencies and organizations are involved with investigating the nature and extent of contamination, assessing and monitoring environmental media, decontaminating and demolishing buildings and structures, evaluating and providing input into cleanup actions, and enforcing compliance with applicable regulations and laws. Below is a summary of the agencies and organizations that have responsibility for assessing, characterizing, monitoring, and remediating areas of SSFL, as well as the agencies charged with enforcing compliance with applicable regulations and laws.

3.2 Key Agencies and Organizations

3.2.1 Federal Agencies

3.2.1.1 U.S. Environmental Protection Agency

USEPA develops and enforces major federal environmental regulations, such as hazardous waste laws, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and RCRA, clean air standards under the Clean Air Act, and safe and usable water laws under the Clean Water Act. The agency is involved and has provided technical assistance as requested over the years to the state and to stakeholder organizations on SSFL Area IV issues.

USEPA has delegated its regulatory authority under RCRA to the state of California Environmental Protection Agency (CalEPA) (i.e., allowing the state to issue permits, to monitor and enforce compliance, etc.). Authority to enforce National Pollutant Discharge Elimination System (NPDES) program, under which surface water regulations are enforced, was likewise delegated to the state of California.

Through a 1995 agency-wide joint Memorandum of Understanding between USEPA and DOE, DOE will conduct facility decontamination and decommissioning in a manner consistent with CERCLA. This requires DOE to submit clean-up documentation to USEPA for its review and comments. Additionally, USEPA provides a procedural review of NEPA decisions and assesses EISs and NEPA program implementation.

USEPA evaluated SSFL Area IV for inclusion on the National Priorities (or Superfund) List in 1996 and again in 2003. Both times, the agency concluded that listing SSFL Area IV was not warranted. A new evaluation in 2007 of the entire SSFL for both chemicals and radionuclides resulted in a USEPA recommendation to list SSFL as a federal Superfund site, but the state has declined the Superfund listing, reserving the right to list in the future.

Under a 2009 Interagency Agreement between DOE and USEPA Region 9, USEPA will conduct a radiological background study in the vicinity of SSFL in areas with similar geological formations as those found in SSFL. DOE transferred \$1.5 million in funding from the 2008 appropriation to USEPA to begin developing the cost, scope, and schedule for the background plus on-site characterization studies. EPA is taking the lead on the radiological characterization of Area IV and the Northern Undeveloped Land. The full funding (\$38.3 million) for the on-site radiological characterization has been provided by the 2009 American Recovery and Reinvestment Act.

USEPA has also provided logistical and funding support for a stakeholder group, the SSFL Workgroup, since 1990. (See Section 4.3.2 for more information.)

USEPA's Office of Radiation and Indoor Air enforces the provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) related to radionuclides. Although nuclear operations are no longer conducted at ETEC, these standards apply to decontamination, decommissioning, demolition, and cleanup activities, once they resume, that might produce air emissions.

3.2.1.2 U.S. Department of Energy

DOE has regulatory authority for cleanup of all of its facilities nationwide that have been radiologically impacted. At SSFL Area IV, DOE will prepare an EIS to evaluate alternatives for disposition of radiological facilities and support buildings, remediation of the affected environment, and disposal of all resulting waste at existing, approved sites.

Through DOE's Office of Environmental Management, the agency is responsible for cleanup and closure of ETEC. DOE provides funding for and management of environmental monitoring and restoration for areas impacted by DOE and its predecessor agency activities. DOE's objectives include completion of radiological cleanup, demolition of structures, removal of unnecessary utilities, and completion of RCRA Corrective Actions. (See Section 3.2.2.1 for additional RCRA information.)

Once the USEPA study has been completed, DOE will prepare ecological and human health risk assessments and an environmental impact statement evaluating options for cleaning up contamination found in, or caused by former activities in, SSFL Area IV. DOE responsibilities throughout the D&D and environmental remediation process will include review and approval of plans, oversight of specific remediation actions, and conducting radiological surveys for final release of facilities after project completion. DOE will also be responsible for the safe handling, processing, packaging, labeling, temporary storage, and transportation of radioactive and hazardous wastes.

3.2.1.3 Council on Environmental Quality

NEPA regulations established the Council on Environmental Quality (CEQ) within the Executive Office of the President. The CEQ oversees federal implementation of the environmental impact assessment process and ensures that federal agencies meet their obligations under NEPA. NEPA requires, among other things, that federal agencies disclose to the public potential environmental effects of a proposed action; ensure public participation in identifying alternatives and issues; and evaluate mitigation to reduce adverse effects.

3.2.1.4 U.S. Fish and Wildlife Service

The U.S. Fish and Wildlife Service (USFWS) is responsible for implementing and enforcing the Endangered Species Act (ESA). The Act protects endangered and threatened species and focuses on conservation of habitats and/or ecosystems supporting wildlife. Through the ESA, the USFWS prohibits taking, possession, sale, or transport of threatened and endangered listed species without authorization, and helps define critical habitats, which are essential for conservation, through Habitat Conservation Plans. For example, Braunton's milk-vetch (*Astragalus brauntonii*) is a federally listed endangered plant known to exist at SSFL. USFWS will assist in the evaluation of SSFL Area IV to determine if any additional listed species could be present, or if a portion of the site should be designated as critical habitat.

3.2.1.5 National Aeronautics and Space Administration

As a property owner at SSFL, NASA is responsible for investigating and cleaning up contamination on their lands in Areas I and II. They also remove unnecessary facilities. At present, NASA is conducting chemical contamination investigation and cleanup activities pursuant to the RCRA Facility Investigation and corrective action Consent Order.

3.2.2 State and Local Agencies

3.2.2.1 State of California Department of Toxic Substances Control

DTSC is CalEPA's department for regulating hazardous chemicals, including the RCRA program, enforcement of which USEPA has delegated to California. DTSC enforces RCRA requirements at operating facilities, including the management of hazardous chemicals from creation through disposal, as well as cleanup of chemical (non-radiological) contaminants released at active facilities.

Under RCRA, DTSC exercises regulatory authority over two separate processes: permitting and corrective actions. Under the Permitting Program, it issues and enforces hazardous materials permits to ensure that operating facilities are handling these materials safely. Under the Corrective Action Program, DTSC responsibilities include oversight and approval of RCRA cleanups and enforcement of hazardous waste management regulations. At SSFL, DTSC manages the RCRA Corrective Action process through a Consent Order with DOE, NASA, and Boeing that governs the investigation and cleanup of groundwater and soil contaminated with chemicals. DTSC has final approval authority over cleanups of hazardous chemicals at SSFL.

In 2007, DTSC revised its Consent Order with DOE, Boeing, and NASA, requiring the organizations to include a detailed schedule for the investigation and cleanup of SSFL. A 2009 revision currently being negotiated by the responsible parties (individuals or companies responsible for or contributing to a spill or other contamination at a Superfund site) will add provisions from California Senate Bill 990 (SB990) to the Consent Order. SB990, which California enacted in 2007, identifies cleanup requirements specifically for SSFL.

3.2.2.2 State of California Department of Public Health

As an agreement state under the provisions of the Atomic Energy Act, the state of California has jurisdiction over non-DOE radiological activities at SSFL Area IV. The California Department of Public Health (CDPH) oversees the radioactive material license held by Boeing, radioactive facility cleanups, and environmental monitoring, as well as the enforcement of radiation control laws and regulations that protect radiation workers, the public, and the environment.

Although CDPH does not have regulatory authority over DOE activities, DOE and Boeing have historically requested that the CDPH verify radiological cleanup and survey procedures. This involves review of final sampling, verification of sampling results, and concurrence on release of a former nuclear facility.

3.2.2.3 Los Angeles Regional Water Quality Control Board

The Water Quality Control Boards in California enforce and administer the federal Clean Water Act and the California Porter Cologne Water Quality Control Act, regulations designed to control water quality. As one of nine Regional Water Quality Control Boards in the state, the Los Angeles Regional Water Quality Control Board (LARWQCB) regulates surface water discharges, establishes maximum limits for contaminants in stormwater discharges from SSFL, sets monitoring and reporting requirements, and issues permits for discharges.

Also, the LARWQCB administers the federal NPDES program. NPDES activities on SSFL include monitoring stormwater runoff and establishing discharge limits. The NPDES permit is issued to Boeing as the landowner and must be renewed every 5 years. The permit defines the maximum limits for chemical and radiological contaminants in surface water discharged from SSFL and the discharge sampling requirements. Both DTSC and LARWQCB monitor discharges to groundwater.

3.2.2.4 California Native American Heritage Commission

The California Native American Heritage Commission fosters the preservation and protection of Native American cultural and ancestral remains, artifacts and traditions. It administers the application of the Public Resources Code §5097.9 et al. Under this code, the Commission may, among other things, maintain an inventory of sacred places, investigate the effects of proposed actions that may result in severe irreparable damage by public agencies, and recommend mitigation measures. DOE will invite the Commission to visit Area IV to identify any Native American remains and artifacts, and to offer advice on preservation if any are found.

3.2.2.5 California Office of State Historic Preservation

The Office of Historic Preservation (OHP) and the State Historical Resources Commission (SHRC), in partnership with governmental agencies, fosters the preservation and enhancement of California's historic heritage as a matter of public interest to maintain its legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits. In developing a path forward, DOE will consult with the State Historical Preservation Officer (SHPO) in regard to preserving cultural resources in Area IV. The SHPO is responsible for the operation and management of the OHP and serves as Executive Secretary to the SHRC.

3.2.2.6 Ventura County Environmental Health Division

The Ventura County Environmental Health Division (VCEHD) enforces compliance with state laws and county ordinances related to hazardous materials and waste generation and storage. Division activities include investigations, enforcement actions, and outreach and education.

The state of California has given VCEHD the authority to administer and enforce certain hazardous waste regulations. The agency has oversight for hazardous waste generation, including manifest preparation and temporary on-site storage. Facilities that store hazardous materials must develop a risk management and prevention program.

3.2.2.7 Ventura County Air Pollution Control District

The Ventura County Air Pollution District (Air District) is responsible for regulating nonradioactive air contaminant emissions into ambient air. The Air District establishes and enforces local air pollution regulations, which meet or exceed requirements of the federal and California Clean Air Acts and the California Health and Safety Code. Also, the Air District issues permits that set requirements for construction, modification, and operation of equipment and processes that may result in air emissions.

Although the Air District has no regulatory authority over radionuclide emissions, such emissions would be reported as part of the air toxics “Hot Spots” emissions inventory as supplied by Boeing.

3.2.3 Other Organizations

3.2.3.1 Private Company

Boeing owns the majority of land at SSFL; manages daily operations, both its own and those under contract to DOE and NASA; and conducts environmental monitoring. Currently, Boeing’s primary activities at SSFL involve carrying out the RCRA Corrective Actions identified in the Consent Order, as well as maintaining compliance with environmental permits.

Coordinated investigation and cleanup efforts between Boeing, NASA, and DOE are taking place along two separate regulatory pathways – radiological and chemical. **Table 1** summarizes the organizations and activities at SSFL.

Table 1. Organizations and Activities at SSFL

<i>Organization</i>	<i>Activity</i>
<i>Federal Agencies</i>	
CEQ	Oversight of federal implementation of the NEPA and the EIS process
DOE	Primary regulatory authority for cleanup of residual radiological materials and radiological waste associated with Area IV activities
	Cleanup of radiologically impacted facilities in SSFL Area IV
	Oversight of decontamination, decommissioning, and demolition of DOE facilities
	Responsible for environmental monitoring and waste management related to past nuclear and liquid metals research and development activities
	Site characterization survey to determine the nature and extent of radiological contamination; under a memorandum of agreement, DOE has funded USEPA to conduct this survey
	Under a California DTSC Consent Order, completing RCRA Corrective Actions for chemically-contaminated groundwater and soils
	Responsible for completion of an EIS for remediation of SSFL Area IV
NASA	Responsible for chemical contamination investigation and cleanup on lands in Area I and II
	Under a California DTSC Consent Order, completing RCRA corrective actions for chemically-contaminated groundwater and soils
USEPA	Development and enforcement of federal environmental regulations: CERCLA; Clean Air Act; Clean Water Act; RCRA
	Review and evaluation of NEPA implementation and EISs
	Technical assistance to the California DTSC in evaluating radiological contamination, comprehensive background study (chemical and radiological contaminants)
	Access to CERCLA radiation experts for technical consultations
	Technical support from Radiation and Indoor Environments National Laboratory, Las Vegas
	Lead role in USEPA radiological survey – conducting a background radiological study and comprehensive radiological study of SSFL Area IV
USFWS	Primary regulatory agency for the ESA
	Assist in evaluation of SSFL listed species and/or critical habitat
<i>State Organizations</i>	
California DTSC	Regulatory authority for investigation and cleanup of hazardous chemical contamination
	Authority to implement and enforce federal RCRA requirements in state – manage hazardous materials
	Jurisdiction and oversight of RCRA actions: closure of inactive RCRA treatment, storage, or disposal units; compliance/permitting of active RCRA units, groundwater characterization and remediation, and RCRA corrective actions
	Lead for groundwater monitoring
California Native American Heritage Commission	Fostering preservation of Native American cultural resources
California Office of Historic Preservation	Fostering preservation of cultural resources
CDPH, Radiologic Health Branch	Implementation of Atomic Energy Act-delegated authority
	Issuance of licenses to Boeing for use of by-product radiological material at specific facilities
	Primary regulatory authority for cleanup of radiological waste at non-DOE facilities
	Oversight of decontamination and decommissioning for non-DOE facilities
LARWQCB	Lead regulatory authority for surface water discharges
	Administers and enforces NPDES permit
<i>Local Agencies</i>	
VCAPCD	Regulatory authority for local air emissions programs
VCEHD	Enforcement of state hazardous waste regulations
	Responsible for permitting and inspections of hazardous materials environmental programs
<i>Private Company</i>	
Boeing	Management of daily operations at SSFL
	Responsible for chemical contamination investigation and cleanup on lands in Area I, III, and IV
	Under a California DTSC Consent Order, completing RCRA corrective actions for chemically-contaminated groundwater and soils

4.0 COMMUNITY BACKGROUND SUMMARY

4.1 Regional Community Profile

SSFL sits at the top of Woolsey Canyon in the Simi Hills in southeastern Ventura County, bordering the San Fernando Valley in Los Angeles County to the east. Major population centers in the area include Moorpark and Simi Valley in Ventura County, and Woodland Hills, Canoga Park, Chatsworth, West Hills, Thousand Oaks, Oak Park, Agoura Hills, Calabasas, Hidden Hills, Bell Canyon, and Northridge in northern Los Angeles County. The population within a 5-mile periphery of SSFL is approximately 96,500, and more than 450,000 within an 8-mile periphery. **Tables 2 and 3** provide demographic information on the regional cities. (Note: tables will be updated with 2010 census data as soon as it is available.)

Table 2. Demographic Profile of the Community Surrounding SSFL

<i>Demographic Detail</i>	<i>Distance from SSFL</i>			
	<i>2-Mile Periphery</i>	<i>4-Mile Periphery</i>	<i>6-Mile Periphery</i>	<i>8-Mile Periphery</i>
Total Population				
2000 Census	2,595	72,454	267,782	432,832
Growth Rate 2000-2005	8.6%	5.7%	5.7%	6.0%
Age				
2000 Average Age	36.8	37.4	36.8	37.4
Population - Above 20 Years	72.1%	73.4%	73.3%	73.4%
Population - Below 20 Years	27.9%	26.6%	26.7%	26.7%
Housing				
2000 Estimated Housing Units	788	24,469	92,986	152,254
Growth Rate 2000-2005	8.7%	6.2%	6.2%	6.4%
2000 Median Property Value	\$500,000	\$299,668	\$314,273	\$320,890
2000 Average Household Size	3.3	3.0	2.9	2.8
Population by Race				
White	83.8%	83.9%	78.3%	77.9%
Black	1.5%	1.5%	2.2%	2.1%
Asian or Pacific Islander	12.6%	9.3%	9.5%	10.2%
Other Race(s)	2.1%	5.3%	10.0%	9.8%
Hispanic	8.2%	14.5%	20.8%	20.2%
Household Income				
2000 Average Household Income	\$235,254	\$95,676	\$87,939	\$91,695
2000 Median Household Income	\$176,271	\$75,549	\$67,849	\$67,925
Estimated Per Capita Income	\$71,356	\$32,306	\$30,518	\$32,216
Education Level				
High School Diploma	12.6%	23.9%	22.4%	21.5%
Some College, No Degree	22.5%	27.0%	26.5%	25.5%
Associate Degree	4.9%	10.0%	9.1%	9.0%
Bachelor Degree	20.5%	18.2%	18.7%	19.7%
Graduate Degree	26.8%	9.3%	9.2%	10.3%

Source: U.S. Census 2000.

Table 3. Demographic Profiles for Major Population Centers Near SSFL

<i>Demographic Detail</i>	<i>Population Center</i>					
	<i>Canoga Park</i>	<i>Chatsworth</i>	<i>Northridge</i>	<i>Simi Valley</i>	<i>West Hills</i>	<i>Woodland Hills</i>
Total Population						
2000 Census	70,973	41,255	68,469	111,351	20,445	67,006
Housing						
2000 Median Property Value	190,800	254,882	275,850	239,900	284,729	378,700
Population by Race						
White	53.8%	71.0%	62.5%	81.3%	78.9%	79.9%
Black	4.2%	3.5%	5.1%	1.3%	2.1%	3.3%
Asian or Pacific Islander	11.3%	14.4%	15.1%	6.4%	12.1%	7.1%
American Indian	0.9%	0.5%	0.5%	0.7%	1.4%	0.3%
Other Race(s)	24.3%	6.1%	11.5%	6.5%	2.8%	4.8%
Hispanic	48.2%	16.3%	24.8%	16.8%	9.3%	11.9%
Household Income						
2000 Median Household Income	\$45,122	\$63,817	\$60,108	\$70,370	\$79,514	\$72,568
Estimated Per Capita Income	\$18,065	\$28,316	\$26,098	\$26,586	\$33,361	\$38,124
Education Level						
High School Diploma	21.1%	21.9%	16.2%	23.6%	18.0%	16.0%
Some College, No Degree	19.7%	23.3%	25.7%	29.6%	25.1%	24.3%
Associate Degree	6.0%	8.1%	7.2%	8.8%	9.2%	6.9%
Bachelor Degree	14.7%	20.9%	23.2%	17.8%	25.4%	28.2%
Graduate Degree	3.7%	6.9%	7.6%	7.1%	8.5%	9.3%

Source: U.S. Census 2000.

All of these areas were initially inhabited by the Fernandeno and Chumash Indians, followed by Spanish and Mexican land grant recipients. Access to water rights in the early 1900s led to growth throughout most of the area and gradually changed the communities' character from agricultural to suburban. Communities are shown in **Figure 5** and the details on each of the communities follow.

4.1.1 Canoga Park/West Hills

The two communities, located in Los Angeles County's northwestern San Fernando Valley, were originally one, named Owensmouth, because of its proximity to the Owensmouth aqueduct. The town was renamed to Canoga Park in 1930. In 1998, the community on the west side of Canoga Park voted to change its name to West Hills. The West Hills area is comprised of more upscale homes, and residents voted to establish a separate area with a new identity.

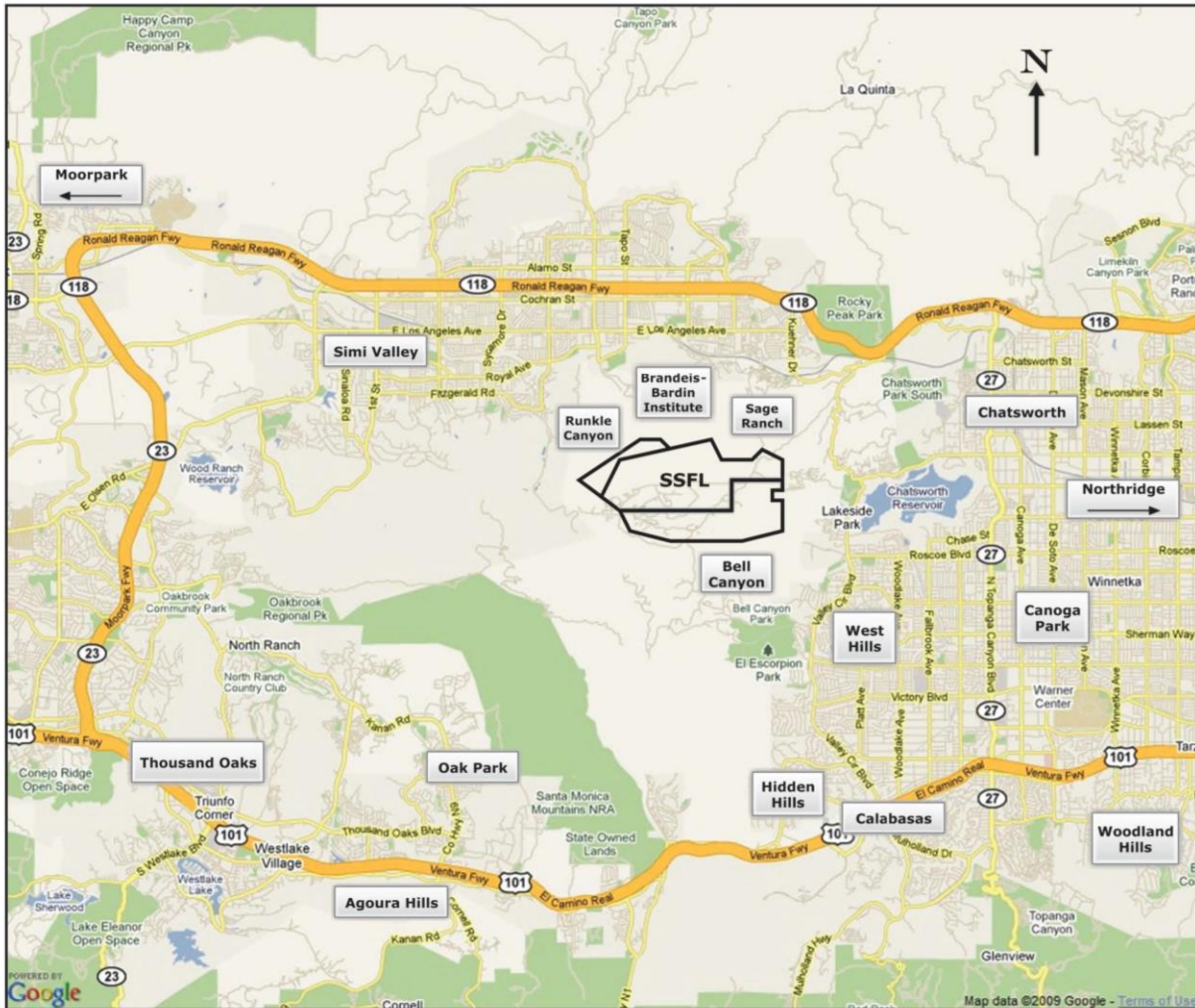


Figure 5. Communities Around SSFL

4.1.2 Chatsworth

Chatsworth is in the northwest portion of the San Fernando Valley, surrounded by the Santa Susana Mountains. The population of the area increased after the construction of the Santa Susana railroad tunnel in 1905. In 1915, the residents voted to become part of the city of Los Angeles in order to buy water from the Mulholland water project. With the increased water and irrigation, the diversity of agriculture increased in Chatsworth. Fruit orchards were prevalent. The area was known for its horse ranches, and as a movie and television backdrop. Residential subdivisions were built after World War II, and by 1951 industrial companies had moved into the area. Today Chatsworth supports several high tech firms.

4.1.3 Northridge

The community of Northridge was founded in 1910 as Zelzah Station, a depot for the Southern Pacific railroad. In 1914, the residents voted for annexation to the city of Los Angeles and rights to the Owens River water. In 1929, the area changed its name to North Los Angeles, and finally to Northridge in 1938.

4.1.4 Simi Valley

The city of Simi Valley is located in southeastern Ventura County. The Simi name derives from the Chumash word Shimiyi, which refers to the stringy, thread-like clouds that typify the region. Early accessibility to Simi Valley from the San Fernando Valley was limited to horse trails through the Santa Susana Pass. In 1905, the arrival of the railroad improved access to Simi Valley, but did not lead to a major increase in population. Simi Valley experienced its first housing boom during the 1960s and was incorporated in 1969. Housing increased again with the completion of the Simi Valley Freeway in 1980.

4.1.5 Woodland Hills

In 1922, 2,886 acres were purchased and became known as the town of Girard. An infrastructure was developed, and 120,000 trees were planted. In 1941 the town was renamed Woodland Hills, in honor of the trees planted earlier. Horse ranches gave way to commercial centers, high-rise office buildings, and shopping centers.

4.2 Land Use

Currently, the areas surrounding SSFL include agriculture and grazing (predominantly to the west), parks, open space, and private property (to the north, south, and east). Land uses are predominantly residential, agricultural, and recreational. The adjacent property to the northwest of the site is owned by the Brandeis-Bardin Institute, part of the American Jewish University. The adjacent land to the northeast is owned by the Santa Monica Mountains Conservancy and maintained as parks, open space, trails, and wildlife conservation areas. The adjacent land on the eastern side of SSFL consists of open space and housing developments. Dense residential areas begin 2 miles east of SSFL. Bell Canyon, a residential area, is adjacent to the south of SSFL. Runkle Canyon, devoted to open space and cattle grazing, is adjacent to SSFL on the northwestern boundary.

4.3 History of Community Involvement at SSFL

4.3.1 DOE

Prior to the EA court decision in 2007, DOE held two public meetings and began attending the SSFL Workgroup meetings. The 2007 court order requiring DOE to prepare the *SSFL Area IV EIS* significantly increased DOE's public involvement requirements at SSFL Area IV. As this *Community Involvement Plan* lays out, DOE intends to comply with the spirit and intent of NEPA public involvement requirements, and to implement public involvement efforts well beyond what is required by NEPA. The effort began in earnest in 2008.

In preparation for the *SSFL Area IV EIS*, scientists under contract to DOE evaluated the existing environmental data for Area IV of SSFL to see what was usable for evaluating alternatives in the *SSFL Area IV EIS* and, if data were missing or inadequate, to determine what additional data would be necessary to conduct the evaluation of cleanup alternatives. A *Draft Gap Analysis Report* was completed and released to the public in June 2008. The report contained recommendations for additional data collection. Two public meetings were held in connection with that effort and many comments from the public will be incorporated into the *Final Data Gap Analysis Report*.

During July 2008, DOE held six *SSFL Area IV EIS* scoping meetings to present the proposed alternatives and to receive comments from agencies, organizations and the public. The scoping meetings were held in Simi Valley, Northridge, and Sacramento, California. Public comment on the

scope, or range of issues to be analyzed in the *SSFL Area IV EIS*, was accepted until late August 2008.

In addition to the data gap analysis report and scoping meetings, DOE has participated in and sponsored several other public involvement projects. In August 2009, DOE sponsored a day-long workshop with three independent experts on nuclear reactors who shared perspectives on the Sodium Reactor Experiment and the July 1959 accident. Over 150 participants had the opportunity to ask questions and develop their own statements and perspectives about the accident.

DOE representatives attend the regularly scheduled stakeholder meetings of the SSFL Workgroup and the West Hills Neighborhood Council, and meet informally with community members and elected officials. A DOE website (www.etec.energy.gov) provides access to meeting materials, site information, technical and historical documents, upcoming events, and contact information.

Section 6.0 of this document, *Upcoming Program Activities and Involvement Opportunities*, describes involvement activities planned for the next two years.

4.3.2 USEPA

At the request of community members and local elected officials, USEPA sponsored the establishment of the SSFL Workgroup, which was chartered in 1990. The group, which meets quarterly, consists of representatives from regulatory oversight agencies, such as DTSC and LARWQCB, other involved and interested parties, such as DOE, NASA, and USEPA, as well as members of the community. According to the group's charter, its objectives include facilitation of the exchange of information, coordination of regulatory agencies' activities, and providing a forum for the public to receive information, ask questions, and express concerns to the agencies, including USEPA, NASA and DOE. USEPA chaired the Workgroup until 2003. Currently, DTSC is taking the lead in providing support to this group.

USEPA is conducting public involvement activities in conjunction with its development of a radiological background study and a comprehensive radiological characterization study of SSFL Area IV and adjacent undeveloped land. A community meeting was held in December 2008 to present a description of the projects and how they will be completed. Since that time, USEPA has worked with some community members to identify background sampling locations. Additional community meetings are being organized. USEPA is also preparing a community involvement plan, which provides a strategy for public involvement throughout the radiological studies.

4.3.3 DTSC

DTSC public involvement activities began in the 1980s, as part of the RCRA cleanup activities taking place at SSFL. DTSC hosts public meetings and briefings to present information on technical milestones, address community concerns, and to convey important issues. Also, DTSC has held informal meetings with community groups and legislators, and presented a series of informal community workshops to discuss RCRA Facility Investigation reports and community interests.

In 1992, DTSC issued the first Consent Order for Corrective Action to Boeing, NASA, and DOE. The Consent Order was revised and updated in 2007 and again in 2009. Among the requirements within the Consent Order were specific actions for public involvement. For example, in order to provide information regarding cleanup activities to the public quickly, the agencies must submit documents electronically and fund a dedicated website. DTSC manages an SSFL website, with funding from Boeing, NASA, and DOE. The website, www.dtsc-ssfl.com, displays information, technical documents, notices, and links related to SSFL cleanup activities.

4.3.4 Boeing and NASA

Additional community involvement projects conducted by Boeing and NASA include public meetings and a website. Public presentations on stormwater and groundwater research at SSFL have been given by Boeing scientists. The Boeing website, http://www.boeing.com/aboutus/environment/santa_susana/index.html, gives access to technical documents, groundwater, surface water, and soil sampling information, and data on regulatory compliance. NASA has hosted small group meetings, prepared fact sheets and is in the process of building an SSFL website.

4.4 SSFL Area IV Community Interviews and Other Input

In keeping with DOE's commitment to better respond to community concerns, in spring 2008 DOE commissioned P2 Solutions, a company specializing in public participation, to conduct independent interviews of SSFL stakeholders, representing the range of perspectives among community members. These interviews involved 59 individuals with different reasons for their involvement at SSFL, including regulators, local officials, community residents, members of activist groups, Native Americans, and others. These interviews revealed, among other issues, concerns about the completeness of the historical information available about the site. Observations and concerns are documented in *Report on Community Interviews: Community Concerns and Preferences for Public Participation in the Cleanup of Area IV Santa Susana Field Laboratory*. (See Appendix F for the summary report. The entire report can be found at http://www.etec.energy.gov/EIS/Documents/EIS_Community_Interviews.pdf.)

This section also summarizes general public input DOE received during the comment period of the SSFL Area IV EIS.

4.4.1 Key Community Concerns Identified during Interviews

During the community interview process, the following key community concerns, among others, were identified. People are concerned about the nature and extent of contamination at SSFL and believe that the cleanup will not adequately address all of the contamination. Specific concerns expressed included:

- DOE's plans to restrict the analysis to SSFL Area IV will not address contamination that has migrated beyond that area.
- There is contamination in locations where it is not supposed to be, including locations that are outside site boundaries.
- Site contamination poses threats to site workers, the environment, and the communities surrounding the site.
- Onsite contamination has resulted in contaminated surface water runoff (spreading the contamination beyond the site boundaries) and contaminated groundwater below the site.
- If the cleanup does not address all of the contamination, then the resulting cleanup will not be thorough enough, leaving the community at risk.

Others were convinced that site contamination has caused health impacts, including cancers, retinoblastoma, and thyroid problems. Most interviewees believe that DOE has never admitted that health concerns could be attributable to site contamination.

Individuals expressed concern about the process and regulatory approach DOE will use to make decisions related to cleanup. Specific concerns expressed included:

- Some stakeholders questioned what would be the most appropriate regulatory framework for decision-making related to cleanup of contamination at SSFL.
- Hazardous contamination is being cleaned up under RCRA. It might be more appropriate to prepare an *SSFL Area IV EIS* after all of the remedial investigations have been conducted (on the schedule that was negotiated with DTSC).
- DOE decision-making is undefined and not transparent.
- DOE doesn't really use NEPA documentation to support its decision-making processes.
- The EIS will not be based on a thorough review of all relevant historical documents and/or will rely on flawed data.
- The EIS will be based on an inappropriate assessment of how much contamination is attributable to background.
- DOE will not set appropriate/protective cleanup standards.

Interviewees are concerned that the preparation of the *SSFL Area IV EIS* will take too long, delaying implementation of the cleanup program.

People believe that DOE won't design the cleanup program to offer long-term protectiveness. Specific concerns included:

- The final cleanup will not be adequately protective.
- The final cleanup decision will focus on minimizing costs rather than on doing what is right, necessary, and protective of public health.
- DOE wants to leave 90 percent of the contamination behind, but this will cause problems downhill now and in the future.

People expressed concerns about DOE's relationship with the community. Specific criticisms included:

- DOE has not always been forthcoming with information.
- DOE has hidden behind a legacy of cold-war secrecy to obfuscate, obstruct, and fail to respond to public concerns.
- DOE has a reputation of lying to the public and/or spinning information ("torturing the data").
- DOE is believed by some to be a corrupt agency for ignoring the public, breaking environmental laws, and demonstrating hostility towards the community.
- DOE has tried to cover up what has gone on there in the past.
- DOE will fail to proceed in a transparent manner and/or fail to be responsive to public concerns.
- DOE has failed to deliver on promises.

The lack of trust in DOE compounded concerns about the scope of the *SSFL Area IV EIS* and the eventual cleanup.

People have expressed concerns about who DOE chooses to involve in community involvement activities. One particular concern focused on the observation that the environmental activists are the only people who participate, leaving the impression that they represent the entire community.

4.4.2 Key Issues Identified During Scoping

DOE held scoping meetings and a public comment period in summer 2008, in connection with the *SSFL Area IV EIS*. Nearly 1,900 comments were received. The majority of the comments focused on the following general areas:

- **Impacts to resource areas:** Slightly more than 25 percent of the commentors expressed concern about potential environmental consequences to air, biological, soil, water, and cultural resource areas, and about the cumulative impacts to the environment as a result of SSFL past activities.
- **Scope of EIS:** More than 20 percent of the comments focused on the scope of the EIS, most of them recommending that the EIS address all of SSFL and adjacent lands, not just Area IV.
- **Defining the nature and extent of contamination:** About 14 percent of the comments related to fully defining the nature and extent of contamination, especially before preparing the Draft EIS. The commentors expressed concern that DOE might miss some contaminants, and they emphasized the importance of identifying all contaminants present, their concentrations, and their locations.

5.0 COMMUNITY INVOLVEMENT PROGRAM

5.1 Vision and Purpose

DOE has listened to the comments summarized in Section 4.4 and acknowledges that an open process is of key importance to ensure understanding of and inclusion of varying points of view. Community involvement goals and needs will be considered and balanced with the project's legal, regulatory, technical and scientific requirements. DOE will give full consideration to community input by:

- Providing timely, accurate and credible information and/or access to needed information to the public, agencies and organizations who are interested in or may be affected during the SSFL Area IV remediation and closure process as it moves forward.
- Ensuring adequate time, opportunity and DOE staff accessibility to enable members of the public to gain understanding of project issues so that they can provide meaningful input.
- Assisting the public, agencies and organizations in understanding their role in the decision-making process: how their input is considered by technical staff and project decision makers, and what factors are considered in the decision-making process of the federal government.
- Providing ample opportunities for public engagement in decision-making by focusing public involvement activities on issues that are most important to the public and at the same time continuously providing opportunities for public input throughout the cleanup and closure process.

5.2 Community Involvement Tools and Activities

The section below describes a suite of activities that may be undertaken in connection with the SSFL Area IV community involvement program over the next several years. However not all of these activities will be undertaken within the 2-year timeframe of this plan, and some will be implemented over the course of several years.

Tools and activities will center on input (how DOE receives information from the public), output (how DOE shares information with the public), outreach (how DOE promotes education and awareness about the project) and involvement (opportunities for public contribution to project issues, reports, plans and other project documents that DOE will use in its decision-making process as the project progresses). Following are goals, methods and responsibilities for SSFL public involvement activities.

Some of the tools and activities crosscut all of the above categories. These include:

5.2.1 Building Relationships

Description: Continued assignment of two to three full-time federal employees at the SSFL.

Goal: Improve relationships with regulators, elected officials and affected and interested public; contribute to public understanding of SSFL Area IV.

Method: Continue participation in monthly conference calls and quarterly meetings, participate in regularly scheduled local government and organization meetings, maintain availability by telephone and e-mail and during regular business hours.

Who: DOE federal employees.

5.2.2 Meetings with the Community, Regulators and Elected Officials

Description: Meetings such as public availability sessions, workshops, and forums hosted by DOE as project events dictate, depending upon the complexity of issues, public interest and regulatory (including EIS) requirements. DOE will explore the idea of creating a community advisory group, if requested by the community.

Goal: Update community on site developments and address concerns, ideas, and comments; contribute to public understanding of SSFL Area IV.

Method: In general, DOE staff will be available and accessible during community meetings, with meeting formats, settings, objectives and frequency varying as project events dictate.

Who: DOE federal employees supported by contractor staff.

5.2.3 Coordination of Approach to Address SSFL Cleanup

Description: Regular coordination with Boeing and NASA to ensure a comprehensive approach to cleanup.

Goal: Collaborate with NASA and Boeing to ensure a shared vision and comprehensive approach among SSFL landlord/tenants for site-wide SSFL cleanup and closure.

Method: DOE would coordinate regularly with NASA and Boeing and also with USEPA and DTSC regarding cleanup activities, vision, and approach to SSFL; survey interested organizations to identify viable strategies for a comprehensive approach; and jointly develop and sponsor public meetings as appropriate to solicit stakeholder input on cleanup.

Who: DOE federal employees supported by contractor staff, SSFL landowners, NASA, and Boeing.

5.2.4 Evaluation of Community Involvement Tools and Activities

Description: Through its policies and directives concerning DOE's relationships with members of local communities, DOE is accountable for effectiveness in community involvement.

Goal: Ensure that the community is adequately and appropriately participating in DOE activities as DOE makes decisions at SSFL Area IV.

Method: The community will be asked to review DOE SSFL Area IV's performance through surveys, evaluation forms, and periodic additional interviews. The DOE SSFL Area IV staff will perform periodic self-assessments of its community involvement activities.

Who: Contractor support under DOE direction.

5.3 Input Tools and Activities: Ways DOE Receives Information from the Public

5.3.1 Informal Public Input

Description: Encouragement of informal discussions through phone calls and email to help DOE understand public concerns and issues; frequent formal input solicited through written comments on DOE documents and proposed activities (such as sampling), as a means of conveying concerns and issues to DOE.

Goal: Provide ongoing opportunities for interested parties to provide input as early as possible in the process to help DOE recognize trends in issues of public concern and identify areas that require more information or clarification.

Method: Informal comments can be offered anytime, such as during open houses, site tours, community visits and meetings, workshops and in writing. Establish project database to track comments over time and by whom. Offer formal comment opportunities on recently drafted documents and proposed plans

Who: All project staff interacting with stakeholders.

5.3.2 Other Stakeholder Group Meetings

Description: DOE will actively seek appropriate organizations and agencies to provide information at their meetings.

Goal: Ensure that members of these organizations have an opportunity to provide information to DOE on issues and concerns at venues and times convenient for those groups and that DOE understands various groups' and agencies' concerns.

Method: In addition to sponsoring its own meetings with agency stakeholders, DOE will participate in non-DOE sponsored neighborhood council meetings, workshop meetings, city/council meetings and homeowners' association meetings, in addition to the SSFL Workgroup meetings. (This also serves as an "output" tool because it is also an opportunity for DOE to provide information.)

Who: DOE federal employees supported by contractors.

5.3.3 Public Comment Periods

Description: Formal opportunity for stakeholders to review and contribute comments on various DOE documents, plans, actions and those required under regulations.

Goal: Provide citizens with opportunities for meaningful input to the process and provide DOE with valuable input as it works through its decision-making process.

Method: DOE will announce comment periods with ads in newspapers, e-mail and surface mail notifications, media releases, public service announcements, website information, neighborhood notices with information on what is being presented, when and how to comment (including web-based comments), and comment period length.

Who: Contractor support under DOE direction.

5.3.4 Mailing List Expansion

Description: Regular maintenance of an up-to-date mailing list will be sought from community members interested in receiving information about the project through surface and e-mail.

Goal: Ensure that those with an interest are kept apprised of project activities and that those with little or no interest in project activities have an additional opportunity to be informed of project activities and contact DOE with concerns or information requests.

Method: Direct solicitation, contacting organizations to invite members to sign up. Mail lists will continuously be updated and reviewed for accuracy.

Who: Contractor staff under DOE direction.

5.3.5 Community Surveys and Interviews

Description: Community interviews, print or telephone surveys.

Goal: Identify SSFL Area IV concerns and issues in-depth.

Method: DOE will implement periodic web-based, mailed, telephone and personal surveys and interviews.

Who: Contractor staff under DOE direction.

5.4 Output Tools and Activities: Ways DOE Shares Information with the Public

5.4.1 ETEC Website (www.etc.energy.gov)

Description: Internet access to major technical reports, progress reports, updates, frequently asked questions and other project documentation on SSFL Area IV.

Goal: Provide resources for accessing general and specific information on SSFL Area IV.

Method: Post updates, technical reports, and progress reports within one business day of release. Notices of all public meetings, comment sessions, announcements and frequently asked questions related to the project will be posted and updated regularly. Links will be provided to important project-related information posted on other sites.

Who: Contractor staff under DOE direction.

5.4.2 Summaries of Technical Documents

Description: Brief documents written in plain language with graphics to help the community understand project information, including technical reports and concepts.

Goal: Facilitate public understanding of site information.

Method: Technical document summaries of technical documents will be produced throughout the life of the project especially during comment periods required by regulations.

Who: Contractor staff under DOE direction.

5.4.3 Technical Reports and Work Plans

Description: Publicly available reports detailing all investigations, studies, findings and problem-solving approaches

Goal: Ensure public access to detailed information on the study and cleanup process, findings, analyses, and decision-making.

Method: DOE will make these documents publicly available on the ETEC website and in reading rooms within a week of public release. Complex documents will be supported with other community involvement activities and summary guides to technical documentation to help provide a clear understanding of material presented in the document.

Who: Contractor staff under DOE direction.

5.4.4 Progress Reports/Newsletters

Description: Community oriented publications on project progress, upcoming events, and opportunities for involvement.

Goal: Ensure the community is kept informed and up to date on a regular basis.

Method: Information written for the general public will be distributed electronically, by mail and on the web at least twice a year, but may be issued more often to meet community information needs.

Who: Contractor staff under DOE direction.

5.4.5 Annual Report

Description: An annual summary of the previous year's efforts, program highlights, clean-up activities and the status of soil and groundwater cleanup as a bonus issue of the *CleanUpdate*.

Goal: Provide project a roundup of activities in one document for easy reference.

Method: DOE will distribute print and electronic documents to those on the mailing list (who aren't on listserv), to information repositories and to government and agency officials.

Who: Contractor staff under DOE direction.

5.4.6 Press Releases and Public Notices

Description: Advertisements in local newspapers, mailings, e-mails, public service announcements, and press releases on public comment periods, meeting notices, project information and milestones, document availability and other relevant announcements.

Goal: Communicate important announcements to large audiences.

Method: DOE will issue press releases to area news media, sponsor paid advertisements in local newspapers with diverse audiences, and provide for mailings, e-mails, and public service announcements.

Who: Contractor staff under DOE direction.

5.4.7 Electronic Mail

Description: Free electronic news distribution system to deliver updates, notifications, and progress reports to subscribers via e-mail.

Goal: Disseminate information as quickly and effectively as possible to large numbers of stakeholders.

Method: Current recipients of mailed or faxed notifications will be encouraged to switch to electronic distribution for earliest notification. For community members who do not have access to or use the Internet or who prefer a printed copy, DOE will continue to send printed information. Graphics-rich documents will be available on the ETEC website and at reading rooms, and paper copies may be available upon request.

Who: Contractor staff under DOE direction.

5.4.8 Local and Regional Press

Description: Concerted effort to provide project information and updates and help educate local reporters on SSFL activities and project plans, and counter misinformation when necessary.

Goal: Provide accurate and timely information to the public through the media as questions arise, participation opportunities occur and milestones are accomplished.

Method: DOE staff will provide information and be accessible to local and regional media and editorial boards upon request and also initiate media contact as project events warrant.

Who: DOE federal employees with contractor support.

5.4.9 Maps, Project Roadmap, Photographs, Other Visual Aids

Description: Development of maps and visual aids to assist in understanding of the site, its geography, and locations of current and former structures and areas of environmental concern.

Goal: Communicate complex issues effectively by showing project elements and their relationships, and help the community visualize the big picture.

Method: Maps, project road map, photographs and other visual aids will be used in documents, fact sheets, website, and at meetings. A roadmap will show the project schedule in a way that identifies and describes the interrelationship of major project elements, their timing and sequence, scheduled opportunities for public input. A second version may be developed that describes how input will be used in the decision-making process.

Who: Contractor staff under DOE direction.

5.4.10 Comment Response Summaries

Description: Description and documentation of community concerns received during formal comment periods or when DOE has specifically requested public input on a project document, including DOE's responses to comments and whether and how the comments will be used in subsequent project documents and decisions.

Goal: Improve and enhance the quality of DOE documents and appropriateness of DOE's decisions by incorporating substantive community input.

Method: Those providing comment during formal comment periods or in response to DOE requests will receive a Comment Response Document. It will also be posted on the web and made available in information repositories.

Who: Contractor staff under DOE direction.

5.4.11 Information Repositories

Description: Continued use of the three repositories: 1) The Platt Library in Woodland Hills, 2) the Simi Valley Library in Simi Valley, and 3) the California State University Northridge Library in Northridge, where printed copies of major project documents can be accessed. Maintenance of information repositories in libraries that have public-use computers to provide access to additional information.

Goal: Provide accessible public locations where residents can read and copy official project documents.

Method: DOE will maintain three information repositories and continue to add documents as they become available. DOE will check with local organizations or museums with regard to becoming SSFL information repositories.

Who: Contractor staff under DOE direction.

5.5 Outreach Tools and Activities: Ways DOE Promotes Education and Awareness about the Project

5.5.1 Project Site Visits and Tours

Description: Small-group guided tours to view key locations in Area IV. Government agencies and/or community groups may be invited to participate in some of these tours.

Goal: Provide stakeholders a better understanding of what is on SSFL Area IV today and the project clean-up and closure process.

Method: DOE staff will lead tours and explain what has happened on the site, what's happening now, locations of interest and future vision for the site, at a minimum of twice per year and upon request. A former employee and/or site historian may be asked to support the site tour program.

Who: DOE federal employees with contractor support.

5.5.2 Public Educational Outreach

Description: Development of the ETEC website as "town square" for regular community interaction that will be considered a factual information clearinghouse with an opportunity for all points of view to openly contribute.

Goal: Provide a forum for DOE to become the honest broker to the public of SSFL Area IV history and current activities.

Method: DOE may develop a virtual site tour, web-based videos on sampling, web-based modeling of historical and future site activities, including groundwater modeling and SRE release, (while ensuring there are no proprietary issues with the programs), regular updates from SSFL Area IV management, including index and search function.

Who: Contractor staff under DOE direction.

5.5.3 School Educational Outreach

Description: Collaboration with interested schools to assist them in developing educational projects related to the Santa Susana Field Laboratory Area IV.

Goal: Expand understanding and awareness of the project and strengthen ties to the community.

Method: DOE will provide project information to area schools, and educators and schools can call or visit SSFL Area IV staff for information, arrange a field trip for a presentation, and request a visit to their school.

Who: DOE federal employees with contractor support.

5.5.4 Environmental Justice Activities

Description: Facilitation of participation by communities that may not have direct access to project information due to language or cultural barriers or the inability to receive information on the project through usual mechanisms.

Goal: Increase awareness, education and information about the project, especially in diverse communities that may not know how to access information or that may not have many opportunities or methods to do so.

Method: Using community demographic and community interview data, DOE will analyze current activities directed toward identified communities and develop activities to increase awareness. Examples of activities include printing notices in languages other than English in targeted areas and seeking assistance from agencies that work with immigrant, low-income and non-English speaking communities.

Who: Contractor staff under DOE direction.

5.6 Involvement Activities: Community Involvement in Decision Making – Opportunities for Public Contribution to Project Issues Resolution, Reports, Plans and Other Project Documents

5.6.1 Community Involvement for “Big Picture” Issues (General Community)

Description: Opportunities for public input on policy level decisions that directly involve the values and concerns of the broad community, such as input into the scope of the *SSFL Area IV EIS*, comments on DOE’s decision-making processes, values prioritization, and other major site issues.

Goal: Solicit input from the community on its values and desires as the SSFL Area IV decision-making process proceeds, as opposed to other involvement techniques that involve technical evaluation of a specific program or document.

Method: DOE would involve the largest possible cross-section of community members using an open house format and some of the tools above, complemented by an SSFL Area IV “Annual Meeting” or more frequently as program activities require. Members of subject-specific working groups (described in Section 5.6.2 below) would be invited to make presentations at SSFL Area IV Annual Meeting on the results of their activities.

Who: DOE federal employees with contractor support.

5.6.2 Focused Study Groups

Description: Establishment of temporary study groups focused on specific issues of interest to community groups on topics such as complex technical issues, Native American cultural preservation, or the SSFL Area IV Historical Interviews.

Goal: Foster dialogue between and among DOE and community members on specific issues to ensure all points of views are considered and that resulting documents and programs are improved following input from the public.

Method: DOE would involve groups and individuals with a working understanding of, or interest in, focused SSFL Area IV topics. This technique would involve articulating how the product or program will fit into SSFL Area IV clean-up and closure goals. Members of a Focused Study Group would have a specific tasking and finite number of meetings over a period of time.

Who: DOE federal employees with contractor support.

6.0 UPCOMING PROGRAM ACTIVITIES AND INVOLVEMENT OPPORTUNITIES

DOE's upcoming involvement activities are the direct result of input from SSFL stakeholders who assisted us by participating in interviews, workshops, and public comment opportunities. An initial document, the *Report on Community Interviews: Community Concerns and Preferences for Public Participation in Cleanup of Area IV Santa Susana Field Laboratory*, describes major areas of concern, and the *SSFL Area IV EIS Comment Response Document* presents stakeholder comments received during scoping. Accordingly, DOE plans to have frequent opportunities for communication and participation as SSFL moves forward in its path to closure. These activities include:

- **Community Dialogue on Risk Assessment.** DOE must prepare several scientific studies prior to completing the *SSFL Area IV EIS*. One key activity is completion of the **SSFL Area IV Ecological Risk Assessment**. This study will examine the potential future effects of contaminants from past SSFL activities on the environment and ecological systems. The public will be invited to participate in a workshop on risk assessment and comment on DOE's approach to performing the study. The public will also be asked to provide input during a workshop on the follow-up field sampling work plan that will guide collection of data to be used in the ecological risk assessment. DOE intends to partner its involvement activities to the extent possible, with other agencies that are performing studies of SSFL Area IV. Following completion of the Ecological Risk Assessment, DOE intends to involve the public in a similar manner as it prepares the **Human Health Risk Assessment** for Area IV. *Tentatively planned for Spring 2010, pending completion of the Site Risk Assessment Manual.*
- **Historical Interviews Project.** Through its Historical Interviews Project, DOE plans to reach out to former employees and others with knowledge of SSFL past activities. DOE intends to engage people through individual interviews and during small group meetings. Site tours may be offered to former employees to assist in recalling Area IV past activities. DOE's objective is to expand its knowledge of past SSFL Area IV work processes and activities so that it can thoroughly describe the nature and extent of contamination in the *SSFL Area IV EIS*. In the process, it will capture notable stories for the historical record. *Tentatively planned for Fall 2009.*
- **Community Outreach.** DOE staff will expand its efforts to participate in other community group events to demonstrate its commitment to partnering with the community. Through its **Community Liaison Program and Open House**, DOE plans to solicit input and gather information from a broad cross-section of stakeholders, including former employees as discussed above, to ensure a depth and breadth of input is considered. *Tentatively planned to begin in early 2010.*

- **Native American Engagement.** DOE will work to ensure that Native American cultural resources are protected throughout *SSFL Area IV EIS* activities by inviting **Native American Site Visits** and ensuring that issues and concerns are addressed before, during and after the EIS process. *Tentatively planned to begin in Summer 2009.*
- **On-going Communications.** DOE plans to continue to use its website, information repositories, topic-specific fact sheets, and newsletter, the ***CleanUpdate***, to inform the community on a regular basis, about SSFL Area IV progress toward remediation and closure. *These activities are already ongoing.*

As project events dictate, the activities in this plan may be modified and priority activity may shift to respond to emerging issues. The plan will be updated every two years or more frequently as project events and requirements dictate.

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**APPENDIX F –
REPORT ON COMMUNITY INTERVIEWS: COMMUNITY
CONCERNS AND PREFERENCES FOR PUBLIC
PARTICIPATION IN THE CLEANUP OF
AREA IV SANTA SUSANA FIELD LABORATORY
SUMMARY**

SUMMARY

DOE contracted with P2 Solutions, a firm specializing in public participation services, to evaluate the relationship with the community and develop recommendations for conducting public participation activities to support development of the EIS. P2 Solutions interviewed key stakeholders regarding their concerns about DOE's plans to prepare the EIS and preferences for being involved during development of the EIS. This report explains the methodology used to conduct the interviews, summarizes the responses to the questions asked, and presents recommendations for DOE's consideration.

Fifty interviews were conducted with a total of 59 people. Interviewees included agency representatives, current and former employees, elected officials, the local business community, neighbors, people with environmental or health concerns, and Native Americans. Most were completed in less than two hours. Interviews were conducted at the interviewees' homes or places of work, over the telephone, and in public places.

Participants were asked about their concerns related to DOE's plans to prepare an EIS for the Area IV cleanup. Concerns focused on the nature and extent of contamination at SSFL and the effects of that contamination on the environment and the nearby community, the appropriateness of using a NEPA document to make decisions related to cleanup, and DOE's relationship with the community.

Interviewees were invited to provide recommendations for sources of information that DOE should use during preparation of the EIS. Participants suggested that DOE consider the entire inventory of available documentation and begin by conducting a thorough evaluation of the contamination that must be cleaned up. In addition, it was suggested that DOE consider sources of information that might otherwise be overlooked, including former employees and knowledgeable members of the community.

Interviewees were asked to offer observations about how DOE has conducted public participation activities in the past. Most responses were simple and fairly negative. Interviewees commented on their perceptions about DOE's attitudes towards the public and made suggestions for improving relationships with the public. Many observed that DOE has failed to demonstrate responsiveness to the public's concerns and has not done a good job of conducting public participation in the past.

Participants were invited to make suggestions about DOE's objectives for involving the public while developing the EIS. Suggestions included objectives for the public participation effort, attributes of an effective public participation program, and suggestions for how DOE should decide which public(s) to involve and respond to questions from the public.

When asked about the role the public should play in framing the alternatives for evaluation in the EIS, some expressed doubts that the public was qualified to serve in that capacity. Most thought the

public should be consulted during development of alternatives, however, and suggested that DOE explain alternatives that have already been identified and then invite suggestions for additional alternatives. Some participants suggested that DOE screen alternatives suggested by the public before including them in the full analysis.

Regarding the role that the public should have in developing the issues that will be evaluated in the EIS, most were confident that the public would be able to provide valuable input. Some people provided suggestions for issues to be addressed in the EIS.

Essentially everyone supported an extensive public comment period on the Draft EIS. Many suggested that DOE should plan to involve the public throughout the entire decision-making process as well as during the implementation of the cleanup program.

Participants were invited to react to a variety of public participation activities that DOE could choose to employ in the public participation program to support decision-making related to the cleanup of Area IV at Santa Susana Field Laboratory. Respondents were supportive of internet tools, informational fact sheets, and information repositories for sharing information. Formal public meetings, periodic briefings, and public tours were also widely supported. There was little support for information kiosks, detailed technical presentations, and ongoing citizen advisory groups.

After obtaining reactions to the possible public participation activities, interviewees were asked which three to five possible activities would support the most appropriate role for the public during development of the EIS. Interviewees indicated the most support for the Internet, public tours, formal public meetings, public open houses, and workshops. A telephone hotline, periodic review of technical documents, detailed technical presentations, and information kiosks were mentioned by less than five of the interviewees as being important activities to include in the public participation program.

Participants were asked for any other advice they would provide to DOE for involving the public in the development of the EIS. Responses included suggestions that DOE make every effort to be honest and open with the public, try harder to communicate well with the public, acknowledge past mistakes, be forthcoming with information, make a genuine effort to involve the public and to be responsive to the public's concerns, avoid allowing the activist community to control information that is available to the public, and try harder to reach out to a broader community while conducting public participation. A small number of people cautioned against going overboard with public participation activities.

The final question provided one final opportunity for interviewees to bring up any additional issues or concerns. Many people had nothing more to add. Unique comments included reflections that the history of the site is significant and should be preserved and observations that previous site operations should not be judged harshly as most followed standard practices at the time. One person closed with the observation that DOE's success or failure will turn on DOE's commitment to engaging the public in its decision-making.

Recommendations based on the interviews focus on developing a clear explanation of how the investigation and cleanup of the entire SSFL and surrounding areas will be accomplished and development of a meaningful role for the public within that decision-making process.